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**west virginia department of environmental protection**

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Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
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**ENGINEERING EVALUATION / FACT SHEET**

**BACKGROUND INFORMATION**

Application No.: R13-2545G  
Plant ID No.: 099-00089  
Applicant: Allevard Sogefi USA, Inc. (Allevard Sogefi)  
Facility Name: Prichard Facility  
Location: Wayne County  
SIC Code: 336390  
Application Type: Class II Administrative Update  
Received Date: March 3, 2016  
Engineer Assigned: John Legg  
Fee Amount: \$300.00  
Date Received: March 4, 2016  
Complete Date: March 9, 2016 (Date Newspaper Affidavit Emailed to DAQ)  
Due Date: May 9, 2016  
Applicant Ad Date: February 5, 2016  
Newspaper: *The Herald-Dispatch*  
UTM's: Easting: 359.37 km    Northing: 4,233.34 km    Zone: 17  
Lat/Long: Latitude: 38°14' 12.56" N    Longitude: 82° 36' 22.88" W

Description: Addition of a new filter production line (FE3S) to produce engine oil filters and diesel fuel filters for automobiles.

**BACKGROUND INFORMATION**

The Allevard Sogefi plant is located in the community of Prichard, Wayne County, WV, about 12 miles south of Huntington.

The plant originally operated 2 production lines to manufacture Tube and Solid Stabilizer Bars. These production lines have since been removed (in 2013).

Under R13-2545E, approved 11/07/08, the facility added production line FE1S to manufacture: gasoline fueled filters, diesel fueled filters and fine particle cabin filters.

Under R13-2545F, approved 9/12/13, a second production line (FE2S) was added to produce gasoline and diesel filters.

**Table 1: Production Line History.**

Production Line	Permit	Permit Approval Date
FE1S	R13-2545E	11/07/08
FE2S	R13-2545F	09/12/13
FE3S - New	R13-2545G	July 26, 2016

**DESCRIPTION OF PROCESS**

**New Filter Production Line Number 3 (FE3S)**

With this application, a third production line (FE3S) will be added to produce engine oil filters and diesel fuel filters at a rate of 1,200 filters per hour (the same rate that filters are produced on the two existing filter production lines).

The line consists of 6 different stations described below:

**Table 2: Description of Stations Making Up New Filter Production Line FE3S.**

Station No.	Overview	Description
1	Paper Unwinding (No emissions)	Spools of filter paper are unwound.  The paper is cellulose and non-woven polymer fiber - see application's attached material safety data sheet (MSDS).
2	Paper Pleating [2 vacuum lines connect to baghouse (FE1C)]	Folds the paper into pleats using a steel tool.  Two, 4-inch dust collection lines (Emission Points FE3SA and FE3SB) are attached to station 2. The other end of the lines are connected to baghouse FE1C.  The same baghouse (FE1C) also serves Production Filter Lines 1 and 2 (FE1S and FE2S).  The baghouse was permitted in 2008 under R13-2545E. Its manufacturer's collection efficiency of 99.999%.  The baghouse exhausts to atmosphere at emission point FE1E.

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Alleward Sogefi USA, Inc.  
Prichard Facility, Wayne County, WV

**Table 2: Description of Stations Making Up New Filter Production Line FE3S.**

Station No.	Overview	Description
3	Pleated Paper Joining (No emissions)	Joins the ends of the pleated paper by melting a small nylon strand/wire.
4	Filter Caps Assembly (No emissions)	Deposits a polyester glue into plastic caps, forms the pleated paper into a cylinder, and then assembles these caps to the paper.
5	Laser Printing (No emissions)	Prints part number and lot date information on the plastic caps using a CO <sub>2</sub> laser engraver (no CO <sub>2</sub> emissions).
6	Glue Curing Furnace (Vents to Combustion Exhaust Stack FE3SC)	Loads assembled filters into a natural gas-fired furnace that cure hardens the polyester glue. This furnace has one exhaust pipe through the roof to atmosphere for gas combustion. Finished filters are packed into boxes at the end of Station 6.

**Table 3: New Entries in the Emission Units Table Resulting from Filter Production Line FE3S (New).**

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
<b>FE3S - Automobile Filter Production Line (Engine Oil Filters and Diesel Fuel Filters)</b>					
FE3SA	FE1E	Filter Production Line, Vacuum (Pleater Vacuum #1)	2015	70 cfm	FE1C
FE3SB	FE1E	Filter Production Line, Vacuum (Pleater Vacuum #2)	2015	70 cfm	FE1C
FE3SC	FE3EA	Natural Gas-Fired Glue Curing Oven with Ambient Cooling Station	2015	1.5 MM Btu/hr	NA

**ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER**

**VOC Emissions Error/Over-Estimate in R13-2545F**

During the review of this application (R13-2545G), it was determined that there was an error in section 4.1.3 of the old permit (R13-2545F) which resulted in VOC emissions for Filter Production Lines 1 and 2 being over-estimated.

