

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on July 20, 2012.

Permit Number: **R30-00300026-2012**  
Application Received: **September 29, 2011**  
Plant Identification Number: **03-54-00300026**  
Permittee: **MAAX US Corporation**  
Facility Name: **Martinsburg Facility**  
Mailing Address: **718 Mid Atlantic Parkway, Martinsburg, WV 25401**

Permit Action Number: *MM01*    Revised: *July 1, 2014*

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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.

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### 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.

The proposed Title V modification incorporates changes associated with the R13-2006D modification for specific changes to the permit conditions, to increase manufacturing flexibility and incorporate a new acrylic products (Pearl Line) operation.

### Emissions Summary

There are no increases in potential emissions (PTE) associated with this modification.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains 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.

The modification to 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
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
45CSR34	Emission Standards For Hazardous Air Pollutants
45CSR30	Operating permit requirement.
40 C.F.R. Part 63, Subpart WWWW	National Emissions Standards For Hazardous Air Pollutants: Reinforced Plastic Composites Production

#### State Only:

N/A

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> )
R13-2006D	January 3, 2014	

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," which may be downloaded from DAQ's website.

## Determinations and Justifications

This permit modification incorporates the modified R13-2006D permit which adds a new acrylic line operation and increases manufacturing flexibility. R13-2006D also incorporated specific changes to many of the permit conditions and has renumbered some of the existing conditions with new condition numbers. The citation of authority in the Title V permit has been revised as appropriate to correspond with R13-2006D. Where permit condition numbers are referenced in a particular permit condition, the condition numbers have been revised as needed to correspond to the correct permit condition. Some of the specific revisions include the following:

- 1) The “Emission Units” table was updated to include the new acrylic molding station and a resin storage tank. Other revisions have been made to information that reflect changes made in permit R13-2006D and/or were previously incorrect.
- 2) The language in the following conditions (existing Title V permit condition numbers) were revised:  
  
3.1.16., 3.1.20. - 3.1.23., 4.1.2., 4.1.6. - 4.1.12., 4.2.1. – 4.2.3., 4.3.3., 4.3.4., 4.5.2., 5.1.1., 5.1.2., 5.1.4., 5.2.1., 5.4.2., and 5.5.1.  
  
The revisions include R13-2006D language changes, partial deletions of requirements that are no longer required in R13-2006D, and/or requirements that have been expanded.
- 3) The following conditions (existing Title V permit condition numbers) were deleted because the requirements were deleted in R13-2006D:  
  
3.1.17. -3.1.19., 3.2.1., 3.2.3. – 3.2.5., 4.3.1., 4.3.2., 4.3.5., 5.1.3., 5.1.5., and 5.5.2.
- 4) The following conditions were added in this Title V permit modification as new requirements from R13-2006D:  
  
4.1.13. – 4.1.15., 4.2.4., 4.2.5., 4.4.2., 4.5.3.
- 5) The Styrene and Methyl Methacrylate (MMA) limits in condition 4.1.7. are no longer limits in R13-2006D and therefore were removed from the Title V permit.

As explained in the evaluation for Permit R13-2006D:

“...Resin formulations are changing with additional monomers added in the resin besides styrene and MMA. All of these monomers are VOCs but only a few are classified as HAPs. Regardless of these formulation changes, MAAX would be required to comply with VOC limits and the 4W NESHAPs limits. The 4W NESHAP limits not only focus on styrene or MMA but total organic HAPs from the open molding process. Therefore, the writer recommends omitting the specific HAP for styrene and MMA and just let the 4W NESHAP regulate the HAP emissions from the open molding process as it was intended.”

## Non-Applicability Determinations

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

40 CFR Part 64 CAM determinations are not applicable for minor modifications.

## 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: Not Applicable for minor modifications.  
Ending Date: N/A

### **Point of Contact**

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

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

### **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.

### **Response to Comments (Statement of Basis)**

Not applicable.