



west virginia department of environmental protection

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MEMORANDUM

To: Beverly D. McKeone
From: John Legg
Date: May 28, 2015

John Legg
5/28/15

Subject: R13-2285C - Class II Administrative Update
Northwest Pipe Company (Northwest)
Parkersburg/Washington, Wood County, WV
Company ID No: 107-00031

Summary

Northwest Pipe Company (Northwest) manufactures, cleans, coats and lines steel pipe used mainly for water conveyance systems in large metropolitan areas

On April 13, 2015, the Company submitted a Class II Administrative Update to existing permit R13-2285B to replace a grit ID (inside diameter) blast system (one of the three pipe cleaning processes located at the facility). According to Northwest, the proposed change will not affect the amount of blasting done at the facility but will allow for more efficient blasting of larger diameter pipe.

On April 16, 2015, the DAQ received the application fee (\$300.00) and the writer was assigned.

On May 4, 2015, the DAQ received the original affidavit of publication for Northwest's April 24, 2015 legal advertisement which appeared in *The Parkersburg News and Sentinel*. **PM and PM10 were estimated in the advertisement to increase less than 2 lb/hr and 5 ton/yr.** See Attachment 2 to this evaluation for Northwest's explanation as to why the proposed equipment change is a Class II administrative Update under WV 45CSR13 (Rule 13).

Upon review of the application, the writer determined that the application was complete as submitted, and the statutory review period commenced on May 4, 2015, the date the original affidavit of publication of the legal advertisement was received. The 45 day review period will end on June 17, 2015.

Process Description

See Attachment 1 to this evaluation for a process description provided by Northwest in their application (Attachment F).

Proposed Changes

Northwest proposes to replace the 2011 “Gardner Blaster” unit in one of the three pipe cleaning processes with a new 2015 Selmers ID blaster system. The new blaster system is vented through 3 cartridge-type filters:

- Two of the filters (Donaldson Torit Models DFO 3-48 and DFO 4-64) vent the abrasive blasting operation itself. The DFO 4-64 about 55%, and the DFO 3-48 cleans about 45% of the air, based on horsepower rates of each.
- A smaller unit (Donaldson Torit Model TDP 675) filters the air vented from the elevator, screw conveyor and air wash equipment that recovers and recycles used blast media.

The new filters have a 99.9% PM removal efficiency. The Selmers ID blaster system has an Emission Unit ID No. of 23 and Control Device Nos. of 23C1, 23C2, and 23C3.

According to the permit application: it should be noted that any steel pipe that has been blasted on this unit, continues on to the Wheelabrator. The Selmers ID blaster activity is directly limited in steel pipe throughput by the Wheelabrator speed, which is much slower than the ID Blaster.

Site Inspection

The writer did not inspect Northwest’s facility for this Class II Administrative Update. The facility was last inspected on October 10, 2012 by John Money Penny. That inspection was a full onsite inspection with an overall result of 30 meaning the site was in compliance.

Assumptions Used in Calculation of PM Emissions

The 2015 Selmers ID blaster can propel about 748 lb/min or 44,900 lb/hr of abrasive blast based on the blaster manufacturer’s information and internal engineering estimates.

Northwest assumed 100 psi, based on maximum air pressure rate.

Facility hours are based on a 16 hr/day, 365 day/yr. Actual blasting hr/day for this unit can

be as little as 2-3 hr/day. To be conservative, Northwest will use the same number of hours of blasting operation from the 2003 permit application which assumed 12 hr/day, or 4,380 hr/yr.

Emissions in the calculations are combining all three (3) air outlets; each dust collector off of the pipe blasting itself, and the duct collector off the air wash separator.

Northwest assumed PM and PM10 to be equal. PM2.5 was assumed to equal 10% of PM/PM10 based on EPA's AP-42, Chapter 13.3.6, Table 13.2.6-1, Particle Emission Factors for Abrasive Blasting.

PM Emission Estimate for 2015 ID Blaster & Dust Control

See Attachment E in the permit application for the emission estimate for the 2015 Selmers ID Blaster & Dust Control.

