

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:
MAAX US Corporation
Martinsburg Facility
R30-00300026-2012

John A. Benedict
Director

Issued: July 20, 2012 • Effective: August 3, 2012
Expiration: July 20, 2017 • Renewal Application Due: January, 20, 2017

Permit Number: **R30-00300026-2012**
Permittee: **MAAX US Corporation**
Facility Name: **Martinsburg Facility**
Permittee Mailing Address: **718 Mid Atlantic Parkway, Martinsburg, WV 25401**

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:	Martinsburg, Berkeley County, West Virginia
Facility Mailing Address:	(Same as above)
Telephone Number:	(304) 263-2525
Type of Business Entity:	Corporation
Facility Description:	Fiberglass Bath Unit Manufacturing Facility
SIC Codes:	Primary 3088; Secondary NA; Tertiary NA
UTM Coordinates:	762.31 km Easting • 4376.5 km Northing • Zone 18

Permit Writer: Frederick Tipane

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
EU1	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU2	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU3	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU4	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU5	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU6	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU7	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU8	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU9	ST1	Gel Gun (Magnum external mix atomized spray gun, ATG-3500-FIT-INT)	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU10	ST1	Gel Gun (Magnum external mix atomized spray gun, ATG-3500-FIT-INT)	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU11	ST1	Gel Gun (Magnum external mix atomized spray gun, ATG-3500-FIT-INT)	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU12	ST1	Gel Gun (Magnum external mix atomized spray gun, ATG-3500-FIT-INT) Robot Controlled	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU12A	ST1	Gel Gun (Magnum external mix atomized spray gun, ATG-3500-FIT-INT) Robot Controlled	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU14	ST1	Resin Storage Tank HT1	1987	5,000 gal	RTO-C1 (Adsorber w/RTO)
EU15	ST1	Resin Storage Tank HT2	1987	5,000 gal	RTO-C1 (Adsorber w/RTO)
EU16	ST15	Resin Storage Tank HT3	1987	5,000 gal	RTO-C1 (Adsorber w/RTO)

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
EU13	ST2	Saw/Grinders	1987	6.24 lbs/hr	DC-1 (Mech Collector)
EU13	ST2	Saw/Grinders	2001	6.24 lbs/hr	DC-2 (Mech Collector)
EU17	ST1	RTO Combustion	1997	8MM btu/hr	N/A
EU18	ST1	Mold Release Wax Application	2005	0.22 lbs/hr	RTO-C1 (Adsorber w/RTO)

Control Devices

Control Device ID	Control Device	Model No.	Control Efficiency	Controlled Pollutant
RTO-C1	Concentrator with Regenerative Thermal Oxidizer	Durr Custom Designed System	82% overall	VOCs, Styrene, Total Organic HAPs
DC-1	Mechanical Collector	Dust Control S3400	99.9%	PM
DC-2	Mechanical Collector	Dust Control S3400	99.9%	PM

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
R13-2006C	04-10-2007

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

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, 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.
[40 C.F.R. §61.145(b) 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]
- 3.1.9. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in section 3.1.10. (ST2)
[45CSR §7-3.1., 45CSR13, R13-2006, 4.1.11.]
- 3.1.10. The provisions of section 3.1.9 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. (ST2)
[45CSR §7-3.2. 45CSR13, R13-2006, 4.1.11.]
- 3.1.11. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of 45CSR7. (ST2)
[45CSR §7-4.1.]
- 3.1.12. No person shall circumvent the provisions of 45CSR7 by adding additional gas to any exhaust or group of exhausts for the purpose of reducing the stack gas concentration.
[45CSR §7-4.3.]
- 3.1.13. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.
[45CSR §7-4.12.]
- 3.1.14. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR §7-5.1.]
- 3.1.15. 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.]

- 3.1.16. The permittee shall manufacture fiberglass reinforced plastic composite products using the open-molding process. The permittee shall employ the following application technologies for corresponding resin type within the listed parameters.

