

10/14/15

FILE INDEX

Applicant : TRAMCO Services, Inc.
Facility : Williamson, Mingo County, WV

Plant ID No.: 059-00117 **Region:** 05
R13-3253

Chronological Order - Add Index Pages As Necessary

Date	To	From	Subject
10/9/15	File	John Legg	Information table and DAQ legal ad
9/28/15	Teresa Schuller	John Legg	Emails. Related to incorporating company comments.
9/25/15	File	John Legg	Draft Permit.
9/25/15	File	John Legg	Engineering Evaluation.
9/25/15	File	John Legg	Document Tracking Manifest, Airtrak Information Sheet; and Airtrak Days Open Report.
9/22/15	Teresa Schuller	John Legg	Email thanking Teresa for paint filter info and instructing her to mark up draft permit.
9/21/15	John Legg	Teresa Schuller	Emails. Information on paint booth filters attached. Teresa to have comments on draft permit to me by 9/25/15.
9/18&3&2/15 7/6/15	Teresa Schuller	John legg	Email question about source of Burnout Oven emission factors.
9/14/15	File	Internet	Technical Data Sheet for varnish BC-346-A.
9/11&14/15	Teresa Schuller	John Legg	Email with attached revised draft permit. Teresa will need addition time to review.
9/8&9/15	Teresa Schuller	John Legg	Email with attached draft permit and questions about paint booth filters and emission points.
6/23/15	DAQ	Teresa Schuller	Letter of Transmittal and Affidavit of Publication for company's legal ad.
6/2/15	File	Sandy Adkins	Email Application Status Letter, Airtraks - Permit/Application Information Sheet and Incomplete Application Checklist.
5/19/15	Assistant Director of Permitting	Teresa A. Schuller	Cover Letter; Construction permit application and application on electronic disk.

John Legg
FR - 9/28/15

10/14/15

10/9/15

Permit Writer	John Legg
Email Address	John.c.legg@wv.gov
Company Name	TRAMCO Services, Inc.
Company ID	059-00117
Facility Name	Williamson
Permit Number	R13-3253
County	Mingo
Newspaper	Charleston Gazette
Company Contact & Email	Scott Sheppard shep@solutionk.com
Consultant Email Address	Teresa Schuller Teresa.Schuller@meadhunt.com
Regional Office (if applicable)	None

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10/9/15

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On May 26, 2015, Tramco Services, Inc. (Tramco) applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to construction an electric motor build and re-build facility located PO Box 770, Williamson, Mingo County, WV at latitude 37.71098N and longitude -82.25683W. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-3253.

The following potential emissions will be authorized by this permit action: Particulate Matter less than 10 microns, 2 tons per year (TPY); Particulate Matter, 4 TPY; Sulfur Dioxide, 1 TPY; Oxides of Nitrogen, 5 TPY; Carbon Monoxide, 2 TPY; Volatile Organic Compounds, 11 TPY; Tetrachloroethylene, 8.3 TPY; Xylene, 0.4 TPY; Ethylbenzene, 0.1 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on MM/DD/YYYY. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed construction will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

John Legg
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1257
FAX: 304/926-0478

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Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx

Legg, John C

9/28, 25/15

From: Legg, John C
Sent: Monday, September 28, 2015 9:55 AM
To: 'Teresa Schuller'
Cc: McKeone, Beverly D
Subject: FW: Draft Permit Revisions - Tramco (059-00117)
Attachments: 049-00033_PERM_13-3162.pdf

Teresa,

I forgot to change the mailing address to Kanawha Electric's address: 141 Campbells Creek Drive, Charleston, WV 25306.

The attached permit has been changed.

If you have any comments, now is the time to offer them.

I plan to submit this permit to go to DAQ legal notice on Tuesday, 9/29/15.

John

From: Legg, John C
Sent: Friday, September 25, 2015 4:44 PM
To: 'Teresa Schuller'
Cc: McKeone, Beverly D
Subject: Draft Permit Revisions - Tramco (059-00117)

Id. No. 059-00117 Reg. R13-3253
 Company Tramco
 Facility Williamson Region 5
 Initials JL Legg

Teresa,

I made most of the changes to the draft permit we discussed today over the phone.

You now should be able to read the column heading on the example opacity log in Appendix A to the permit.

Although I agreed to change 7.4.3., upon reviewing the change, I realized that Bev has always in the past not allowed me to make the changes I agreed to with you, i.e., the hourly VOC limit can be calculated as a daily average hourly limit but the averaging period cannot be extended beyond one day. I will allow TRAMCO to calculate the 12-month rolling VOC emission rate for the facility on a monthly bases instead of a daily bases. I am sorry to have to default on my verbal agreement. I have copy Bev on this email in case she would like to comment on not allowing section 7.4.3. to change.

If you see mistakes in the draft, please by all means point them out so I can fix them.

If I don't hear from you, I plan to submit the draft permit to Bev on Monday (9/28/15) for approved to go to DAQ legal notice. The final permit can not be issued until a 30-day public comment period has passed from when the legal ad appeared in the newspaper.

Although the record keeping requirements associated with section 7.4.3 may looks overwhelming at first, with the use of a spreadsheet, it will only take a minute or two each day to enter the amount of VOC-containing materials used each day and the number of hours per day the materials were used. This is pretty much required of all companies in similar businesses, and after a short adjustment period, they eventually adjust to doing it.

Good working with you,

9/25/15

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name TRAMCO Services, Inc. (Company ID:059-00117)

Permitting Action Number R13-3253 Total Days _____ DAQ Days _____

Permitting Action:

- | | | |
|--|---|--------------------------------------|
| <input type="radio"/> Permit Determination | <input type="radio"/> Temporary | <input type="radio"/> Modification |
| <input type="radio"/> General Permit (Class I) | <input type="radio"/> Relocation | <input type="radio"/> PSD (Rule 14) |
| <input type="radio"/> Administrative Update | <input checked="" type="radio"/> Construction | <input type="radio"/> NNSR (Rule 19) |

Documents Attached:

- | | |
|---|--|
| <input checked="" type="radio"/> Engineering Evaluation/Memo | <input type="radio"/> Completed Database Sheet |
| <input type="radio"/> Draft Permit | <input type="radio"/> Withdrawal |
| <input type="radio"/> Notice | <input type="radio"/> Letter |
| <input type="radio"/> Denial | <input type="radio"/> Other (specify) |
| <input checked="" type="radio"/> Final Permit/General Permit Registration | |

Id. No. 059-00117 Reg. R13-3253
 Company Tramco
 Facility Williamson Region 5
 Initials J.L. Legg

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Date	From	To	Action Requested
09/25/15	John Legg	Bev McKeone	Okay to go to DAQ Legal Notice!
<i>10/9</i>	<i>Bev</i>	<i>John</i>	<i>See Comments - Address Go to Notice</i>

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).

9/25/15



Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	TRAMCO Services, Inc.		Facility:	Williamson	
Region:	5	Plant ID:	059-00117	Application #:	13-3253
Engineer:	Legg, John		Category:		
Physical Address:			SIC: [3621] ELECTRONIC & OTHER ELECTRICAL EQUIPMENT & COMPONENTS - MOTORS AND GENERATORS NAICS: [335312] Motor and Generator Manufacturing		
County:	Mingo				
Other Parties:	VICE PRES - Sheppard, Scott 304-235-5370 Consultant - Schuller, Teresa 681-313-4617				

- Information Needed for Database and AIRS**
1. Need valid physical West Virginia address with zip
 2. Air Program
 3. Inspection result
 4. Pollutant and class

Regulated Pollutants

CO	Carbon Monoxide	1.430 TPY
PM10	Particulate Matter < 10 um	0.410 TPY
VOC	Volatile Organic Compounds (Reactive organic gases)	11.000 TPY
NOX	Nitrogen Oxides (including NO, NO2, NO3, N2O3, N2O4, and N2O5)	4.740 TPY

Summary from this Permit 13-3253

Air Programs	Applicable Regulations
	06 07 13 22 34 63 ZZZZ
Fee Program	Application Type
9M	CONSTRUCTION
Fee	Fee
\$1,000.00	

Notes from Database

Permit Note: Electric Motor Build and Re-build Shop consisting of: 1) Four (4) Ovens: Two (2) Burnout Ovens (One Electric; One Natural Gas); and Two (2) Bake Ovens (Both Electric). 2) Two (2) Paint Booth (#1 and #2). 3) One (1) Vacuum Pressure Impregnation (VPI) Tank. 4) One (1) Varnish Dip Tank. and 5) One (1) Emergency Generator (#1)[Emergency Generator (#2) is not operated.]

Activity Dates

APPLICANT PUBLISHED LEGAL AD	05/22/2015
APPLICATION RECEIVED	05/26/2015
ASSIGNED DATE	06/02/2015
APPLICATION FEE PAID	06/23/2015
APPLICATION DEEMED COMPLETE	09/25/2015

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Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 059-00117
 Company: TRAMCO Services, Inc.
 Printed: 09/22/2015
 Engineer: Legg, John

9/25/15

Action	Date	Days	Open	OAQ Status
APPLICANT PUBLISHED LEGAL AD	05/22/2015	----	----	----Entry ignored
APPLICATION RECIEVED	05/26/2015	0	0	0 Open on Co Time
ASSIGNED DATE	06/02/2015	----	----	----Entry ignored
APPLICATION FEE PAID	06/23/2015	----	----	----Entry ignored
APPLICATION DEEMED COMPLETE	09/25/2015	122	122	0 Open on OAQ time
Corrected to :	09/22/2015	0	119	-2 Open on OAQ time
Final Values	09/22/2015	0	119	-2 Open on OAQ time

9/22/15

Legg, John C

From: Legg, John C
Sent: Tuesday, September 22, 2015 11:02 AM
To: 'Teresa Schuller'
Cc: McKeone, Beverly D
Subject: RE: Engineering Evaluation and Draft Permit for R13-3253 - Tramco Services, Inc. (059-00117)

Id. No. 059-00117 Reg. R13-3253
Company Tramco
Facility Williamson Region 5
Initials J.C. Legg

Teresa,

Thank you for the paint booth filter information.

The regulated pollutant for the generator is VOC, not TOC, i.e., DAQ can't permit for TOC. I think VOC can be calculated from TOC (by taking out methane emissions?).

Also, the latest draft permit that was sent, corrected the generator source ID to 3S (from 4S).

Please in an effort to save time: mark up the **latest** draft permit as you/Tramco would like the permit to read and send the marked up draft back to me electronically.

This way I don't have to guess at what it is that Tramco wants: It will already be specified exactly as what they want. That being said, I cannot guarantee that suggested changes will make it to the final permit.

Please change the mis-information in the draft concerning generator #2 (being broken, etc.) to exactly as you want in the final permit.

It would be great to have the design capacities for some of the equipment, i.e., for example the dip tank can accommodate 5,000 lbs of metal at one time or that it holds 150 gallons of varnish, etc. That being said, if Tramco can't come up with the info by Friday, please let us move ahead with the permit and this information can be put in the next time the permit is modified/updated.

Also, please read and mark up the evaluation if you have comments. VOC was not advertised in Tramco's legal advertisement. So I had to assume that HAP emissions were VOC and HAP emissions. Also in the application, ethylbenzene (I think) emissions in the varnish were calculated at 50% by weight when in reality they should have been calculated at only 5% by weight. I granted the 11 ton/yr of HAP/VOC emission, but they increase actual emissions by a factor of 6 or more.

I look forward to you comment, and in finishing Tramco's permit!

John

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From: Teresa Schuller [<mailto:Teresa.Schuller@meadhunt.com>]
Sent: Monday, September 21, 2015 3:52 PM
To: Legg, John C
Subject: RE: Engineering Evaluation and Draft Permit for R13-3253 - Tramco Services, Inc. (059-00117)

Hi John –

I am in the process of reviewing it now. Couple of little items – Generator source ID is 3S, not 4S; generator #2 is out-of-service and not broken (it can replace generator 1 if it breaks down – both not used together); and section 5.1.3 – we calculated TOC not VOCs for the generator. I'll be talking with Tramco in the next day or

9/21/15

Legg, John C

From: → Teresa Schuller <Teresa.Schuller@meadhunt.com>
Sent: → Monday, September 21, 2015 3:52 PM
To: Legg, John C
Subject: RE: Engineering Evaluation and Draft Permit for R13-3253 - Tramco Services, Inc. (059-00117)
Attachments: paint booth filters.pdf

Hi John –

I am in the process of reviewing it now. Couple of little items – Generator source ID is 3S, not 4S; generator #2 is out-of-service and not broken (it can replace generator 1 if it breaks down – both not used together); and section 5.1.3 – we calculated TOC not VOCs for the generator. I'll be talking with Tramco in the next day or two to resolve design capacity questions. Paint booths are equipped with filters (MSDSs attached) to minimize particulates go to the exterior building vents. That's as far as I've gotten today with other project interruptions.

I'll have final comments to you by the end of this week. Thanks..

Teresa A. Schuller | Sr. Environmental Project Manager | Associate
 Mead & Hunt | M & H Architecture, Inc | 400 Tracy Way, Suite 200 | Charleston, West Virginia 25311
Direct: 681-313-4617 | Mobile: 304-415-9184 | Fax: 304-345-6714
teresa.schuller@meadhunt.com | www.meadhunt.com

From: Legg, John C [<mailto:John.C.Legg@wv.gov>] ←
Sent: Monday, September 21, 2015 3:42 PM ←
To: Teresa Schuller <Teresa.Schuller@meadhunt.com>
Subject: Engineering Evaluation and Draft Permit for R13-3253 - Tramco Services, Inc. (059-00117)

Teresa,

The attached engineering evaluation will be posted on the DAQ's website by county (Mingo) for the public to view:

<http://www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx>

If you have any comments, now is the time to make them before the evaluation posts to the website.

