

**West Virginia Department of Environmental Protection
Division of Air Quality**

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Operate



Pursuant to
Title V
of the Clean Air Act

Issued to:
Viking Pools, LLC
Jane Lew
R30-04100045-2011

John A. Benedict
Director

Issued: July 27, 2011 • Effective: August 10, 2011
Expiration: July 27, 2016 • Renewal Application Due: January 27, 2016

Permit Number: **R30-04100045-2011**
Permittee: **Viking Pools, LLC**
Facility Name: **Jane Lew**
Permittee Mailing Address: **P.O. Box 550, Jane Lew, WV 26378**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: Jane Lew, Lewis County, West Virginia
Facility Mailing Address: 439 Industrial Parkway, Jane Lew, WV 26378
Telephone Number: 304-884-6954
Type of Business Entity: LLC
Facility Description: Reinforced Composite Plastic Manufacturing
SIC Codes: 3089
UTM Coordinates: 552.3 km Easting • 4328.1 km Northing • Zone 17

Permit Writer: Bobbie Scroggie

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.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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1.0 Emission Units and Active R13, R14, and R19 Permits

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
EU-1B	EP-01, EP-02	Building One Manufacturing Process (Viking Pools Building)	2010	N/A	CD-01 Fabric Filter
EU-1B	EP-03, EP-04	Building Two Manufacturing Process (CPC Building)	2010	N/A	CD-02 Fabric Filter
EU-1A	EP-07	Building One Mold Maintenance/ Research and Development	2010	N/A	None
EU-1A	EP-08	Building Two Mold Maintenance/ Research and Development	2010	N/A	None
EU-02	N/A	Finishing Area Fugitive Emissions	2010	N/A	CD-03 Fabric Filter
EU-03	N/A	Material Storage Area	1999	N/A	None
EU-04	N/A	Haul Road Particulate Fugitives	1999	N/A	None

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2332D	February 18, 2011

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 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months

2.2. Acronyms

CAAA	Clean Air Act Amendments	NESHAPS	National Emissions Standards for Hazardous Air Pollutants
CBI	Confidential Business Information	NO_x	Nitrogen Oxides
CEM	Continuous Emission Monitor	NSPS	New Source Performance Standards
CES	Certified Emission Statement	PM	Particulate Matter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	pph	Pounds per Hour
C.S.R. or CSR	Codes of State Rules	ppm	Parts per Million
DAQ	Division of Air Quality	PSD	Prevention of Significant Deterioration
DEP	Department of Environmental Protection	psi	Pounds per Square Inch
FOIA	Freedom of Information Act	SIC	Standard Industrial Classification
HAP	Hazardous Air Pollutant	SIP	State Implementation Plan
HON	Hazardous Organic NESHAP	SO₂	Sulfur Dioxide
HP	Horsepower	TAP	Toxic Air Pollutant
lbs/hr	Pounds per Hour	TPY	Tons per Year
LDAR	Leak Detection and Repair	TRS	Total Reduced Sulfur
m	Thousand	TSP	Total Suspended Particulate
MACT	Maximum Achievable Control Technology	USEPA	United States Environmental Protection Agency
mm	Million	UTM	Universal Transverse Mercator
mmBtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
mmft³/hr	Million Cubic Feet Burned per Hour	VOC	Volatile Organic Compounds
NA or N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
 - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.
[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.

[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.

[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.

[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.

[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
- b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield.
- d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

- e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.
- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
- b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
- c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. 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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. 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.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

- b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.
[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would 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.
[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably 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.
[45CSR§30-5.7.a.]
- 2.17.2. 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 45CSR§30-5.7.c. are met.
[45CSR§30-5.7.b.]
- 2.17.3. 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. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, 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, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
[45CSR§30-5.7.c.]
- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]
- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. 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 modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required 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.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. 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.
[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]
- 2.21.2. Nothing in this permit shall alter or affect the following:
- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
 - b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.
[45CSR§30-5.6.c.]

2.22. Credible Evidence

- 2.22.1. 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 defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

- 2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

- 2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.
 - a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
 - b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
 - c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.
[45CSR§30-5.1.d.]
- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.
[45CSR§30-5.1.a.2.]