Table 4.1.1. - Application Technology				
Resin Type	Technology	Gun Type	Pump Pressure Range (psig)	Maximum Pump Ratio
Gel Coat	Mechanical Atomized Spray	Magnum ATG-35000-FIT-INT	45-75	22:1
Polyester Resin	Mechanical Non-Atomized Spray	Magnum TRT-1000-F	25-50	11:1

[45CSR13, R13-2006, 4.1.1.]

- 3.1.17. The permittee shall install, operate, and maintain a ventilation system for the production manufacturing building that is capable of creating a negative pressure environment of greater than 10%, a capture efficiency of 100%, or meets the design and operations requirements for a permanent total enclosure specified in U.S. EPA Method 204 of the product manufacturing building. This ventilation system shall route this stream to the concentrator/RTO identified as RTO-C1.

[45CSR13, R13-2006, 4.1.3.]

- 3.1.18. The maximum material usage for the facility shall be limited to the following usage rates.

Table 4.1.5. - Maximum Material Usage Limits					
Process	Material	Maximum MMA con. (% by wt.)	Maximum Styrene con. (% by wt.)	Maximum Total VOC con. (% by wt.)	Annual Usage (lb/yr)
Gel Coat	Gel Coat	4.5	36.0	36.0	3,000,000
Resin	Polyester Resin	0	36.0	37.0	12,000,000
Catalyst	MEKP	0	0	100.0	600,000
Mold Repair	Tooling Resin	0	46.8	48.5	3,825
Mold Repair	Tooling Gel Coat	0	36.8	41.8	1,170
Cleaning	Unisolve EX	0	0	99.6	100,000
Cleaning	Isopropyl Alcohol	0	0	100.0	4,000
Mold Release	WOLO (Mold release wax)	0	0	99.0	15,000

[45CSR13, R13-2006, 4.1.5.]

- 3.1.19. The permittee shall not use or consume a material that contains one of the listed pollutants which has a concentration greater than what is listed in Table 4.1.5 (Section 3.1.18) of this permit.
[45CSR13, R13-2006, 4.1.6.]
- 3.1.20. 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 (Section 3.1.16) of this permit.
[45CSR13, R13-2006, 4.1.7.]
- 3.1.21. The permittee shall operate and maintain the spray equipment that is employing the non-atomizing spray technology in accordance with the spray equipment manufacturer's specification at all times. A copy of the manufacture's specification shall be maintain on site and made immediately available for inspection by the Secretary or his/her duly authorized representative.
[45CSR13, R13-2006, 4.1.8.]
- 3.1.22. The permittee shall provide all production personnel formal training on the use of the non-atomizing spray gun technology in accordance with the manufacturer's instructions and specifications on an annual basis. New production personnel shall be trained with 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, R13-2006, 4.1.9.]
- 3.1.23. The permittee shall conduct all resin application activities within the ventilated area of the product manufacturing building. This shall include any maintenance activities which requires the manual application of tooling resin or tooling gel coat.
[45CSR13, R13-2006, 4.1.14.]
- 3.1.24. The air drying of any container to remove VOCs is prohibited.
[45CSR13, R13-2006, 4.1.18.]
- 3.1.25. **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.
[45CSR13, R13-2006, 4.1.19.]

3.2. Monitoring Requirements

- 3.2.1. For the purpose of demonstrating compliance with the content limits in Section 4.1 and 5.1 of R13-2006 (Sections 3.1.19 and 5.1.2 of this permit) and 40 CFR 63 Subpart WWW, the permittee shall obtain a Certificate of Analysis for each batch or lot of resin to include gel coat resin delivered to the facility. The permittee shall maintain these Certificates of Analysis in accordance with 3.4.2. of this permit. A Certificate of Analysis 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, Total HAP, and Total VOC content by weight; and

- e. Amount of resin and date delivered.

[45CSR13, R13-2006, 3.2.1.]