I again made sight changes to the draft permit and have attached the draft permit for your comment.

If I do not hear from you during this week (ending 9/25/15), I will submit the draft permit to Bev to ask for permission to go to DAQ legal notice. After a 30-day public comment period beginning on the day the legal ad runs, the permit can be signed by the director.

The company can comment on the draft permit while it is at DAQ legal notice, but it would be easier to comment on it this week, before the ad runs.

It was good working with you.

John Legg
 Permit Writer
 Division of Air Quality
 601 57th Street, SE

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Id. No. 059-00117 Reg. R13-3253
 Company Tramco
 Facility Williamson Region 5
 Initials JC Legg



FILTERSOURCE

Inc.

101 W. High St. • Kingwood, West Virginia 26537 • (304) 329-1100 Phone • (304) 329-0283 Fax

Fax Transmittal Sheet

To: Theresa Schuler
RPM (Kanawha Electric)

Fax No.
304-345-6714

From: Steve

Date:
4/03/2009

Per our phone conversation, I am attaching three (3) MSDS sheets on the paint booth filters for Kanawha Electric. These are copies of the sheets I faxed to Scott at Kanawha Electric today.

1. Superior Fibers MSDS on the Fiberglass Pads.
2. Columbus Industries MSDS on the intake ring panels.
3. Columbus Industries MSDS on the intake ring panels.

There are two separate MSDS sheets on the ring panels, because there are two layers of media making up that filter.

Hopefully this will give you all the information you need.

FILTRATION PRODUCTS



SUPERIOR FIBERS, L.L.C.

**US Department of Labor
Occupational Safety and Health Administration
This MSDS Complies with 29 CFR 1910.1200
(THE HAZARDOUS COMMUNICATION STANDARD)**

Form: SFI-0001

Page 1 of 3

IDENTIFY (AS USED ON LABELS AND LISTS):

Glass Fiber Air Filtration Media (Paint Stop)

SECTION I

MANUFACTURER'S NAME: Superior Fibers, LLC
ADDRESS: 499 North Broad Street
Bremen, Ohio 43107-0089

REVISED: 30 March 2009
SUPERSEDES: All Others

TELEPHONE NUMBER FOR INFORMATION: (740) 569-4175

EMERGENCY TELEPHONE NUMBER: (740) 569-4175

SECTION II — HAZARDOUS INGREDIENTS / IDENTITY INFORMATION

HAZARDOUS COMPONENTS (SPECIFIC CHEMICAL IDENTITY, COMMON NAME (S)):

	OSHA PEL	ACGIH TLV	Other Limits Recommended
Glass Fibers (Nuisance particles, Non-Respirable)	10 mg/m	10 mg/m	N/A
Cured Urea Formaldehyde Resin	None Est.	None Est.	N/A
Polybutene Emulsion	None Est.	None Est.	N/A

N.L. = Not Listed N.A. = Not Available N/A = Not Applicable

SECTION III — PHYSICAL / CHEMICAL CHARACTERISTICS

BOILING POINT: N/A **SPECIFIC GRAVITY (H₂O=1):** N/A

VAPOR PRESSURE: N/A **MELTING POINT:** N/A

VAPOR DENSITY: N/A **EVAPORATION RATE (BUTYL ACETATE=1):** N/A

SOLUBILITY IN WATER: Insoluble

APPEARANCE AND ODOR: Free-form, lofted glass fibers, many colors, no odor.

SECTION IV — FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (METHOD USED): Open Cup **FLAMMABLE LIMITS:** N/A **Deg. F.:** 380+ **LEL:** N/A **UEL:** N/A

EXTINGUISHING MEDIA: Water fog – CO₂ Dry chemical – Multipurpose foam.

SPECIAL FIRE FIGHTING PROCEDURES: Wear full protective clothing and self-contained breathing apparatus. Material is self extinguishing in bulk roll form. Basfo media carries a Class 2 fire rating listing by Underwriters Laboratories, Inc.

UNUSUAL FIRE FIGHTING HAZARDS: If present – Triaryl Phosphate, when exposed to open flame, will emit toxic acid vapors that are formed from Phosphorous Oxide.

SECTION V — REACTIVITY DATA

STABILITY: Unstable Conditions to Avoid: None
Stable

INCOMPATIBILITY (MATERIALS TO AVOID): None

HAZARDOUS DECOMPOSITION OR BYPRODUCTS: Will not occur

HAZARDOUS May Occur Conditions to Avoid: None
POLYMERIZATION May Not Occur

SECTION VI — HEALTH HAZARD DATA

ROUTE(S) OF ENTRY: INHALATION? No SKIN? Yes INGESTION? No EYES? Yes
HEALTH HAZARDS (ACUTE AND CHRONIC):

Skin Contact: May produce allergic reaction in sensitive individuals. No long term effects have been identified.

Eye Contact: Avoid by use of protective equipment. Seek medical treatment if irritation persists.

Inhalation: None

Ingestion: None

CARCINOGENICITY: NTP? No IARC MONOGRAMS? No OSHA REGULATED? No
SIGNS AND SYMPTOMS OF EXPOSURE:

Skin: Redness and/or rash in sensitive individuals.

Eyes: Irritation and/or burning sensations.

Inhalation: None

Ingestion: None

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE:
None known. Sensitive individuals will experience increased discomfort with repeated unprotected exposure.
EMERGENCY AND FIRST AID TREATMENT:

Skin: Wash exposed areas with soap and water after exposure. Wash before all meals.

Eyes: Flush eyes repeatedly with large quantities of water. Seek medical help if irritation persists.

Inhalation: None

Ingestion: None

Notes

SECTION VII — PRECAUTIONS FOR SAFE HANDLING AND USE

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: None required. Solid non-toxic material.

WASTE DISPOSAL METHOD: Clean material can be disposed of in approved landfills according to local, state, and federal regulations. Disposal of contaminated (spent) media will be governed by the particulate that has been captured by the filter. Check all local, state and federal regulations pertaining to the contaminate.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: No special handling required.

OTHER PRECAUTIONS: Wear protective clothing, gloves and eye protection.

SECTION VIII — CONTROL MEASURES

RESPIRATORY PROTECTION (SPECIFY TYPE): Wear a dust mask to filter inhalation if cutting, sanding, or grinding products that contain glass fibers.

VENTILATION LOCAL EXHAUST: Yes
SPECIAL: N/A

MECHANICAL (GENERAL): Yes
OTHER: N/A

PROTECTIVE CLOTHING OR EQUIPMENT:

Gloves: Mandatory impervious gloves

Eye Protection: Yes, avoid any eye contact— Side shields on all eyeglasses, recommended.

Other Protective Clothing or Equipment: None required. Barrier creams can be of help to ultra sensitive individuals. Recommend long sleeve, loose fitting, shirts be worn by sensitive individuals. It is recommended to wash work clothing separate from other laundry. Rinse washer at the end of a cycle.

WORK / HYGIENIC PRACTICES:

Follow normal work / hygienic practices. Avoid using compressed air for work area clean-up. Recommend using wet sweep or filtered vacuum.

The information contained herein is believed to be true and accurate, but is not warranted to be, whether originating with the company or not. Customers are advised to confirm that the information is current, applicable and suitable to their circumstances.

Performance Engineered Air Filter Products



**Columbus
Industries, Inc.**

Material Safety Data Sheet

THIS MSDS COMPLIES WITH 29 CFR 1910.1200 (THE HAZARD COMMUNICATION STANDARD)

**PRODUCT IDENTITY (AS USED ON LABELS): POLYESTER FILTER MEDIA
(Low Melt Binder)**

SECTION I -- COMPANY IDENTIFICATION

Manufacturer's Name: Columbus Industries, Inc.
Address: 2938 State Route 752
Ashville, Ohio 43103

Revised: September 7, 2004

Supersedes: March 8, 2004

Telephone Number for Information: (740) 983-2552 MSDS Coordinator: Ext. #5265

Emergency Telephone Number: (740) 983-2552

SECTION II -- HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Hazardous Components (Specific Chemical Identity, Common Name(s))

Other Limits %

CAS No. OSHA PEL ACGIH TLV Recommended (optional)

No toxic chemical(s) subject to the reporting requirements of SARA TITLE III, Section 313 of Title and of 40 CFR 372 is present.

This product material is polyester staple fibers. The binder is Polyester-based.

SECTION III -- PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point:	N/A	Specific Gravity (H ₂ O = 1)	> 1
Vapor Pressure (mm Hg):	N/A	Melting Point:	N/A
Vapor Density (Air = 1):	N/A	Evaporation Rate (Butyl Acetate = 1)	N/A

Solubility in Water: N/A

Appearance and Odor: High loft Non-Woven material. No distinct or noticeable odor.



SECTION IV -- FIRE AND EXPLOSION HAZARD DATA

Flash Point (Method Used) : N/A	Flammable Limits:	LEL N/A	UEL N/A
------------------------------------	-------------------	------------	------------

Special Fire Fighting Procedures: Use Self-Contained Breathing Apparatus (SCBA)

Unusual Fire Fighting Hazards:

Not considered an explosive hazard. Combustion products similar to this organic material produce mainly carbon dioxide, water and carbon monoxide.

SECTION V -- REACTIVITY DATA

Stability:	Unstable		Conditions to Avoid: Direct contact to flames
	Stable	X	

Incompatibility (Materials to Avoid): Hydrochloric Acid.

Hazardous Polymerization	May Occur	Conditions to Avoid: N/A
	Will not Occur X	

SECTION VI -- HEALTH HAZARD DATA

Health Hazards (Acute and Chronic) :
 Skin Contact: N/A
 Eye Contact: N/A
 Inhalation: N/A

Carcinogenicity: NONE	NTP?	IARC Monographs?	OSHA Regulated?
-----------------------	------	------------------	-----------------

Performance Engineered Air Filter Products



Signs and Symptoms of Exposure:

Non -- toxic
This product is not listed by OSHA, NTP, or IARC as a carcinogen.

Medical Conditions Generally Aggravated by Exposure: None

Emergency First Aid Treatment:

Eyes: None
Skin: None
Inhalation: None
Ingestion: None

SECTION VII -- PRECAUTIONS FOR SAFE HANDLING AND USE:

Steps to be taken in Case Material is Released or Spilled:

No special precautions required.

Waste Disposal Method:

May be disposed of in an approved incinerator or landfill in compliance with
Local, State and Federal regulations.

Precaution to be Taken in Handling and Storing:

No special precautions required.

Other Safety Precautions to consider: None

Performance Engineered Air Filter Products



**Columbus
Industries, Inc.**

SECTION VIII -- CONTROL MEASURES

Respiratory Protection (Specify Type): None

Ventilation:	Local Exhaust: N/A	Special: N/A
	Mechanical (General) N/A	Other: N/A

Protective Gloves: None

Eye Protection: N/A

Other Protective Clothing or Equipment:

None

Work/Hygienic Practices:

None

SECTION IX -- MISCELLANEOUS INFORMATION:

Precautionary Statements:

Product is not biodegradable.
Product is combustible.

SECTION X -- TRANSPORTATION REQUIREMENTS:

D. O. T. Proper Shipping Name (49 CFR 172.101): None

D. O. T. Hazard Classification (49 CFR 172): None

D. O. T. Labels Required: None

Hazardous Waste: Non-Hazardous.

**THE INFORMATION CONTAINED HEREIN IS BELIEVED TO BE TRUE AND ACCURATE
BUT IS NOT WARRANTED TO BE WHETHER ORIGINATING WITH THE COMPANY OR
NOT. CUSTOMERS ARE ADVISED TO CONFIRM THAT INFORMATION IS CURRENT,
APPLICABLE AND SUITABLE TO THEIR CIRCUMSTANCES.**

Performance Engineered Air Filter Products



**Columbus
Industries, Inc.**

Material Safety Data Sheet

THIS MSDS COMPLIES WITH 29 CFR 1910.1200 (THE HAZARD COMMUNICATION STANDARD)

PRODUCT IDENTITY (AS USED ON LABELS): POLYESTER FILTER MEDIA (PVC/EVCL Binder)

SECTION I -- COMPANY IDENTIFICATION

Manufacturer's Name: Columbus Industries, Inc.
Address: 2939 State Route 752
Ashville, Ohio 43103

Revised: November 12, 2008

Supersedes: September 7, 2004

Telephone Number for Information: (740) 983-2552 MSDS Coordinator: Ext. #5267

Emergency Telephone Number: (740) 983-2552

SECTION II -- HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Hazardous Components (Specific Chemical Identity, Common Names (s))

Other Limits %

CAS No. OSHA PEL ACGIH TLV Recommended (optional)

No toxic chemical(s) subject to the reporting requirements of SARA TITLE III, Section 313 of Title and of 40 CFR 372 is present.

This product material is polyester staple fibers. The binder is PVC or EVCL-based.

SECTION III -- PHYSICAL/CHEMICAL CHARACTERISTICS

Bolling Point:	N/A	Specific Gravity (H ₂ O = 1)	<1
Vapor Pressure (mm Hg):	N/A	Melting Point:	N/A
Vapor Density (Air = 1):	N/A	Evaporation Rate (Butyl Acetate = 1)	N/A

Solubility in Water: N/A

Appearance and Odor: High loft Non-Woven material. No distinct or noticeable odor.

