Division of Air Quality
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West Virginia Department of Environmental Protection

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

PERMIT TO 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 R13-2285B.

Name of Permittee:	Northwest Pipe Company
Name of Facility:	Parkersburg, WV Facility
Permit No.:	R13-2285C
Plant ID No.:	107-00031
Effective Date of Permit:	May 29, 2015
Permit Writer:	John Legg
Facility Mailing Address:	183 Northwest Drive Washington, WV 26181
County:	Wood
Nearest City or Town:	Washington, West Virginia
UTM Coordinates:	Easting: 440.174 km Northing: 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 2011 "Gardner Blaster" unit with a new 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.

THE SOURCE IS NOT SUBJECT TO 45CSR30.

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 blaster shall not exceed 44,900 pounds per hour.

6. Emissions from the 2015 Selmers ID blaster line shall be controlled by three dust collectors (23C1, 23C2 and 23C3). Total PM emissions from the line shall not exceed 1.97 pounds per hour nor 4.31 tons per year.

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 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 three (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 limitations set forth in **SPECIFIC REQUIREMENT A.6**, the applicant shall maintain certified 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: _____

WILLIAM F. DURHAM, DIRECTOR
WV DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

DATE SIGNED: 5-29-2015