

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00300026-2012**
Application Received: **July 21, 2011**
Plant Identification Number: **03-54-003-00026**
Permittee: **MAAX US Corporation**
Facility Name: **Martinsburg Facility**
Mailing Address: **718 Mid Atlantic Parkway, Martinsburg, WV 25401**

Revised: NA

Physical Location: Martinsburg, Berkeley County, West Virginia
UTM Coordinates: 762.31 km Easting • 4376.5 km Northing • Zone 18
Directions: From I81 take exit 16E go to stop light make a left, make an immediate left onto Mid Atlantic Parkway. Plant is located ½ mile on right.

Facility Description

MAAX US Corporation Martinsburg Facility is a fiberglass bath unit manufacturing facility covered by Standard Industrial Classification (SIC) Code 3088. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility uses the open-mold technique to manufacture these units. The facility consists of four gel coat booths, two lamination areas, trim area, and finish area.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	43.84	22.8
Nitrogen Oxides (NO _x)	10.82	1.9
Particulate Matter (PM ₁₀)	0.66	0
Total Particulate Matter (TSP)	0.66	0
Sulfur Dioxide (SO ₂)	0.027	0
Volatile Organic Compounds (VOC)	202.2*	17.1

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Styrene	202.2 *	13.2
Methyl Methacrylate (MMA)	9.11	0**

Some of the above HAPs may be counted as PM or VOCs.

* The VOC and Styrene PTE are the R13-2006 permit limits during restoration of the Concentrator/RTO

** MMA has not been a component of any of the process chemicals currently used at the facility. Chemicals containing MMA may be used in the future. Therefore for operational flexibility, it has been listed here.

Title V Program Applicability Basis

This facility has the potential to emit 202 tpy of VOC and 202 tpy of Styrene. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, MAAX US Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR6	Open burning prohibited.
45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
45CSR11	Standby plans for emergency episodes.
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation

WV Code § 22-5-4 (a) (14) 45CSR30 45CSR34 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F 40 C.F.R. Part 63, Subpart WWWW	The Secretary Can Request Any Pertinent Information Such As Annual Emission Inventory Reporting. Operating Permit Requirement Emission Standards For Hazardous Air Pollutants Asbestos Inspection And Removal Ozone Depleting Substances National Emissions Standards For Hazardous Air Pollutants: Reinforced Plastic Composites Production
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State Only:

45CSR4	No objectionable odors
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Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2006C	04-10-2007	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B" which may be downloaded from DAQ's website.

Determinations and Justifications

- ❖ This is a renewal of the Title V permit which was issued on January 22, 2007. Substantial changes to the most recent version of the Title V Permit consist of the following:

1) Title V Boilerplate changes

- Condition 2.1.4. – The word “monthly” was added to the definition of “rolling yearly total.”
- Conditions 3.1.1. and 3.1.2. – These conditions were revised because the language in 45CSR§§6-3.1. & 3.2. was revised.
- Condition 3.1.3. - The citation of authority was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34.
- Condition 3.3.1. – Subsection “d” was added to this condition. Also section 14 of WV Code §§22-5-4 (a) was added in the citation of authority.

- Conditions 3.5.3. and 3.5.5. - These conditions were revised to require electronic submittal of the annual certification to USEPA. The certification shall now only be submitted to the USEPA by e-mail. Also the USEPA address and office name were updated in condition 3.5.3.
- 2) **Section 1.1 “Emission Units” Table** – The “Control Device ID No.” column has been deleted and the information has been combined in the “Control Device” column. The Emission Unit ID for Resin Storage Tank has been corrected to EU16. It was incorrectly listed as EU6.
- 3) In various requirements throughout the permit, emission point IDs, for which the requirement pertained, were shown in brackets following the citation of authority at the end of the requirement. The IDs have been included in the text of the requirement and deleted from the citation of authority line.
- 4) **Condition 3.1.18.** – The maximum total VOC concentration (% by wt.) for the Polyester Resin has been corrected to match R13-2006 value of 37%.
- 5) **Condition 4.3.1.** – Since the performance tests have been on going as pursuant to this requirement the first sentence has been slightly revised to replace “after issuance of this permit” with “twelve months of the last performance test.”
- 6) **Condition 4.3.5.** – The RTO uses a mix of styrene and natural gas as fuel. The ratio of Styrene to natural gas will vary depending upon the production level in the facility. Since natural gas is not the only fuel used in the RTO and since styrene does not contain sulfur, this condition was revised to include styrene.
- 7) **Condition 5.1.2.** – Since the requirements of 40 CFR §63.5805(b) are contained in this condition and in 5.1.4. the paragraph containing the “40 CFR §63.5805(b)” language was not needed and therefore deleted.
- 8) **Condition 5.1.3.** – The citation of authority “40 C.F.R § 63.5805(b). 45CSR34” was incorrect and therefore deleted. The authority for this condition is R13-2006.
- 9) **Condition 5.1.6.** –The citation of authority was incorrectly shown as 40 C.F.R § 63.5835(b) in R13-2006 and the current Title V permit. The correct citation should have been 40 C.F.R § 63.5835(c). Therefore it has been corrected.
- 10) **Condition 5.2.1.** – Added 40 C.F.R § 63.5895 to the citation of authority
- ❖ **40 CFR Part 64** – This is a 2nd renewal. Since CAM was addressed in the first renewal and there were no modifications to the facility that would have triggered a CAM review subsequent to the first renewal, a CAM evaluation was not made.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. The three air make-up units at this facility are 5.5, 5.5, and 3 MM BTU’s using natural gas as fuel. They are used for comfort heating only. They do not have any applicable requirements.
- b. 45CSR29 - This facility is not located in Putnam, Kanawha, Cabell, Wayne, Wood, or Greenbrier Counties, therefore 45CSR29 does not apply to this facility in accordance with 45CSR§29-3.3.

- c. 45CSR6 - This facility does not incinerate any hazardous materials as defined by 45CSR§6-4.7, and as such, this requirement does not apply to this facility.
- d. 45CSR§7-4.2. - This facility does not have to potential to emit one tenth of a pound per hour of mineral acids or an aggregate of one hundred pounds per year for all sources of mineral acids located at the stationary source, and therefore are exempt from Mineral acids requirements by 45CSR§7-10.6.
- e. 45CSR§7-4.13. - This facility does not emit lead, arsenic, beryllium or other such materials.
- f. 40 C.F.R. 63 Subpart P (Surface Coating of Plastic Parts and Products) – The facility does not use coatings that contain any hazardous air pollutants (HAP).
- g. Greenhouse Gas (GHG) Permitting - This is a renewal Title V permit and there have not been any modifications that would have triggered a PSD permit. Therefore, there are no applicable GHG requirements

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: June 4, 2012
Ending Date: July 5, 2012

All written comments should be addressed to the following individual and office:

Frederick Tipane
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.