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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3338
Plant ID No.:	079-00192
Applicant:	4305 First Avenue (WV), LLC (First Avenue)
Facility Name:	Nitro Annex
Location:	4301 1st Avenue, Nitro, Putnam County
NAICS Code:	811310
Application Type:	Construction
Received Date:	August 26,2016
Engineer Assigned:	John Legg
Fee Amount:	$1,000.00
Date Received:	August 30, 2016
Complete Date:	September 9, 2016
Due Date:	December 9, 2016
Applicant Ad Date:	September 2, 2016
Newspaper:	*The Charleston Gazette*
UTM's:	Easting: 427.547 km Northing: 4,255.775 kn Zone: 17
Description:	Construction of a paint booth, a grit blasting booth, and a vehicle wash bay at an existing truck, trailer and associated equipment service facility. New construction will allow the facility to repair and refinish mobile crane equipment.

On August 26, 2016, First Avenue submitted an application to construct an equipment maintenance, painting and repair facility. The $1,000.00 air permit application fee was paid on August 30, 2016. The company's legal ad ran in *The Charleston Gazette* on September 2, 2016. The newspaper's legal affidavit of publication was received at the DAQ via email on September 9, 2016 and the application was deemed complete. There were no public comments resulting from the legal notice.

Potential emissions from operating the facility are estimated to be:

CO = 2.92 TPY	NOx = 3.48 TPY	PM_{10} = 0.33 TPY
SO_2 =0.021 TPY	VOC = 10.59 TPY	Total HAP = 2.34 TPY

DESCRIPTION OF PROCESS

The following process description came from Attachment G in the permit application:

First Avenue's Nitro Annex provides a local West Virginia-based maintenance facility for truck, trailer and crane equipment. First Avenue proposes to add a grit blasting booth, a paint spray booth and a vehicle wash bay to the facility.

The facility currently provides welding and vehicle mechanical repair services for truck, trailer and crane equipment. The company believes that the fugitive emissions of air pollutants from its current welding maintenance activities and the current truck repair activities are trivial. The current truck repair activity does include two small closed-top parts washing machines.

The purpose of this air permit application is to allow for the construction and operation of the following emission units:

1. **Paint Booth (PB-1)** controlled by overspray filters (FIL-1). The paint spraying operation will be low volume for maintenance painting of truck, trailer or crane components. The paint is applied manually via hand-held spray gun.

2. **Paint Booth Heaters #1 & #2 (HE-1 & HE-2)**, which will combust natural gas in order to provide heated drying air for Paint Booth (PB-1). Each heater is rated at 4.0 MMBtu/hr design heat input.

3. **Automatic Spray Gun Cleaner (GC-1)**: a small, closed-top cleaning machine for the spray guns used in Paint Booth (PB-1).

4. **Grit Blasting Booth (GB-1)**, controlled by dust collector (DC-1). The grit blasting operation will be low volume for maintenance activities, and will be performed prior to spray painting the truck, trailer or crane components in Paint Booth (PB-1).

5. **Hotsy Water Heater (HW-1)** for the Hotsy vehicle washing system. The water heater will combust natural gas and is rated at 0.6 MMBtu/hr design heat input.

Table 1.0 Emission Units.

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
PB-1	PB-1E, PB-2E	Paint Booth	2016	34,000 cfm each stack	FIL-1
HE-1	HE-1E	Paint Booth Heater #1	2016	4.0 MM Btu/hr	None
HE-2	HEW-2E	Paint Booth Heater #2	2016	4.0 MM Btu/hr	None
GB-1	GB-1E (vents inside building)	Grit Blasting Booth	2016	24,500 cfm	DC-1
HW-1	HW-1E	Hotsy Water Heater1	2016	0.6 MM Btu/hr	None
GC-1	Uncaptured Fugitive	Automatic Spray Gun Cleaner/Solvent Recycler	2016	N/A	None
VC-1	Uncaptured Fugitive	General Clean-up System Cleaning Operations	2016	N/A	None

MSDS SHEETS

First Avenue submitted fourteen (14) MSDS in Attachment H in their permit application. They are summarized below:

Table 2: MSDS Submitted by First Avenue in Permit Application R13-3338.