Performance Engineered Air Filter Products



**Columbus
Industries, Inc.**

SECTION IV -- FIRE AND EXPLOSION HAZARD DATA

Flash Point (Method Used): N/A	Flammable Limits:	LEL N/A	UEL N/A
-----------------------------------	----------------------	------------	------------

Special Fire Fighting Procedures: Use Self-Contained Breathing Apparatus (SCBA)

Unusual Fire Fighting Hazards:

Not considered an explosive hazard. Combustion products similar to this organic material produce mainly carbon dioxide, water and carbon monoxide, HCL, Phosgene at low oxygen levels, acetic acid..

SECTION V -- REACTIVITY DATA

Stability:	Unstable		Conditions to Avoid: Direct contact to flames
	Stable	X	

Incompatibility (Materials to Avoid): None

Hazardous Polymerization	May Occur	Conditions to Avoid: N/A
	Will not Occur X	

SECTION VI -- HEALTH HAZARD DATA

Health Hazards (Acute and Chronic) : Skin Contact: N/A
 Eye Contact: N/A
 Inhalation: N/A

Carcinogenicity: NONE	NTP?	IARC Monographs?	OSHA Regulated?
-----------------------	------	------------------	-----------------

Performance Engineered Air Filter Products

Columbus Industries, Inc.

Signs and Symptoms of Exposure:

Non-toxic
This product is not listed by OSHA, NTP, or IARC as a carcinogen.

Medical Conditions Generally Aggravated by Exposure: None

Emergency First Aid Treatment:

Eyes: None
Skin: None
Inhalation: None
Ingestion: None

SECTION VII -- PRECAUTIONS FOR SAFE HANDLING AND USE:

Steps to be taken in Case Material is Released or Spilled:

No special precautions required.

Waste Disposal Method:

May be disposed of in an approved incinerator or landfill in compliance with Local, State and Federal regulations.

Precaution to be Taken in Handling and Storing:

No special precautions required.

Other Safety Precautions to consider: None

Performance Engineered Air Filter Products



**Columbus
Industries, Inc.**

SECTION VIII -- CONTROL MEASURES

Respiratory Protection (Specify Type): None

Ventilation:	Local Exhaust: <u>N/A</u>	Special: <u>N/A</u>
	Mechanical (General) <u>N/A</u>	Other: <u>N/A</u>
Protective Gloves: <u>None</u>	Eye Protection: <u>N/A</u>	

Other Protective Clothing or Equipment:

None

Work/hygienic Practices:

None

SECTION IX -- MISCELLANEOUS INFORMATION:

Precautionary Statements:

Product is not biodegradable.
Product is combustible.

SECTION X -- TRANSPORTATION REQUIREMENTS:

D. O. T. Proper Shipping Name (49 CFR 172.101): None

D. O. T. Hazard Classification (49 CFR 172): None

D. O. T. Labels Required: None

Hazardous Waste: Non-Hazardous.

THE INFORMATION CONTAINED HEREIN IS BELIEVED TO BE TRUE AND ACCURATE BUT IS NOT WARRANTED TO BE WHETHER ORIGINATING WITH THE COMPANY OR NOT. CUSTOMERS ARE ADVISED TO CONFIRM THAT INFORMATION IS CURRENT, APPLICABLE AND SUITABLE TO THEIR CIRCUMSTANCES.

Legg, John C

From: Teresa Schuller <Teresa.Schuller@meadhunt.com>
Sent: Monday, September 21, 2015 3:52 PM
To: Legg, John C
Subject: RE: Engineering Evaluation and Draft Permit for R13-3253 - Tramco Services, Inc. (059-00117)
Attachments: paint booth filters.pdf

Hi John –

I am in the process of reviewing it now. Couple of little items – Generator source ID is 3S, not 4S; generator #2 is out-of-service and not broken (it can replace generator 1 if it breaks down – both not used together); and section 5.1.3 – we calculated TOC not VOCs for the generator. I'll be talking with Tramco in the next day or two to resolve design capacity questions. Paint booths are equipped with filters (MSDSs attached) to minimize particulates go to the exterior building vents. That's as far as I've gotten today with other project interruptions.

I'll have final comments to you by the end of this week. Thanks..

Teresa A. Schuller | Sr. Environmental Project Manager | Associate
Mead & Hunt | M & H Architecture, Inc | 400 Tracy Way, Suite 200 | Charleston, West Virginia 25311
Direct: 681-313-4617 | Mobile: 304-415-9184 | Fax: 304-345-6714
teresa.schuller@meadhunt.com | www.meadhunt.com

From: Legg, John C [<mailto:John.C.Legg@wv.gov>]
Sent: Monday, September 21, 2015 3:42 PM
To: Teresa Schuller <Teresa.Schuller@meadhunt.com>
Subject: Engineering Evaluation and Draft Permit for R13-3253 - Tramco Services, Inc. (059-00117)

Teresa,

The attached engineering evaluation will be posted on the DAQ's website by county (Mingo) for the public to view:

<http://www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx>

If you have any comments, now is the time to make them before the evaluation posts to the website.

I again made sight changes to the draft permit and have attached the draft permit for your comment.

If I do not hear from you during this week (ending 9/25/15), I will submit the draft permit to Bev to ask for permission to go to DAQ legal notice. After a 30-day public comment period beginning on the day the legal ad runs, the permit can be signed by the director.

The company can comment on the draft permit while it is at DAQ legal notice, but it would be easier to comment on it this week, before the ad runs.

It was good working with you.

John Legg
Permit Writer
Division of Air Quality
601 57th Street, SE

 14

Charleston, WV 25304
(304) 926-0499 ext. 1257
John.c.legg@wv.gov

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9/18/15 9/3/15 9/2/15 7/16/15

Legg, John C

From: Teresa Schuller <Teresa.Schuller@meadhunt.com>
Sent: Friday, September 18, 2015 12:32 PM
To: Legg, John C
Subject: RE: What is the source of the Emission Factors used to calculate emissions for the PCP Burnout Oven (E03)?

Hi John –

I did misread your question. Lacking any unit specific-emission data for burn-off/bake off ovens, I defaulted to the emission rates provided by Ed Andrews during the 2009 Kanawha Electric air permit application for similar units. The values used are ones he used in verifying our calculations. Hope this addresses the question. Thanks.

Teresa A. Schuller | Sr. Environmental Project Manager | Associate
Mead & Hunt | M & H Architecture, Inc | 400 Tracy Way, Suite 200 | Charleston, West Virginia 25311
Direct: 681-313-4617 | Mobile: 304-415-9184 | Fax: 304-345-6714
teresa.schuller@meadhunt.com | www.meadhunt.com

From: Legg, John C [<mailto:John.C.Legg@wv.gov>]
Sent: Friday, September 18, 2015 11:22 AM
To: Teresa Schuller <Teresa.Schuller@meadhunt.com>
Subject: What is the source of the Emission Factors used to calculate emissions for the PCP Burnout Oven (E03)?

Teresa,

You may have misread by 9/2/15 question.

Let me ask it again:
What is the reference source for the emission factors used in the PCP Burnout Oven table on page 58 of the application? Are the emission factors from the oven manufacturer? If not, where do the emission factors come from?

John

From: Teresa Schuller [<mailto:Teresa.Schuller@meadhunt.com>]
Sent: Thursday, September 03, 2015 9:19 AM
To: Legg, John C
Subject: RE: R13-3253 - TRAMCO Service, Inc. (059-00117)

Id. No. 059-00117 Reg. R13-3253
Company Tramco
Facility Williamson Region 5
Initials J.C. Legg

Hi John –

It is E03 emission point on the process diagram. Let me know if you need anything else. Thanks.

Teresa A. Schuller | Sr. Environmental Project Manager | Associate
Mead & Hunt | M & H Architecture, Inc | 400 Tracy Way, Suite 200 | Charleston, West Virginia 25311
Direct: 681-313-4617 | Mobile: 304-415-9184 | Fax: 304-345-6714
teresa.schuller@meadhunt.com | www.meadhunt.com

From: Legg, John C [<mailto:John.C.Legg@wv.gov>] 
Sent: Wednesday, September 02, 2015 5:18 PM 
To: Teresa Schuller
Subject: R13-3253 - TRAMCO Service, Inc. (059-00117)

Teresa,

I am working on TRAMCO's draft air permit.

Where did the PCP Burnout Oven emission factors come from? (See page 58 of the application)

John Legg

From: Teresa Schuller [<mailto:Teresa.Schuller@meadhunt.com>] 
Sent: Thursday, July 16, 2015 1:19 PM 
To: Legg, John C
Subject: FW: Tramco payment
Importance: High

John –

Here's Tramco information on their payment. Please let me know when it is located. Thanks.

Teresa A. Schuller | Sr. Environmental Project Manager | Associate
Mead & Hunt | M & H Architecture, Inc | 400 Tracy Way, Suite 200 | Charleston, West Virginia 25311
Direct: 681-313-4617 | **Mobile:** 304-415-9184 | **Fax:** 304-345-6714
teresa.schuller@meadhunt.com | www.meadhunt.com

From: William Kincaid [<mailto:wkincaid@solutionk.com>]
Sent: Thursday, July 16, 2015 12:34 PM
To: Teresa Schuller
Cc: Scott Sheppard
Subject: Tramco payment

Ms. Schuller

The payment of \$ 1,000 has been made and the check #44281 cleared BB&T on 6/25/2015.

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≈ 9/14/15



TECHNICAL DATA SHEET

JOHN C. DOLPH COMPANY

320 New Road
Monmouth Junction, NJ
08852

Ph: (732) 329-2333
Fax: (732) 329-1143
info@dolphs.com
www.dolphs.com

HI-THERM[®] BC-346-A

CLEAR BAKING VARNISH

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PRODUCT DESCRIPTION

BC-346-A is a specially formulated, high temperature varnish, which can be used in a wide range of dip and bake applications.

FEATURES & BENEFITS

- Excellent flexibility
- Excellent adhesion
- High film build
- Superior wetting properties
- Military approval - Qualified under MIL-I-24092, Grade CB, Class 155 and 180
- UL recognized varnish in systems up to 220°C

TYPICAL APPLICATIONS

- Transformers
- Stators
- Form Wound Coils

Id. No. 059-00117 Reg. R13-3253
 • Random Wound Coils Company Tranco Services, Inc.
 • Armatures Facility Williamson Region 5
 • Relays Initials J.L. Legg

TYPICAL PROPERTIES

Physical

Color/Appearance	Light-Dark Amber
Density @ 77°F (25°C), Lbs/gal	7.4 - 7.8
Viscosity @ 77°F (25 °C), Brookfield Viscometer, cps	150 - 320
Flash Point, °F	54
Film Build, mils/side, ASTM D-115	1.0 - 3.0
Thinner (solvent)	T-200X or T-100
VOC Content, ASTM D 6053, lbs/gal	3.8
Corrosive Effect on Copper	None

All statements, technical information and recommendations related to Sellers' products are based on information believed to be reliable, but the accuracy or completeness thereof is not guaranteed. Before using the product, the user should determine the suitability of the product for its intended use. The user assumes all risks and liabilities whatsoever in connection with such use. The statements contained herein are made in lieu of all warranties, expressed or implied. Seller shall not be liable for any injury, loss or damage, direct or consequential, arising out of the use or inability to use its products. The sole liability of John C. Dolph Co., Inc. for any claims arising out of the manufacture, use or sale of its products shall be for the buyer's purchase price.

Mechanical

Bond Strength, Helical Coil Method, lbs to break	@25°C	28
	@150°C	2.5
Thermal Conductivity, ASTM C 3111, BTU-in./hr-ft ² -°F		2.4

Electrical

Dielectric Strength ASTM D115, volts/mi	Dry	4,000
	Wet	2,900

Chemical Resistance

Water	Excellent
Acid (10% Sulfuric Acid)	Excellent
Alkali (1% Sodium Hydroxide)	Excellent
Salt Water	Excellent
Oil, ASTM D-115	Passed

Thermal Class (UL-1446)

Twisted Pair	MW16	240
	MW24	155
	MW28	155
	MW30	180
	MW35	200
	MW76	180

APPLICATION GUIDELINES

<p>Following is a suggested dip and bake cycle.</p> <ol style="list-style-type: none"> Preheat parts to 250-325°F to remove moisture. <i>Note: If thermoset tapes are used, preset tapes according to tape manufacturer's recommendations.</i> Cool to 130°-140°F Dip until bubbling stops (15-30 minutes). Drain between 5-20 minutes Bake in a preheated oven at recommended time and temperature 	<p>Suggested Bake Cycles*</p> <p>1-2 hours @ 325°F 2-3 hours @ 300°F 2-4 hours @ 275°F</p> <p>* Times are taken after unit reaches baking temperature</p>
---	--

STORAGE AND SHELF LIFE

Shelf life is one year from date of shipment from our plant, when stored in closed containers at 70°F or below.

- Store in cool, dry place at 70°F/21°C or below.
- Protect from direct sunlight and sources of heat
- Keep away from heat, sparks and open flame.

SAFETY AND ENVIRONMENT

Avoid contact with skin and eyes. See Material Safety Data Sheet.