Instead of VOC emissions being 39.19 ton/yr for each line (per R13-2545F, section 4.1.3), VOC emissions were really half that amount or 19.58 ton/yr for each of the two lines. This means that each line over-estimated VOC emissions by 19.61 ton/yr, for a total VOC emissions over-estimate of 39.22 tpy.

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Over-estimate for One (1) Line = (39.19 - 19.58)ton/yr  
 = 19.61 ton/yr

Total Over-estimate = 2 lines X 19.61 ton/yr / line  
 for Two (2) Lines = 39.22 ton/yr

The following correction was made to section 4.1.3 of Permit R13-2545G:

Section 4.1.3. Emissions to the atmosphere shall not exceed the hourly and annual emission limits as set forth in the following table:

Emission Point ID	Description	Pollutant	Emission Limit	
			(lb/hr)	(ton/yr)
FE1E	Exhaust from Dust Collection Baghouse (FE1C)	PM	0.01	0.01
FE2EA <sup>1</sup>	Exhaust from Glue Curing Oven (NG) Line FE1S	NOx	0.14	0.30
		SO <sub>2</sub>	0.01	0.02
		CO	0.12	0.25
		PM <sub>10</sub>	0.02	0.5
		VOC	44.06	<del>39.19</del> 19.58
FE3E	Bubble Tester	VOC	0.41	0.86
FE2EC <sup>1</sup>	Exhaust from Glue Curing Oven (NG) Line FE2S	NOx	0.14	0.30
		SO <sub>2</sub>	0.01	0.02
		CO	0.12	0.25
		PM <sub>10</sub>	0.02	0.5
		VOC	44.06	<del>39.19</del> 19.58
Note: Bottom portion of table not shown to save space!				

<sup>1</sup>VOC emissions include emissions from natural gas combustion AND glue off gassing.

The error/over-estimate was reviewed (on June 22, 2016) with previous permit writer who agreed with finding.

### Emission Calculations Revisions - 5/23/16

On April 28, 2016, the writer via email asked Allevard to:

- Update the calculation section of the application (Attachment N) for the filter production line currently under review.

[The application was submitted with the calculations for one of the previously permitted lines and not for the line under review (FE3S).]

On April 29, 2016, the writer via email asked Allevard to:

- Update Attachment N by crossing out the old ID's and putting in the new ID's for line 3.

The writer explained to Allevard that the application's emission source ID's were confusing and that it was hard to tell which production line the emission source ID's belonged to.

Allevard spent considerable time and effort revising and updating Attachment N. The revised application was emailed to the writer on May 23, 2016.

### Emission Calculations Revisions - 7/14/16

On June 3, 2016, after submitting a draft permit to the company (June 2, 2016) and after talking with Beverly McKeone, NSR permit supervisor, about the draft permit, the writer voiced concern to Allevard via email about:

- The VOC emissions error/over-estimate in existing lines 1 and 2 (discussed above) and the need to fix the error.
- The company's method for calculating VOC emissions for the new line by: weighing a glue sample, before and after curing, and then using the difference in weights to calculate the percentage by weight of VOCs in the glue, instead of basing VOC emissions on the product MSDS information and assuming 100% of the VOCs in the product are emitted to the atmosphere during the curing operation.

On June 13, 2016, via email, the writer wrote Allevard asking that the VOCs for the new line be calculated the same way the VOCs for the existing lines 1 and 2 were calculated [by assuming 100% of the VOCs in the glue (weight % VOCs from the product MSDS) being emitted to the atmosphere].

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Allevard Sogefi USA, Inc.  
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On July 12, 2016 in response to a email from Allevard sent earlier that day, the writer asked Allevard to calculated VOCs in the same way as lines 1 and 2 were calculated.

On July 14, 2016, Allevard re-calculated emissions as asked on July 12, 2016. Attachments N and J were revised in the application based on the re-calculated emissions.

### Changes to Calculations

The writer reviewed the Company's emission calculations for the new line (FE3S) submitted on 7/14/16 and on 7/21/16 asked via email that additional changes be make. Based on the suggested changes to the emission calculation submitted on 7/14/16, the writer believes the emission calculations to be logical and accurate.

