

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Permit to Construct



DRAFT R13-2948

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:

Rubberlite, Incorporated
Huntington Facility
011-00174

*John A. Benedict
Director*

Issued: DRAFT • Effective: DRAFT

Facility Location: Huntington, Cabell County, West Virginia
Mailing Address: 2501 Guyan Avenue; Huntington, WV 25703
Facility Description: Foam Production and Fabrication Facility
NAICS Codes: 326291
UTM Coordinates: 4,254.328 km Easting • 376.588 km Northing • Zone 17
Permit Type: Construction
Description of Change:

This is a facility wide permit for an existing foam production facility that is adding a lamination system. Facility wide potential to emit air emissions are: 2.43 tpy of CO, 2.90 tpy of NO_x, 0.27 tpy of PM 2.5, 0.42 tpy of PM₁₀, 1.24 tpy of PM, 0.02 tpy of SO₂, 23.55 tpy of VOC, 0.5 tpy of Formaldehyde, 1.18 tpy of MDI, and 4.60 of Total HAPs.

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.

F

T

Table of Contents

1.0. Emission Units 3

2.0. General Conditions 4

 2.1. Definitions 4

 2.2. Acronyms 4

 2.3. Authority 5

 2.4. Term and Renewal 5

 2.5. Duty to Comply 5

 2.6. Duty to Provide Information 5

 2.7. Duty to Supplement and Correct Information 6

 2.8. Administrative Permit Update 6

 2.9. Permit Modification 6

 2.10. Major Permit Modification 6

 2.11. Inspection and Entry 6

 2.12. Emergency 6

 2.13. Need to Halt or Reduce Activity Not a Defense 7

 2.14. Suspension of Activities 7

 2.15. Property Rights 7

 2.16. Severability 8

 2.17. Transferability 8

 2.18. Notification Requirements 8

 2.19. Credible Evidence 8

3.0. Facility-Wide Requirements 9

 3.1. Limitations and Standards 9

 3.2. Monitoring Requirements 9

 3.3. Testing Requirements 9

 3.4. Recordkeeping Requirements 11

 3.5. Reporting Requirements 11

4.0. Source-Specific Requirements 13

 4.1. Limitations and Standards 13

 4.2. Monitoring Requirements 16

 4.3. Testing Requirements 16

 4.4. Recordkeeping Requirements 16

 4.5. Reporting Requirements 18

APPENDIX A 19

CERTIFICATION OF DATA ACCURACY 20

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device
1S	1E	Foam Production Unit	1999	1,314,000 ft/yr	None
2S	2E	Bun press	1989	N/A	None
3S	3E	Hot Melt Laminator No. 1	2007	45.92 ft/min	None
4S	4E	Hot Melt Laminator No. 2	2012	45.92 ft/min	None
5S	5E	Buffer	2005	30 ft/min	1C, 2C
6S	6E	Misting Unit	2010	27.0 ft/min	None
7S	7E	Roll Coater with Apollo Dryer	2012	16.4 ft/min 6.54 MMBtu/hr	None
8S	8E	Solvent Cleaning Stations	1999/ 2007	N/A	None
9S	9E	Lab Production Unit (R&D)	2011	N/A	None
10S	10E	ISO Tanks	1999	2 - 7,000 gallon 3 - 800 gallon	None
11S	11E	Glycol Tanks	1999	5 to 330 gallons	None
12S	12E	Vehicle Activity	1989	N/A	None
Control Devices					
Control Device ID	Control Device Description		Year Installed/ Modified	Design Capacity	
1C	Sternvent single-stage mechanical collector; Model No. CYA-4800		2005	n/a	
2C (BH1, BH2)	Sternvent baghouse; Model No. AFAE 5612D		2005	99.9% (urethane dust)	

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 shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2948 and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

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

2.7. Duty to Supplement and Correct Information

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

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

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

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

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed

equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

2.13. Need to Halt or Reduce Activity Not a Defense

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

2.14. Suspension of Activities

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

2.15. Property Rights

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

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent

jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

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

2.18. Notification Requirements

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

2.19. Credible Evidence

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

A

F

T

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

- 3.5.4. **Operating Fee.**

- 3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.4.2. In accordance with 45CSR22 – Air Quality Management Fee Program, enclosed with this permit is an Application for Certificate to Operate (CTO). The CTO will cover the time period beginning with the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the CTO application.
- 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.