- 3.2.2. For purposes of demonstrating compliance with 45CSR§§6-4.3., 6-4.4., 45CSR§§7-3.1., 7-3.2., permit conditions 4.1.11. and 4.1.12. of R13-2006 (Sections 4.1.2., 4.1.3., 3.1.9. and 3.1.10. of this permit), the permittee shall conduct visible emission checks of each emission point subject to an opacity limit once per month during periods of normal manufacturing operations using U.S. EPA Method 22. If during these checks, or at any other time, visible emissions are observed at any emission point, compliance shall be determined by conducting addition observations in accordance with the visible emission test procedures in 45CSR§7A-2.1 for emission point ST2 and U.S. EPA Method 9 for emission point ST1 within 48 hours. If the addition observations determined that the opacity to be greater than the limit, than an evaluation to determine the cause of the exceedance shall be conducted within three (3) days, unless the cause of the exceedance is corrected within 24 hours. If after four consecutive months that no visible emissions were observed from the emission point, then the permittee may conduct such visible emission check once each calendar quarter. If any visible emissions are observed during the quarterly checks, visible emission check shall return to being performed each calendar month. Records shall be maintained in accordance with 3.4.2. of this permit and shall include all data required by U.S. EPA Methods 9 and 22, or the visible emission test procedure defined in 45CSR§7A-2.1, whichever is appropriate. These records shall include, at a minimum, the date and time of each visible emission check, the result of the visible emission check or observation, observer's name, and if appropriate all corrective actions taken.

[45CSR13, R13-2006, 4.2.3.]

- 3.2.3. For the purpose of demonstrating compliance with the limits and requirements set forth in section 3.1.16. of this permit, the permittee shall monitor the pressure of the supplied air to the individual spray gun at the beginning of every shift when operated. Records of such monitoring shall be maintained in accordance with condition 3.4.2.

[45CSR13, R13-2006, 4.2.5.]

- 3.2.4. For the purpose of demonstrating compliance with the usage limits set forth in section 3.1.18. of this permit, the permittee shall monitor the amount of material used/consumed by type and specific product name on a daily basis. The permittee shall sum these daily usages to determine a calendar monthly total and a 12 month rolling total for the purpose of demonstrating compliance the annual usage limits list in section 3.1.18. The corresponding monthly and 12-month rolling total shall be completed no later than fifteen days from the end of each calendar month.

[45CSR13, R13-2006, 4.2.6.]

- 3.2.5. For purpose of demonstrating on-going compliance with 3.1.17. of this permit, the permit shall measure the negative pressure environment of the production manufacturing building via the control board on a daily basis. Records of such monitoring shall be maintained in accordance with 3.4.2. of this permit.

[45CSR13, R13-2006, 4.2.7.]

- 3.2.6. The permittee shall inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of all such inspections and scheduled and non-scheduled maintenance. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the monthly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.

[45CSR§30-5.1.c.]

- 3.2.7. If utilized, the permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. These records shall be maintained on site for a period of no less than five (5) years.
[45CSR§30-5.1.c.]

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), 45CSR7 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., 45CSR13, R13-2006, 4.4.1.]

- 3.4.2. **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.

[45CSR§30-5.1.c.2.B., 45CSR13, R13-2006, 3.4.1.]

- 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.]

- 3.4.4. **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, R13-2006, 4.4.2.]

- 3.4.5. **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, R13-2006, 4.4.3.]

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

If to the US EPA:

Associate Director
Office of Air Enforcement and Compliance
Assistance (3AP20)
U. S. Environmental Protection Agency
Region III

1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 304/926-0475
FAX: 304/926-0478

- 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.]

3.6. Compliance Plan

- 3.6.1. N/A

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. 40 C.F.R. 63 Subpart PPPP (Surface Coating of Plastic Parts and Products) – The facility does not use coatings that contain any hazardous air pollutants (HAP).

4.0 Chop and Gel Guns, Resin Tanks, Saw/Grinders, Wax Application [emission point ID(s): ST1, ST2]

4.1. Limitations and Standards

- 4.1.1. No person shall cause, suffer, allow or permit particulate matter to be discharged from any incinerator (i.e., RTO-C1) into the open air in excess of the quantity determined by use of the following formula:

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

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

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

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

[45CSR §6-4.1.]