The writer reviewed Northwest's emission calculations. The calculations seemed to be logical and were performed correctly. An uncontrolled PM emissions rate of 394.9 lb/hr was calculated for the replacement unit. The dust collector manufacturer claimed 99.9% Control Efficiency. To be on the safe side, Northwest used a 99.5% Control Efficiency. Applying the 99.5% Control Efficiency of the filters, the controlled PM/PM10 emission rate was estimated to be 1.97 lb/hr. Controlled Annual PM/PM10 emission rate was calculated to be 4.31 ton/yr based on 4,380 hr/yr of operation. Hourly and annual PM2.5 emission rates were estimated at 10% PM/PM10 emission rates.

Compare File

A compare file is attached to this evaluation detailing the changes made to R13-2285B to arrive at R13-2285C.

Record Keeping Requirements

Abrasive Shot Usage: No Change. The applicant shall maintain certified daily and monthly records of abrasive shot or grit usage. See A.5 under "Specific Requirements" and B.5 under "Other Requirements."

Pressure Drop

Across New Filters: This requirement was omitted from the new permit. No information was provided in the permit application concerning the pressure drops across the new filters. Because of this, the writer decided to remove A.7 under "Specific Requirements."

Instead of maintaining certified daily and monthly records of the pressure drops across the filters, the applicant is to maintain certified records documenting when the three (3) cartridge-type filters are changed out. See A.6 under “Specific Requirements” and B.6 under “Other Requirements.”

Visible Emission
Checks:

New requirement. Visible emission checks to determine the presence of PM emissions from the cartridge filters are to be conducted for the 2015 Selmers ID blaster line’s exhaust stack at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks are to be performed for a sufficient time interval, but no less than one (1) minute per check, to determine if any visible emissions are present. Visible emission checks are to be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present from the 2015 Selmers ID blaster line’s exhaust stack for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at the source (having visible emissions for 3 consecutive monthly checks) using the procedures and requirements of Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

See B.2 under “Other Requirements,” §45-7-3.1 and B.7 under “Other Requirements.”

Attachment 1

Process Description

Northwest Pipe Company

Parkersburg, WV

The following information came from Northwest's permit application, R13-2285C, Attachment C, page 1 through 4.

General Process Overview

The facility manufactures various sizes of steel pipe used mainly for water conveyance systems in large metropolitan areas. Mild steel coils of 3/16 to 3/4 inch thickness are uncoiled, formed, and welded into specified size pipe ranging in size up to 145 inches in diameter.

The pipe is abrasive blasted, then lined and/or coated with a protective paint and/or is wrapped with a special tape and lined with cement mortar. Products are stored onsite then delivered by semi truck.

1. Pipe Manufacturing, Fabrication & Welding

Steel Coil enters the facility via rail way, semi truck, or barge.

The coil is unloaded and either stored or sent into the coil bay for production.

The coil is processed through one of two Byard spiral mills then cut to length. One spiral mill is referred to as "Old Byard" with a Cut-To-Length plasma cutter. These emission source points are 1S.A and 1S.C, respectively. The second spiral mill is referred to as "New Byard" with a Cut-To-Length plasma cutter. These emissions source points are 1S.B and 1S.D, respectively. The welding process used is a double submerged arc weld (DSA W) using weld wire & flux. This process, as well as the cutting, generates only minor fugitive emissions.

The pipe may have additional repair welding or fabrication (emissions source point 1.S.E.) needed before it moves onto the next production process. Repair rack and pick-up welding involves use of mainly E71 (FCAW) weld wire or similar and carbon arc rods to back gouge the welds. We have minor hand grinding on-site in the fabrication area. We could

have at most 3 grinders intermittently operating. This process generates only minor fugitive emissions.

If the spiral welded pipe is to be used as water transmission piping it will be moved into the hydro-test bay for pressurized water testing. Hydro-testing does not generate air emissions of concern.

If pipe may require additional finishing processes such as beveling or expansion of the pipe ends. These finishing processes are mechanical, and do not generate air emissions of concern.