Manufacturer	HAP [1]	Product Name (Product Code)	No. of pages
Axalta	2,5,8	Low VOC Epoxy Primer - Black (825P28300)	13
	8	Epoxy Primer - Gray (825P30020)	13
	2, 8	Activator - Slow (937S)	11
	1, 5	Activator - Extra Slow (948S)	11
		Imron - Elite Manitowoc Red (851678EX)	11
		Medium Temperature Activator - Imron (15305S)	11
ChemSpec USA, Inc.	8	Acrylic Urethane Clear (CRV22)	08
	4	Activator (CR22AM)	11

Table 2: MSDS Submitted by First Avenue in Permit Application R13-3338.

Manufacturer	HAP [1]	Product Name (Product Code)	No. of pages
Grow Automotive/PPG	7	KEY81 Urethane Reducer Medium (1370)	08
3M	6	Golden Extra Body Filler (01127, 01177, 01277, 01317, 31177)	14
PPG Industries, Inc.	7	Wax and Grease Remover (GRO-1705-5/ ADV-193)	05
Grow Automotive/PPG	7	Wax, Grease, Silcone Remover (GRO-1705-5/ ADV-193)	04
Eastman Chemical Co.		Methyl Amyl Ketone (00133-00)	11
Superior	3, 7, 8	Super 16 Paint Gun Cleaner (300585)	10

(1) For identity of HAP, see Table 3 below.

Table 3: HAP to be Used by First Avenue's Nitro Annex.

Number	Hazardous Air Pollutant (HAP)	CAS #
1	Cumene	98-82-8
2	Ethylbenzene	100-41-4
3	Methanol	67-56-1
4	Methyl Isobutyl Ketone (MIBK; Hexone; 4-Methyl-2-pentanone)	108-10-1
5	Naphthalene	91-20-3
6	Styrene	100-42-5
7	Toluene	108-88-3
8	Xylene	1330-20-7

SITE INSPECTION

Dan Bauerle, DAQ Enforcement Inspector, and the writer on Tuesday, November 1, 2016, inspected First Avenue's new facility/construction at the Nitro Annex. First Avenue appears to be a related company to All Crane & Equipment Rental Corp. Chad Shamblin, the General Manager, Rick Dosier, and Mark (the foreman of the new paint booth area) were on hand to give us DAQ personnel a guided tour of the new equipment. The facility was located in an industrial park and was not close to any residential housing. The Paint Booth, Grit Blasting Booth with Cartridge Dust Collector, and Totsey Water Heater were all in place. At the time of the inspection, workers were working on the electrical system of the Paint Booth. It was evident from the quality of workmanship and the grandeur in scale of the new equipment that a lot of money had been spent on construction. The new facility, although nearing completion, appeared not to have been placed into service. No violations were noted.

Directions to the facility as given in permit application (Attachment G) are as follows:

> From Interstate 64 driving west from Charleston, take the Nitro exit (Exit 45). At the bottom of the exit ramp, drive straight across State Route 25 to 1st Avenue. Turn right on 1st Avenue and proceed 0.3 miles to the facility on the left.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

The writer reviewed the emissions calculations found in Appendix N of permit application and found the calculations to be logical and correct.

CO = 2.92 TPY	NOx = 3.48 TPY	PM_{10} = 0.33 TPY
SO_2 =0.021 TPY	VOC = 10.59 TPY	Total HAP = 2.34 TPY

Table 4 : Total Emission Rates from First Avenue Nitro Annex.

Pollutant	Emissions									
	Hotsey Water Heater (HW-1E)		Paint Booth Heaters (HB-1E & HB-2E)		Paint Booth (PB-1E; PB-2E)		General Cleanup/Solvent Cleaning &. Misc. Operations (VC-1)		Facility Total	
	(lb/hr)	(ton/yr)(1)	(lb/hr)	(ton/yr)(1)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
CO	0.05	0.20	0.62	2.72	---	---	—	---	0.67	2.92
NO_X	0.06	0.24	0.74	3.24	---	---	---	---	0.80	3.48
PM10	0.01	0.02	0.06	0.02	0.20 (2)	0.08 (2)	---	---	0.27	0.12
VOC	0.01	0.01	0.04	0.02	21.92	8.0	Not Calculated	2.4	21.97	10.43
HAP	---	---	---	---	3.48	1.28	Not Calculated	0.48	3.48	1.76

Table 4 : Total Emission Rates from First Avenue Nitro Annex.										
Pollutant	Emissions									
	Hotsey Water Heater (HW-1E)		Paint Booth Heaters (HB-1E & HB-2E)		Paint Booth (PB-1E; PB-2E)		General Cleanup/Solvent Cleaning &. Misc. Operations (VC-1)		Facility Total	
	(lb/hr)	(ton/yr)(1)	(lb/hr)	(ton/yr)(1)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr))

(1) Based on operating 8,760 hr/yr.
(2) PM_{10} emissions after Paint Booth Filter System (FIL-1).

