



west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

February 9, 2016

CERTIFIED MAIL

91 7199 9991 7035 6665 8875

David Robinson
181 Pleasants Industrial Center
St. Marys, WV 26170

Re: SimEx, Inc.
Waverly, Pleasants County, WV
Permit No.: R13-2357G
Plant ID No. 072-00021

Dear Mr Robinson,

Your application for a Class II Administrative Update to air permit R13-2357F as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed air permit R13-2357G is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

The source is not subject to 45CSR30.

In accordance with 45CSR22 - Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the Certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

Promoting a healthy environment.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1257.

Sincerely,



John Legg
Permit Writer

Enclosures

c: Steve Tomlin, Consultant, Tomlin Environmental Consulting, LLC

Permit to Update



R13-2357G

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
SimEx, Inc.
Waverly Facility
073-00021

A blue ink signature of William F. Durham, written in a cursive style, positioned above a horizontal line.

William F. Durham
Director

Issued: February 9, 2016

This permit will supercede and replace Permit R13-2357F.

Facility Location: Waverly, Pleasants County, West Virginia

Mailing Address: P.O. Box 1646, Parkersburg, WV 26102

Facility Description: Vinyl compounding and extrusion facility

SIC Codes: 3089

UTM Coordinates: 469.0 Easting • 4354.9 Northing • Zone 17

Permit Type: Class II Administrative Update

Description

of Change: The following equipment was to be installed in 2015: a router/milling machine (RM1/100C) serviced by dust collector (96C), a corner fold machine using a two part adhesive applied using a glue machine (GM1), and an orbital wrapper/packing machine (no emissions).

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

As a result of the granting of this permit, the source is not subject to 45CSR30.

Table of Contents

1.0. Emission Units	3
2.0. General Conditions	6
2.1. Definitions	6
2.2. Acronyms	6
2.3. Authority	7
2.4. Term and Renewal	7
2.5. Duty to Comply	7
2.6. Duty to Provide Information	7
2.7. Duty to Supplement and Correct Information	8
2.8. Administrative Permit Update	8
2.9. Permit Modification	8
2.10. Major Permit Modification	8
2.11. Inspection and Entry	8
2.12. Emergency	9
2.13. Need to Halt or Reduce Activity Not a Defense	9
2.14. Suspension of Activities	9
2.15. Property Rights	10
2.16. Severability	10
2.17. Transferability	10
2.18. Notification Requirements	10
2.19. Credible Evidence	10
3.0. Facility-Wide Requirements	11
3.1. Limitations and Standards	11
3.2. Monitoring Requirements	11
3.3. Testing Requirements	11
3.4. Recordkeeping Requirements	13
3.5. Reporting Requirements	13
4.0. Source-Specific Requirements	15
4.1. Limitations and Standards	15
4.2. Monitoring Requirements	17
4.3. Testing Requirements	18
4.4. Recordkeeping Requirements	18
4.5. Reporting Requirements	20
CERTIFICATION OF DATA ACCURACY	21

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
S-1	1E	Primary Ingredient Silo	2000	18,000 lb/hr vinyl resin	1C Baghouse
S-2	2E	Primary Ingredient Silo	2000	18,000 lb/hr vinyl resin	2C Baghouse
S-9	7E	Primary Ingredient Silo	2004	10,000 lb/hr vinyl resin	85C Baghouse
S-10	8E	Primary Ingredient Silo	2004	10,000 lb/hr vinyl resin	91C Baghouse
H-1, H-2, H-49, and H-58	N/A	PVC Vacuum Hopper	2003 2004	17,700 lb/hr PVC resin (cumulatively)	3C, 4C, 86C, and 92C Baghouses
H-3 through H-12 and H-50 through H-54	N/A	Secondary Ingredient Hopper	2003 2004	4,000 lb/hr secondary ingredients (cumulatively)	52C Central Filter
SC-1 through SC-12	N/A	Main Scales, Secondary Scale, and Check Scales	2003 2004	17,700 lb/hr primary ingredients and 4,000 lb/hr secondary ingredients (cumulatively)	52C Central Filter; 5C, 6C, 7C, and 8C Baghouses
H-13 and H-14; H-15 and H-16	N/A	Hand Add Stations and Color Feed Systems	2003	200 lb/hr ingredients of resin blend (cumulative)	52C Central Filter; None
HM-1 and HM-2; CM-1 and CM-2	N/A	Hot Mixers and Cooling Mixers	2003	10,850 lb/hr primary and secondary ingredients of PVC blend per mixer	9C and 10C; 11C and 12C Baghouses
H-17 and H-18	N/A	Hoppers	2003	10,850 lb/hr finished resin blend (each)	52C Central Filter
S-3 through S-8	N/A	Finished Resin Silos	2003	21,700 lb/hr PVC blend (each)	13C - 18C Baghouses
DB-1 through DB-3	N/A	Day Bins	2003	12,000 lb/hr PVC blend (each)	19C - 21C Baghouses
H-19 through H-25	N/A	Extruder Hoppers	2003	500 lb/hr PVC blend (each)	22C - 28C Baghouses
H-26 through H-28	N/A	Extruder Hoppers	2003	850 lb/hr PVC blend (each)	29C - 31C Baghouses
H-29 through H-35	N/A	Extruder Hoppers	2003	1,100 lb/hr PVC blend (each)	32C - 38C Baghouses
H-36	N/A	Extruder Hopper	2003	1,500 lb/hr PVC blend	39C Baghouse