II. Pipe Cleaning Processes:

Pipe enters the coating building where it can be cleaned via ID (Inside Diameter) and/or OD (Outside Diameter) grit blast in one of three methods, as described below. The grit blasting operation is to remove rust and produce a profile on the pipe surface. The spent grit falls to the bottom of the chamber for reuse. Emissions from abrasive blasting operations are controlled with dust collectors.

Wheelabrator OD (Outside Diameter) Shot Blast Cabinet

The Wheelabrator steel grit blast machine is a booth approximately 12 foot by 12 foot by 20 foot with inserts on each end with rubber seals to prevent loss of shot and dust. The Wheelabrator and dust collection system is currently referred to as emission source point 2S and 2C respectively. The dust collector system is a Donaldson Torit. This system was permitted and installed in 1980.

Clemco ID/OD/Hand Blast Booth

The Clemco blast system uses steel grit and can be used by hand or on an automated probe. The booth is approximately 24 foot by 24 foot by 60 foot and fully enclosed. The Clemco and dust collection system is currently referred to as emission source point 3S and 3C respectively. This system was permitted and installed in 1982. The dust collector system is a FARR/Tenkay, and replaced the previous older unit in 2013.

****Selmers ID (Inside Diameter) Blast System (proposed Change)****

The 2015 Selmers ID Blaster will replace the previous ID Blaster. The previous ID Blaster was named the "Gardner Blaster," and was permitted in 2011.

The “Gardner Blaster” replaced the Selmer’s Blaster which was permitted and installed in 2003. The 2015 Selmers ID blaster system is vented through three (3) cartridge-type filters. Two (2) of the filters are cartridge-type filters (Donaldson Torit Models DFO 3-48 and DFO 4-64) that vent the abrasive blasting operation itself. The DFO 4-64 cleans about 55%, and the DFO 3-48 cleans about 45% of the air, based on horsepower rates of each. A third smaller unit (Donaldson Torit Model TDP 675) filters the air vented from the elevator, screw conveyor and air wash equipment that recovers and recycles used blast media. Literature on the Donaldson/Torit DFO units is attached. All the filter makers claim 99.9% removal efficiency for Particulate Matter. The Selmers ID and dust collection system is currently referred to as emission source points 23S and 23C1/23C2/23C3 respectively.

It should be noted, that any steel pipe that has been blasted on this unit, continues on to the Wheelabrator, above. The Selmers ID blaster activity is directly limited in steel pipe throughput by the Wheelabrator speed, which is much slower than the ID Blaster.

III. Coating & Lining Processes:

Blasted and cleaned pipe can be sold bare, or can be cement lined, or can be painted or tape lined or coated.

Cement Mortar ID Lining

Mortar is produced by the mixing of cement, sand, and water in a cement batch plant. No aggregate is used in the mortar making process. Cement mortar is conveyed through an automatic lance where it is centrifugally applied to spinning pipe. The cement batch plant consists of a cement silo (31S), weigh batcher (33S), a paddle mixer (34S), sand stockpile (35S), and haul road emissions (36S). Emissions are controlled with a Eurotech passive dust collector. This system was permitted and installed in 1999.

A direct, gas fired steam generator (Kemco brand) may be used to assist in curing the cement (20S). The unit generates steam into a plastic wrap enclosed pipe, which allows the cement to cure slowly, reducing cracks/breakage of the cement mortar. The Kemco unit is exempt from air permitting, and was installed with the cement batch plant in 1999.