A

F

T

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. In accordance with the information filed in Permit Application R13-2948, the equipment identified under Section 1.0 of this permit shall be installed, maintained, and operated so as to minimize any fugitive escape of pollutants, shall not exceed the listed maximum design capacities, and shall use the specified control devices.
- 4.1.2. The permittee shall not exceed the hourly and annual emission limits established in Table 4.1.2. Annual emission limits are on a 12-month rolling basis.

Table 4.1.2. - Emission Limits

Emission Point ID	Emission Unit ID	Regulated Pollutant	Maximum Potential Controlled Emissions	
			lb/hr	tpy
1E and 9E	1S, 9S	Total VOC	3.44	15.08
		Total HAP	0.01	0.01
2E	2S	Total VOC	2.74	5.48
		Total HAP	1.38	2.76
3E and 4E	3S, 4S	Total VOC	0.50	1.17
		Total HAP	0.50	1.17
5E	5S	PM	0.01	0.01
		PM ₁₀	0.01	0.01
		PM _{2.5}	0.01	0.01
6E	6S	Total VOC	0.62	0.40
		Total HAP	0.62	0.40
7E	7S	CO	0.56	2.43
		NO _x	0.66	2.90
		PM	0.06	0.22
		PM ₁₀	0.06	0.22
		PM _{2.5}	0.06	0.22
		SO ₂	0.01	0.02
		Total VOC	2.00	0.26
		Total HAP	1.98	0.13

8E	8S	Total VOC	0.27	1.15
		Total HAP	0.03	0.09

Note: Total HAPs may include any one or more of the following: 4,4-Methylenediphenyl Diisocyanate (MDI), Toluene, Ethylene Glycol, Glycol Ethers, and Formaldehyde.

- 4.1.3. Facility wide Formaldehyde emissions shall not exceed 1,000 pounds per year, calculated on a 12-month rolling total. Should the permittee exceed this limit, they shall immediately become subject to all applicable requirements of 45CSR27, including the use of Best Available Technology “BAT”. **[45CSR27]**
- 4.1.4. To ensure compliance with the production [1E] emission limits in Table 4.1.2, the permittee shall not exceed 2,135,024 linear feet of foam production per year. Compliance with the annual production shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of linear foam produced at any given time for the previous twelve (12) consecutive months.
- 4.1.5. To ensure compliance with the Bun Press [2E] emission limits in Table 4.1.2, the permittee shall limit the glue usage to a maximum of 2,000 gallons per year of V-4055. Compliance with the annual usage shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of V-4055 used at any given time for the previous twelve (12) consecutive months.
- 4.1.6. To ensure compliance with the Hot Melt Laminator [3E, 4E] emission limits in Table 4.1.2, the permittee shall limit the MDI containing glue usage to a maximum of 234,000 pounds per year for both units. Non-MDI containing glue usage is not included in this maximum annual usage limit. Compliance with the annual usage shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of all glue used at any given time for the previous twelve (12) consecutive months.
- 4.1.7. To ensure compliance with the Misting Unit [6E] emission limits in Table 4.1.2, the permittee shall limit the usage of misting agent to 200,000 pounds per year. Compliance with the annual usage shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of misting agen used at any given time for the previous twelve (12) consecutive months.
- 4.1.8. To ensure compliance with the Roll Coater [7E] emission limits in Table 4.1.2, the permittee shall limit the annual usage of PF 4211 to the amount specified in the permit application. Compliance with the annual usage shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of PF 4211 used at any given time for the previous twelve (12) consecutive months.
- 4.1.9. To ensure compliance with the Roll Coater [7E] emission limits in Table 4.1.2, the permittee shall limit the annual fuel usage to the Apollo Dryer to 57.82 MM SCF. The fuel type shall be limited to Natural Gas. Compliance with the annual usage shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of natural gas used at any given time for the previous twelve (12) consecutive months.
- 4.1.10. To ensure compliance with the Multiple Parts Washer [8E] emission limits in Table 4.1.2, the permittee shall keep the lids to the parts washers closed when solvent is present in the system(s) and not in use.