AUTHORIZED DISTRIBUTOR

9/14/15

9/11/15

Legg, John C

From: → Teresa Schuller <Teresa.Schuller@meadhunt.com>
Sent: → Monday, September 14, 2015 9:45 AM
To: Legg, John C
Cc: McKeone, Beverly D
Subject: RE: Draft Permit R13-3253 - TRAMCO Services, Inc. (059-00117)

John –

We will require some additional time. The draft and now revised are being sent to the client for their review and assistance in addressing your questions. Our goal is to be complete by next week, if this is acceptable. Thanks.

Teresa A. Schuller | Sr. Environmental Project Manager | Associate
 Mead & Hunt | M & H Architecture, Inc | 400 Tracy Way, Suite 200 | Charleston, West Virginia 25311
Direct: 681-313-4617 | Mobile: 304-415-9184 | Fax: 304-345-6714
teresa.schuller@meadhunt.com | www.meadhunt.com

From: Legg, John C [<mailto:John.C.Legg@wv.gov>] ←
Sent: Friday, September 11, 2015 3:30 PM ←
To: Teresa Schuller <Teresa.Schuller@meadhunt.com>
Cc: McKeone, Beverly D <Beverly.D.Mckeone@wv.gov>
Subject: Draft Permit R13-3253 - TRAMCO Services, Inc. (059-00117)

Teresa,

I hate to change things but:

I revised section 5.0 of the above draft permit to include requirements for 40 CFR 63, Subpart ZZZZ (Rice MACT) for the 2002 year emergency generator #1.

The revised permit is attached and is approximately 3 pages longer than the 1st draft permit sent on 9/8/15.

If you need additional time to review the draft permit, please let me know.

Sincerely,

John Legg
 Permit Writer
 WVDEP DAQ
 601 57th Street, SE
 Charleston, WV 25304
 (304) 926-0499 ext. 1257
John.c.legg@wv.gov

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Id. No. 059-00117 Reg. R13-3253
 Company Tramco
 Facility Williamson Region 5
 Initials JL Legg

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9/9/15

9/8/15

Legg, John C

From: Teresa Schuller <Teresa.Schuller@meadhunt.com> ←
Sent: Wednesday, September 09, 2015 10:27 AM ←
To: Legg, John C
Subject: RE: Draft Permit - R13-3253 TRAMCO Service, Inc. (059-00117), Williamson, WV

John –

I have sent this over to Tramco for their assistance in addressing your questions. We will try and have the responses back to you by COB Monday or early Tuesday. Thanks.

Teresa A. Schuller | Sr. Environmental Project Manager | Associate
 Mead & Hunt | M & H Architecture, Inc | 400 Tracy Way, Suite 200 | Charleston, West Virginia 25311
Direct: 681-313-4617 | Mobile: 304-415-9184 | Fax: 304-345-6714
teresa.schuller@meadhunt.com | www.meadhunt.com

From: Legg, John C [<mailto:John.C.Legg@wv.gov>] ←
Sent: Tuesday, September 08, 2015 6:10 PM ←
To: Teresa Schuller <Teresa.Schuller@meadhunt.com>
Subject: Draft Permit - R13-3253 TRAMCO Service, Inc. (059-00117), Williamson, WV

Id. No. 059-00117 Reg. R13-3253
 Company Tramco
 Facility Williamson Region 5
 Initials JCL

Teresa,

I have attached a draft permit for the above facility.

Please review the draft carefully and if it does not make sense, NOW is the time to COMMENT!

If possible please try to fill out the emission units table better, specifically the design capacity column.

Design capacity for the VPI, Dip Tank, Electric Bake Ovens, Burnout Oven, paint booths can be the maximum weight of material (metal) that can be processed at one time, for example maybe a 6,000 lb engine can be dipped or place in an oven?

Do the paint booths have filters to control PM emissions?

Do the paint booths have emission points where an opacity reading can be conducted?

Please let me know your comments within the next two to three days, if possible.

I still have to get this approved by my management and then there is another 30-day public comment period before the permit can be issued.

Thank you.

Entire Document
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John Legg
 Permit Writer
 Division of Air Quality
 601 57th Street SE
 Charleston, WV 25304
 Phone No. – (304) 926-0499 ext. 1257
John.c.legg@wv.gov

6/23/15



Letter of Transmittal



Mead & Hunt, inc.
400 Tracy Way, Suite 200
Charleston, WV 25311
304-345-6712
Fax: 304-345-6714:

To: Mr. Scott Shepherd
Kanawha Electric & Machine Company
141 Campbells Creek Drive
Charleston, WV 25306

Date: 6/2/15

Reference:

Mead & Hunt Project No.: R4023400-130867.02

Client Project/Reference No.:

Mead & Hunt Phase No.:

We are sending you the following items:

- Contracts
- Specifications
- Plans
- Shop drawings
- Prints
- Change order
- Copy of letter
- Reports
- Samples

Transmitted via:

- USPS

Other: Affidavit/legal

Copies Item Dated Item Description

Copies	Item Dated	Item Description
1		Legal notice and affidavit form Charleston Newspaper for Tramco air permit

These are transmitted as checked below:

- For approval/review
- For signature
- Rejected (Resubmit)
- No exceptions taken
- For your use
- As requested
- Comments attached
- Note markings

Other:

For bids due:

Remarks:

Scott -

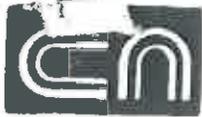
Id. No. 059-00117 Reg. R13-3253
 Company Tramco
 Facility Williamson Region 5
 Initials JC Legg

Please include this legal notice/affidavit with the check for \$1000 payable to WVDEP (DAQ application R13-3253 TRAMCO facility in Williamson). Let me know if you have any problems. Thanks.

Signed:

Phone: 681-313-4617

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P.O. Box 2993
Charleston, West Virginia 25330
Billing 348-4898
Classified 348-4848
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LEGAL ADVERTISING INVOICE

INVOICE DATE	05/26/15
ACCOUNT NBR	094983103
SALES REP ID	0998
INVOICE NBR	952524001

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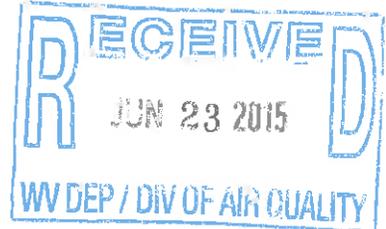
received
5-29-15

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LEGAL ADVERTISEMENT

USA



AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that TRAMCO Services, Inc. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for an After-the-Fact Operating Permit for a machining and repair facility located on Buffalo Creek Road, Chattoah, Mingo County, West Virginia. The latitude and longitude coordinates are: 37.71098N and -82.25683W.

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be less than:

NOx	5 TPY
CO	2 TPY
PM	4 TPY
PM10	2 TPY
SO2	1 TPY
HAPS	11 TPY
TAPS	0.1 TPY
Formaldehyde	0.1 TPY

Please ret
Make checks

Startup of operation began in the 1970s. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the 22nd day of May 2015.

By: TRAMCO Services, Inc.
Scott Sheppard
Vice President
PO Box 770
Williamson, WV 25661

AMOUNT PAID: _____

INVOICE DATE	05/26/15
ACCOUNT NBR	094983103
SALES REP ID	0998
INVOICE NBR	952524001

1-800-WVA-NEWS
FEIN 55-0676079

Legal pricing is based upon 63 words per column inch.

Each successive insertion is discounted by 25% of the first insertion rate.

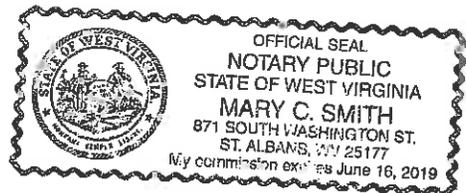
The Daily Mail rate is \$.13 per word, the Charleston Gazette rate is \$.14 per word, and the Metro Putnam rate is \$.13 per word.

ISSUE DATE	AD TYPE	PUB	DESCRIPTION		AD NUMBER	AD RATE		GROSS AMOUNT	NET AMOUNT
			REFERENCE NBR	PURCHASE ORDER #		TOTAL RDS	RAW		
05/22	LEG	GZ	5722	TRAMCO SERVICES	0599708	1X0700	8.82	61.74	61.74
				952524001		7.00			
TOTAL INVOICE AMOUNT									61.74

State of West Virginia, AFFIDAVIT OF PUBLICATION

Gisa Fitzwater

of



THE CHARLESTON GAZETTE,

do solemnly swear that the legal notice of:
5/22 TRAMCO SERVICES AIR

was duly published in said newspaper(s) at the stated price for the respective newspaper(s) and during the dates listed below:

05/22/15-05/22/15

Subscribed and sworn to before me this 27th day of May, 2015

Mary C. Smith
Notary Public of Kanawha County, West Virginia

6/2/15

Legg, John C

From: Adkins, Sandra K
Sent: Tuesday, June 02, 2015 9:21 AM
To: shep@solutionk.com
Cc: McKeone, Beverly D; Legg, John C
Subject: WV DAQ Permit Application Status for TRAMCO Services, Inc.; Williamson facility

**RE: Application Status
TRAMCO Services, Inc.
Williamson Facility
Plant ID No. 059-00117
Application No. R13-3253**

Mr. Sheppard,

Your application for a construction permit for the Williamson facility was received by this Division on May 26, 2015, and was assigned to John Legg. The following items were not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.

**Application fee AND/OR additional application fees not included:
\$1,000 Construction, Modification, Relocation or Temporary Permit**

These items are necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from John Legg stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, John Legg, at 304-926-0499, extension 1257.

Id. No. 059-00117 Reg. R13-3253
Company Tramco
Facility Williamson Region 5
Initials JL

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after-the-fact

059-00117 New ID# Construction

R13#3253 John 2/6/15

45CSR13 Administrative Update, Construction, Modification, Relocation, Temporary Permit or General Permit Registration Incomplete Application

A complete application is demonstrated when all of the information required below is properly prepared, completed and attached. The items listed below are required information which must be submitted with a 45CSR13 permit application. Any submittal will be considered incomplete if the required information is not included. The applicant must submit a complete application in order to receive a 45CSR13 permit.



Class I legal advertisement not published in a newspaper certified to accept legal advertisements and original affidavit submitted.



Application fee AND/OR additional application fees not included:

- \$250 Class I General Permit
- \$300 Class II Administrative Update
- \$1,000 Construction, Modification, Relocation or Temporary Permit
- \$500 Class II General Permit
- \$1,000 NSPS
- \$2,500 NESHAP
- \$2,500 45CSR27 Pollutant
- \$5,000 Major Modification
- \$10,000 Major Construction

Id. No. 059-00117 Reg. R13-3253
 Company Tranco
 Facility Williamson Region 5
 Initials g l Regg

- Original and two (2) copies of the application not submitted.
- File organization – application pages are not numbered or in correct order, application is not bound in some way, etc.
- Confidential Business Information is not properly identified.
- General application forms not completed and signed by a responsible official.
- Authority of Corporation form not included – required if application is signed by someone other than a responsible official.
- Applicant is not registered with the West Virginia Secretary of State's Office.
- Copy of current Business Registration Certificate not included.
- Process description, including equipment and emission point identification numbers, not submitted.
- Process flow diagram, including equipment and emission point identification numbers, not submitted.
- Plot plan, including equipment and emission point identification numbers, not submitted.
- Applicable technical forms not completed and submitted:
 - Emission Point Data Summary Sheets
 - Air Pollution Control Device Sheets
 - Emission Unit Data Sheets
 - Equipment List Form
- Emission calculations not included – emission factors, references, source identification numbers, etc.
- Electronic submittal diskette not included.

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6/2/15



Permit / Application Information Sheet Division of Environmental Protection West Virginia Office of Air Quality

Company:	TRAMCO Services, Inc.	Facility:	Williamson
Region:		Plant ID:	059-00117
Engineer:	Legg, John	Application #:	13-3253
Physical Address:		Category:	
County:		SIC: [3621] ELECTRONIC & OTHER ELECTRICAL EQUIPMENT & COMPONENTS - MOTORS AND GENERATORS NAICS: [335312] Motor and Generator Manufacturing	
Other Parties:	Consultant - Schuller, Teresa 681-313-4617		

- Information Needed for Database and AIRS**
1. Need valid physical West Virginia address with zip
 2. Air Program
 3. Inspection result
 4. Pollutant and class

Regulated Pollutants

Summary from this Permit 13-3253		
Air Programs	Fee	Applicable Regulations
Fee Program	\$0.00	CONSTRUCTION

Notes from Database

Activity Dates
 APPLICATION RECEIVED 05/26/2015
 ASSIGNED DATE 06/02/2015

Id. No. 059-00117 Reg. R13-3253
 Company Tramco
 Facility Williamson Region 5
 Initials JL Legg

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 059-00117
Company: TRAMCO Services, Inc.
Printed: 06/02/2015
Engineer: Legg, John

Entire Document
NON-CONFIDENTIAL



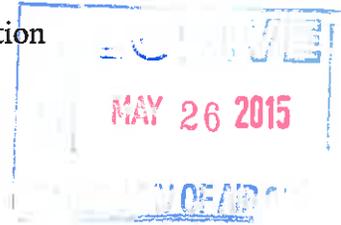
Mead & Hunt, Inc.
 M&H Architecture, Inc.
 400 Tracy Way, Suite 200
 Charleston, West Virginia 25311
 803-315-6712
 meadandhunt.com

5/26/15

19 May 2015

Assistant Director of Permitting
 WVDEP – DAQ
 601 57th Street SE
 Charleston, WV 25304

Re: Reg. 13 After-the-fact Construction permit application
 TRAMCO Services, Inc.
 Williamson, WV
 Project Number: R4023400-130867.02



Dear Sir or Madame:

Enclosed is a bound original and two CDs of Reg. 13 construction (after-the-fact) permit application for the TRAMCO Services, Inc.'s facility in Williamson, West Virginia. The ad will be published in the Charleston Gazette during the week of 18 May 2015. The original affidavit will be submitted upon its receipt.