Spray Coating:

Pipe can either be spray coated (outer diameter application) or spray lined (inner diameter application) using automatic or hand-operated airless spray guns. Spray coating applications were permitted in both 1979 & 1982, and the facility primarily used Coal Tar at that time. Spray coating applications were referred to as emissions source point "1S." Over the years, the facility reduced the coal tar material usage, and increased the usage of paints, polyurethane, epoxies, and tape coatings to be safer for employees and more environmentally conscientious. Today, coal tar is no longer used, and to prevent confusion we no longer refer to the emissions source code "1S Coal Tar Coating." The current emission source points for spray coating are 4S through 10S; the specific description of each is as follows:

- 4S Primer Spray gun (mounted OD application)
- 5S Polyken Tape (mounted OD application, immediately downstream of 4S)
- 6S Final Spray Coat Gun (mounted OD application, downstream & in lieu of 4S & 5S)
- 7S Final Hand Spray Gun (mounted or hand-held operated OD application)
- 8S Primer Hand Spray gun (mounted or hand-held operated OD application)
- 9S Back-up sprayer (mounted or hand-held operated OD application)
- 10S ID Sprayer (mounted ID application)

IV. Fuel and petroleum tanks:

To support production and maintenance activities, the facility has a diesel storage tank (1000 gallons), a gasoline storage tank (500 gallons), kerosene storage tank (500 gallons), hydraulic oil tank (500 gallons), and a used oil storage tote (250 gallons). These units' emission source point numbers are 15S-18S, and are exempt from air permitting due to size and throughput.

V. Vehicle Emissions

Emissions are associated with vehicles used on site, both combustion related emissions and roadway emissions (30S). These emissions are considered fugitive.

Last updated 03/2015

Attachment 2

**Class II Administrative Update
Northwest Pipe Company**

Parkersburg, WV

The attached analysis as to why Northwest's replacement of a grit ID (inside diameter) blaster system is a Class II Administrative Update under 45CSR13 instead of a Modification came from Attachment E of Northwest's permit application R13-2285C.



Attachment E Emission Estimate for 2015 Selmers ID Blaster & Dust Control

This equipment replacement project does not constitute a "Modification" as described under 45 CSR13 2.17. Therefore this replacement is considered a Class II Administrative Update. A "Modification" means any physical change in or change in the method of operation of any existing stationary source, which:

Sub-Heading	Regulation	NW Pipe Response
A.	Results in emissions increase of six (6) pounds per hour and ten (10) tons per year or more, or more than 144 pounds per calendar day	Original 2003 permit application for this unit provided: <ul style="list-style-type: none"> • 0.06 #/hr • 0.15 TPY • 0.72 #/calendar day Today's equipment replacement provides the following emissions: <ul style="list-style-type: none"> • 1.97 #/hr (< 6#/hr difference) • 4.31 TPY (< 10 TPY difference) • 23.64 #/calendar day (< 144 #/day difference)
B.	Results in an emissions increase of 2 pounds over hour or 5 tons per year of hazardous air pollutants considered on an aggregated basis	HAP emissions related to this process would be Mn and Ni in the blasted steel, and Mg, Ni, and Cr in the blast media. The blasted steel is typically around 1% Mn, and less than 0.01% Ni. The blast media is <1.2% Mn, <0.2%Ni, and <0.8% Cr. Assuming the PM _{total} emissions are made up of 50% blast media and 50% steel rust/scale dusts, and using the higher % of each HAP listed, we could say the following: <p>Mn</p> <ul style="list-style-type: none"> • 1.97 #/hr x 1.2% = 0.024 Mn #/hr (< 2 #/hr) • 4.31 TPY x 1.2% = 0.052 Mn TPY (< 5 TPY) <p>Ni</p> <ul style="list-style-type: none"> • 1.97 #/hr x 0.2% = 0.004 Ni #/hr (< 2 #/hr) • 4.31 TPY x 0.2% = 0.008 Ni TPY (< 5 TPY) <p>Cr</p> <ul style="list-style-type: none"> • 1.97 #/hr x 0.8% = 0.016 Cr #/hr (< 2 #/hr) • 4.31 TPY x 0.8% = 0.034 Cr TPY (< 5 TPY)
C.	Results in an increase of an air emission listed on Table 45-13A	Not applicable. Listed chemicals are not associated with this process.
D.	Results in an increase in emissions of any pollutant listed in Table 45-13A	Not applicable. Listed chemicals are not associated with this process.
E.	Results in an increase in emissions of any regulated air pollutant increase for which the owner or operator of a source voluntarily chooses to obtain a modification permit pursuant to this rule.	Not applicable.
F.	These do not constitute a modification of a stationary source:	
F.1	Installation or replacement of air pollution equipment provided that such equipment is at least as effective as equipment replaced & no new air pollutant discharge	Replacement equipment is equal in effectiveness as the originally installed equipment (99.5% control efficiency from original equipment, 99.9% CE for replacement equipment)
F.2	Routine maintenance, repair, & replacement	Not applicable
F.3	An increase in hours of operation unless a limitation has been placed	Using same number of blaster calculated hours from the original 2003 permit application
F.4	An increase in throughput or production rate if such increase does not exceed the design capacity of the source unit or increase emissions above the levels provided in this paragraph	Blast media throughput is higher, but does not result in emissions greater than levels provided in subheading A. Furthermore, this process is restricted by, and always has been restricted by, the next Wheelabrator immediately downstream of the process. The Wheelabrator is relatively slow equipment, restricting the pipe throughput of the ID Blaster.
F.5	Use of an alternative fuel or raw material, provided that the source is designated to accommodate such alternative use without increasing emissions	Not applicable
F.6	An emissions reduction for each regulated pollutant from current actual emissions to new potential emissions from any replacement of natural gas compressor engine not previously required to obtain a permit...	Not applicable