Natural Gas-fired Combustion Sources

Hotsy Water Heater (HW-1; HW-1E)

As the annual emission limits given in the table below are based on operating 8,760 hr/yr at a maximum design heat input capacity of 0.6 MM Btu/hr for the Hotsy Water Heater (HW-1), there is no limit on the annual hours of operation or natural gas usage for this heater.

Table 5: Maximum Emission Rates for Hotsy Water Heater (HW-1).

Pollutant	Emission Rate	
	(lb/hr)	(ton/yr)(1)
CO	0.05	0.20
NO_X	0.06	0.24
PM_{10}	0.004 (2)	0.02 (2)
SO_2	0.0003 (2)	0.001 (2)
VOC	0.003 (2)	0.01 (2)

(1) Based on 8,760 hr/yr of operation.
(2) Emissions too small to be in final permit/R13-3338.

Paint Booth Heaters (PC-1; HE-1 & HE-2)

As the annual emission limits given in Table below are based on operating 8,760 hr/yr at a maximum design heat input capacity of 4.0 MM Btu/hr for each of the Paint Booth Heaters (HE-1 & HE-2), there are no limits on the annual hours of operation or natural gas usage for these heaters.

Table 6: Maximum Emission Rates for Paint Booth Heaters (HE-1 & HE-2).				
Pollutant	Maximum Emission Rates			
	One (1) Heater		Two (2) Heaters	
	(lb/hr)	(tons/yr)(1)	(lb/hr)	(tons/yr)(1)
CO	0.31	1.38	0.62	2.76
NO_X	0.37	1.62	0.74	3.24
PM_{10}	0.03 (2)	0.01 (2)	0.06 (2)	0.02 (2)
SO_2	0.002 (2)	0.01 (2)	0.004 (2)	0.02 (2)
VOC	0.02 (2)	0.01 (2)	0.04 (2)	0.02 (2)

(1) Based on 8,760 hr/yr of operation.
(2) Emissions too small to be in final permit/R13-3338.

Paint Booth Filter System Emissions (PB-1; PB-1E and PB-2E)

All emissions from Paint Booth (PB-1) are to be vented through the Paint Booth Filter System (FIL-1) having a minimum PM_{10} control efficiency of 98.8%. The filter system (FIL-1) is to be in place, properly maintained and functioning before the Paint Booth (PB-1) is placed into operation.

PM_{10}, VOC and HAP emissions from the Paint Booth [PB-1; Emission Point IDs for two (2) stacks: PB-1E and PB-2E] were estimated and are given below:

Table 7: PM_{10}, VOC & HAP Emission Rates from Paint Booth (PB-1).						
Emission Point ID (2 Stacks)	Emission Rate					
	PM_{10} (1)		VOC		Total HAP(s)	
	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
PB-1E	0.10	0.04	10.96	4.0	1.74	0.64
PB-2E	0.10	0.04	10.96	4.0	1.74	0.64
Total (Both Stacks)	0.20	0.08	21.92	8.0	3.48	1.28

(1) Controlled PM_{10} emissions after Paint Booth Filter System (FIL-1).

Grit Blasting Booth

PM_{10} emissions from the Grit Blasting Booth (GB-1) are to be vented through the Grit Blasting Booth Dust Collector (DC-1) having a minimum control efficiency of 99.99%. The Grit Blasting Booth Dust Collector (DC-1) is to be in place, properly maintained and functioning before the Grit Blasting Booth (GB-1) is placed into operation.

PM_{10} emissions from the Grit Blasting Booth Dust Collector (DC-1) shall be vented inside the building and shall not exceed 0.01 lb/hr and 0.01 ton/yr.

General Clean-up/Solvent Cleaning & Misc. Operations (VC-1)

Emissions from General Clean-up/Solvent Cleaning & Misc. Operations (VC-1) shall not exceed 2.4 ton/yr of VOC and 0.48 ton/yr Total HAP(s). This includes body work using putty, body fillers and pastes, spray gun cleaning/solvent recycling, parts cleaning, and general solvent clean-up.

REGULATORY APPLICABILITY

The facility is a minor source for criteria pollutants, and an area source ofHAPs. It is not subject to Title V.

