

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 March 22, 2007.

Permit Number: **R30-10500005-2007**
Application Received: **November 25, 2009**
Plant Identification Number: **03-54-105-00005**
Permittee: **Mustang Survival Mfg., Inc.**
Facility Name: **Elizabeth Plant #2**
Mailing Address: **P. O. Box 520, Elizabeth, WV 26143**

Permit Action Number: *MM01* Revised: *March 25, 2010*

Physical Location: Elizabeth, Wirt County, West Virginia
UTM Coordinates: 465.36 km Easting • 4323.78 km Northing • Zone 17
Directions: Located on State Route 14, north of downtown Elizabeth, WV

Facility Description

Mustang Survival Mfg, Inc. is a rubber product manufacturing facility covered by SIC Codes 3069, 2385 and NAICS Codes 31332, 315299. The facility manufactures waterproof and air-tight items such as clothing bags, foul weather wear, and life preservers. Rubber, nylon, or urethane are cut into desired patterns and then sewed and bonded (either by hand, patch press machines, or radio frequency machines). The bonded rubber, nylon, and urethane products are then cured to allow the adhesive to thoroughly dry and ensure that a proper bond has been achieved. Most of the products are allowed to bond by air drying at ambient temperature or by low temperature drying using the drying oven.

This minor modification is to include R13-2043C in the Title V Permit, which is (1) to remove the Solvent Recovery System from the Title V permit since it has been shut down; (2) to change the description of Curing Oven #1 to Drying Oven #1 since it will be used only as a drying oven; (3) to remove the electrostatic precipitator since there are no particulate matter emissions from drying operation; (4) to set the Drying Oven #1 temperature to 180 °F, (5) require the facility to monitor and record the oven temperature

daily when it is operating; and (6) to require the facility to perform weekly visible observations. This modification also incorporates R13-2043B, which is for the removal of the Curing Oven #2 and all references to Methyl Ethyl Ketone from the permit.

Emissions Summary

Plant Wide Emissions Summary [Tons per Year]	
Regulated Pollutants	Potential Emissions
Volatile Organic Compounds (VOC)	1.07 Decrease
Hazardous Air Pollutants	
Toluene	1.07 Decrease
<i>Some of the above HAPs may be counted as PM or VOCs.</i>	

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 25 tons per year of hazardous air pollutants. Due to this facility's potential to emit over 10 tons per year of hexane, 10 tons per year of toluene, and over 25 tons per year of aggregate HAPs, Mustang Survival Mfg., Inc. 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:	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	45CSR30	Operating permit requirement.
State Only:	None	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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>)
R13-2043C Removed the solvent recovery system from the permit since it had been shut down Supersedes R13-2043B Issued 01/02/2007 Remove Curing Oven #2 and all references to Methyl Ethyl Ketone	January 19, 2010	

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

The following changes to the March 22, 2007 Title V Permit and Fact Sheet are NSR permits, R13-2043B and R13-2043C. These changes are:

1. R13-2043B is for the removal of the Curing Oven #2 and Methyl Ethyl Ketone from the permit. Methyl Ethyl Ketone was removed due to its delisting as a hazardous air pollutant (HAP).
2. R13-2043C is for the removal of the solvent recovery system from permit since the unit is shut down.
3. The application for R13-2043C and the Title V permit revision is to:
 - (1) Remove the electrostatic precipitator [Section 1.1] as a control device from the Title V permit since there are no particulate matter emissions from drying operation.
 - (2) Replace "Curing" with Drying" in the Emission Unit table of Section 1.1.
 - (3) Change the description in the heading of Section 4.0 from Curing Oven #1 to Drying Oven #1 since the oven will be used only as a dryer. [Section 4.0]
 - (4) Set the Drying Oven #1 [Section 4.1.3] temperature to 180 °F and require the facility to monitor and record the oven temperature daily when it is operating [Sections 4.2.1 and 4.4.2].
 - (5) Require the facility to perform weekly visible observations of the Drying Oven #1 vent once per week while the oven is operated, and record the results of each observation [Section 4.3.1].
 - (6) Remove the Solvent Recovery System [Section 6.0] from the Title V permit since it has been shut down.

The additional changes to the March 22, 2007 Title V Permit and Fact Sheet are:

1. Added Section 1.2, Active R13, R14, and R19 Permits and Table.
2. Removed the suffixes in the citations for permit R13-2043A.
3. Updated the facility information and regulatory language for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2.
4. In 3.1.3, 45CSR34 is now cited with 40 C.F.R. Part 61 because 45CSR15 was repealed and Part 61 is referenced in 45CSR34.
5. Because of a typo in Section 3.3.1 citation, the NSR permit number was amended from R13-2054A to R13-2043. Condition B.4 was also added to the citation because this condition of R13-2043C refers to 45CSR7A, which is the compliance test procedure for 45CSR7.
6. Sections 3.5.3 and 3.5.5 were revised accordingly to US EPA Region 3 request that all annual compliance certifications be submitted electronically (e-mail). This is a general change to the boiler plate language.
7. Replaced “Curing” with “Drying” in Section 4.1.2.

Non-Applicability Determinations

None

Request for Variances or Alternatives

None

Insignificant Activities

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

Comment Period

None

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

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Response to Comments (Statement of Basis)

Not applicable.