A2 - 1

WordPerfect Document Compare Summary

Original document: Q:\AIR_QUALITY\LEGG\Northwest Pipe

Company\R13-2285C\107-00031_PERM_13-2285B.wpd

Revised document: @PFDesktop\MyComputer\Q:\AIR_QUALITY\LEGG\Northwest Pipe

Company\R13-2285C\107-00031_PERM_13-2285C.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 34 Deletions, 39 Insertions, 0 Moves.

Compare file comparing
R13-2285C to R13-2285B



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West Virginia Department of Environmental Protection

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PERMIT TO ~~MODIFY~~ ADMINISTRATIVELY UPDATE A METAL FABRICATION AND COATING PLANT

IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL LAW (W. Va. Code §§22-5-1 et seq.), AND REGULATIONS PROMULGATED THEREUNDER, THE FOLLOWING PERMITTEE IS AUTHORIZED TO CONSTRUCT, SUBJECT TO THE TERMS AND CONDITIONS OF THIS PERMIT, THE SOURCE DESCRIBED BELOW.

This permit will supersede and replace Permit R13-2285~~AB~~.

Name of Permittee: Northwest Pipe Company
 Name of Facility: ~~Northwest Pipe Company~~ Parkersburg, WV Facility
 Permit No.: R13-2285~~B~~C
 Plant ID No.: 107-00031
 Effective Date of Permit: ~~January 3~~ May 29, 2011~~5~~
 Permit Writer: ~~Steven R. Pursley, PE~~ John Legg
 Facility Mailing Address: ~~Route 1, Box 15~~ 183 Northwest Drive
 Washington, ~~West Virginia~~ WV ~~26160~~ 1
 County: Wood
 Nearest City or Town: Washington, West Virginia
 UTM Coordinates: Easting: ~~440.2247~~ 174 km Northing: ~~4345.0333~~ 4344.925 km
 Zone: ~~17~~

Directions to Exact Location: Previous Directions: Traveling south Parkersburg on WV State Route 68, turn right onto WV State Route 892. Proceed on Route 892 for approximately four (4) miles until passing the GE Plastics Washington Facility on your right. Immediately after passing GE Plastics, turn right onto Northwest Ave., follow the access road to the offices.

Latest Directions: From Rt. 50 take DuPont Road; exit left at light 2.1 miles; take right onto Northwest Drive.

Type of Facility or Modification: Class II administrative update to replace the ~~Selmers-blast~~ 2011 "Gardner Blaster" unit with a new ~~ID-unit~~ 2015 Selmers ID blaster system. The new system is vented through 3 cartridge-type filters. Two of the filters (Donaldson Torit Models DFO 3-48 and DFO 4-64) vent the abrasive blasting operation itself. The DFO 4-64 about 55%, and the DFO 3-48 cleans about 45% of the air, based on horsepower rates of each. A smaller unit (Donaldson Torit Model TDP 675) filters the air vented from the elevator, screw conveyor and air wash equipment that recovers and recycles used blast media. All filters have a 99.9% PM removal efficiency. The Selmers ID blaster system has an Emission Unit ID No. of 23 and Control Device Nos. of 23C1, 23C2, and 23C3.

