

*West Virginia Department of Environmental Protection*  
Earl Ray Tomblin  
Governor

*Division of Air Quality*

Randy C. Huffman  
Cabinet Secretary

# Permit to Construct



**R13-3348-D-R-A-F-T**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

*Issued to:*  
**MEC CONSTRUCTION LLC**  
**Fairmont Facility**  
**049-00195**

---

*William F. Durham*  
*Director*

*Issued: D-R-A-F-T*

Facility Location: Fairmont, Marion County, West Virginia  
Mailing Address: 130 Meadow Ridge Road  
Mt. Morris, PA 15349  
Facility Description: Oil and Gas Pipeline and Related Structures Construction  
NAICS Code: 237120  
UTM Coordinates: 572.49 km Easting • 4,363.28 km Northing • Zone 17  
Permit Type: Construction  
Description of Change: Construction of a metal pipe preparation and painting facility.

*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.*

---

*The source is not subject to 45CSR30.*

**Table of Contents**

**1.0. Emission Units ..... 4**

**2.0. General Conditions..... 5**

    2.1. Definitions .....5

    2.2. Acronyms.....5

    2.3. Authority.....6

    2.4. Term and Renewal.....6

    2.5. Duty to Comply .....6

    2.6. Duty to Provide Information.....6

    2.7. Duty to Supplement and Correct Information.....7

    2.8. Administrative Update.....7

    2.9. Permit Modification.....7

    2.10 Major Permit Modification .....7

    2.11. Inspection and Entry .....7

    2.12. Emergency .....7

    2.13. Need to Halt or Reduce Activity Not a Defense .....8

    2.14. Suspension of Activities .....8

    2.15. Property Rights .....8

    2.16. Severability .....9

    2.17. Transferability.....9

    2.18. Notification Requirements .....9

    2.19. Credible Evidence.....9

**3.0. Facility-Wide Requirements..... 10**

    3.1. Limitations and Standards .....10

    3.2. Monitoring Requirements .....10

    3.3. Testing Requirements .....10

    3.4. Recordkeeping Requirements .....12

    3.5. Reporting Requirements .....12

**4.0. Source-Specific Requirements..... 14**

    4.1. Limitations and Standards .....14

    4.2. Monitoring Requirements .....16

    4.3. Testing Requirements .....16

    4.4. Recordkeeping Requirements .....16

    4.5. Reporting Requirements .....17

**APPENDIX A.....18**

**APPENDIX B.....19**

**CERTIFICATION OF DATA ACCURACY..... 20**

### 1.0. Emission Units

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device<sup>1</sup></b>
1S	1E	Paint Room (50' x 60') with natural gas fired make-up air unit (1.5 MMBtu/hr)	2016	5 gal/hr	1C
2S	2E	Paint Room (18' x 60') with natural gas fired make-up air unit (1.5 MMBtu/hr)	2016	5 gal/hr	2C
3S	3E	Media Blast Booth (1997, modified 2003)	2016	62.5 lb/hr	3C

<sup>1</sup> 1C and 2C – Air Flow Technology Model 15g Filter; 3C – Denray Model 85120, single compartment baghouse

## 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.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>CBI</b>	Confidential Business Information	<b>NSPS</b>	New Source Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>2.5</sub></b>	Particulate Matter less than 2.5 μm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>PM<sub>10</sub></b>	Particulate Matter less than 10μm in diameter
<b>CO</b>	Carbon Monoxide	<b>Ppb</b>	Pounds per Batch
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>Pph</b>	Pounds per Hour
<b>DAQ</b>	Division of Air Quality	<b>Ppm</b>	Parts per Million
<b>DEP</b>	Department of Environmental Protection	<b>Ppm<sub>v</sub> or ppmv</b>	Parts per Million by Volume
<b>dscm</b>	Dry Standard Cubic Meter	<b>PSD</b>	Prevention of Significant Deterioration
<b>FOIA</b>	Freedom of Information Act	<b>Psi</b>	Pounds per Square Inch
<b>HAP</b>	Hazardous Air Pollutant	<b>SIC</b>	Standard Industrial Classification
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>M</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>MDHI</b>	Maximum Design Heat Input	<b>USEPA</b>	United States Environmental Protection Agency
<b>MM</b>	Million	<b>UTM</b>	Universal Transverse Mercator
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet per Hour	<b>VOC</b>	Volatile Organic Compounds
<b>NA</b>	Not Applicable	<b>VOL</b>	Volatile Organic Liquids
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		

### **2.3. Authority**

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

### **2.4. Term and Renewal**

- 2.4.1. This permit (R13-3348) is the initial permit for the facility. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

### **2.5. Duty to Comply**

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-3348, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;  
**[45CSR§§13-5.11 and -10.3.]**
- 2.5.2. 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;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

### **2.6. Duty to Provide Information**

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 administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records 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.

## **2.7. Duty to Supplement and Correct Information**

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.

## **2.8. Administrative Update**

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4.]

## **2.9. Permit Modification**

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

## **2.10 Major Permit Modification**

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

## **2.11. Inspection and Entry**

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.