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person 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 or allow 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 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.
[40 C.F.R. 61 and 45CSR34]
- 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. **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 45CSR11.
[45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.
- [40 C.F.R. 82, Subpart F]

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.2. Monitoring Requirements

- 3.2.1. For the purposes of demonstrating compliance with resin content limits in Sections 4.1., 5.1., 6.1., and 40 CFR 63 Subpart WWWW, the permittee shall maintain a record of each batch or lot of resin/gel coat delivered to the facility. Such records shall be maintained in accordance with 3.4.2. of this permit. These records shall contain at the minimum the following information:
- a. Name of resin and the manufacturer;
 - b. Type of resin (i.e. gel coat off white, gel coat white polyester resin, etc.);
 - c. Batch or Lot identification number;
 - d. Styrene, MMA and Total HAP content by weight; The permittee may use the MSDS for the specific resin or gelcoat received to obtain this data;
 - e. Amount of resin delivered; and
 - f. Date delivered to the facility.

[45CSR13 - Permit R13-2332, Condition 3.2.1.]

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, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are 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.

- 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 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.
 3. A statement of compliance or non-compliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** 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.

[45CSR§30-5.1.c.2.A. and 45CSR13 - R13-2332, Conditions 4.4.1. and 5.4.1.]

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required

by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **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§30-5.1.c. 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.

[45CSR§30-4.4. and 5.1.c.3.D.]

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

[45CSR§30-5.1.c.3.E.]

- 3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, 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, mailed first class, or by private carrier 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
Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

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. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.

[45CSR§30-8.]

- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.

[45CSR§30-5.3.e.]

- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. **[45CSR§30-5.1.c.3.A.]**
- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.
- 3.5.8. **Deviations.**
- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
 3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
 4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken. **[45CSR§30-5.1.c.3.C.]**
- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary. **[45CSR§30-5.1.c.3.B.]**
- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement. **[45CSR§30-4.3.h.1.B.]**
- 3.5.10. The permittee shall submit to the Director a revised Styrene Odor Control Plan pursuant to the receipt of a written request from the Director. The plan will be revised to include the identification of control devices and/or changes in operating procedures designed to reduce styrene emissions that have been recognized as sources of objectionable odor complaints received following the submittal of the preceding plan. The plan will

be submitted within 90 days of receipt of the written request. The plan will document the efforts undertaken by the permittee that are designed to reduce or eliminate styrene odors caused by emissions from the facility. **[45CSR13 - Permit R13-2332, Condition 3.5.6.]**

3.6. Compliance Plan

3.6.1. None.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- a. 45CSR§7-3.7. - The facility does not have storage structures which produce particulate emissions.
 - b. 45CSR17 - The facility is not subject to 45CSR17 because it is subject to 45CSR7.
 - c. 45CSR21 - The facility is not in a county regulated by this rule.
 - d. 45CSR27 - The facility is not a source of toxic air pollutants.
 - e. 45CSR29 - The facility is not in a county regulated by this rule.

4.0. Manufacturing Processes Requirements [EP-01 through EP-04, EP-07, EP-08]

4.1. Limitations and Standards

4.1.1. The permittee shall manufacture fiberglass reinforced plastic composite products using the open mold process inside the structures identified as Building One and Building Two. The permittee shall employ the following application technologies for the corresponding resin type using the listed spray gun type and pump pressure range.

Table 4.1.1. - Application Technology				
Resin Type	Technology	Gun Type	Maximum Pump Pressure (psig)	Maximum Pump Ratio
Crystite	Mechanical Atomized Spray	Magnum Venus ITD-3500	70	11:1
Gelcoat	Mechanical Atomized Spray	Magnum Venus ITD-3500	70	11:1
VE Resin	Mechanical Non-Atomized Spray (FIT)	Magnum Venus VPR-1000	70	6:1
Ceramic Resin	Mechanical Atomized Spray	Magnum Venus ITD-3500	70	20:1
General Purpose Resin	Mechanical Non-Atomized Spray (FIT)	Magnum Venus VPR-1000	70	6:1

[45CSR13 - Permit R13-2332, Condition 4.1.1.]