- 4.1.2. Emission of Visible Particulate Matter --No person shall cause, suffer, allow or permit emission of smoke into the atmosphere from any incinerator (i.e., RTO-C1) which is twenty (20%) percent opacity or greater. **[45CSR §6-4.3., 45CSR13, R13-2006, 4.1.12.]**
- 4.1.3. The provisions of section 4.1.2 shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up. **[45CSR §6-4.4., 45CSR13, R13-2006, 4.1.12.]**
- 4.1.4. No person shall cause, suffer, allow or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator (i.e., RTO-C1) which are large enough to be individually distinguished in the open air. **[45CSR §6-4.5.]**
- 4.1.5. Incinerators (i.e., RTO-C1), including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors. **[45CSR §6-4.6.]**
- 4.1.6. Emissions generated during the manufacturing process, identified as EU1 through EU12A, and the three resin storage tanks, identified as EU14, EU15, and EU16 shall be completely captured and vented to the concentrator/RTO control device as identified as RTO-C1 at all times. **[45CSR13, R13-2006, 4.1.2.]**
- 4.1.7. Emissions released to the atmosphere from emission point ST1 shall not exceed the following rates on a pollutant basis except for VOCs, and styrene while the concentrator/RTO is being restored as specified under condition 4.2.1. During the restoration phase as permitted under condition 4.2.1, alternative emission rate for VOCs, and styrene from emission point ST1 shall not exceed the respective rates listed Table 4.1.4.b.

Table 4.1.4.a. - Emission Limits for Emission Point ST1 (Concentrator/RTO Stack)

Pollutant	Hourly Rate (lb/hr)	Annual Emissions (TPY)
PM ₁₀	0.15	0.66
PM	0.15	0.66
Sulfur Dioxide	0.03	0.11
Oxides of Nitrogen	2.47	10.82
Carbon Monoxide	10.01	43.84
VOC	28.33	92.08
Styrene (HAP)	28.03	91.1
Methyl Methacrylate (HAP)	2.80	9.11

Table 4.1.4.b. - Alternative Emission Limits for Emission Point ST1 (Concentrator/RTO Stack)

Pollutant	Hourly Rate (lb/hr)	Total Emissions Allowed during the Restoration Phase (tons)
VOC	93.6	202.2
Styrene (HAP)	93.6	202.2

[45CSR13, R13-2006, 4.1.4.]

- 4.1.8. Emissions of particulate matter and particulate matter less than ten (10) microns emitted from emission point ST2 shall not exceed 0.01 pounds per hour and 0.06 tons per year. Compliance with the annual limits shall be demonstrated on a 12-month rolling total.

[45CSR13, R13-2006, 4.1.10.]

- 4.1.9. The permittee shall operate and maintain the particulate matter control devices identified as DC-1 and DC-2 with a pressure drop across each control device not to exceed 3 kPa.

[45CSR13, R13-2006, 4.1.13.]

- 4.1.10. For the purpose of ensuring proper operation of the control device RTO-C1, the permittee shall maintain a minimum operating temperature 1575°F or the average of the recorded temperatures during the most recent testing that demonstrated compliance with the carbon monoxide, oxides of nitrogen, and volatile organic compounds limits in condition 4.1.7 of this permit. Compliance with this condition shall be demonstrated using a daily average.

[45CSR13, R13-2006, 4.1.15.]

- 4.1.11. The permittee shall install and maintain a continuous measuring device to measure the operating temperature of the combustion chamber of the RTO of the control device RTO-C1.

[45CSR13, R13-2006, 4.1.16.]

- 4.1.12. Outages of the RTO portion of control device RTO-C1 for up to twenty-four (24) hours and an accompanying delay in the regeneration schedule for the rotary concentrators are allowable if the permitted VOC emissions limits will not be exceeded. Outages of two of the four rotary concentrators for regeneration and maintenance activities are allowable if the permitted VOC emission limits will not be exceeded.