45CSR2 - "To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers"

According to Section 11.1: "Any fuel burning unit(s) having a heat input under ten (10) million B.T.U.'s per hour will be exempt from sections 4, 5, 6, 8 and 9." Exempted sections:

- Section 4 is entitled: "Weight Emission Standards."
- Section 5 is entitled: "Control of Fugitive Particulate Matter."
- Section 6 is entitled: "Registration."
- Section 8 is entitled: "Testing, Monitoring, Recordkeeping and Reporting."
- Section 9 is entitled: "Start-ups, Shutdowns and Malfunctions."

Applicable/non-exempted sections:

- Section 3 is entitled, "Visible Emissions of Smoke And/Or Particulate Matter Prohibited And Standards of Measurement.;"
- Section 7 is entitled, "Permits;"
- Section 10 is entitled, "Variances;"

- Section 11 is entitled, "Exemptions;" and
- Section 12 is entitled, "Inconsistency Between Rules."

Section 3 of this rule applies to the following equipment:

- The two (2) natural gas fueled **Paint Booth Heaters #1 and #2 (HE-1 and HE-2)**, each heater having a maximum design heat input of 4.0 MM Btu/hr, and

- The natural gas fueled **Hotsy Water Heater (HW-1)** having a maximum design heat input of 0.6 MM Btu/hr.

No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. **[45CSR§2-3.1.]**

Note: Visible emission checks of the fuel burning (natural gas) paint booth heaters and the Hotsy Waster Heater are not required because the equipment is exempted from Section 8 of Rule 2.

45CSR7 - To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations

Rule 7 applies to particulate matter emissions from the following equipment:

- The **Paint Booth (PB-1; PB-1E and PB-2E)**. PM emissions to the atmosphere are controlled by the Paint Booth Filter Media (FIL-1) which has a PM_{10} emission removal/control efficiency of 98.8%.

- The **Grit Blasting Booth (GB-1; GB-1E)**. PM emissions to the atmosphere are controlled by the Grit Blasting Booth's Cartridge Dust Collector (DC-1) which has a PM_{10} emission removal/control efficiency of 99.99%.

Applicable Sections of 45CSR§7 quoted in the permit are:

45CSR §7-3.1. - No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.

45CSR §7-5.1. - No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.

45CSR §7-8.1. - At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.

45CSR §7-8.2. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.

45CSR §7-9.1. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in this rule may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.

45CSR13 - Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation

First Avenue submitted an application for an air permit to construct an equipment maintenance, painting and repair facility. The company paid an application fee (of $1,000.00), ran a legal advertisement (in *The Charleston Gazette),* submitted to the DAQ via email the newspaper legal affidavit of publication at which time the DAQ deemed First Avenue's application to be complete.

45CSR21 - Regulation to Prevent and Control Air Pollution From the Emission of Volatile Organic Compounds

This facility is located in Putnam County which is subject to Rule 21

- Section 19, "Coating of Miscellaneous Metal Parts"

First Avenue's Paint Booth (PB-1) is used to refinish mobile crane equipment. It is exempt per section 19.1. ("Applicability") c.3.: Automobile and truck refinishing.

The refinishing operation at First Avenue will be NAICS 811310 and SIC 7699, which is exempt from regulation because it does not meet the definition of "Miscellaneous parts and products" (per 45CSR21-19.2.g.).

- Section 40, "Other Facilities that Emit Volatile Organic Compounds (VOC)"

First Avenue's facility will emit less than the Section 40. threshold applicability of aggregate maximum theoretical emissions of 90.7 megagrams (mg) (100 tons) or more of VOCs per calendar year in the absence of control devices.

45CSR34 - "Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 CFR, Part 63"

This rule establishes and adopts a program of national emission standards for hazardous air pollutants (NESHAPS) and other regulatory requirements promulgated by the United States Environmental Protection Agency pursuant to 40 CFR Parts 61, 63 and section 112 of the federal Clean Air Act, as amended (CAA). This rule codifies general procedures and criteria

to implement emission standards for stationary sources that emit (or have the potential to emit) one or more of the eight substances listed as hazardous air pollutants in 40 CFR §61.01(a), or one or more of the substances listed as hazardous air pollutants in section 112(b) of the CAA. The Secretary hereby adopts these standards by reference. The Secretary also adopts associated reference methods, performance specifications and other test methods which are appended to these standards.