4.1.2. Emissions generated during the resin application processes per manufacturing building shall be limited to the following associated emission rates:

Table 4.1.2. Maximum Daily Material Usage - Building 1					
Material	Maximum MMA conc. (% by wt.)	MMA Emissions (lbs/hr)	Maximum Styrene conc. (% by wt.)	Styrene Emissions (lbs/hr)	Daily Usage (lbs/day)
Clear Gelcoat	7.0	10.4	45.0	53.7	2,827
Colored Gelcoat	6.0	5.1	33.0	16.7	1,365
Vinyl Ester Resin	0.0	0.0	46.0	26.3	5,653
Ceramic Filled	0.0	0.0	35.0	15.9	3,899
General Purpose Resin	1.0	5.2	35.0	26.9	8,383
Building 1 Total		20.7		139.5	

Table 4.1.2. Maximum Daily Material Usage - Building 2					
Material	Maximum MMA conc. (% by wt.)	MMA Emissions (lbs/hr)	Maximum Styrene conc. (% by wt.)	Styrene Emissions (lbs/hr)	Daily Usage (lbs/day)
Clear Gelcoat	7.0	11.5	45.0	59.4	3,127
Colored Gelcoat	6.0	1.1	33.0	18.5	1,510

Vinyl Ester Resin	0.0	0.0	46.0	29.0	6,255
Ceramic Filled	0.0	0.0	35.0	17.6	4,314
General Purpose Resin	1.0	0.0	35.0	29.7	9,274
Building 2 Total		12.6		154.2	

1 - Emissions were derived from ACMA UEF Tables.

2 - The maximum hourly emissions are based on the highest emitting resin being applied at the maximum permitted resin usage rate as established in permit application.

[45CSR13 - Permit R13-2332, Condition 4.1.2.]

4.1.3. The permittee shall not exceed the following limits that are associated with the application process. As a result of these limits, the facility shall be limited to a VOC emission rate of 164.7 tons per year from the manufacturing process.

Table 4.1.3. - Maximum Annual Material Usage - Building 1 (Contingent Operating Mode)					
Material	Max. MMA conc. (% by wt)	Annual MMA Emissions (tpy)	Maximum Styrene conc. (% by wt)	Annual Styrene Emissions (tpy)	Annual Usage (lbs/year)
Clear Gelcoat	7.0	1.9	45.0	11.8	87,265
Colored Gelcoat	6.0	2.4	33.0	7.9	107,984
Vinyl ester resin	0.0	0.0	46.0	5.8	209,908
Ceramic Filled	0.0	0.0	35.0	2.0	55,952
General Purpose Resin	1.0	1.1	35.0	5.5	287,477
Catalyst	N/A	0.0	N/A	0.0	14,972
Total		5.4		33	

Table 4.1.3. - Maximum Annual Material Usage - Building 2 (Contingent Operating Mode)					
Material	Max. MMA conc. (% by wt)	Annual MMA Emissions (tpy)	Maximum Styrene conc. (% by wt)	Annual Styrene Emissions (tpy)	Annual Usage (lbs/year)
Clear Gelcoat	7.0	6.2	45.0	38.3	282,260
Colored Gelcoat	6.0	7.9	33.0	25.7	349,274
Vinyl ester resin	0.0	0.0	46.0	18.9	678,948
Ceramic Filled	0.0	0.0	35.0	6.3	180,977
General Purpose Resin	1.0	3.5	35.0	17.9	929,846
Catalyst	N/A	0.0	N/A	0.0	48,426
Total		17.6		107.1	

Table 4.1.3. - Maximum Annual Material Usage - Building 1 (Routine Operating Mode)					
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Material	Max. MMA conc. (% by wt.)	Annual MMA Emissions (tpy)	Maximum Styrene conc. (% by wt.)	Annual Styrene Emissions (tpy)	Annual Usage (lbs/year)
Clear Gelcoat	6.0	2.3	37.0	11.3	120,196
Colored Gelcoat	5.0	2.8	30.0	9.9	148,732
Vinyl ester resin	0.0	0.0	43.0	7.4	289,119
Ceramic Filled	0.0	0.0	32.0	2.1	77,066
General Purpose Resin	1.0	1.5	32.0	6.8	395,960
Catalyst	N/A	0.0	N/A	0.0	20,621
Total		6.6		37.5	