An application check will be supplied once the fees are provided. Once you have reviewed the application, please give me a call at 681-313-4617 with questions.

Sincerely,

Teresa A. Schuller

Teresa A. Schuller
 Sr. Environmental Project Manager

Entire Document
NON-CONFIDENTIAL

Enclosure: bound original and two CDs

CC: Scott Sheppard – TRAMCO Services, Inc.

Id. No. 059-00117 Reg. R13-3253
 Company Tramco
 Facility Williamson Region 5
 Initials gc fgg



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone (304) 926-0475 • FAX: (304) 926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-3253
Plant ID No.: 059-00117
Applicant: TRAMCO Services, Inc. (Tramco)
Facility Name: TRAMCO Services, Inc.
Location: Williamson, Mingo County, WV
NAICS Code: 335312 - Motor and Generator Manufacturing
SIC Code: 7694 - Armature Rewinding Shop
Application Type: Construction
Received Date: May 26, 2015
Engineer Assigned: John Legg
Fee Amount: \$1,000.00
Fee Received: June 23, 2015
Date Assigned: June 2, 2015
Complete Date: June 23, 2015 (Paid permitting fee and received legal affidavit of publication)
Due Date: September 23, 2015
Applicant Ad Date: May 22, 2015
Newspaper: *Charleston Gazette*
UTM's: Easting: 389.134 km Northing: 4,174.322 km Zone: 17S
Description: Electric Motor Build and Re-build Shop consisting of:
1) Four (4) Ovens:
 - Two (2) Burnout Ovens (One Electric; One Natural Gas)
 - Two (2) Bake Ovens (Both Electric)
2) Two (2) Paint Booth (#1 and #2)
3) One (1) Vacuum Pressure Impregnation (VPI) Tank
4) One (1) Varnish Dip Tank
5) One (1) Emergency Generator (#1).
 [Emergency Generator (#2) is not operated.]

DESCRIPTION OF PROCESS

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

Tramco Services provides industry-leading service:

- A.C. & D.C. electric motor repair
- Machine department
- Fabrication department
- Equipment rebuild shop
- Complete inventory of new parts
- On site vibration analysis
- Laser alignment

VPI (Vacuum Pressure Impregnation) System insures quality treatment of electrical motor windings. Vacuum Pressure Impregnation is a process that is a step above the conventional vacuum system. VPI includes pressure in addition to vacuum, thus assuring good penetration of the varnish in the coil. The result is improved mechanical strength, electrical properties and thermal performance. This means improved heat transfer by eliminating air/gas pockets and makes it impossible for moisture or other contamination to degrade the system. The solid void-free structure reduces the possibility of internal corona damage on high-voltage machines. VPI minimizes coil movement, slots are completely filled, and by the use of suitable fibers, laminated structures and bracing materials, a solid reinforced end winding structure is obtained. This ensures improved reliability and long service life. The core wire is completely filled and sealed. This eliminates problems due to loose cores and provides positive protection against migration of moisture and other contamination through the core.

Process: Motors or equipment are cleaned, broken down, and then placed in burn out ovens to remove insulation and other solid materials. Bale ovens remove any remaining water. Refurbished motors and equipment are placed in the dip tank, or VPI tank, for processing. The equipment is then dried in the drying ovens. The equipment may or may not be painted using water-based paints or powder coatings in paint booths (no VOCs or HAPs). The equipment is left to air dry in the paint booth prior to transport to the warehouse.

Operational usage based upon 1 shift, 5.5 days/wk and 50 weeks/year:

- Dip Tank (varnish) - 1,600 hrs/yr
- VPI Tank (no VCS or HAPS) - 1,600 hrs/yr
- Drying ovens - 1,600 hrs/yr each
- Paint Booth #1 - 1,600 hrs/year (no VOCs or HAPs)
- Paint Booth #2 - 800 hrs/year (no VOCs or HAPS)
- Paint booths use powder coatings or water-based paints

Given below is the Emission Units Table developed by the writer, based on information from the permit application: Emission Units Table (Attachment I), plot plan (Attachment E&F), the Process Flow Diagram (Attachment E&F) and Process Description (Attachment G):

Fact Sheet R13-3253
TRAMCO Services, Inc.
Williamson, Mingo County, WV

Promoting a healthy environment.

Table 1: Emission Units Table.

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Main Building (Electric Motor Build & Rebuild Shop)					
1S (No VOC or HAP Emissions per Application)	E01	Vacuum Pressure Impregnation (VPI) Tank (pressurized) (resin filled)	Mid-1990s	150 gallon	None (Enclosed System)
2S	E01	Dip Tank (varnish)	Mid-1990s	110 gallon	None
Not Assigned	E01	Electric Bake Oven * (Steelman 4x4x6 ETC)	1977	500 lb	None
Not Assigned	E01	Electric Bake Oven * (Steelman 7x7x20 ETC)	Mid 1990s	2,500	None
3S	E02	⁽¹⁾ Generator #1 (Detroit Diesel, Model 71637305) (outside Main Building)	2002	590 HP	None
4S	E02	⁽¹⁾ Generator #2 (Standby Unit) (Detroit Diesel, Model 71637305) (outside Main Building)	2002	590 HP	None
5S	E03	Natural Gas-fired ** Burnout Oven (PCP Model CPI 1504215)	1997	0.398 MM Btu/hr	Afterburner
Not Assigned (No VOC or HAP Emissions per Application)	Not Assigned	Electric Burnout Oven ** (Armature 321-E)	1980	200 lb	None
Not Assigned (No VOC or HAP Emissions per Application) PM Emissions	Not Assigned	Paint Booth #1 *** (water-based paints powder coatings)	1977	400 lb	PM Filter Bank
Not Assigned (No VOC or HAP Emissions per Application)	Not Assigned	Electric Water Evaporator (Inside Building)	1970	Not Given	None
Not Assigned (No VOC or HAP Emissions per Application)	Not Assigned	Electric Water Evaporator #2 (Outside Building)	2009	Not Given	None
Fabrication Shop					

Fact Sheet R13-3253
TRAMCO Services, Inc.
Williamson, Mingo County, WV

Not Assigned PM Emissions (No VOC or HAP Emissions per Application)	Not Assigned	Paint Booth #2 *** (water-based paints & powder coatings)	2000	2,500 lb	PM Filter Bank
<p>* Bake off/dries motors/equipment.</p> <p>** Final removal of stripped pieces - No VOC emissions from stripped pieces.</p> <p>*** Paints are water-based or powder coatings.</p> <p>(1) Generator #1 and Generator #2 are identical model generators having the same emissions. Only one of the two generators is to be run at a time. At the time the application was submitted Generator #1 was to be operated in the event of an emergency and Generator #2 was designated as the "Standby Generator" to be operated only if something mechanically went wrong with Generator #1.</p>					

SITE INSPECTION

The writer did not inspect the facility for the issuance of this (construction) permit. Tramco is an existing facility constructed forty-plus years ago in 1970. The facility's location is known to DAQ enforcement. The distance from Charleston to Williamson is approximately 83 miles. Directions as given in the permit application are:

I-64 west to Oakwood Road exit. Turn right onto US119 and follow it to Harris Hollow Road and turn left onto old US Rt. 119. On old US 119, continue north to a right turn onto Buffalo Creek Road. The facility is on the left, approximately 2.4 miles from turn onto Buffalo Creek Road.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Advertised Emissions

Tramco advertised the following emissions in their May 22, 2015 legal advertisement which appeared in the Charleston Gazette:

Advertised		As Permitted Under Permit R13-3253			
Pollutant	Emission Rate (ton/yr)	Section 5	Section 6	Section 7	Total (ton/yr)
		Emergency Generator #1 (ton/yr)	Bakeout Oven (ton/yr)	Facility-Wide VOC/HAP Emissions (ton/yr)	
NOx	5	4.57	0.17	0.00	4.74
CO	2	0.99	0.44	0.00	1.43
PM	4	---	---	---	---
PM10	2	0.32	0.09	--- (1)	0.41 (1)
SO2	1	---	---	---	---
HAPs	11	0.36 TOC/VOCs 0.002 HAPs	0.09 VOCs	10.55 VOCs (2) 10 - Individual HAPs 25 - Aggregated HAPs	11 VOCs 10 - Individual HAPs 25 - Aggregated HAPs
*TAPs	0.1	---	---	---	---
*Formaldehyde	0.1	---	---	---	---

Fact Sheet R13-3253
TRAMCO Services, Inc.
Williamson, Mingo County, WV

Advertised		As Permitted Under Permit R13-3253			
		Section 5	Section 6	Section 7	Total (ton/yr)
Pollutant	Emission Rate (ton/yr)	Emergency Generator #1 (ton/yr)	Bakeout Oven (ton/yr)	Facility-Wide VOC/HAP Emissions (ton/yr)	

- * From 590 HP, diesel-fired Emergency Generator #1 (3S, E02).
- (1) Tramco calculated PM-10 emissions from spraying degreaser (S00703) inside a building at 1.17 ton/yr. The writer did not think these emissions were real, and did not limit PM-10 emissions in permit section 7.
- (2) Facility-Wide VOCs = 11 ton/yr - (0.36 +0.09) ton/yr = 10.55 ton/yr.

Section 5 of R13-3253 - Emergency Generator #1 (3S, E02) Emissions

Note: Generator #1 and Generator #2 are identical model generators having the same emissions. Only one of the two generators is to be run at a time. At the time the application was submitted Generator #1 was to be operated in the event of an emergency and Generator #2 was designated as the "Standby Generator" to be operated only if something mechanically went wrong with Generator #1.

The writer reviewed Tramco's emission calculations for the Emergency Generator #1 (Detroit Diesel Model 71637305 operating at 440 kW (590 HP) and found the calculations to be correct (see permit application, page 56 of 62).

Emission factors came from EPA AP-42, Chapter 3.3, "Gasoline and Diesel Industrial Engines." Emergency Generator #1 is permitted under section 5 of the permit (R13-3253).

- 5.1.3. Emissions from Emergency Generator #1's diesel engine (4S) shall not exceed the following limitations:

Pollutant	Emission Rate	
	(lb/hr)	(ton/yr)*
Nitrogen Oxides (NOx)	18.29	4.57
Carbon Monoxide (CO)	3.94	0.99
Particulate Matter (PM ₁₀)	1.30	0.32
Volatile Organic Compounds (VOC)	**1.46	**0.36

- * Based on 500 hours per year of operation.
- ** These VOC limitations are included in the facility-wide VOC limitations established in section 7.1.2 of this permit.

Section 6 of R13-3253 - Natural Gas-fired Burnout Oven (5S, E03) Emissions

The writer reviewed Tramco's emission calculations for the 0.398 MM Btu/hr, natural gas-fired, PCP Burnout Oven, Model CPI 15041215 and found the calculations to be correct (see permit application, page 58 of 62).

Fact Sheet R13-3253
 TRAMCO Services, Inc.
 Williamson, Mingo County, WV

The writer asked Teresa Schuller, Tramco's Consultant, the source of the Burnout Oven's emission factors. Ms. Schuller's response was as follows:

"Lacking any unit specific-emission data for burn-off/bake off ovens, I defaulted to the emission rates provided by Ed Andrews during the 2009 Kanawha Electric air permit application for similar units. The values used are ones he used in verifying our calculations."

The Burnout Oven is covered under section 6 of the permit (R13-3253).

6.1.2. Emissions from the Burnout Oven (5S) shall not exceed the following limitations:

Pollutant	Emission Rate	
	(lb/hr)	(ton/yr)
Particulate Matter (PM ₁₀)	0.02	0.09
Nitrogen Oxides (NO _x)	0.04	0.17
Carbon Monoxide (CO)	0.10	0.44
⁽¹⁾ Volatile Organic Compounds (VOC)	**0.02	**0.09

(1) VOC emission rate controlled by Afterburner.

** These VOC limitations are included in the facility-wide VOC limitations established in section 7.1.2 of this permit.

VOC Emissions

Sources Having No VOC Emissions

The following sources located at Tramco's Williamson, WV facility were identified in the permit application (pages 12 and 13 of 62) as not having VOC or HAP emissions:

Emission Unit ID	Emission Point ID	Building	Emission Unit Description
1S	E01	Main Building	VPI Tank
Not Assigned	Not Assigned	Main Building	Armature Burn Out Oven (Final removal of stripped pieces - No VOC's.)
Not Assigned	Not Assigned	Main Building	Paint Booth #1 (Paints are water-based or powder coatings.)