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
H-37 through H-43	N/A	Extruder Hoppers	2003	250 lb/hr PVC blend (each)	40C - 46C Baghouses
H-44 through H-48	N/A	Extruder Hoppers	2003	500 lb/hr PVC blend (each)	47C - 51C Baghouses
H-55 and H56	N/A	Extruder Hoppers	2004	2,500 lb/hr PVC blend (each)	87C and 88C Baghouses
H-59 and H-60	N/A	Extruder Hoppers	2004	2,500 lb/hr PVC blend (each)	93C and 94C Baghouses
H-61 and H-57	N/A	Foam Feed	2004	50 lb/hr resin ingredients (each)	None
EX-1 through EX-7; EX-25 through EX-30	N/A	Extruder	2003	500 lb/hr PVC blend (each)	55C through 61C; 79C through 84C Baghouses
EX-8 through EX-10	N/A	Extruder	2003	850 lb/hr PVC blend (each)	62C through 64C Baghouses
EX-11 though EX-17	N/A	Extruder	2003	1,100 lb/hr PVC blend (each)	65C through 71C Baghouses
EX-18	N/A	Extruder	2003	1,500 lb/hr PVC blend (each)	72C Baghouse
EX-19 through EX-24	N/A	Extruder	2003	250 lb/hr PVC blend (each)	73C through 78C Baghouses
EX-31 and EX-32	N/A	Extruder	2004	2,500 lb/hr PVC Resin blend (each)	89C and 95C Baghouses
G-1 through G-3	N/A	Granulator	2003	5,000 lb/hr vinyl scraps (each) 21,375,000 lb/yr vinyl scraps (cumulatively)	53C, 54C, and 90C Baghouse
R-1	N/A	Railcar Loading	2005	10,850 lb/hr vinyl or foam blend	52C Central Filter
Box Out	N/A	Box Out Loading	2003	7,200 vinyl or foam blend	52C Central Filter
BX2	N/A	Box Out Station	2009	21,700 lb/hr	52C Central Filter

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
PLV	N/A	Pulverized Unloading Station	2009	21,700 lb/hr	52C Central Filter
RM1	N/A	Router/Milling Machine	2015	166 lb foam/hr	96C Dust Collector
GM1	GM1	Glue Machine	2015	0.5 lb glue/hr	None
96C	96C	Dust Collector	2015	99.0% Minimum Efficiency	None

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-2357F. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2357, R13-2357A, R13-2357B, R13-2357D, R13-2357E, R13-2357F, R13-2357G, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification to this permit as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§14-6 or 45CSR§19-12]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond

the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are not met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee

shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary 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. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
 - d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.
- [WV Code § 22-5-4(a)(14-15) and 45CSR13]**

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken.
[State-Enforceable only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee.