Table 4.1.3. - Maximum Annual Material Usage - Building 2 (Routine Operating Mode)					
Material	Max. MMA conc. (% by wt.)	Annual MMA Emissions (tpy)	Maximum Styrene conc. (% by wt.)	Annual Styrene Emissions (tpy)	Annual Usage (lbs/year)
Clear Gelcoat	6.0	6.2	37.0	31.0	329,304
Colored Gelcoat	5.0	7.6	30.0	27.2	407,486
Vinyl ester resin	0.0	0.0	43.0	20.2	792,106
Ceramic Filled	0.0	0.0	32.0	5.7	211,140
General Purpose Resin	1.0	4.1	32.0	18.6	1,084,821
Catalyst	N/A	0.0	N/A	0.0	56,497
Total		17.9		102.7	

Notes: All usage rates are listed on a neat basis, excluding all inert fillers and additives.
 Compliance with the annual limits shall be demonstrated on a 12 month rolling total.

Regardless of the above limits, combined total emissions (both buildings, both operating modes) of Styrene shall not exceed 140.2 tpy and combined total emissions of MMA shall not exceed 24.5 tpy. [45CSR13 - Permit R13-2332, Condition 4.1.3.]

4.1.4. The permittee shall not use a resin or gel coat with a concentration greater than what is listed in Table 4.1.3. of this permit for the corresponding resin type at this facility.
[45CSR13 - Permit R13-2332, Condition 4.1.4.]

4.1.5. The permittee shall operate all spray guns at the lowest pressure that produces an acceptable spray pattern without exceeding the maximum allowable pressure listed in Table 4.1.1.
[45CSR13 - Permit R13-2332, Condition 4.1.5.]

4.1.6. The permittee shall operate and maintain the spray equipment that is employing the fluid impingement technology (FIT), which is classified as non-atomized spray technology, in accordance with the manufacturer's specifications at all times. A copy of the manufacturer's specifications shall be maintained on site and made immediately available for inspection by the Secretary or his/her duly authorized representative.
[45CSR13 - Permit R13-2332, Condition 4.1.6.]

- 4.1.7. The permittee shall provide all production personnel who use mechanical, non-atomized application equipment (e.g. FIT spray guns) formal training on its use in accordance with the manufacturer's instructions and specifications on an annual basis. New production personnel shall be trained within the first 30 days of being employed by the permittee. The permittee shall maintain records of such training in accordance with 3.4.2. of this permit.
[45CSR13 - Permit R13-2332, Condition 4.1.7.]
- 4.1.8. Emissions of particulate matter from the swimming pool manufacturing process shall not exceed a rate of 2.3 pounds per hour or 2.6 tons per year per building.
[45CSR§7-4.1. and 45CSR13 - Permit R13-2332, Condition 4.1.8.]
- 4.1.9. Emissions of visible particulate matter emitted from emission points EP-01, EP-02, EP-03 and EP-04 shall not exceed 20% opacity, except for visible emissions which are less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR§§7-3.1. and 7-3.2. and 45CSR13 - Permit R13-2332, Condition 4.1.9.]
- 4.1.10. The permittee shall replace all fabric filters used to control particulate matter being emitted to the atmosphere through emission points EP-01, EP-02, EP-03, and EP-04 anytime the pressure drop across the baghouse falls outside of the manufacturers specifications. If the filters undergo a malfunction as observed through the monitoring requirement listed in Condition 4.2.5. of this permit, the filters shall be replaced immediately.
[45CSR§§7-3.1. and 7-5.1. and 45CSR13 - Permit R13-2332, Condition 4.1.10.]
- 4.1.11. The permittee shall install, operate, and maintain a ventilation system for each manufacturing building that is capable of creating a capture efficiency of 100%, or meets the design and operation requirements for a permanent total enclosure specified in EPA Method 204 of appendix M to 40 CFR Part 51 for the manufacturing area inside each of the manufacturing buildings. This ventilation system shall be constructed in accordance with the recommendation within the Odor Control Plan dated November 4, 2005 and Permit Application R13-2332C. A fabric filter system shall be incorporated with this ventilation system that has a collection efficiency of 95% for particulate matter.
[45CSR§4-3.1, 45CSR§7-3.1, and 45CSR13 - Permit R13-2332, Condition 4.1.11.]
- 4.1.12. The permittee shall construct and maintain exhaust stack(s) heights for Emission Points EP-01 and EP-02 at a minimum of 50 feet in elevation above the ground and for Emission Points EP-03 and EP-04 at a minimum height of 62 feet in elevation above the ground. These stacks shall not contain any obstacles that would reduce or block the flow of exhaust gases through the stack to the atmosphere.
[45CSR§20-2.4. and 45CSR13 - Permit R13-2332, Condition 4.1.12.]
- 4.1.13. The permittee shall have all interior and exterior openings in the ventilated areas of the manufacturing areas of Building One and Building Two closed at all times, except to allow the flow of raw materials, equipment, and personnel. When introducing new molds or removing pools, the permittee shall not have more than one overhead door open at any one time. The permittee shall install and maintain all doors and walls on all interiors and exterior openings to ensure compliance with condition 4.1.11.
[45CSR§4-3.1. and 45CSR§7-5.1. and 45CSR13 - Permit R13-2332, Condition 4.1.13.]
- 4.1.14. The permittee shall conduct all resin application activities within the ventilated manufacturing area. This shall include any maintenance activities using resin/gel coat spray equipment.
[45CSR13 - Permit R13-2332, Condition 4.1.14.]
- 4.1.15. The air drying of any container to remove VOCs is prohibited at the facility.