Fact Sheet R13-3253
TRAMCO Services, Inc.
Williamson, Mingo County, WV

Emission Unit ID	Emission Point ID	Building	Emission Unit Description
Not Assigned	Not Assigned	Fabrication Shop	Paint Booth #2 (Paints are water-based or powder coatings.)
Not Assigned	Not Assigned	Main Building	Electric Water Evaporator (Inside Building)
Not Assigned	Not Assigned	Main Building	Electric Water Evaporator (Outside Building)

Sources Having VOC Emissions

The following sources located at Tramco's Williamson, WV facility were identified in the permit application (pages 12 and 13 of 62) and are thought by the writer to have VOC or HAP emissions:

Emission Unit ID	Emission Point ID	Building	Emission Unit Description
2S	E01	Main Building	Dip Tank (varnish)
Not Assigned	E01	Main Building	Steelman Bake Oven (446ETC) electric (Bake off/dries motors/equipment)
Not Assigned	E01	Main Building	Steelman Bake Oven (7720ETC) electric (Bake off/dries motors/equipment)
5S	E03	Main Building	Natural Gas-fired Burn Out Oven PCP UPI 1504215 (Final removal of stripped pieces - No VOC's.)
3S	E02	Main Building	Emergency Generator #1 (outside building)
4S	E02	Main Building	Emergency Generator #2 (outside building) (not in use)

Section 7 of R13-3253 - VOC/HAP Emissions

To insure that the facility remains an area source of HAPs, per section 7.7.1 of the permit, HAP emissions can not exceed 10 ton/yr for any individual HAP and 25 ton/yr for total/aggregated HAPs.

VOC and HAP emissions result from the use of process materials such as solvents (cleaning/degreaser), varnishes, etc.

Tramco listed 11 ton/yr of HAP emissions in their legal advertisement. There was no listing in the advertisement for VOC emissions.

General Comment: All HAP emissions are VOC's. And HAP emissions are the worst kind of the VOCs.

The writer had to assume that Tramco meant to advertise for VOCs and HAPs instead of just HAPs.

Tramco calculated the actual facility-wide HAP emission rate by determining the HAP emissions from the vanish (BC-346-A) and Spray-on degreaser (S00703) used at the facility over a period of one year. This was determined by Tramco to be 1.57 ton/yr. [The writer determined it to be 1.40 ton/yr, i.e., 1.29 ton/yr (no change) from the spray-on degreaser plus 0.112 ton/yr (a decrease of 0.17 ton/yr from varnish (BC-346-A)).]

Tramco then multiplied the actual annual HAP emission rate (1.57 ton/yr) by a factor of 6.6 to get the potential annual HAP emission rate of 10.4 ton/yr. Tramco then rounded up to 11 ton/yr. (The writer got 9.24 ton/yr instead of 10.4 ton/yr.)

(The 6.6 factor used to convert from actual to potential emissions is based on the average hours Tramco operated the facility, i.e., out of 8,760 hr/yr, Tramco ran the facility on average only 1,314 hr/yr. Dividing 8,760 hr/yr by 1,314 hr/yr yields the 6.6 factor.)

The writer calculates the HAP to VOC ratio to be equal to about 83.7%.

HAP/VOC = (Varnish HAPs + De-greaser HAPs) lb/yr

(Varnish VOCs + De-greaser VOCs) lb/yr

$$= \frac{[(\text{Varnish VOCs} \times 0.30 \text{ HAPs/VOC}) \times 210 \text{ gal/yr}] + [(\text{De-greaser VOCs} \times 1.0 \text{ HAPs/VOCs}) \times 200 \text{ gal/yr}]}{[(\text{Varnish VOCs}) \times 210 \text{ gal/yr}] + [(\text{De-greaser VOCs}) \times 200 \text{ gal/yr}]}$$

$$= \frac{[(3.8 \text{ lb/gal} \times 0.30) \times 210 \text{ gal/yr}] + [(13.17 \text{ lb/gal} \times 1.00) \times 200 \text{ gal/yr}]}{[(3.8 \text{ lb/gal}) \times 210 \text{ gal/yr}] + [(13.17 \text{ lb/gal}) \times 200 \text{ gal/yr}]}$$

$$= \frac{239.4 \text{ lb/yr} + 2634 \text{ lb/yr}}$$

$$\text{HAP/VOC} = \frac{798 \text{ lb/yr} + 2634 \text{ lb/yr}}{2873.4 \text{ lb/yr} / 3432 \text{ lb/yr}} = 83.7\%$$

Fact Sheet R13-3253
TRAMCO Services, Inc.
Williamson, Mingo County, WV

Bottom-line

Conclusion: The assumption that the 11 ton/yr of HAPs advertised in the newspaper is equal to 11 ton/yr of VOCs + HAP is okay/acceptable because 83.7 % of the 11 ton/yr is equal to 9.2 ton/yr of HAPs. Dividing the 9.2 ton/yr of HAPs by 1.57 ton/yr which Tramco calculated to be the annual HAP emission rate for the facility still yields a factor of 5.86 (instead of 6.6), i.e., Tramco over estimated actual HAP emissions for the facility by a factor of 5.86 times the actual HAP emission rate.

Facility-wide VOC emission limitations were established under section 7 of the permit and are equal to 3.75 lb/hr and 11 ton/yr (as advertisement in the newspaper).

The facility-wide hourly VOC limitation of 3.75lb/hr was calculated from Tramco's summary table found on page 54 of the permit application and as shown below:

Pollutant	Source	PTE (# / hr)	Comments
TOC	Emergency Generator #1	1.46	Hourly limitation for Emergency Generator #1 given in section 5.1.3 of the permit.
VOCs	Building Units	0.33	VOCs from vanish use in section 7 of the permit (0.31) + VOCs (0.02) from NG-fired Burnout Oven (5S, E03) in section 6.1.2 of the permit.
Ethylbenzene	Building Units	0.28 *	From Varnish. Already accounted for in VOCs - Building Units
Xylene	Building Units	0.14	From Varnish. Already accounted for in VOCs - Building Units
Tetrachloroethylene	Building Units	1.96	From Spray-on Degreaser (S00703).
Total		3.75	
* Ethylbenzene emissions were calculated too high. Should have been calculated at 5% by weight instead of 50% by weight. VOCs were calculated correctly and ethylbenzene is accounted for in the VOCs.			

The Facility-wide hourly and annual VOC emission rates include VOC emissions from Emergency Generator #1 (3S, E02) and the Natural Gas-fired Burnout Oven (E03) covered under permit sections 5 and 6 of this permit.

Permit Section 5 VOC emissions from Emergency Generator #1 (3S, E02) were calculated by Tramco to be 1.46 lb/hr and 0.36 ton/yr. (See the permit application, page 56 of 62.)

Permit Section 6 VOC emissions from the natural gas-fired Burnout Oven (5S, E03) were calculated by Tramco to be 0.02 lb/hr and 0.09 ton/yr. (See the permit application, page 58 of 62.)

Permit Section 7 Annual VOC emissions from the use of VOC containing materials can not exceed 10.55 ton/yr [11 ton/yr (as advertised in newspaper) - 0.36 ton/yr (emergency generator #1) - 0.09 ton/yr (burnout/oven)]

Hourly VOC emissions from the use of VOC containing materials can go up as high as 3.75 lb/hr when the generator and the natural gas-fired burnout oven are not in operation; when both the generator and burnout oven are in operation, the hourly VOC emission rate from the use of VOC containing materials can not exceed 2.27 lb/hr [3.75 lb/hr - 1.46 lb/hr - 0.02 lb/hr].

Table: Physical Location of Equipment at Facility. And Section # of Permit that the Equipment is Covered Under.

Location			Permit Section	Equipment Covered Under Permit Section	
Building	Emission Point ID	Emission Unit ID			
Main Building Electric Motor Build & Rebuild Shop	Outside	E02	3S	5	Emergency Generator #1
			4S		Emergency Generator #2 (not operated)
	Inside	E03	5S	6	Natural Gas-fired Burn Out Oven (5S) (PCP UPI 1504215)
			E01		2S
		Not Assigned		Dip Tank (2S)	
		Not Assigned		Electric Steelman Bake Oven (446ETC)	
		Not Assigned		Electric Steelman Bake Oven (7720ETC)	
		Not Assigned	Not Assigned	Electric Armature Burn Out Oven	
	Not Assigned	Not Assigned	Paint Booth #1		
	Building 2 Fabrication Shop	Not Assigned	Not Assigned		Paint Booth #2

REGULATORY APPLICABILITY

Tramco's Williamson, WV facility is a non-major stationary source, not subject to Title V (45SCR30) because it is not subject to a substantive standard or other requirement under § 112 of the Clean Air Act.

Fact Sheet R13-3253
 TRAMCO Services, Inc.
 Williamson, Mingo County, WV

Applicable State Rules:

45CSR6 - Control of Air Pollution from Combustion of Refuse

Rule 6 establishes emission standards for particulate matter and requirements for activities involving incineration of refuse which are not subject to, or are exempted from regulation under a federal counterpart for specific combustion sources.

Various items, such as motors with electrical damage, are heated in the natural gas-fueled burnout oven to remove varnish, epoxy, paint, grease, rubber and other combustible materials from metal. A burnout oven has a high-temperature afterburner that breaks down and eliminates any chemical residues or VOC fumes that could be released into the environment.

Tramco's Burnout Oven (5S) is considered by the DAQ to be an incinerator under Rule 6. Particulate matter emission limitations for the oven are set in section 5.1.2. of the permit at 0.02 lb/hr and 0.09 tons/yr (based on 8,760 hours per year of operation).

Sections of 45CSR§6 quoted in the permit are:

- 45CSR§6-4.1. - An allowable hourly PM emission rate can be calculated using the equation in this section. The rate, however, is too large and the more conservative emission limitation established in section 5.1.2. of the permit is used instead.
- 45CSR§6-4.3. - Opacity must be less than 20% [Burnout Ovens 1S and 2S].
- 45CSR§6-4.4. - Allowable opacity during startup & stoking operations, quoted in permit Section 5.1.6; and
- 45CSR§6-4.6. - No objectionable odors [Burnout Ovens 1S and 2S].

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

The purpose of Rule 7 is to prevent and control particulate matter air pollution from manufacturing processes and associated operations.

The paint booths (#1 and #2) are subject to the emissions standards of 45CSR7.

- 45CSR§7-3.1. - Opacity must be less than 20%.
- 45CSR§7-5.1. - Must be equipped with control sytem(s) to

Fact Sheet R13-3253
TRAMCO Services, Inc.
Williamson, Mingo County, WV

- minimize fugitive PM.
- 45CSR§7-8.1. - Director may required PM stack testing.
- 45CSR§7-8.2. - Director or his representative may conduct tests to evaluate emissions.
- 45CSR§7-9.1. - Continued operation allowances for unavoidable malfunction of equipment.

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

Tramco's Williamson, WV facility is considered to be a stationary source and is therefore required to have an air permit, i.e., the facility has the potential to discharge more than five (5) tons per year of hazardous air pollutants considered on an aggregated basis. This is confirmed by the company's May 22, 2015 legal advertisement which estimates HAP emissions as being 11TPY.

The facility is also subject to substantive requirements of emission control rules promulgated by the Secretary:

- The Burnout Oven (5S) is considered by the DAQ to be an incinerator and as such is subject to Rule 6.
- The paint booths (#1 and #2) and other process equipment located at the facility are subject to the emissions standards of 45CSR7.

Tramco ran the required legal advertisement, submitted a complete permit application, and paid the required permitting fee.

Applicable Federal Rule:

40 CFR 63, Subpart ZZZZ - This regulation applies to Tramco's 2002 year, 590 hp emergency generator.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

Three (3) MSDS were submitted in Attachment H to the application. Hazardous Air Pollutants (HAPs) are identified below:

1) H1 - Varnish Dip Tank & Drying Ovens:

BC-346-A, Clear Baking Varnish; Contains:

- **Xylene** (CAS# 1330-20-7), **HAP**, 10 - 25% by weight.
- **Ethyl Benzene** (CAS# 100-4104), **HAP**, less than 5% by weight.

2) H2 - VPI Tank & Drying Ovens

Permafill # 74041 Epoxy Resin (no VOC or HAPs), Insulating Varnish, Catalyzed Epoxy Resin.

- Bisphenol A-Epichlorocrydin Polymer (CAS# 2506-38-6), **not a HAP**, 30 - 60% by weight.
- p-tert-Butylphenyl Glycidyl Ether (CAS# 3101-60-8), **not a HAP**, 30 -60% by weight.
- Trade Secret Component (TS000001), **not identified as being a HAP**, 1 - 5% by weight.

3) H3 - Sprayon Electric Motor Degreaser & Safety Solvent. Note that this MSDS is not listed on the cover sheet listing of "Attachment H - MSDSs".

- Tetrachloroethylene (CAS# 127-18-4), **HAP**, 98% by weight.
- Carbon Dioxide (CAS# 124-38-9), **not a HAP**, 2% by weight.

Although stated on the cover sheet listing of "Attachment H - MSDSs" the following MSDS was not included in attachment:

- Paint Booth (per Tramco: NO VOCs or HAPs)
 - Water-based paints
 - Powder Coating

AIR QUALITY IMPACT ANALYSIS

Tramco's Williamson, WV facility is consider to be an non-major source under State Rules 14 and 19. It is considered to be an area source of HAPs under 40 CFR 63, Subpart ZZZZ. For these reasons, no impact analysis study **was** conducted for the source.

MONITORING OF OPERATIONS

Section 5

Emergency Generator #1

- Monitor to insure maintenance work is conducted to manufacturer's specifications.
- Monitor hours of operation not to exceed 500 hr/yr.

Fact Sheet R13-3253
TRAMCO Services, Inc.
Williamson, Mingo County, WV

- Monitor diesel fuel usage not to exceed 28 gal/hr and 14,000 gal/yr.