Subpart HHHHHH - Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

This subpart is not applicable because First Avenue agreed to:

- not use coatings that contain any of the following target HAP metals: lead, chromium, manganese, nickel, or cadmium.
- not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride in paint removal processes.

Subpart XXXXXX - Nine Metal Fabrication and Finishing Source Categories

This subpart is not applicable because First Avenue's Nitro Annex is not primarily engaged in the nine source categories listed in 63.11514 as further described in Table 1 to the subpart.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

The section of this evaluation entitled "MSDS Sheets" lists hazardous air pollutants (HAPs) found in the various coatings and raw materials to be used at this facility.

AIR QUALITY IMPACT ANALYSIS

No air quality impact analysis was conduct for this construction permit..

MONITORING OF OPERATIONS

6.2.1. **Paint Booth (PB-1) Opacity Monitoring**. For the purpose of determining compliance with the PM_{10} emission limits set forth in Section 6.1.3. and the opacity limit set forth in Section 6.1.8. (per 45CSR7-3.1), the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for the Paint Booth (PB-1; PB-1E & PB-2E).

6.4.1. **Daily, Monthly, and Annual Records for the Paint Booth (PB-1) Operation.** For the purpose of determining compliance with the VOC and HAP emission limitations set forth in Section 6.1.3. of this permit, the permittee shall keep daily records of:

- the date and time/duration in hours the paint booth was in operation,
- the name(s) and/or the identification number(s), and amount(s) of each coating used,
- the name(s) and/or the identification number(s), and amount(s) of each thinner/solvent used for cleanup or added to coating(s) that were used.

Using the above information, the permittee shall calculate and record on a monthly basis:

1. Total monthly VOC and HAP emissions,
2. Average hourly VOC and HAP emission rates (based on the number of hours the paint booth was in operation for the month), and
3. The 12-month rolling totals for VOC and HAP emissions.

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

6.4.2. **Monthly Opacity Reading For Paint Booth (PB-1).** For the purpose of demonstrating compliance with the PM_{10} emission limits set forth in Section 6.1.3. and the opacity limit set forth in Section 6.1.8. (per 45CSR7-3.1), the permittee shall maintain records (see example form given in attached Appendix A) of all monitoring data documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

6.4.3. **Paint Booth Filter (FIL-1) Replacement.** For the purpose of determining compliance with the PM_{10} limitations set forth in Section 6.1.3. of this permit, the permitted facility shall keep a record of when the Paint Booth Filters (FIL-1) were replaced.

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

6.4.4. **Grit Blasting Booth Dust Collector (DC-1) Cartridge Replacement.** For the purpose of determining compliance with the PM_{10} control requirements and limitations set forth in Sections 6.1.4. and 6.1.5. of this permit, the permittee shall keep a record of when the Grit Blasting Booth Dust Collector (DC-1) filter cartridges were replaced.

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

6.4.5. **Daily, Monthly, and Annual Records for the General Clean-up/Solvent Cleaning & Misc. Operations (VC-1).** For the purpose of determining compliance with the VOC and HAP emission limitations set forth in Section 6.1.6. of this permit, the permittee shall keep daily records of:

- the name(s) and/or the identification number(s), and amount(s) of each raw material, solvent, coating, etc. emitting VOC(s), and
- the estimated monthly usage of each raw material, solvent, coating, etc. emitting VOC(s).

Using the above information, the permittee shall calculate and record on a monthly basis:

1. Total monthly VOC and HAP emissions, and
2. The 12-month rolling totals for VOC and HAP emissions.

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

6.4.6. **Facility HAP Emissions.** If actual facility VOC emissions should exceed 10 ton/yr:

For the purpose of determining compliance with the HAP emission limitations set forth in Section 6.1.1. of this permit, the permittee shall calculate on a monthly basis using information collected from the Paint Booth (PB-1) and the General Clean-up/Solvent Cleaning & Misc. Operations (VC-1), the 12-month rolling HAP emission totals for:

- each single HAP actually used at the facility and
- the aggregated HAPs emission total for the facility.

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

RECOMMENDATION TO DIRECTOR

The writer has reviewed permit application R13-3338 and believes that compliance with all applicable regulations will be achieved. Therefore, the writer recommends that Permit R13-3338 be granted to First Avenue for the construction of a service facility for the repair and refinish of mobile crane equipment at the Nitro Annex, Putnam County, WV.

John Legg
Permit Writer

November 4, 2016
November 04, 2016