Emissions for Allevard Sogefi's Prichard Facility are given below in Table 4. Changes resulting from the addition of the third filter production line are highlighted in red. A version of this table appears in the final permit (R13-2546G) as section 4.1.3.

**Table 4: Emission Changes Resulting from the Addition of Filter Production Line FE3S at Allevard Sogefi's Prichard, Wayne County, WV Facility.**

Filter Line	Description	NO <sub>x</sub>		SO <sub>2</sub>		CO		PM/PM <sub>2.5</sub>		VOC	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
---	FE1E - Dust Collector	--	--	--	--	--	--	<del>0.01</del> 0.03	<del>0.01</del> 0.09	--	--
FE1S	FE2SA - Curing Oven	0.14	0.30	0.01	0.02	0.12	0.25	0.02	0.05	0.01	0.03
	Off Gassing of Glue	--	--	--	--	--	--	--	--	44.06	<del>39.58</del> 19.58
---	Bubble Tester	--	--	--	--	--	--	--	--	0.41	0.86
FE2S	FE2SC - Curing Oven	0.14	0.30	0.01	0.02	0.12	0.25	0.02	0.05	0.01	0.03
	Off Gassing of Glue	--	--	--	--	--	--	--	--	44.06	<del>39.58</del> 19.58
FE4EA thru FE4EI	15-ton Rooftop Gas Furnace; 6 Makeup Air Handlers; Split System A/C #1& #2	0.4	1.62	0.1	0.01	0.4	1.69	0.1	0.05	0.1	0.05
NEW	FE3SC -Curing Oven	0.14	0.38	0.01	0.03	0.12	0.33	0.02	0.06	0.01	0.03
FE3S	Off Gassing of Glue	--	--	--	--	--	--	--	--	22.71	23.87
<b>Sub-total</b>		<b>0.14</b>	<b>0.38</b>	<b>0.01</b>	<b>0.03</b>	<b>0.12</b>	<b>0.33</b>	<b>0.02</b>	<b>0.06</b>	<b>22.72</b>	<b>23.90</b>
<b>Total</b>		<del>0.68</del> <b>0.82</b>	<del>2.22</del> <b>2.60</b>	<del>0.12</del> <b>0.13</b>	<del>0.05</del> <b>0.08</b>	<del>0.64</del> <b>0.76</b>	<del>2.19</del> <b>2.52</b>	<del>0.16</del> <b>0.19</b>	<del>0.16</del> <b>0.30</b>	<del>88.65</del> <b>111.37</b>	<del>80.13</del> <b>64.03</b>

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Allevard Sogefi USA, Inc.  
Prichard Facility, Wayne County, WV

## CHANGES TO PERMIT R13-2545F

The following changes were made to permit R13-2545F:

- \* The new equipment was added to the Emissions Unit Table 1.0, and permit sections 4.1.3, 4.1.4 and 4.1.5.
- \* Conditions 4.1.6 and 4.1.7 were changed to reflect the addition of the third filter production line (FE3S).

A file comparison is given in Attachment 1 to this evaluation that highlights the changes made to old the permit (R13-2545F) to arrived at the new permit (R13-2546G).

## REGULATORY APPLICABILITY

No changes in regulatory applicability.

The following state and federal regulations were reviewed for applicability to the facility:

### STATE RULES

45CSR2      *To Prevent and Control Particulate Air Pollution From Combustion of Fuel in Indirect Heat Exchangers*

Not applicable:      The Glue Curing Oven does not meet the definition of an Indirect Heat Exchanger provided in 45CSR2-2.14. "Indirect Heat Exchanger" means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. The term does not include process heaters. This is consistent with previous version of the R13-2545 series of permits for Allevard, Prichard Facility.

45CSR4      *To Prevent and Control the Discharge of Air Pollutants into the Open Air which Causes or Contributes to an Objectionable Odor or Odors*

Operations at the facility may have the potential to emit objectionable odors. The facility is subject to this rule. Under current operations, objectionable odors are not emitted to locations accessible by the public.

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Allevard Sogefi USA, Inc.  
Prichard Facility, Wayne County, WV

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

The facility is a manufacturing source, which has the potential to emit particulate matter during the preparation, processing, and coating operations. The facility is subject to this rule. Specifically, visible emissions are limited to 20% opacity and the facility is subject to the weight limit standard for particulate emissions. The particulate emissions for the facility will be minimized and maintained below the standard by employment of a dust collector possessing a 99.99% capture efficiency.