Section 6

Natural Gas-fired Burnout Oven - Conduct monthly opacity checks.

Section 7

- Monthly opacity checks of paint booths.
- Facility-Wide VOC Emissions - Monitor VOC/HAP usage on a daily bases.
- Paint Booths #1 and #2 - Keep records of paint booth maintenance/filter changeouts.

RECOMMENDATION TO DIRECTOR

Based on the information contained in the permit application, the writer believes that Tramco can operation its Williamson, WV facility in compliance with all applicable state and federal air pollution control rules and regulations, and further recommends that Tramco be issued construction permit R13-3253.



John Legg
Permit Writer



September 25, 2015

EMERGENCY GENERATOR#1

Table 3.3-1. EMISSION FACTORS FOR UNCONTROLLED GASOLINE AND DIESEL INDUSTRIAL ENGINES^a

Pollutant	Gasoline Fuel (SCC 2-02-003-01, 2-03-003-01)		Diesel Fuel (SCC 2-02-001-02, 2-03-001-01)		EMISSION FACTOR RATING
	Emission Factor (lb/hp-hr) (power output)	Emission Factor (lb/MMBtu) (fuel input)	Emission Factor (lb/hp-hr) (power output)	Emission Factor (lb/MMBtu) (fuel input)	
NO _x	0.011	1.63	0.031	4.41	D
CO	6.96 E-03 ^d	0.99 ^d	6.68 E-03	0.95	D
SO _x	5.91 E-04	0.084	2.05 E-03	0.29	D
PM-10 ^b	7.21 E-04	0.10	2.20 E-03	0.31	D
CO ₂ ^c	1.08	154	1.15	164	B
Aldehydes	4.85 E-04	0.07	4.63 E-04	0.07	D
TOC					
Exhaust	0.015	2.10	2.47 E-03	0.35	D
Evaporative	6.61 E-04	0.09	0.00	0.00	E
Crankcase	4.85 E-03	0.69	4.41 E-05	0.01	E
Refueling	1.08 E-03	0.15	0.00	0.00	E

^a References 2,5-6,9-14. When necessary, an average brake-specific fuel consumption (BSFC) of 7,000 Btu/hp-hr was used to convert from lb/MMBtu to lb/hp-hr. To convert from lb/hp-hr to kg/kw-hr, multiply by 0.608. To convert from lb/MMBtu to ng/J, multiply by 430. SCC = Source Classification Code. TOC = total organic compounds.

^b PM-10 = particulate matter less than or equal to 10 μm aerodynamic diameter. All particulate is assumed to be ≤ 1 μm in size.

^c Assumes 99% conversion of carbon in fuel to CO₂ with 87 weight % carbon in diesel, 86 weight % carbon in gasoline, average BSFC of 7,000 Btu/hp-hr, diesel heating value of 19,300 Btu/lb, and gasoline heating value of 20,300 Btu/lb.

^d Instead of 0.439 lb/hp-hr (power output) and 62.7 lb/mmBtu (fuel input), the correct emissions factors values are 6.96 E-03 lb/hp-hr (power output) and 0.99 lb/mmBtu (fuel input), respectively. This is an editorial correction. March 24, 2009

EPA AP-42
Chapter 3.3 Gasoline & Diesel
Industrial Engines.

EMERGENCY GENERATOR #1

Table 3.3-2. SPECIATED ORGANIC COMPOUND EMISSION FACTORS FOR UNCONTROLLED DIESEL ENGINES^a

EMISSION FACTOR RATING: E

Pollutant	Emission Factor (Fuel Input) (lb/MMBtu)
Benzene ^b	9.33 E-04
Toluene ^b	4.09 E-04
Xylenes ^b	2.85 E-04
Propylene	2.58 E-03
1,3-Butadiene ^{b,c}	<3.91 E-05
Formaldehyde ^b	1.18 E-03
Acetaldehyde ^b	7.67 E-04
Acrolein ^b	<9.25 E-05
Polycyclic aromatic hydrocarbons (PAH)	
Naphthalene ^b	8.48 E-05
Acenaphthylene	<5.06 E-06
Acenaphthene	<1.42 E-06
Fluorene	2.92 E-05
Phenanthrene	2.94 E-05
Anthracene	1.87 E-06
Fluoranthene	7.61 E-06
Pyrene	4.78 E-06
Benzo(a)anthracene	1.68 E-06
Chrysene	3.53 E-07
Benzo(b)fluoranthene	<9.91 E-08
Benzo(k)fluoranthene	<1.55 E-07
Benzo(a)pyrene	<1.88 E-07
Indeno(1,2,3-cd)pyrene	<3.75 E-07
Dibenz(a,h)anthracene	<5.83 E-07
Benzo(g,h,l)perylene	<4.89 E-07
TOTAL PAH	1.68 E-04

^a Based on the uncontrolled levels of 2 diesel engines from References 6-7. Source Classification Codes 2-02-001-02, 2-03-001-01. To convert from lb/MMBtu to ng/J, multiply by 430.

^b Hazardous air pollutant listed in the *Clean Air Act*.

^c Based on data from 1 engine.

EPA AP-42
Chapter 3.3 Gasoline & Diesel Industrial Engines.

<http://www.epa.gov/ttn/atw/iceengines/imp.html>

RICE NESHAP Summary of Requirements¹

For Emergency Compression Ignition Engines

Existing Stationary Engine >500 HP Located at Area Sources of HAP, constructed before June 12, 2006

NOTE: Only the tables relevant to this source category are bolded. To refer to the regulatory text, please go to Subpart ZZZZ.

Your **compliance date** is May 3, 2013.

Emission Limitations, Management Practices and Other Requirements: 63.6603(a), Table 2d

§ 63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in **Table 2d** to this subpart and the operating limitations in Table 2b to this subpart that apply to you. (Note: No operating limitations apply to engines addressed in this document).

Operating Limitations: No Requirements

Fuel Requirements: For engines greater than 100 HP AND operated more than 15 hours/year for emergency demand response: 63.6604(b)

§ 63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?

(b) Beginning January 1, 2015, if you own or operate an existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in § 63.6640(f)(4)(ii), you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted.

Performance Tests: No Requirements

¹ Disclaimer: The content provided in this software tool is intended solely as assistance for potential reporters to aid in assessing requirements for compliance under the reciprocating internal combustion engines (RICE) National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 63 Subpart ZZZZ. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern. Use of this tool does not constitute an assessment by the EPA of the applicability of the rule to any particular facility. In any particular case, the EPA will make its assessment by applying the law and regulations to the specific facts of the case.

Continuous Compliance: 63.6605, 63.6640

§ 63.6605 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.

(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

§ 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

(a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and **Table 2d** to this subpart that apply to you according to methods specified in **Table 6** to this subpart.

(c) N/A

(d) For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR 94.11(a).

(e) You must also report each instance in which you did not meet the requirements in **Table 8** to this subpart that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.

(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in nonemergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency

demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for nonemergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or nonemergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

(ii) The 50 hours per year for nonemergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

Notification Requirements: No Requirements

Recordkeeping Requirements: 63.6655, except 63.6655 (c)

§ 63.6655 What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).

(2) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(d) You must keep the records required in **Table 6** of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(2) An existing stationary emergency RICE.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in § 63.6640(f)(2)(ii) or (iii) or § 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

Reporting Requirements: Footnote 2 of Table 2d; for engines greater than 100 HP AND operated more than 15 hours/year for emergency demand response: 63.6650(h)

§ 63.6650 What reports must I submit and when?

Footnote 2 of Table 2d: If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

For an engine with a site rating of more than 100 brake HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in § 63.6640(f)(4)(ii):

§ 63.6640 (h) If you own or operate an emergency stationary RICE with a site rating of more than 100 brake HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in § 63.6640(f)(4)(ii), you must submit an annual report according to the requirements in paragraphs (h)(1) through (3) of this section.

(1) The report must contain the following information:

(i) Company name and address where the engine is located.

(ii) Date of the report and beginning and ending dates of the reporting period.

(iii) Engine site rating and model year.

(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.

(v) Hours operated for the purposes specified in § 63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in § 63.6640(f)(2)(ii) and (iii).

(vi) Number of hours the engine is contractually obligated to be available for the purposes specified in § 63.6640(f)(2)(ii) and (iii).

(vii) Hours spent for operation for the purpose specified in § 63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in § 63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(viii) If there were no deviations from the fuel requirements in § 63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.

(ix) If there were deviations from the fuel requirements in § 63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in § 63.13.

General Provisions (40 CFR part 63) -see Table 8: Yes, except per 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Permit to Construct



R13-3253

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:

TRAMCO Service, Inc.
Williamson, Mingo County, WV
059-00117

*William F. Durham
Director*

Issued: DRAFT

This permit does not supercede or replace another permit.

Facility Location: Williamson, Mingo County, West Virginia
Mailing Address: 141 Campbells Creek Drive, Charleston, WV 25306
Facility Description: Electric Motor Build & Rebuild Shop
SIC Code: 7694 - Armature Rewinding Shop
NAICS Codes: 335312 - Motor and Generator Manufacturing
UTM Coordinates: 389.134 km Easting • 4,174.322 km Northing • Zone 17S
Permit Type: Construction (After-the-fact)
Description of Change:

Construction of an Electric Motor Build and Re-Build Shop.

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.

The source is not subject to 45CSR30.

Table of Contents

1.0.	Emission Units	4
2.0.	General Conditions	6
2.1.	Definitions	6
2.2.	Acronyms	6
2.3.	Authority	7
2.4.	Term and Renewal	7
2.5.	Duty to Comply	7
2.6.	Duty to Provide Information	7
2.7.	Duty to Supplement and Correct Information	8
2.8.	Administrative Permit Update	8
2.9.	Permit Modification	8
2.10.	Major Permit Modification	8
2.11.	Inspection and Entry	8
2.12.	Emergency	8
2.13.	Need to Halt or Reduce Activity Not a Defense	9
2.14.	Suspension of Activities	9
2.15.	Property Rights	9
2.16.	Severability	10
2.17.	Transferability	10
2.18.	Notification Requirements	10
2.19.	Credible Evidence	10
3.0.	Facility-Wide Requirements	11
3.1.	Limitations and Standards	11
3.2.	Monitoring Requirements	11
3.3.	Testing Requirements	11
3.4.	Recordkeeping Requirements	13
3.5.	Reporting Requirements	13
4.0.	Source-Specific Requirements [Control Devices]	15
4.1.	Limitations and Standards	15
4.2.	Monitoring Requirements	15
4.3.	Testing Requirements	15
4.4.	Recordkeeping Requirements	15
5.0.	Source-Specific Requirements [Emergency Generators #1 and #2, Detroit Diesel Engines, Model #71637305: 3S and 4S]	17
5.1.	Limitations and Standards	17
5.2.	Monitoring Requirements	19
5.3.	Testing Requirements	19
5.4.	Recordkeeping Requirements	19
5.5.	Reporting Requirements	19

6.0. Source-Specific Requirements [Main Building Electric Motor Build & Rebuild Shop: Emission Point ID E03 - Burnout Oven: 5S]	21
6.1. Limitations and Standards	21
6.2. Monitoring Requirements	21
6.3. Testing Requirements	22
6.4. Recordkeeping Requirements	22
6.5. Reporting Requirements	23
7.0. Source-Specific Requirements [Main Building Electric Motor Build & Rebuild Shop: Emission Point ID 01 - VPI Tank (1S), Dip Tank (2S) and Electric Steelman Bake Ovens: 446ETC and 7720ETC; Paint Booth #1; and Building 2 Fabrication Shop: Paint Booth #2]	24
7.1. Limitations and Standards	24
7.2. Monitoring Requirements	26
7.3. Testing Requirements	27
7.4. Recordkeeping Requirements	27
7.5. Reporting Requirements	28
APPENDIX A	29
CERTIFICATION OF DATA ACCURACY	30

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Main Building (Electric Motor Build & Rebuild Shop)					
1S (No Emissions)	E01	Vacuum Pressure Impregnation (VPI) Tank (pressurized) (resin filled)	Mid-1990s	150 gal	none (Enclosed System)
2S	E01	Dip Tank (varnish)	Mid-1990s	110 gal	none
	E01	Electric Bake Oven * (Steelman 4x4x6ETC)	1977	500 lb	none
	E01	Electric Bake Oven * (Steelman 7x7x20ETC)	Mid 1990s	2,500 lb	none
3S	E02	⁽¹⁾ Emergency Generator #1 (Detroit Diesel, Model 71637305) (outside Main Building)	2002	590 HP	none
4S	E02	⁽¹⁾ Emergency Generator #2 (Standby Generator) (Detroit Diesel, Model 71637305) (outside Main Building)	2002	590 HP	none
5S	E03	Natural Gas-fired ** Burnout Oven (PCP Model CPI 1504215)	1997	0.398 MM Btu/hr	afterburner
(No Emissions)		Electric Burnout Oven ** (Armature 321-E)	1980	200 lb	none
PM Emissions (No VOC or HAP Emissions)		Paint Booth #1 *** (water-based paints powder coatings)	1977	400 lb	PM filter bank
(No Emissions)		Electric Water Evaporator (Inside Building)	1970		
(No Emissions)		Electric Water Evaporator #2 (Outside Building)	2009		

Fabrication Shop

PM Emissions (No VOC or HAP Emissions)		Paint Booth #2 *** (water-based paints & powder coatings)	2000	2,500 lb	PM filter bank
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* Bake off/dries motors/equipment.