IN ACCORDANCE WITH THE PERMIT APPLICATION AND ITS AMENDMENTS, THIS PERMIT IS LIMITED AS FOLLOWS:

A. SPECIFIC REQUIREMENTS

1. Production of mortar shall not exceed 20.0 cubic yards per hour. Production of mortar shall not exceed 320 cubic yards per day or 116,480 cubic yards per year. Compliance with the production limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of mortar production at any given time for the previous twelve (12) consecutive calendar months.
2. A Eurotech Model ET-0803 passive dust collector, identified in permit application R13-2285 as 1C, shall be installed, maintained, and operated so as to achieve a minimum of 98.9% efficiency in the control of particulate matter emissions from the pneumatic transfer of Portland Cement to the cement silo 1S. The particulate matter emission rate from the dust collector 1C shall not exceed 0.02 pounds per hour.
3. The permittee shall utilize water sprays as often as is necessary in order to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from the sand stockpile, identified in permit application R13-2285 as 6S.

All water sprays shall be designed and maintained so as to minimize the atmospheric entrainment of fugitive particulate matter. The pump delivering the water shall be of sufficient size and capacity so as to be capable of delivering to the spray nozzle(s) an adequate quantity of water, and at a sufficient pressure, so as to assure that the treatment process will minimize the atmospheric entrainment of fugitive particulate emissions. A freeze protection plan to insure the wet suppression system remains operational 8,760 hours a year shall be utilized.

4. The permittee shall apply an environmentally acceptable dust control agent as often as is necessary in order to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from haulroads and other work areas where mobile equipment is used.
5. The maximum amount of shot or grit blasted by the 2015 Selmers ID Blast Line blaster shall not exceed 202444,900 pounds per hour.
6. Emissions from the 2015 Selmers ID Blast Line blaster shall be controlled by two baghouses in series three dust collectors (23C1, 23C2 and 23C3). Total PM emissions from the second baghouse line shall not exceed 01.0497 pounds per hour nor 04.0531 tons per year.

~~7. The pressure drop across baghouses 23C-1 & 2 (models TD 226-2 and DF-T3-~~

R13-2285C
Northwest Pipe Company
Parkersburg, WV Facility

~~12 respectively) shall be maintained between 1 and 6 inches water column each.~~

B. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of 45CSR7, 45CSR13, and 45CSR30, provided that the permittee shall comply with any more stringent requirements as may be set forth under **SPECIFIC REQUIREMENTS**, Section (A) of this permit.
2. The operation of this facility is subject to requirements of 45CSR7. Pertinent sections applying to this operation include, but are not limited to:

§45-7-3.1

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

§45-7-3.2

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.

§45-7-3.7

No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to subsection 5.1 is required to have a full enclosure and be equipped with a particulate matter control device.

§45-7-4.1

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.

§45-7-5.1

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

§45-7-5.2

The owner or operator of a plant shall maintain particulate matter control of the

plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

3. The pertinent sections of 45CSR13 applicable to this facility include, but are not limited to, the following:

§45-13-6.1

At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Director thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or such other tests the Director may specify shall be conducted to determine compliance.

§45-13-10.2

The Director may suspend or revoke a permit if, after six (6) months from the date of issuance, the holder of the permit cannot provide the Director, at the Director's request, with written proof of a good faith effort that construction, modification, or relocation, if applicable, has commenced. Such proof shall be provided not later than thirty (30) days after the Director's request. If construction or modification of a stationary source is discontinued for a period of eighteen (18) months or longer, the Director may suspend or revoke the permit.