[45CSR13, R13-2006, 4.1.17.]

4.2. Monitoring Requirements

4.2.1. The permittee shall perform the following as a periodic monitoring plan for the Durr concentrator/RTO control system in which:

- a. The permittee shall collect and replace a set of five styrene detector tubes every calendar month:
 - Four styrene concentration tubes will be in each of the outlets of the concentrator units;
 - One styrene concentration tube will be in the process exhaust duct from the plant to the control system.

The styrene detector tubes shall be capable of detecting a styrene concentrations ranging from 2 ppm to at least 300 ppm with an accuracy of $\pm 15\%$. All tubes shall be analyzed within the same day to determine the styrene concentration in each tube. The average of the four concentration samples from the outlets will be compared to the process exhaust concentration sample using the following monthly screening equation:

$$\text{Adsorption Efficiency (\%)} = 100\% - \frac{(\text{Outlet1} + \text{Outlet2} + \text{Outlet3} + \text{Outlet4})/4}{\text{Process Exhaust}/100}$$

- b. If the monthly detector tube readings return an average concentrator adsorption efficiency of 83% or less, the permittee shall determine the adsorption efficiency of the concentrator by measuring the styrene concentration in the concentrator inlets and outlets in accordance with U.S. EPA Method 18 test. This testing shall determine the average adsorption efficiency during an entire eight-hour work shift. The permittee shall execute this testing within sixty (60) days after discovering that the efficiency is at or below 83%. This performance testing shall be conducted at a production rate of at least 80% of the plant capacity. This testing shall be conducted in accordance with 3.3.1.
- c. If the results of the performance testing from 4.2.1.b. confirm that the average adsorption efficiency of the concentrator is at or below 83%, then the permittee shall complete restoration of the Durr concentrator/RTO control system, which is identified as RTO-C1, within 180 days after the permittee received the results of the testing required in condition 4.2.1.b. At that time, the styrene and VOC limits of Table 4.1.4.b. and the monitoring requirements of condition 4.2.3. are triggered. The limits of Table 4.1.4.b (established with 4.1.7 of this permit) shall remain in effect for a period not to exceed 180 days or once restoration is complete, whichever comes first. Restoration of the control system shall consist of the following four actions:
 - Adjust the Durr control system timing and operating parameters;
 - Replace the air-seal gaskets in the four individual concentrator units if needed;
 - Upgrade the thermal mass (ceramic block) in the regenerative thermal oxidizer (RTO) unit if needed; and
 - Replace the carbon adsorption media blocks in the four individual concentrator units.

[45CSR13, R13-2006, 4.2.1.]

- 4.2.2. For the purpose of ensuring compliance with the limits in Sections 3.1.9 to 3.1.11, 4.1.8 and 4.1.9 of this permit and proper operation of the control devices, the permittee shall monitor and record the pressure drop across each of the control devices identified as DC-1 and DC-2 on a semi-monthly basis. The filter for the dust collectors shall be inspected at least once per month and be replaced if necessary. Such records shall be maintained in accordance with 3.4.2 of this permit.

[45CSR13, R13-2006, 4.2.2.]

- 4.2.3. For the purposes of demonstrating compliance with styrene and VOC limits in Table 4.1.4.b. (Section 4.1.7. of this permit) while the concentrator/RTO control system is being restored, the permittee shall monitor the styrene and VOC emissions from emission point ST1 on a daily basis until the restoration is complete. The permittee shall determine the average hourly styrene and VOC emission rate using actual daily usage rates, actual overall control efficiency of RTO-C1 and the appropriate results of performance. The use (of) Unified Emission Factors, published by the American Composite Manufacturers Association are not acceptable for demonstrating compliance with styrene and VOC limits in Table 4.1.4.b. Such determination shall account for the actual control efficiency of RTO-C1 based on the results of the testing conducted as required in condition 4.2.1.b. Records of such monitoring shall be maintained in accordance with condition 3.4.2.