** Final removal of stripped pieces - No VOC emissions from stripped pieces.

*** Paints are water-based or powder coatings.

(1) Generator #1 and Generator #2 are identical model generators having the same emissions. Only one of the two generators is to be run at a time. At the time the application was submitted Generator #1 was to be operated in the event of an emergency and Generator #2 was designated as the "Standby Generator" to be operated only if something mechanically went wrong with Generator #1.

2.0. General Conditions

2.1. Definitions

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

2.2. Acronyms

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

2.3. Authority

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

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

2.4. Term and Renewal

- 2.4.1. This permit does not supercede or replace a previously issued permit. 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 Applications R13-3253, 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 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:

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 [Control Devices in Section 1.0, Emission Units Table]

4.1. Limitations and Standards

- 4.1.1. **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.]

4.4. 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.

5.0. Source-Specific Requirements [Emergency Generators #1 and #2, Detroit Diesel Engines, Model #71637305: 3S and 4S]

5.1. Limitations and Standards

- 5.1.1. Only one of the two emergency generators (3S or 4S) shall to be run at a time.
- 5.1.2. Emergency Generators #1 and #2 shall be operated and maintained at all times in accordance with:
 - the manufacturer's emission-related written instructions or to
 - the maintenance plan developed by the permittee which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40CFR§63.6625(e)]

- 5.1.3. Emissions from the Emergency Generator diesel engine (3S or 4S) in operation shall not exceed the following limitations:

Pollutant	Emission Rate	
	(lb/hr)	(ton/yr)*
Nitrogen Oxides (NO _x)	18.29	4.57
Carbon Monoxide (CO)	3.94	0.99
Particulate Matter (PM ₁₀)	1.30	0.32
Volatile Organic Compounds (VOC)	**1.46	**0.36

- * Based on 500 hours per year of operation.
- ** These VOC limitations are included in the facility-wide VOC limitations established in section 7.1.2 of this permit.

- 5.1.4. Emergency Generators #1 and #2 (3S and 4S) shall burn diesel fuel at a rate not to exceed 28 gal/hr and 14,000 gal/yr. Compliance with the maximum yearly fuel consumption rate/limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the fuel consumption at any given time during the previous twelve consecutive calendar months.
- 5.1.5. The permittee shall comply will all applicable requirements in Table 2d of 40 CFR 63, Subpart ZZZZ. For each of the Emergency Generators (3S and 4S):

- a) Change oil and filter every 500 hours of operation or annually, whichever comes first.
- b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40CFR§63.6603(a)]

- 5.1.6. The permittee has the option of utilizing an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of 40 CFR 63, Subpart ZZZZ. **[40CFR§63.6625(h)]**
- 5.1.7. For Emergency Generators (3S and 4S), the permittee shall install a non-resettable hour meter on each emergency generator engine if one is not already installed. **[40CFR§63.6625(f)]**
- 5.1.8. The permittee shall minimize the operating engine's time spent at idle during startup and minimize the operating engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times (other than startup in Tables 1a, 2a, 2c, and 2d) to 40 CFR 63, Subpart ZZZZ apply. **[40CFR§63.6625(h)]**
- 5.1.9. The permittee shall report each instance in which the requirements in Table 8 to 40 CFR 63, Subpart ZZZZ were not met. Table 8 contains the general provisions (of §63) applicable to Subpart ZZZZ. **[40CFR§63.6640(e)]**
- 5.1.9. *Continuous Compliance Requirements for emergency stationary RICE.*
 - (f)(1) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.
 - (i) There is no time limit on the use of emergency stationary RICE in emergency situations.

- (ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- (iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted toward the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40CFR§63.6640(f)]

5.2. Monitoring Requirements

[Reserved]

5.3. Testing Requirements

[Reserved]

5.4. Recordkeeping Requirements

- 5.4.1. To demonstrate compliance with Section 5.1, the permittee shall maintain records of the hours of operation and the amount of diesel fuel consumed. Said records shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

5.5. Reporting Requirements

- 5.5.1. **Footnote 2 of Table 2d:** If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice

requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

[40CFR§63.6650]

6.0. Source-Specific Requirements [Main Building Electric Motor Build & Rebuild Shop: Emission Point ID 01 E03 - Burnout Oven: 5S]

6.1. Limitations and Standards

6.1.1. The exhaust stream from the natural gas-fired PCP Burnout Oven (5S) shall be vented to the afterburner to control VOC emissions. The afterburner shall be in place and functioning before the burnout oven can be placed into operation.

6.1.2. Emissions from the Burnout Oven (5S) shall not exceed the following limitations:

Pollutant	Emission Rate	
	(lb/hr)	(ton/yr)
Particulate Matter (PM ₁₀)	0.02	0.09
Nitrogen Oxides (NO _x)	0.04	0.17
Carbon Monoxide (CO)	0.10	0.44
⁽¹⁾ Volatile Organic Compounds (VOC)	**0.02	**0.09

(1) VOC emission rate controlled by Afterburner.

** These VOC limitations are included in the facility-wide VOC limitations established in section 7.1.2 of this permit.

6.1.3. No person shall cause or allow particulate matter to be discharged from any incinerator into the open air in excess of the quantity determined by use of the following formula:

$$\text{Emissions (lb/hr)} = F \times \text{Incinerator Capacity (tons/hr)}$$

Where, the factor, F, is as indicated in Table I below:

Table I: Factor, F, for Determining Maximum Allowable Particulate Emissions.

Incinerator Capacity	Factor F
A. Less than 15,000 lbs/hr	5.43
B. 15,000 lbs/hr or greater	2.72

[45CSR§6-4.1.]

6.1.4. Compliance with 45CSR§6-4.1. shall be demonstrated through compliance with the more stringent particulate emission limitation set in Section 6.1.2 of this permit.

- 6.1.5. Emission of Visible Particulate Matter. -- No person shall cause or allow emission of smoke into the atmosphere from any incinerator which is twenty percent (20%) opacity or greater. [45CSR§6-4.3.]
- 6.1.6. The provisions of subsection 45CSR§6-4.3 shall not apply to smoke which is less than forty percent (40%) opacity, for a period or periods aggregating no more than eight (8) minutes per start-up, or six (6) minutes in any sixty (60)-minute period for stoking operations. [45CSR§6-4.4.]
- 6.1.7. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors. [45CSR§6-4.6.]

6.2. Monitoring Requirements

- 6.2.1. For the purpose of determining compliance with the opacity limit given in Section 6.1.5 (per 45CSR6-4.3), the permittee shall conduct visible emission checks and/or opacity monitoring and record-keeping for the PCP Burnout Oven (5S).

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 PCP Burnout Oven (5S) at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at the PCP Burnout Oven emission point (E03) for a sufficient time interval, but no less than one (1) minute, 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 at the PCP Burnout Oven (5S) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source 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.

6.3. Testing Requirements

[Reserved]

6.4. Record-keeping Requirements

- 6.4.1. **Record of Monthly Opacity Reading For PCP Burnout Oven Operation (5S).** For the purpose of demonstrating compliance with the opacity limit set forth in Section 6.1.5 (per 45CSR§6-4.3), the permittee shall maintain records (see example form given in attached Appendix A) of all monitoring data documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

6.5. Reporting Requirements

- 6.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, Appendix A, Method 9 must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

7.0. Source-Specific Requirements [Main Building Electric Motor Build & Rebuild Shop: Emission Point ID 01 - VPI Tank (1S), Dip Tank (2S) and Electric Steelman Bake Ovens: 446ETC and 7720ETC; Electric Armature Burn Out Oven; Paint Booth #1; and Building 2 Fabrication Shop: Paint Booth #2]

7.1. Limitations and Standards

7.1.1. The facility-wide emission rate of Hazardous Air Pollutants (HAPs) shall not exceed, on a per HAP basis, ten (10) tons per year, or on a total HAP basis, 25 tons per year. Listed below are HAPs recognized as being used at the facility:

Hazardous Air Pollutant (HAP)	CAS #
Ethylbenzene (clear baking varnish)	100-41-4
Tetrachloroethylene (Perchloroethylene) (electric motor degreaser)	127-18-4
Xylene (clear baking varnish)	1330-20-7

The use of any new materials containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP shall be in accordance with the following:

- a. The permittee shall notify the Director in writing of the new material to be used, the new material's proposed function/use in the process and the HAP(s) contained therein within thirty (30) days of the use of the material. Additionally, an MSDS sheet for the new material shall be supplied at this time to the Director.
- b. The use of the new material shall be incorporated into the record keeping requirements used by the company to show compliance.
- c. Emissions from the use of the new material when combined with emissions from process materials already in use shall not exceed:
 - The facility-wide, single HAP emission limit of 10 ton/yr,
 - The facility-wide, total/aggregated HAP emission limit of 25 ton/yr, and
 - The hourly or annual VOC emission limitations given in Section 7.1.2 of this permit.

- d. For the purposes of this permit, new materials shall be defined as a material applied onto, or impregnated into, a substrate for cleaning/degreasing, protective, decorative, or functional purposes. Such materials include, but are not limited to, stains, thinners, solvents (cleaning/degreaser), sealers, varnishes, paints, primers, catalysts, acrylics, lacquers, and temporary protective coatings, or combinations of the above materials as applied.
- 7.1.2. Facility-wide hourly and annual VOC emission rates shall not exceed 3.75 lb/hr and 11.0 ton/yr. These rates include VOC emissions from Emergency Generator #1 (E02) and the Natural Gas-fired Burnout Oven (E03) covered under sections 5 and 6 of this permit.
- 7.1.3. Paint Booths #1 and #2 shall use water-based paints and powder coating that emit no VOC or HAP emissions.
- 7.1.4. All emissions from Paint Booths #1 and #2 shall be vented through a filter system(s) having a minimum PM control efficiency of 90%. The filter system(s) shall be in place, properly maintained and functioning before the booth(s) being started up can be placed into operation.
- 7.1.5. Sprayon Electric Motor Degreaser & Safety Solvent is the approved degreaser/safety solvent in use at the facility. The permittee shall notify the Director in writing if a solvent(s) other than Sprayon is to be used and the VOC(s) content of the solvent(s) within thirty (30) days of the use. Additionally, an MSDS sheet for the parts cleaning solvent shall be submitted at this time to the Director.
- 7.1.6. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.
[45CSR §7-3.1.]
- 7.1.7. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR §7-5.1.]
- 7.1.8. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such

tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.

[45CSR §7-8.1.]

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

[45CSR §7-8.2.]

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

[45CSR §7-9.1.]

7.2. Monitoring Requirements

- 7.2.1. **Paint Booths #1 and #2 Opacity Monitoring.** For the purpose of determining compliance with the opacity limit given in Section 7.1.6. (per 45CSR7-3.1), the permittee shall conduct visible emission checks and/or opacity monitoring and record keeping for the Paint Booths #1 and #2.

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 Paint Booths 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, 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 at a paint booth for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source 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.

7.3. Testing Requirements

[Reserved]

7.4. Recordkeeping Requirements

7.4.1. **Record of Paint Booth #1 and #2 Maintenance/Filter Changeouts.** For the purpose of determining compliance with Section 7.1.4 of this permit, the permittee shall keep records of all Paint Booth maintenance and filter changeouts.

7.4.2. **Record of Monthly Opacity Reading For Paint Booths #1 and #2.** For the purpose of demonstrating compliance with the opacity limit given in Section 7.1.6 (per 45CSR7-3.1), the permittee shall maintain records (see example form given in attached Appendix A) of all monitoring data documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

7.4.3. **Facility VOC Emission Rates.** For the purpose of determining compliance with the hourly and annual VOC emission limitations set forth in Section 7.1.2 of this permit, the permitted facility shall record:

a). On a daily basis: the amount and VOC content (%) of each VOC-containing material (varnish, degreaser, cleaning solvent, paint, thinner, etc.) used at the facility, the hours per day each VOC-containing material was used/emitted, and the daily and average hourly VOC emission rate for the facility, and

b). On a monthly basis: the 12-month rolling emission rate for the facility (ton/yr).

These records shall be maintained on-site for a period of not less than five (5) years and shall be made available to the Director or his duly authorized representative upon request.

- 7.4.4. **Facility HAP Emission Rates.** If the facility emits more than 10 tons per year of VOCs, the following HAP emission records must be kept:

For the purpose of determining compliance with the HAP emission rate limitations established in Section 7.1.1. of this permit, records shall be kept on a daily basis detailing each single HAP emission rate and the total aggregated HAP emission rate for the facility. In addition to the daily single and total aggregated HAP emission rates: 12-month rolling single HAP emission rates and a 12-month total aggregated HAP emission rate are to be calculated and recorded daily.

7.5. Reporting Requirements

- 7.5.1. Per Section 7.1.1 of this permit: The permittee shall notify the Director in writing of any new material containing any HAP(s) within thirty (30) days of using the new material. An MSDS sheet for the new material shall be included with the notice to the Director.
- 7.5.2. Per Section 7.1.5 of this permit: The permittee shall notify the Director in writing of any new degreaser used in degreaser operation and the VOC content of the degreaser within thirty (30) days of use. An MSDS sheet for the degreaser shall be included with the notice to the Director.

CERTIFICATION OF DATA ACCURACY

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

Signature¹

(please use blue ink)

Responsible Official or Authorized Representative

Date

Name and Title

(please print or type)

Name

Title

Telephone No. _____

Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

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