45CSR10 *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides*

Fuel burning units having a design heat input under 10 MMBTU/hr are exempt from section 3 and sections 6 through 8 per 45CSR10-10.1.

The Glue Curing Oven has a design heat input (DHI) of less than 10 MM Btu/hr. The unit is limited to the combustion of natural gas. The facility is exempt from subsection 4.1 because the operation emits less than the exemption limit of 500 pounds per year of SO<sub>2</sub> (45CSR10-4.1.e). The proposed Class II Administrative Update meets the requirements of this rule.

45CSR13 *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation.*

VOC emissions from the new line increased 23.90 ton/yr. However, due to a 40 ton/yr mistake/over-estimate made in the previous permit, this update ultimately decreased VOC emissions by 16.10 ton/yr. The other criteria pollutants increase slightly, less than 1.0 ton/yr per pollutant. If it had not been for the VOC mistake in the previous permit, this application may not have qualified for a class II administrative update. Note that the applicant's February 5, 2016 legal advertisement listed an increase in VOC emissions of 18.61 ton/yr. A scanned copy of the advertisement was received via email at the DAQ on March 9, 2016.

45CSR30 *Requirements for Operating Permits (Non Applicability)*

The facility does not have the potential to emit 100 tpy of any regulated air pollutant, 10 tpy of any hazardous air pollutant, or 25 tpy of aggregated hazardous air pollutants. The facility is not subject to 40CFR Parts 60, 61, or 63. The facility is therefore not subject to 45CSR30.

FEDERAL RULES:

40CFR60, Subpart MM *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations (Non Applicability)*

The Prichard facility is not subject to this regulation. While the facility manufactures automotive parts and performs powder coating operations, under §60.390 - 'Applicability and designation of affected facility', subpart MM applies to affected facilities in an "automobile or light-duty truck assembly plant". As the facility is not an assembly plant, it is not subject to this regulation.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

No non-criteria regulated pollutants are proposed in this Class II Administrative Update.

AIR QUALITY IMPACT ANALYSIS

This is a minor modification to an existing minor source, as defined in 45CSR14. No modeling studies were performed.

MONITORING OF OPERATIONS

Since the new filter production line is similar to existing filter production lines #1 and #2, the same monitoring will be used.

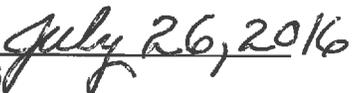
- \* The facility will monitor and maintain records of the monthly and annual natural gas usage in the Curing Oven.

- \* The facility will monitor and record the total number of filter pieces assembled and cured through the oven along with the operating temperature and operating time.
- \* Opacity monitoring is currently required in R13-2545F. The emission points table will be updated to include the new emission points.
- \* The facility will maintain records of all control device maintenance and operational activities and will maintain the control devices to manufacturer specifications.

#### RECOMMENDATION TO DIRECTOR

The information supplied in permit application R13-2545G indicates that compliance with all applicable regulations will be achieved. Therefore, it is the writer's recommendation that this Class II Administrative Update for a new filter production line (FE3S) at Allevard Sogefi USA, Inc.'s Prichard, Wayne County, WV facility be granted.

  
\_\_\_\_\_  
John Legg  
Permit Writer

  
\_\_\_\_\_  
July 26, 2016

Fact Sheet R13-2545G  
Allevard Sogefi USA, Inc.  
Prichard Facility, Wayne County, WV

**ATTACHMENT 1**

File Comparison:

Changes made to Permit R13-2545F  
to Arrived at Permit R13-2545G

Alevarad Sogefi USA, Inc. (099-00089)  
Prichard Facility  
Wayne County, WV 25555

Fact Sheet R13-2545G  
Alevarad Sogefi USA, Inc.  
Prichard Facility, Wayne County, WV

## WordPerfect Document Compare Summary

Original document: Q:\AIR\_QUALITY\J\_LEGG\Allevarð Sogefi  
USA\099-00089\_PERM\_13-2545F.wpd

Revised document: @PFDesktop\MyComputer\Q:\AIR\_QUALITY\J\_LEGG\Allevarð Sogefi  
USA\099-00089\_PERM\_13-2545G.wpd

Deletions are shown with the following attributes and color:

~~Strikeout~~, **Blue** RGB(0,0,255).

Deleted text is shown as full text.

Insertions are shown with the following attributes and color:

Double Underline, Redline, **Red** RGB(255,0,0).

The document was marked with 73 Deletions, 145 Insertions, 0 Moves.