[45CSR13, R13-2006, 4.2.4.]

4.3. Testing Requirements

- 4.3.1. The permittee shall conduct performance testing within twelve months of the last performance test and thereafter on an annual basis to determine the adsorption efficiency of the concentrator RTO-C1. The adsorption efficiency of the concentrator shall be determined by measuring the styrene concentrations in the concentrator inlets and outlets according to U.S. EPA Method 18 test. This testing shall be conducted over an entire eight-hour work shift and at production of at least 80% of the plant maximum capacity. Such testing shall be conducted in accordance with 3.3.1. of this permit.

[45CSR13, R13-2006, 4.3.1]

- 4.3.2. The permittee shall conduct comprehensive performance testing once every five years to coincide with the renewal of the facility's Title V Operating Permit to determine the overall control efficiency of the entire Durr control system, which is identified as RTO-C1, and compliance with the VOC and styrene emission limits in 4.1.7. of this permit. This comprehensive testing will measure concentrations at the four sample locations listed below:

- Concentrator Inlet (Point A)- which includes the inlet from the four concentrators;
- Concentrator Outlet (Point B) - which includes the process exhaust outlet from the plant;
- RTO Inlet (Point C); and
- RTO Outlet (Point D).

This comprehensive performance testing shall be conducted in accordance with the test methods and procedures that are prescribed in the Table 4.3.2.

Table 4.3.2. - Comprehensive Performance Test Methods & Procedures

Location	Parameter	Method or Procedure
Process Enclosure and Process Parameters	Capture Efficiency	U.S. EPA Method 204
	Material Usages	Mass Balance Calculations
	Styrene Contents	MSDS or COA, and formula data
	Application Processes	Equipment Inspection
	Predicted Emission Factor	UEF Tables
	Actual Styrene Emission Factor	Calculation
Point A Concentrator Inlet (Adsorb Outlet)	Airflow Rate	U.S. EPA Methods 1 & 2
	Air Density	ASHREA Psychometrics Tables
	Styrene Concentration	U.S. EPA Method 18 (8-hr)
	THC Concentration	U.S. EPA Method 25A
	Styrene Emission Rate	Calculation
	THC Mass Rate	Calculation
Point B Concentration Outlet (Adsorb Outlet)	Airflow Rate	U.S. EPA Methods 1 & 2
	Air Density	ASHREA Psychometrics Tables
	Styrene Concentration	U.S. EPA Method 18 (8-hr)
	THC Concentration	U.S. EPA Method 25A
	Styrene Emission Rate	Calculation
	THC Mass Rate	Calculation
Concentrator Units	Styrene Collection Efficiency	Calculation
	THC Collection Efficiency	Calculation
Point C RTO Inlet (Desorb Outlet)	Airflow Rate	U.S. EPA Methods 1 & 2
	Air Density	U.S. EPA Methods 3 & 4
	Methane/Ethane Concentration	U.S. EPA Method 18
	Styrene Concentration	U.S. EPA Method 18
	THC Concentration	U.S. EPA Method 25A
	THC Mass Rate	Calculation
Point D RTO Outlet	Airflow Rate	U.S. EPA Methods 1 & 2
	Air Density	U.S. EPA Methods 3 & 4
	Methane/Ethane Concentration	U.S. EPA Method 18

Location	Parameter	Method or Procedure
	Styrene Concentration	U.S. EPA Method 18
	THC Concentration	U.S. EPA Method 25A
	Styrene Emission Rate	Calculation
	THC Mass Rate	Calculation
RTO Unit	Oxidation Temperature	Thermocouple Reading
	Destruction Efficiency	Calculation
	Natural Gas Usage	Natural Gas Meter Reading
	Percent of Autofire	Calculation
Control System (Concentrators & RTO)	Overall Efficiency	Calculation
FID Response	Styrene Response	Field-prepared styrene standard (in Tedlar bags)

[45CSR13, R13-2006, 4.3.2.]