[45CSR13 - Permit R13-2332, Condition 4.1.15.]

- 4.1.16. Grinding emissions from the finishing area shall be controlled by a central vacuum system vented to a baghouse. Said vacuum system and baghouse shall be designed, installed, operated and maintained so as to achieve a minimum overall control efficiency of 99.9%.

[45CSR13 - Permit R13-2332, Condition 4.1.16.]

- 4.1.17. **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, the spray equipment employing the FIT process, ventilation system for each building, 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. and 45CSR13 - Permit R13-2332, Condition 4.1.17.]

4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the limits and requirements set forth in 4.1.1. of this permit, the permittee shall monitor the type of equipment and the pressure of the supplied air to the spray equipment for each step of the manufacturing process at the beginning of each shift. Records of this monitoring shall be maintained in accordance with 3.4.2. of this permit.

[45CSR13 - Permit R13-2332, Condition 4.2.1.]

- 4.2.2. For the purpose of determining compliance with the limits and requirements set forth in 4.1.2. and 4.1.3. of this permit, the permittee shall monitor the time of day when the manufacturing process started, the time of day when the manufacturing process shut down, amount of resin used by type and specific product name. The permittee shall sum the daily usages by resin type. With the tallied daily resin usages, the permittee shall determine the daily average hourly styrene rate, calendar monthly total, and the 12 month rolling total by resin type. These calculations shall be completed and certified by the responsible official no later than fifteen days from the end of each calendar month.

[45CSR13 - Permit R13-2332, Condition 4.2.2.]

- 4.2.3. For purpose of determining compliance with the limits and requirements set forth in 4.1.11. and 4.1.13., the permittee shall develop a written procedure for determining that the entire ventilation system is operating properly. This check shall be performed in accordance with the written procedure and performed on a daily basis prior to commencing manufacturing operations. The permittee shall maintain records of such checks in accordance with 3.4.2. of this permit. A copy of the written procedure shall be maintained on site at all times and made available to the Director or his/her duly authorized representative upon request.

[45CSR13 - Permit R13-2332, Condition 4.2.3.]

- 4.2.4. For the purpose of determining compliance with the opacity limits of set forth in 4.1.9., the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit.

The visible emission check 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 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 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 periods of normal facility operation and appropriate weather conditions.

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 45CSR7A as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A 45CSR7A observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

[45CSR13 - Permit R13-2332, Condition 4.2.4.]