West Virginia Department of Environmental Protection

Earl Ray Tomblin  
Governor

Division of Air Quality

Randy C. Huffman  
Cabinet Secretary

# Class II- Administrative Update



R13-2545FG

*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:  
**Allevard Sogefi USA, Inc.**  
Prichard, WV  
099-00089

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*John A. William F. Benedict Durham*  
Director

Issued: ~~September 12, 2013~~ July 26, 2013 • ~~Effective: September 12, 2013~~ 2016

This permit will supercede and replace Permit R13-2545EF.

Facility Location: Prichard, Wayne County, West Virginia

Mailing Address: 1389 Round Bottom Road  
Prichard, WV 25555

Facility Description: Filter Element Production Facility

SIC Codes: 3493

UTM Coordinates: 359.37 km Easting • 4,233.34 km Northing • Zone 17

Permit Type: Class II Administrative Update

Description of Change:

~~Construction of an additional line to produce gasoline and diesel filters and the removal of the stabilizer bar production lines~~Addition of new/third Filter Element Production Line Number 3 (FE3S) to produce engine oil filters and diesel fuel filters for automobiles. Filter Element Production Lines Number 1 and Number 2 (FE1S and FE2S, respectively) were permitted under R13-2545E (approved 11/07/08) and R13-2545F (approved 9/12/13), respectively.

*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.*

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*The source is not subject to 45CSR30.*

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**1.0 Emission Units**

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	<u>Design Capacity</u>	Control Device
<b><u>FE1S - Automobile Filter Element Production Line (Gasoline and Diesel Filters; and Fine Particle Cabin Filters)</u></b>					
FE1SA	FE1E	Filtration Material Processing Vacuum #1	2008	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE1SB	FE1E	Filtration Material Processing Vacuum #2	2008	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE1SC	FE1E	Filtration Material Processing Vacuum #3	2008	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE1SD	FE1E	Filtration Material Processing Vacuum #4	2008	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE1SE	FE1E	Filtration Material Processing Vacuum #5	2008	<u>70 ft<sup>3</sup>/min</u>	FE1C
<u>FE2SA</u>	<u>FE2EA</u>	<u>Glue Curing Oven (Natural Gas)</u>	<u>2008</u>	<u>1.5 MM Btu/hr</u>	<u>NA</u>
<u>FE3S</u>	<u>FE3E</u>	<u>Bubble Tester</u>	<u>2008</u>		<u>NA</u>
<u>FE4SA</u>	<u>FE4EA</u>	<u>15 ton Rooftop Gas Furnace</u>	<u>2008</u>		<u>NA</u>
<u>FE4SB</u>	<u>FE4EB</u>	<u>Makeup Air Handler #1</u>	<u>2008</u>		<u>NA</u>
<u>FE4SC</u>	<u>FE4EC</u>	<u>Makeup Air Handler #2</u>	<u>2008</u>		<u>NA</u>
<u>FE4SD</u>	<u>FE4ED</u>	<u>Makeup Air Handler #3</u>	<u>2008</u>		<u>NA</u>
<u>FE4SE</u>	<u>FE4EE</u>	<u>Makeup Air Handler #4</u>	<u>2008</u>		<u>NA</u>
<u>FE4SF</u>	<u>FE4EF</u>	<u>Makeup Air Handler #5</u>	<u>2008</u>		<u>NA</u>
<u>FE4SG</u>	<u>FE4EG</u>	<u>Makeup Air Handler #6</u>	<u>2008</u>		<u>NA</u>
<u>FE4SH</u>	<u>FE4EH</u>	<u>Split System A/C #1</u>	<u>2008</u>		<u>NA</u>
<u>FE4SI</u>	<u>FE4EI</u>	<u>Split System A/C #2</u>	<u>2008</u>		<u>NA</u>
<b><u>FE2S - Automobile Filter Element Production Line (Gasoline and Diesel Filters)</u></b>					
FE1SF	FE1E	Filtration Material Processing Vacuum #6	2013	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE1SG	FE1E	Filtration Material Processing Vacuum #7	2013	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE1SH	FE1E	Filtration Material Processing Vacuum #8	2013	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE1SI	FE1E	Filtration Material Processing Vacuum #9	2013	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE1SJ	FE1E	Filtration Material Processing Vacuum#10	2013	<u>70 ft<sup>3</sup>/min</u>	FE1C
FE2SC	FE2EC	Glue Curing Oven <u>(Natural Gas)</u>	2013	<u>1.5 MM Btu/hr</u>	<u>NA</u>
<b><u>FE2SAFE2EA FE3S - Automobile Filter Element Production Line (Engine Oil Filters and Diesel Fuel Filters)</u></b>					
<u>FE3SA</u>	<u>FE1E</u>	<u>Filtration Material Processing Vacuum</u>	<u>2015</u>	<u>70 ft<sup>3</sup>/min</u>	<u>FE1C</u>
<u>FE3SB</u>	<u>FE1E</u>	<u>Filtration Material Processing Vacuum</u>	<u>2015</u>	<u>70 ft<sup>3</sup>/min</u>	<u>FE1C</u>