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. PVC resin shall be unloaded into the storage silos (Equipment ID Nos. S1 and S2) at rates not to exceed 18,000 pounds per hour (lb/hr) each and 146,292,000 pounds of rigid PVC per year (lb/yr). *(1E & 2E)*
- 4.1.2. The particulate matter emission rate from each primary ingredient storage silos, S1 and S2, shall not exceed 0.0072 pounds per hour (lb/hr) and 0.015 tons per year (tpy). *(1E & 2E)*
- 4.1.3. PVC resin shall be unloaded into the storage silos (Equipment ID Nos. S9 and S10) at rates not to exceed 10,000 pounds per hour (lb/hr) each and 43,800,000 lb of foam PVC per year (lb/yr). *(7E & 8E)*
- 4.1.4. The particulate matter emission rate from each primary ingredient storage silos, S9 and S10, shall not exceed 0.004 pounds per hour and 0.009 tons per year (tpy). *(7E & 8E)*
- 4.1.5. PVC blend throughput to the Main and Check Scales (SC-7, SC-8, SC-9, & SC-10) shall not exceed 21,700 pounds per hour (lb/hr) individually and aggregated. *(3E, 4E, 5E, & 6E)*
- 4.1.6. The controlled particulate matter emission rate from the Main and Check Scales (SC-7, SC-8, SC-9, & SC-10) shall not exceed 0.005 pounds per hour (lb/hr) and 0.019 tons per year (tpy) individually and aggregated. *(3E, 4E, 5E, & 6E)*
- 4.1.7. PVC resin through the Rigid PVC Extruders (EX-1 to EX-7, EX-8 to EX-10, EX-11 to EX-17, EX-18, EX-19 to EX-24, EX-25 to EX-30) shall not exceed a maximum throughput of 19,750 pounds per hour (lb/hr) and 146,292,000 pounds per year of rigid PVC (lb/yr).
- 4.1.8. Foam through the Foam Extruders (EX-31 & EX-32) shall not exceed a maximum throughput of 5,000 pounds per hour (lb/hr) and 43,800,000 pounds per year of foam (lb/yr).
- 4.1.9. The maximum emission rate of metallic HAPs (antimony, manganese, chromium, and nickel compounds) shall not exceed 0.10 tons per year per emissions source and 0.69 tons per year of metallic HAPs aggregated.
- 4.1.10. The maximum emission rate of styrene (VOC)(HAP) shall not exceed 1.6 pounds per hour (lb/hr) and 7.0 tons per year (tpy), facility-wide.
- 4.1.11. The amount of vinyl scrap and foam fed the Granulators (G1, G2, and G3) shall not exceed 15,000 pounds per hour (lb/hr) and 21,375,000 pounds per year (lb/yr).
- 4.1.12. The laminating process (Emissions Unit L-1) shall be disconnect from service and shall not be used.
- 4.1.13. The foam board router/milling machine (RM1) shall no be operated unless dust collector 96C is online and operating.

- 4.1.14. The maximum emission rate of methyl methacrylate monomer (VOC)(HAP) from the two-part adhesive used to fold foam boards shall not exceed 0.36 lb/hr and 1.56 ton/yr.
- 4.1.15. Proposal of new ingredients containing different hazardous constituents other than those submitted in Permit Application R13-2357 through R13-2357F will require submittal of Material and Safety Data Sheets (MSDS) along with Potential to Emit (PTE) calculations to the Division of Air Quality via a permit determination by the permittee.
- 4.1.16. The permittee shall install and maintain all particulate matter control devices for the equipment listed in the following table. These control devices shall be operated and maintained in a manner consistent with good engineering practices and in accordance with manufacturer's specifications.

Emission Unit (Source)	Equipment ID No.	Control Device ID No.
Primary Ingredient Silos	S-1 and S-2 S-9 and S-10	1C and 2C 85C and 91C
Finished Resin Silos	S-3 through S-8	13C through 18C
Primary Ingredient Hopper	H-1 and H-2 H-49 and H-58	3C and 4C 86C and 92C
Secondary Ingredient Hopper	H-3 through H-12 H-50 through H-54	52C
Hand Add Station	H-13 and H-14	
Secondary Scale	SC-1 through SC-6 SC-11 and SC-12	
Blending Hopper	H-17 and H-18	
Railcar Loading	R1	
Box Out Loading	Box Out	
Box Loading Station	BX2	
Pulverized Unloading Station	PLV	
Extruder Hopper	H-19 through H-48 H-55 and H-56 H-59 and H-60	22C through 51C 87C and 88C 93C and 94C
Hot Mixer	HM-1 and HM-2	9C and 10C
Cooling Mixer	CM-1 and CM-2	11C and 12C
Day Bin	DB-1 through DB-3	19C through 21C
Main Scale	SC-7 and SC-8	6C and 5C
Check Scale	SC-9 and SC-10	8C and 7C
Granulators	G-1 through G-3	53C, 54C, and 90C

Emission Unit (Source)	Equipment ID No.	Control Device ID No.
Extruder Saws	EX-1 through EX-30 EX-31 and EX-32	55C through 84C 89C and 95C
Router/Milling Machine	RM1	96C

- 4.1.17. 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. [45CSR7-3.1]
- 4.1.18. The provisions of subsection 3.1 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. [45CSR7-3.2]
- 4.1.19. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule. [45CSR7-4.1]
- 4.1.20. 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. [45CSR7-5.1]
- 4.1.21. The permitted facility shall comply with all applicable provisions of 45CSR27, provided, however, that compliance with any more stringent limitation set forth under Section 4.0 of this permit shall also be demonstrated.
- 4.1.22. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. [45CSR§13-5.11.]