- 4.3.3. During the performance of any U.S. EPA Method 18 or Method 25A testing on the control device identified as RTO-C1, the permittee shall conduct concurrent styrene detector tube testing as prescribed in condition 4.3.2. Results of such testing shall be included with the submitted results of the Method 18 or 25A testing to the Director.

[45CSR13, R13-2006, 4.3.3.]

- 4.3.4. Stack testing performed in accordance with Section 4.3.2 above shall include testing for Carbon Monoxide (EPA Method 10) and Nitrogen Oxides (EPA Method 7E).

[45CSR§30-5.1.c.]

- 4.3.5. Compliance with the Sulfur Dioxide limit in Section 4.1.7 for the regenerative thermal oxidizer shall be demonstrated as follows:

- a. Demonstrate that natural gas and/or styrene was used as the only fuels.
- b. Continual compliance shall be demonstrated by maintaining records of fuel usage.

[45CSR§30-5.1.c.]

4.4. Recordkeeping Requirements

- 4.4.1. Please refer to Section 3.4. of this permit.

4.5. Reporting Requirements

4.5.1. If the results of the performance testing from 4.2.1.b. confirm that the average adsorption efficiency of the concentrator RTO-C1 is at or below 83%, then the permittee shall notify the Director in writing within ten (10) days of permittee having received these results.

[45CSR13, R13-2006, 4.5.1.]

4.5.2. The permittee shall submit a detail report of the scope of work performed during the restoration of control device RTO-C1 within 30 days of completion of the restoration to the Director. Such report shall contain a copy of the hourly styrene and VOC emission rates as required in condition 4.2.3 to include data used in determining these emission rates.

[45CSR13, R13-2006, 4.5.2.]

4.6. Compliance Plan

4.6.1. N/A

5.0 40 C.F.R 63 Subpart WWWW

5.1. Limitations and Standards

5.1.1. The permittee shall comply with all applicable requirements as set forth in 40 C.F.R 63 Subpart WWWW - “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The requirements of this subpart applicable to the permitted operation shall include the following subsections.

[45CSR13, R13-2006, 5.1.1., 45CSR34]

5.1.2. 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 C.F.R 63 Subpart WWWW and provided in the following table, Table 5.1.2.

Operation Type	Use	Organic HAP Emissions Limit (lb/ton)¹
Open molding non-corrosion resistant and/or high strength	Mechanical Resin Application	88
Open molding tooling	Manual Resin Application	157
Open molding gel coat	Tooling gel coat	440
Open molding gel coat	White/off white pigmented gel coat	267
Open molding gel coat	All other pigmented gel coat	377

¹ Organic HAP emission limits are expressed as lb of HAPs per ton of resin applied. The permittee must be at or below these values based on a 12-month rolling average.

[40 C.F.R § 63.5805(b), 45CSR34, 45CSR13, R13-2006, 5.1.2]

5.1.3. If the permittee elects to claim that a resin/gel coat 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 complying with the Organic HAP Emission Limit listed in Table 3 of 40 C.F.R 63 Subpart WWWW that corresponds to the use of a CR/HS resin/gel coat or high performance gel coating, the permittee must obtain 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 C.F.R § 63.5935 prior to the beginning of a compliance period (month). This information must be maintained in accordance with 3.4.2 of this permit.

[45CSR13, R13-2006, 5.1.3]

5.1.4. The permittee shall comply with the applicable work practice standards from Table 4 of 40 C.F.R 63 Subpart WWWW as provided in Table 5.1.4 of this permit.

Table 5.1.4. 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 material 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 material 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 cover, except that gaps of up to 1 inch are permissible around the mixer shaft and any required instrumentation.
All mixing operations. ¹	The permittee shall close any mixer vents when actual mixing is occurring, except that vent 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.

¹ Containers 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 C.F.R § 63.5805(b), 45CSR34, 45CSR13, R13-2006, 5.1.4]

5.1.5. The permittee shall demonstrate compliance with condition 5.1.2 of the permit and 40 C.F.R § 63.5805(b) by using one of the compliance options identified in 40 C.F.R § 63.5810. (*see below*) The permittee may switch compliance options as stated in 40 C.F.R § 63.5810.