<u>FE3SC</u>	<u>FE3EA</u>	Glue Curing Oven 2008NFE3SFE3EBubble Tester2008NFE4SAFE4EA15 ton Rooftop (Natural Gas Furnance)	2008 <u>201</u> <u>5</u>	<u>1.5 MM Btu/hr</u>	<u>NA</u>
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~~FE4SBFE4EBMakeup Air Handler #1 2008NFE4SCFE4ECMakeup Air Handler #22008NFE4SDFE4EDMakeup  
 Air Handler #32008NFE4SEFE4EEMakeup Air Handler #42008NFE4SFPE4EFMakeup Air Handler  
 #52008NFE4SGFE4EGMakeup Air Handler #62008NFE4SHFE4EHSplit System A/C #12008NFE4SIFE4EISplit  
 System A/C #22008N~~

**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**

<b>CAAA</b>	Clean Air Act Amendments	Information
<b>CBI</b>	Confidential Business	<b>CEM</b> Continuous Emission Monitor

<b>CES</b>	Certified Emission Statement	<b>TAP</b>	Toxic Air Pollutant
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>TPY</b>	Tons per Year
<b>CO</b>	Carbon Monoxide	<b>TRS</b>	Total Reduced Sulfur
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>TSP</b>	Total Suspended Particulate
<b>DAQ</b>	Division of Air Quality	<b>USEPA</b>	United States Environmental Protection Agency
<b>DEP</b>	Department of Environmental Protection	<b>UTM</b>	Universal Transverse Mercator
<b>dscm</b>	Dry Standard Cubic Meter	<b>VEE</b>	Visual Emissions Evaluation
<b>FOIA</b>	Freedom of Information Act	<b>VOC</b>	Volatile Organic Compounds
<b>HAP</b>	Hazardous Air Pollutant	<b>VOL</b>	Volatile Organic Liquids
<b>HON</b>	Hazardous Organic NESHAP		
<b>HP</b>	Horsepower		
<b>lbs/hr</b>	Pounds per Hour		
<b>LDAR</b>	Leak Detection and Repair		
<b>M</b>	Thousand		
<b>MACT</b>	Maximum Achievable Control Technology		
<b>MDHI</b>	Maximum Design Heat Input		
<b>MM</b>	Million		
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour		
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet per Hour		
<b>NA</b>	Not Applicable		
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		
<b>NO<sub>x</sub></b>	Nitrogen Oxides		
<b>NSPS</b>	New Source Performance Standards		
<b>PM</b>	Particulate Matter		
<b>PM<sub>2.5</sub></b>	Particulate Matter less than 2.5µm in diameter		
<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter		
<b>Ppb</b>	Pounds per Batch		
<b>pph</b>	Pounds per Hour		
<b>ppm</b>	Parts per Million		
<b>Ppmv or ppmv</b>	Parts per million by volume		
<b>PSD</b>	Prevention of Significant Deterioration		
<b>psi</b>	Pounds per Square Inch		
<b>SIC</b>	Standard Industrial Classification		
<b>SIP</b>	State Implementation Plan		
<b>SO<sub>2</sub></b>	Sulfur Dioxide		

### 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 R13-2545E. 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 R13-2545, R13-2545A, R13-2545B, R13-2545C, R13-2545D, R13-2545E, R13-2545F, R13-2545G 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 as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.  
[45CSR§13-5.1]

## **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§34]
- 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, any investigation performed in response to such a complaint, and any responsive action(s) taken.  
[45CSR§4. *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:

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**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 Air Enforcement and Compliance Assistance  
(3AP20)  
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. Only those emission units/sources as identified in Table 1.0, with the exception of any *de minimis* sources as identified under Table 45-13B of 45CSR13, are authorized at the permitted facility. In accordance with the information filed in Permit Application R13-2545FG, the emission units/sources identified under Table 1.0 of this permit shall be installed, maintained, and operated so as to minimize any fugitive escape of pollutants, shall not exceed the listed maximum design capacities, and shall use the specified control devices.