4.2.5. The permittee shall monitor pressure drop across each baghouse at the facility at least once per operating day. During this daily monitoring operation, the facility shall perform the following:

1. Visual inspection.
2. Record pressure drop.
3. Any additional maintenance activities as required by the manufacturer.

[45CSR13 - Permit R13-2332, Condition 4.2.5.]

4.3. Testing Requirements

4.3.1. To determine compliance with the limits set forth under 4.1.11., the permittee shall conduct a U.S. EPA Method 204 test once every five (5) years, and at any such time as may be required by the USEPA Administrator or the Director to determine the capture efficiency of the ventilation system for each of the manufacturing areas. The permittee shall submit the test protocol and results of these tests in accordance with 3.3.1 of this permit. These records shall be certified by a "responsible official" and maintained on site for a period of not less than five (5) years and shall be made available to the Director or a duly authorized representative of the Director upon request.

[45CSR13 - Permit R13-2332, Condition 4.3.1.]

4.4. Recordkeeping Requirements

4.4.1. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0., the spray equipment employing the FIT process as identified in 4.1.1. of this permit, and the ventilation system for each building, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

[45CSR13 - Permit R13-2332, Condition 4.4.2.]

4.4.2. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0., the spray equipment employing the FIT process as identified in 4.1.1. of this permit, and the ventilation system for each building, 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.

[45CSR13 - Permit R13-2332, Condition 4.4.3.]

4.4.3. For the purpose of demonstrating compliance with the monitoring requirements set forth in Section 4.2.2. of this permit, the permittee shall maintain the following records:

- a. Type of resin(s) used, the associated amount of each and the method use to apply the resin;
- b. Styrene, MMA and total HAP content of each resin used;
- c. Amount of catalyst consumed; and
- d. Date.

[45CSR13 - Permit R13-2332, Condition 4.4.4.]

4.4.4. The permittee shall maintain records of all monitoring data required by condition 4.2.4. 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 in the Appendix. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall be maintained per the requirements of 45CSR7A. 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.

[45CSR13 - Permit R13-2332, Condition 4.4.5.]

4.4.5. The facility shall record the monitoring practices listed in Condition 4.2.5. on a daily basis by using a paper or computer log. The log record of each monitoring practice must include:

- a. Date and time of inspection
- b. Name and title of inspector
- c. Visible condition of filter

- d. Pressure drop reading
- e. Documentation of replacement of filter (if applicable)
- f. Reason for replacement of filter (if applicable)
[45CSR13 - Permit R13-2332, Condition 4.4.6.]

4.5. Reporting Requirements

- 4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observations using 45CSR7A 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.
[45CSR13 - Permit R13-2332, Condition 4.5.1.]

4.6. Compliance Plan

- 4.6.1. None

5.0. Mold Repair, Maintenance and Research and Development-Specific Requirements

5.1. Limitations and Standards

5.1.1. The permittee shall not exceed the following emission rates by pollutant for the facility.

	VOC (TPY)	Styrene (TPY)	MMA (TPY)	Total HAPs (TPY)	PM & PM₁₀ (TPY)
Facility Wide Limit	4.0	1.3	0.4	1.7	0.4

[45CSR13 - Permit R13-2332, Condition 5.1.1.]

5.1.2. The permittee shall be limited to an aggregated annual raw material usage of 22,800 pounds per year for mold fabrication and maintenance. Compliance with this annual usage limit shall be demonstrated on a 12-month rolling total.

[45CSR13 - Permit R13-2332, Condition 5.1.2.]

5.1.3. The permittee shall not use a tooling gel coat resin or any other gel coat used for the repair and manufacturing of molds with a styrene content of greater than 47% by weight nor any resin with a MMA content greater than 5% by weight. The amount of tooling gel coat resin used for the either repair or manufacturing of molds shall not exceed 7,500 pounds per year.

[45CSR13 - Permit R13-2332, Condition 5.1.3.]

5.1.4. The permittee may construct molds used in the open molding process at the permitted facility. The amount of resin(s) used to manufacture these molds shall be counted against the respective allowable limits stated in table 4.1.3 and condition 4.1.4. of this permit.

[45CSR13 - Permit R13-2332, Condition 5.1.4.]