- 4.1.11. The permittee shall establish and adhere to a preventive maintenance program for the Sternvent mechanical collector [1C] and baghouses [2C] that is consistent with manufacturer's recommendation to ensure the 99.9% efficiency stated in the Emissions Unit Table 1.0 of this permit. At a minimum, the preventive maintenance program shall include at what frequency or at what trigger (such as change in differential pressure) the filters are to be replaced.
- 4.1.12. For the Roll Coater with Apollo Dryer [7S], the permittee shall comply with all applicable requirements of 45CSR2. The principle provision of 45CSR2 applicable to the permitted facility is:
- a. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. **[45CSR-2.3.1]**
- 4.1.13. For the Buffer Unit [5S], the permitted facility shall comply with all applicable requirements of 45CSR7, with the exception of any more stringent limitations set forth in Table 4.1.2 of this permit. The principle provisions of 45CSR7, applicable to the permitted facility are:
- a. 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; **[45CSR 7-3.1]**
 - b. The provisions of subsection 3.1 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period; **[45 CSR 7-3.2]**
 - c. 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 opr 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];**
 - d. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. **[45CSR 7-5.2]**
- 4.1.14. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. **[45CSR§13-5.11.]**

4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the opacity limits of 45CSR2-3.1 and section 4.1.12 of this permit, the permittee shall conduct visible emission checks and/or opacity monitoring and record keeping for all emission sources subject to an opacity limit.
- a. 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.
- b. Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) 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 appropriate weather conditions.
- c. If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) 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.

4.3. Testing Requirements

Reserved.

4.4. Recordkeeping Requirements

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

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- D
- 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:

- R
- 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.
- A
- 4.4.4. To demonstrate compliance with the formaldehyde emission limit set forth in section 4.1.3 of this permit, the permittee shall maintain monthly and annual emission records. Annual records shall be maintained on a 12-month rolling total basis.
- 4.4.5. To demonstrate compliance with the emission limit set forth in section 4.1.3 of this permit, the permittee shall maintain records indicating the amount of HYCAR® 2679 purchased. Annual records shall be maintained on a 12-month rolling total basis.
- 4.4.6. To demonstrate compliance with the production limit set forth in section 4.1.4 of this permit, the permittee shall maintain monthly and annual production records. Annual records shall be maintained on a 12-month rolling total basis.
- 4.4.7. To demonstrate compliance with the usage limits set forth in sections 4.1.5, 4.1.6, 4.1.7, and 4.1.8 and the emission limit for [1E] set forth in Table 4.1.2, the permittee shall maintain records indicating the amount of ISO purchased, V-4055 purchased, hot melt laminator MDI containing glue purchased, the amount of misting agent purchased, and the amount of PF4211 purchased. Annual usage records shall be maintained on a 12-month rolling total basis.
- 4.4.8. To demonstrate compliance with the natural gas usage limit established in section 4.1.9 of this permit, the permittee shall maintain records of the fuel usage. Annual records shall be maintained on a 12-month rolling total basis.
- 4.4.9. To demonstrate compliance with the maintenance requirements established in section 4.1.11

of this permit, the permittee shall maintain records indicating all maintenance that has been performed on the mechanical collector and baghouses. At a minimum the records shall include the date that the maintenance was performed and shall include all filter changes that were made.

- 4.4.10. The permittee shall maintain records of all monitoring data required by section 4.1.12 of this permit 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). An example form is supplied as Appendix A. 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.

4.5. Reporting Requirements

- 4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observation 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.
- 4.5.2. The permittee shall submit, upon request by the Director, records that the document that the source is exempt from the emission limitations of 45CSR21-40.3.
- a. These records shall be submitted to the Director within 30 days from the date of request.
 - b. If such records are not made available, the source will be considered subject to the limits in 45CSR21-40.3.
[45CSR21-40.6b]

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

D _____ 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

R

_____ Title

Telephone No. _____

Fax No. _____

¹

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

- A**
- 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.
- F**
- T**