4.2. Monitoring Requirements

- 4.2.1. Opacity from Emission Points listed in Section 1.0 shall not exceed 20 percent. In order to determine compliance with this limit the permittee shall conduct monthly visual emission observations. These observations shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, within 24 hours. A 40CFR60 Appendix, Method 9 evaluation shall not be

required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed. Records shall be maintained on site reporting the results of each monthly test.

- 4.2.2. The permittee shall monitor on a monthly basis the amount of PVC resin and vinyl compound stored and purchased.
- 4.2.3. The permittee shall monitor on a monthly basis the amount of foam product produced and the amount of vinyl compound produced. Also, the permittee shall maintain the hours of operation of the extruders.
- 4.2.4. The permittee shall monitor the hours of operation of the extruders on a monthly basis.
- 4.2.5. *Reserved.*
- 4.2.6. The permittee shall monitor the amount of PVC blend fed through the Main and Check Scales (SC-7, SC-8, SC-9, & SC-10) on a monthly and yearly basis.

4.3. Testing Requirements

N/A - Section 3.3 - Facility - Wide Testing Requirements

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
 - a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess

emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
 - f. Steps taken to correct the malfunction.
 - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.4.4. In order to demonstrate compliance with the throughput and emission limits set forth in Sections 4.1.1, 4.1.2, 4.1.3, 4.1.4, the permittee shall keep monthly records of the amount of PVC resin and vinyl compound stored and purchased. Said records shall be certified upon request by a responsible official and shall be maintained on site for a period of five (5) years. Certified copies of these records shall be made available to the Director or his duly authorized representative upon request.
- 4.4.5. In order to demonstrate compliance with the production limits set forth in Sections 4.1.7 and 4.1.8, the permittee shall keep monthly records of the amount of foam product produced and the amount of vinyl compound produced. Also, the permittee shall maintain the hours of operation of the extruders. Said records shall be certified upon request by a responsible official and shall be maintained on site for a period of five (5) years. Certified copies of these records shall be made available to the Director or his duly authorized representative upon request.
- 4.4.6. In order to demonstrate compliance with the reprocessing limits set forth in Sections 4.1.11, the permittee shall keep monthly records of the amount of foam product and vinyl compound waste reprocessed. Also, the permittee shall maintain hours of operation for the granulators. Said records shall be maintained onsite for a period of five (5) years. Certified copies of these records shall be made available to the Director or his duly authorized representative upon request.
- 4.4.7. In order to demonstrate compliance with the requirements set forth in Sections 4.1.20 and §45-7-5.1, the permittee shall keep records of all maintenance work performed in connection with the PM vent filters. In addition, the permittee shall maintain monthly records of the visual emission checks of the source operations at the facility. Said records shall be certified upon request by a responsible official and shall be maintained on site for a period of five (5) years. Certified copies of these records shall be made available to the Director or his duly authorized representative upon request.
- 4.4.8. In order to demonstrate compliance with the methyl methacrylate monomer (VOC)(HAP) emission limits set forth in Sections 4.1.14, the permittee shall keep records of the amount of two-part

adhesive used on a daily and 12-month rolling total bases . Certified copies of these records shall be made available to the Director or his duly authorized representative upon request.

- 4.4.9. In order to demonstrate compliance with the throughput and emission limits set forth in Section 4.1.5. and 4.1.6., the permittee shall keep monthly records of the amount of PVC blend fed to the Main Scales and Check Scales on a monthly and yearly basis and the hours of operation. Said records shall be certified upon request by a responsible official and shall be maintained on site for a period of five (5) years. Certified copies of these records shall be made available tot he Director or his duly authorized representative upon request.

4.5. Reporting Requirements

N/A - Section 3.5 - Facility - Wide Reporting Requirements

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name and Title _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

- ¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.