5.2. Monitoring Requirements

5.2.1. For the purpose of determining compliance with the limits and requirements set forth in Section 5.1. of this permit, the permittee shall monitor the following information pertaining to each material in used mold building and maintenance operation on a monthly basis:

a. Type and amount of material used;

b. Total VOC and HAP content.

[45CSR13 - Permit R13-2332, Condition 5.2.1.]

5.2.2. To determine compliance with the annual material usage limit in 5.1.2 and the emission limits in 5.1.1., the permittee shall determine the 12 month rolling total of the individual material consumed at the end of each month. This 12 month rolling total shall be conducted no later than 15 days from the end of the previous month. A 12 month rolling total shall mean the sum of the individual material consumed at any given time for the previous twelve (12) consecutive months.

[45CSR13 - Permit R13-2332, Condition 5.2.2.]

5.3. Testing Requirements

- 5.3.1. None.

5.4. Recordkeeping Requirements

- 5.4.1. **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.
[45CSR13 - Permit R13-2332, Condition 5.4.2.]

- 5.4.2. **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.

[45CSR13 - Permit R13-2332, Condition 5.4.3.]

- 5.4.3. The permittee shall maintain records of the monitoring from 5.2.1. and 5.2.2. in accordance with 3.4.2. of this permit.

[45CSR13 - Permit R13-2332, Condition 5.4.4.]

5.5. Reporting Requirements

- 5.5.1. None.

5.6. Compliance Plan

- 5.6.1. None.

6.0. 40 CFR Part 63, Subpart WWWW - Specific Requirements

6.1. Limitations and Standards

6.1.1. The permittee shall comply with all applicable requirements as set forth in 40 CFR Part 63, Subpart WWWW - “National Emission Standards for Hazardous Air Pollutants for Reinforced Plastics Composites (RPC) Production.” The requirements of this Subpart applicable to the permitted operation shall include but are not limited to the conditions 6.1.2. through 6.5.2 inclusive.

[45CSR13 - Permit R13-2332, Condition 6.1.1.]

6.1.2. The permittee shall limit its operations at the facility in such a manner that the HAP emissions are equal to or less than the maximum limits for each operation as defined in Table 3 of 40 CFR part 63, subpart WWWW and provided in the following table, Table 6.1.2.:

Table 6.1.2. - Organic HAP Limits		
Operation Type	Use	Organic HAP Emission Limit (pounds/ton of resin) ¹
Open Molding CR/HS	Mechanical	113
Open Molding non-CR/HS	Mechanical	88
Open Molding Tooling	Mechanical	254
Open Molding Tooling	Manual	157
Open Molding Gel coat	Tooling Gel Coating	440
Open Molding Gel coat	White/Off White Gel Coating	267
Open Molding Gel coat	All Other Pigmented Gel Coating	377
Open Molding Gel coat	CR/HS or High Performance Gel Coating	605
Open Molding Gel coat	Clear Production Gel Coating	522

¹Organic HAP emissions limits are expressed as lb/ton. The permittee must demonstrate compliance with the applicable limits in accordance with condition 6.4.2.

[40 CFR §63.5805(b), 45CSR34 and 45CSR13 - Permit R13-2332, Condition 6.1.2.]

6.1.3. If the permittee elects to claim that a resin/gel coating used at the facility meets the definition of either a corrosion-resistant (CR), high strength (HS), or high performance gel coating for the purposes of using the Organic HAP Emissions Limit corresponding to the use of the CR/HS resin/gel coating or high performance gel coating, the permittee must obtain, prior to the beginning of a compliance period (month), supporting information demonstrating that the particular resin or gel coating meets the definition of either corrosion-resistant, high strength, or high performance gel coating as defined in 40 CFR §63.5935. This information must be maintained in accordance with 3.4.2. of this permit.

[45CSR13 - Permit R13-2332, Condition 6.1.3.]

6.1.4. The permittee shall comply with applicable work practices standards from 40 CFR 63, Table 4 of the Subpart WWWW as provided in the following table, Table 6.1.4.:

Table 6.1.4. - Work Practice Standard	
Operation	Work Practice Standard
For an existing cleaning operation...	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
For a new or existing HAP-containing materials storage operation...	The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
All mixing operations ¹	The permittee shall install and use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to one inch are permissible around the mixer shafts and any required instrumentation.
All mixing operations ¹	The permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95% efficient control device are exempt from this requirement.
All mixing operations ¹	The permittee shall keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

¹Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e. they are actively being used to apply resin).