4.1.2 The maximum hourly and annual fuel consumption by all natural gas fired sources shall be limited as follows:

<u>Emission Unit ID (Source)</u>	<u>Maximum Emission Unit Description</u>	<u>Max. Heat-Input Rating (MMBtu/hr) Maximum</u>	<u>Max. Natural Gas Consumption</u>	
			<u>Hourly (scf per hr)</u>	<u>Annual (MMscf per year)</u>
<u>FE2SCA</u>	<u>Line FE1S - Glue Curing Oven (NG)</u>	1.50	1390	5.79 <sup>(1)</sup>
<u>FE2SA</u> <u>FE2SC</u>	<u>Line FE2S - Glue Curing Oven (NG)</u>	1.50	1390	5.79 <sup>(1)</sup>
<u>FE3SC</u>	<u>Line FE3S - Glue Curing Oven (NG)</u>	<u>1.50</u>	<u>1390</u>	<u>5.79<sup>(1)</sup></u>
FE4SA	<u>15 ton Rooftop Gas Furnace</u>	<u>3.12</u>	<u>2900</u>	<u>25.41</u>
FE4SB	<u>Makeup Air Handler #1</u>			
FE4SC	<u>Makeup Air Handler #2</u>			
FE4SD	<u>Makeup Air Handler #3</u>			
FE4SE	<u>Makeup Air Handler #4</u>			
FE4SF	<u>Makeup Air Handler #5</u>			
FE4SG	<u>Makeup Air Handler #6</u>			

FE4SH	<u>Split System A/C #1</u>	290025.41	
FE4SI	<del>3.12</del> <u>Split System A/C#2</u>		

(1) Based on facility operating schedule of 4,160 hours

4.1.3. Emissions to the atmosphere shall not exceed the hourly and annual emission limits as set forth in the following table:

Emission-Point ID	Description	Pollutant pph	Emission Limit	
			(lb/hr)	tpy(ton/yr)
FE1E	<u>Exhaust from Dust Collection Baghouse (FE1C)</u>	PM	0.0+ <u>3</u>	0.0+ <u>9</u>
FE2EA <sup>†</sup>	<u>Exhaust from Glue Curing Oven (NG) Line FE1S</u>	<u>NO<sub>x</sub></u>	<u>0.14</u>	<u>0.30</u>
<u>FE2EA<sup>1</sup></u>		SO <sub>2</sub>	<u>0.01</u>	<u>0.02</u>
		CO	<u>0.12</u>	<u>0.25</u>
		PM <sub>10</sub>	<u>0.02</u>	<u>0.5</u>
		VOC	<del>0.14</del> <del>0.01</del> <del>0.12</del> <del>0.02</del> 44.06	<del>0.30</del> <del>0.02</del> <del>0.25</del> <del>0.05</del> 39 <u>19.19</u> <u>58</u>
FE3E	<u>Bubble Tester</u>	VOC	0.41	0.86
FE2EC <sup>†</sup>	<u>Exhaust from Glue Curing Oven (NG) Line FE2S</u>	<u>NO<sub>x</sub></u>	<u>0.14</u>	<u>0.30</u>
<u>FE2EC<sup>1</sup></u>		<u>SO<sub>2</sub></u>	<u>0.01</u>	<u>0.02</u>
		<u>CO</u>	<u>0.12</u>	<u>0.25</u>
		<u>PM<sub>10</sub></u>	<u>0.02</u>	<u>0.5</u>
		<u>VOC</u>	<u>44.06</u>	<u>19.58</u>