[40 C.F.R § 63.5810, 45CSR34, 45CSR13, R13-2006, 5.1.5]

Note: In this section “this subpart” means 40 C.F.R 63 Subpart WWWW, “You” means the permittee.

40 C.F.R § 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

You must use one of the following methods in paragraphs (a) through (d) of 40 C.F.R § 63.5810 to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of 40 C.F.R § 63.5810. When you change to an option based on a 12-month rolling

average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.

(1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63.

(2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

- 5.1.6. The affected sources as defined in 40 C.F.R § 63.5790(b) located at this facility shall be operated and maintained according to the provisions in 40 C.F.R § 63.6(e)(1)(i).
[40 C.F.R § 63.5835(c), 45CSR34, 45CSR13, R13-2006, 5.1.6]

5.2. Monitoring Requirements

- 5.2.1. The permittee shall collect the appropriate records in accordance with 40 C.F.R §§ 63.5895(c) & (d) (*see below*) for the corresponding selected compliance option in 40 C.F.R § 63.5810. This requirement may not supersede or replace the monitoring requirement in Section 4.2 of R13-2006 (Sections 3.2.2 to 3.2.5, 4.2.1 to 4.2.3 of this permit).
[40 C.F.R § 63.5895, 45CSR34, 45CSR13, R13-2006, 5.2.1.]

Note: In this section “this subpart” means 40 C.F.R 63 Subpart WWWW, “You” means the permittee.

40 C.F.R § 63.5895 How do I monitor and collect data to demonstrate continuous compliance?

- (c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an

organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are 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.

(d) 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 §63.5810(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 paragraph (a) of §63.5810. 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 3 or 5 of this subpart, 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.

5.3. Testing Requirements

5.3.1. *Reserved*

5.4. Recordkeeping Requirements

5.4.1. The permittee shall maintain a copy of each notification and report that is required to be submitted to comply with 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 C.F.R § 63.19(b)(2)(xiv).

[40 CFR §63.5915(a)(1), 45CSR34, 45CSR13, R13-2006, 5.4.1]

5.4.2. For the purposes of demonstrating compliance with HAP emission limits set forth by this permit and 40 C.F.R 63, Subpart WWWW, the permittee shall maintain records supporting one of the following compliance options, as defined by Subpart WWWW:

- a. 12-month rolling HAP emissions factor averaging option - The permittee shall provide monthly records demonstrating that the 12-month weight average organic HAP emissions for all open molding operation at the facility comply with the emission limits set forth in Table 5.1.1 of the permit and 40 C.F.R § 63.5805(b).
- b. Compliance 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 5.1.1 of this permit and 40 C.F.R § 63.5805(b).

[45CSR13, R13-2006, 5.4.2]

5.5. Reporting Requirements

5.5.1. For the purpose of demonstrating compliance with the reporting requirements set forth in 40 C.F.R 63, Subpart WWWW, the permittee shall prepare and submit a semi-annual compliance report addressing any deviations from the applicable emissions limitations as defined in 40 C.F.R § 63.5805(b) and the work practice standards as defined in 40 C.F.R § 63.5805(b) during each reporting period. Such reports shall be submitted by July 31 and January 31 of each year to the U.S. EPA Administrator and Director.
[40 CFR §63.5910(b), 45CSR34, 45CSR13, R13-2006, 5.5.1]

5.5.2. For the purpose of demonstrating compliance with condition 5.1.3., 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 C.F.R § 63.5935 no later than fifteen days from the beginning of the first compliance period (month) when electing to use the Organic HAP Emission Limit for Open Molding (CR/HS type operations or for the use of CR/HS or high performance gel coating for open molding gel coat type operations for the purposes of demonstrating compliance with 40 C.F.R § 63.5805(b).
[45CSR13, R13-2006, 5.5.2., 45CSR34]

5.6. Compliance Plan

5.6.1. N/A