[40 CFR §63.5805(b), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.1.4.]

6.1.5. The affected sources located at this facility: open molding, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts manufactured, shall be operated and maintained according to the provisions in 40 CFR §63.6(e)(1)(i).

[40 CFR §63.5835(c), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.1.6.]

6.2. Monitoring Requirements

6.2.1. The permittee shall demonstrate compliance with Section 6.1.2. of this permit and 40 CFR §63.5805(b) by using the compliance options identified in 40 CFR §63.5810 and listed in Section 6.4.2. of this permit. The permittee may switch compliance options as stated in 40 CFR §63.5810.

[40 CFR §63.5810, 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.1.5.]

6.2.2. a. The permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Section 6.1.2. of this permit. The permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP content limits in Table 7 of 40 CFR part 63, subpart WWWW if averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

- b. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in Section 6.4.2.a. However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or you change the application method or controls, then you again must demonstrate that the individual resin or gel coat meets its emission limit as specified in Section 6.4.2.a. of this permit. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 6.1.2. of this permit, you must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

This requirement may not supersede or replace the monitoring requirements in Section 4.2. of this permit.
[40 CFR §63.5895 (e) and (d), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.2.1.]

6.3. Testing Requirements

None.

6.4. Recordkeeping Requirements

- 6.4.1. The permittee shall maintain a copy of each notification and report that has been submitted to comply with 40 CFR part 63, subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee has submitted according to the requirements in 40 CFR §63.10(b)(2)(xiv).

[40 CFR §63.5915(a)(1), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.4.1.]

- 6.4.2. For the purpose of demonstrating compliance with the emission limits set forth by this permit and 40 CFR part 63, subpart WWWW, the permittee shall maintain records supporting one of the following compliance options, as defined by this Subpart:

- a. Compliant material option - The permittee shall maintain records demonstrating that all resin used in the process has a maximum organic HAP content equal to or less than the maximum applicable limits established in Table 6.1.2. of this permit.

[40 CFR §63.5810(a), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.4.2.c.]

- b. Actual Operation HAP emission factor (Weighted Average for unique process stream) option - The permittee shall maintain records demonstrating that the 12-month weighted average for each unique combination of operation type and resin application method or gel coat type meets the individual organic HAP emissions limits set forth in Table 6.1.2. of this permit.

[40 CFR §63.5810(b), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.4.2.a.]

- c. 12-month rolling HAP emissions factor averaging option - (Weighted Average of actual operation HAP emission factors) The permittee shall provide monthly records demonstrating that the rolling 12-month weighted average organic HAP emissions for all open molding operations at the facility comply with the emission limits set forth in Table 6.1.2. of this permit.

[40 CFR §63.5810(c), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.4.2.b.]

6.5. Reporting Requirements

6.5.1. For the purpose of demonstrating compliance with the reporting requirements set forth by 40 CFR part 63, subpart WWWW, the permittee shall prepare and submit a semi-annual compliance report addressing any deviations from applicable emissions limitations as defined in Table 6.1.2. of this permit and the work practice standards as defined in Table 6.1.4. of this permit during each reporting period. The permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established.
[40 CFR §63.5910(b), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.5.1.]

6.5.2. For the purpose of demonstrating compliance with condition 6.1.3., the permittee shall submit to the Director a copy of the information proving that the resin(s) or gel coat(s) is either corrosion-resistant (CR), high strength (HS), or high performance gel coating as defined in 40 CFR §63.5935 no later than 15 days from the beginning of the first compliance period (month) when electing to use the Organic HAP emission limits for Open Molding CR/HS type operations or for the use of CR/HS or high performance gel coating for open modeling gel coat type operations for the purposes of demonstrating compliance with 40 CFR §63.5805(b).
[45CSR13 - Permit R13-2332, Condition 6.5.2.]

6.6. Compliance Plan

None.