<u>Emission-Point ID</u>	<u>Description</u>	<u>Pollutant</u> pph	<u>Emission Limit</u>	
			<u>(lb/hr)</u>	<u>tpy(ton/yr)</u> )
<u>FE3EA</u> <sup>1</sup>	<u>Exhaust from</u> <u>Glue Curing Oven (NG)</u> <u>Line FE3S</u>	<u>NOx</u>	<u>0.14</u>	<u>0.38</u>
		<u>SO<sub>2</sub></u>	<u>0.01</u>	<u>0.03</u>
		<u>CO</u>	<u>0.12</u>	<u>0.33</u>
		<u>PM<sub>10</sub></u>	<u>0.02</u>	<u>0.06</u>
		<u>VOC</u>	<u>22.72</u>	<u>23.90</u>
<u>FE4EA</u>	<u>15 ton Rooftop Gas Furnace</u>			
<u>FE4EA</u> <u>FE4EB</u> <u>FE4EB</u>	<u>Makeup Air Handler #1</u>	<u>NOx</u>	<u>0.4</u>	<u>1.62</u>
<u>FE4EC</u>	<u>Makeup Air Handler #2</u>	<u>SO<sub>2</sub></u>	<u>0.1</u>	<u>0.01</u>
<u>FE4ED</u>	<u>Makeup Air Handler #3</u>	<u>CO</u>	<u>0.4</u>	<u>1.1269</u>
<u>FE4EE</u>	<u>Makeup Air Handler #4</u>	<u>PM<sub>10</sub></u>	<u>0.1</u>	<u>0.02</u>
<u>FE4EF</u>	<u>Makeup Air Handler #5</u>	<u>VOC</u>	<u>0.1</u>	<u>0.25</u>
<u>FE4EG</u>	<u>Makeup Air Handler #6</u>			<u>0.05</u>
<u>FE4EH</u>	<u>Split System A/C #1</u>			<u>39</u>
<u>FE4EI</u>	<u>SO<sub>2</sub></u> <u>PM<sub>10</sub></u> <u>VOC</u> <u>NO<sub>x</sub></u> <u>Split System A/C#2</u>	<u>0.1</u> <u>0.1</u> <u>0.1</u> <u>0.4</u>	<u>0.01</u> <u>0.05</u> <u>0.05</u> <u>1.63</u>	<u>0.1905</u>

<sup>1</sup>VOC emissions include emissions from natural gas combustion AND glue off gassing.

4.1.4 All baghouse and/or filter systems installed on the vacuum drops at the filter element assembly station

shall be maintained and operated so to meet the minimum performance specifications as shown in the following table:

<b>Control Device ID</b>	<b>Control System</b>		<b>Design Specifications</b>	
	<b>Make</b>	<b>Model</b>	<b>AP (in. of H.O)</b>	<b>Control Eff. (%)</b>
FE1C	United Air Specialties	BDC-23T	1.74 - 1.48	99.99

- 4.1.5 The production rate for the filter pieces shall not exceed 1,200 pieces per hour per line (~~23,400~~600 pieces per hour total for the three lines) and the operating time of each of the Glue Curing Oven shall not exceed 4,160 hours per year (~~8,320~~12,480 hours per year for the ~~two~~three ovens combined).
- 4.1.6 The operating temperature of the Glue Curing Ovens [Emission Unit IDs: FE2SBA & FE2SD FE2SC & FE3SC] shall not exceed 365°F.
- 4.1.7 Consumption of isopropyl alcohol in the bubble tester shall not exceed 1 gallon per day.
- 4.1.8 **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 For the purpose of determining compliance with the opacity limits of 45 C.S.R. 7 §§3.1 and 3.2, the permittee shall conduct opacity monitoring for all emission points and equipment subject to an opacity limit under 45 C.S.R. 7, including, but not limited to, the emission points addressed in Section 4.1. - Limitations and Standards, of this permit. The opacity monitoring shall include visual emission checks for all emission points subject to a particulate matter emission limit contained in this permit.

Monitoring shall be conducted at least once per month with a maximum of forty-five (45) days between consecutive readings. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22, during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval to determine if there is a visible emission.

If visible emissions are identified during the visible emission check, or at any other time regardless

of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45 C.S.R. 7A within three (3) days of the first sign of visible emissions. A 45 C.S.R. 7A evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions.

#### **4.3. Testing Requirements**

*[Reserved]*

#### **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. For the purpose of demonstrating compliance with the monitoring requirements set forth in Section 4.2.1. of this permit, records shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and, if necessary, all corrective actions taken.
- 4.4.5. For the purpose of demonstrating compliance with the operating limits and requirements set forth in Section 4.1. of this permit, the permittee shall maintain monthly records of the natural gas consumption rate of the permitted fuel burning sources.
- 4.4.6. For the purpose of demonstrating compliance with the Glue Curing Ovens requirements in Sections 4.1.5. and 4.1.6. of this permit, the permittee shall maintain monthly records of the filter production rates, hours of operation, and operating temperatures.
- 4.4.7. For the purpose of demonstrating compliance with the limitation of isopropyl alcohol set forth in Section 4.1.7. of this permit, the permittee shall maintain monthly records of the quantity of isopropyl alcohol added to the bubble tester each day.

#### **4.5. Reporting Requirements**

*[Reserved]*

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### 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.

Signature<sup>1</sup> \_\_\_\_\_ Date \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative

Name and Title \_\_\_\_\_ Title \_\_\_\_\_  
(please print or type) Name

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

- <sup>1</sup> 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.