§45-13-10.3

The Director may suspend or revoke a permit if the plans and specifications upon which the approval was based or the conditions established in the permit are not adhered to. Upon notice of the Director's intent to suspend, modify or revoke a permit, the permit holder may request a conference with the Director in accordance with the provisions of W.Va Code § 22-5-5 to show cause why the permit should not be suspended, modified or revoked.

4. For the purposes of determining compliance with maximum mortar production limit set forth in **SPECIFIC REQUIREMENTS A.1**, and the water truck usage requirement set forth in **SPECIFIC REQUIREMENTS A.4** the applicant shall maintain certified daily and monthly records. Example forms are included as Attachments A and B. Such records shall be retained by the permittee for at least five (5) years. Certified records shall be made available to the Director or his duly authorized representative upon request.
5. For the purpose of determining compliance with the ~~abrasive blasting limits~~ set forth in **SPECIFIC REQUIREMENTS A.5**, the applicant shall maintain certified daily and monthly records of abrasive shot or grit usage. Such records shall be retained by the permittee for at least ~~five~~three (~~5~~3) years. Certified records shall

be made available to the Director or his duly authorized representative upon request.

6. For the purpose of determining compliance with the PM emission limit ~~limitations~~ set forth in **SPECIFIC REQUIREMENT A.6**, ~~and the operating requirement of SPECIFIC REQUIREMENT A.7~~ the applicant shall maintain certified daily and monthly records of the ~~pressure drops across the filters.~~ records documenting when the 2015 Selmers ID blaster line's three (3) cartridge-type filters were changed out. These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

7. For the purpose of determining compliance with the opacity limit given in SPECIFIC REQUIREMENT B.2 (§45-7-3.1), the permittee shall conduct visible emission checks and/or opacity monitoring, and keep records of these checks for the 2015 Selmers ID blaster line's exhaust stack.

The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted for the 2015 Selmers ID blaster lines's exhaust stack at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed for a sufficient time interval, but no less than one (1) minute per check, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present from the 2015 Selmers ID blaster line's exhaust stack for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at the source (having visible emissions for 3 consecutive monthly checks) using the procedures and requirements of Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

C. GENERAL REQUIREMENTS

1. In accordance with 45CSR30 - "Operating Permit 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 filing a Certified Emissions Statement (CES) and paying the appropriate fee. Such Certified Emissions Statement (CES) shall be filed and the appropriate fee paid annually. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Director or his/her duly authorized representative.

2. 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.
3. The permitted facility shall be constructed and operated in accordance with information filed in Permit Application R13-2285, R13-2285A, R13-2285B and any amendments thereto. The Director may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to.
4. At such reasonable time(s) as the Director may designate, the permittee shall conduct or have conducted test(s) to determine compliance with the emission limitations established in the permit application and/or applicable regulations. Test(s) shall be conducted in such a manner as the Director may specify or approve and shall be filed in a manner acceptable to the Director. The Director, or his/her duly authorized representative, may at his option witness or conduct such test. Should the Director exercise his option to conduct such test(s), the permittee shall provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment, and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices. For any tests to be conducted by the permittee, a test protocol shall be submitted to the DAQ by the permittee at least thirty (30) days prior to the test and shall be approved by the Director. The Director shall be notified at least fifteen (15) days in advance of the actual dates and times during which the test will be conducted.
5. In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations, either in whole or in part, authorized by this permit, the permittee shall notify the Director, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.
6. 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.
7. The permittee shall notify the Director, in writing, within fifteen (15) calendar days of the commencement of the construction, modification, or relocation activities authorized under this permit.

8. The permittee shall notify the Director, in writing, at least fifteen (15) calendar days prior to actual startup of the operations authorized under this permit.
9. This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13.
10. 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.
11. At such time(s) as the Director may designate, the permittee herein shall prepare and submit an emission inventory for the previous calendar 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 Director may, based upon the type and quantity of the pollutants emitted, establish a submittal frequency other than on an annual basis.

ISSUED BY: _____

~~JOHN A~~WILLIAM F. BENEDICT~~DURHAM~~, DIRECTOR
WV DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

DATE SIGNED: _____