## **2.12. Emergency**

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable 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.

- 2.12.2. 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 Section 2.12.3 are met.
- 2.12.3. 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. 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 must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

### **2.13. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it should 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.

### **2.14. Suspension of Activities**

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

### **2.15. Property Rights**

This permit does not convey any property rights of any sort or any exclusive privilege.



**2.16. Severability**

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

**2.17. Transferability**

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

**2.18. Notification Requirements**

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

**2.19. Credible Evidence**

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 defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

### 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency 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, suffer, allow or permit 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.  
[40CFR§61.145(b) and 45CSR§34]
- 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. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.  
[45CSR§13-10.5.]
- 3.1.6. **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.]

#### 3.2. Monitoring Requirements

*[Reserved]*

#### 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 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as 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. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- 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 sixty (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; and,
  3. A statement of compliance or noncompliance with each permit or rule condition.

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

### 3.4. Recordkeeping Requirements

- 3.4.1. **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.
- 3.4.2. **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§4. State Enforceable Only.]**

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** 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, or mailed first class 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 57<sup>th</sup> Street  
Charleston, WV 25304-2345

**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

#### 3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or

contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.4.2. In accordance with 45CSR22 – Air Quality Management Fee Program, enclosed with this permit is an Application for a Certificate to Operate (CTO), from the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office no later than 30 days prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the Application for a Certificate to Operate (CTO).
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

## 4.0. Source-Specific Requirements

### 4.1. Limitations and Standards

- 4.1.1. VOCs emissions generated from the application of surface coatings vented through emission points 1E and 2E at the facility shall not exceed 26.70 lb/hr and 12.88 TPY, combined. For purposes of limiting the facility's emissions to the above mentioned limits, the following conditions are established:
- a. The maximum annual usage of coatings/thinners/solvents as applied shall not exceed 800 gallons per year for each category, minus water and other exempt compounds. Approved categories include Carboline 890, Carboline 635, Carboline 859, Carboline 134, Sherwin Williams Zinc Clad III, Sherwin Williams Macropoxy 646, Sherwin Williams Zinc High Solids Polyurethane, Sherwin Williams Acrolon 218 HS and Sherwin Williams 235 Dura Plate.
  - b. Any record showing use of any non-approved coatings (other than those listed in 4.1.1.a.) shall be reported by sending a copy of such record to the Director within 30 days following that use.
  - c. The use of open containers for the storage or disposal of cloth impregnated with VOCs that are used for surface preparation cleanup, or coating removal is prohibited.
  - d. Spent or fresh VOC to be used for surface preparation, cleanup or coating removal shall not be stored in open containers.
  - e. VOCs for cleanup of spray equipment must be performed in a manner such that cleaning compounds are collected and the evaporation of VOCs to the atmosphere is minimized.
- 4.1.2. Controlled PM and PM<sub>10</sub>, emissions from the application of surface coatings from the paint rooms (1S and 2S) at the facility shall not exceed 0.193 lb/hr and 0.123 TPY, combined. Visible emissions from emission point 1E and 2E shall not be greater than 20% opacity, independently. For purposes of limiting the facility's emissions to the above mentioned limits, the following conditions are established:
- a. The maximum annual usage of coatings/thinners/solvents as applied shall not exceed 5 gallons per hour per paint room for each category, minus water and other exempt compounds. Approved categories include Carboline 890, Carboline 635, Carboline 859, Carboline 134, Sherwin Williams Zinc Clad III, Sherwin Williams Macropoxy 646, Sherwin Williams Zinc High Solids Polyurethane, Sherwin Williams Acrolon 218 HS and Sherwin Williams 235 Dura Plate.
  - b. Paint rooms venting to emission points 1E and 2E shall be equipped and maintained with a 15 gram fiberglass paint collector (filter) with a particulate matter removable efficiency of no less than 98.81%. The filter system shall be in place, properly maintained and functioning before the Paint Room is placed into operation.
  - c. The coating application equipment used in the paint rooms shall be of the type that provides a maximum overspray of no more than 5%.
  - d. The solids content of any surface coating at the facility shall not exceed a solid content of 58.6 pounds per gallon of coating as applied.

- 4.1.3. All PM and PM<sub>10</sub>, emissions from the blasting of the various metal parts in the Media Blast Booth (3S) to prepare the parts for painting at the facility shall not exceed the following:

<b>Pollutant</b>	<b>lb/hr</b>	<b>TPY</b>
PM	0.017	0.017
PM <sub>10</sub>	0.008	0.008
PM <sub>2.5</sub>	0.001	0.001

For purposes of limiting the facility' emissions to the above mentioned limits, the following condition is established:

- a. The maximum weight of material processed through the operation in a single hour shall not exceed 62.5 pounds.
  - b. The maximum operating hours for the Blasting Room operation shall not exceed 2,000 hours/year.
  - c. The Media Blast Booth venting to emission point 3E shall be equipped and maintained with a 100% spun-bond (2 filter cartridges) with a particulate matter removable efficiency of no less than 99%. The filter system shall be in place, properly maintained and functioning before the Blast Booth is placed into operation.
- 4.1.4. The facility-wide emission rate of Hazardous Air Pollutants (HAPS) shall not exceed, on a per HAP basis, ten (10) tons per year, or on a total aggregated HAP basis, 25 tons per year. The use of any new surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP that is not listed in permit application R13-3348 shall be in accordance with the following:
- a. The permittee shall notify the Director in writing of any new surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
  - b. The use of any new surface coating shall be incorporated into the record keeping requirements to show compliance with the VOC/HAP limits contained in this permit.
  - c. Emissions from the use of any new surface coating when combined with emissions from surface coatings already in use shall not exceed:
    - the facility-wide, single HAP emission limit of 10 ton/yr, and
    - the facility-wide, total aggregated HAP emission limit of 25 ton/yr.
  - d. For the purposes of this permit, surface coatings shall be defined as a material applied onto, or impregnated into, a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, stains, thinners, solvents, sealers, varnishes, paints, primers, catalysts, acrylics, lacquers, adhesives and temporary protective coatings, or combinations of the above materials as applied.

- 4.1.5. **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.  
[45CSR§13-5.11.]

## 4.2. Monitoring Requirements

- 4.2.1. The permittee shall monitor and record the following information for the purpose of complying with the limitations in Condition 4.1. on a daily basis:
- The name and identification number of each coating, as applied;
  - The mass of VOC per volume of each coating (minus water and exempt compounds), as applied, used each day;
  - Volume of coating applied during the day, minus water and exempt compounds.
- 4.2.2. For the purpose of determining compliance with the opacity limits given in Sections 4.1.2. (per 45CSR7-3.1), the permittee shall conduct visible emission checks and/or opacity monitoring and record keeping for the Paint Rooms (1S and 2S).

The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted for the Paint Rooms (1S and 2S) at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at the Paint Rooms (1S and 2S) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at the source (having visible emissions) using the procedures and requirements of Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

## 4.3. Testing Requirements

*[Reserved]*

## 4.4. Recordkeeping Requirements

- 4.4.1. **Paint Rooms (1S and 2S) VOC Emission Rate.** For the purpose of determining compliance with the VOC emission limitations set forth in Section 4.1.1. of this permit, the permitted facility shall record on a daily basis:
- the name, identification number, and number of gallons of compliant coating applied,



- the mass of VOC per volume of each coating (minus water and exempt compounds), as applied, each day.
- the 12-month rolling total for number of gallons of compliant coating applied and VOC emission total for the Paint Rooms (1S and 2S).

An example daily record form for complying coatings is provided in Appendix B to this permit. These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

- 4.4.2. **Paint Rooms (1S and 2S) Monthly Opacity Reading Records.** For the purpose of demonstrating compliance with the opacity limit given in Sections 4.1.2. (per 45CSR7-3.1), the permittee shall maintain records (see example form given in attached Appendix A) of all monitoring data documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the normal monthly evaluation, the record of observation may note “out of service” (O/S) or equivalent.
- 4.4.3. **Facility HAP Emission Rates.** For the purpose of determining compliance with the single HAP emission rate limitations set forth in Section 4.1.4. of this permit, record shall be kept on a daily basis detailing the single HAP emission rate(s) from the facility using information collected from the Paint Rooms (1S and 2S) operations and from cleaning solvent(s) usage for the facility. In addition to the daily single HAP emission rate(s), 12-month rolling single HAP emissions rate(s) shall also be recorded daily.
- 4.4.4. **Paint Rooms / Blast Booth Filter / Cartridge Change-out.** For the purpose of determining compliance with the PM emission limitations set forth in Section 4.1.2. and 4.1.3. of this permit, the permitted facility shall record when the 15 gram Fiberglass Exhaust Filters (4.1.2.) and the 100% spun-bond cartridges (4.1.3.) are changed out. These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

## 4.5. Reporting Requirements

- 4.5.1. Per Section 4.1.4.a. of this permit:

The permittee shall notify the Director in writing of the use of any new surface coating containing any HAP(s) within thirty (30) days of using the new surface coating. An MSDS sheet for the surface coating shall be included with the notice to the Director.

- 4.5.2. Any record showing non-compliance or exceedance with the limit in item a of Condition 4.1.1. and 4.1.2. of this permit shall be reported by sending a copy of the record to the Director within 30 days following the occurrence.

APPENDIX A

**Example Form**  
**Monthly Opacity Record**

Date of Observation: \_\_\_\_\_

Data Entered by: \_\_\_\_\_

Reviewed by: \_\_\_\_\_

Date Reviewed: \_\_\_\_\_

Describe the General Weather Conditions:

Stack ID/Vent ID/ Emission Point ID	Stack/Vent/Emission Point Description	Time of Observation	Visible Emissions? Yes/No	Consecutive Months of Visual Emissions	Comments

**APPENDIX B  
 RECORDKEEPING FORM  
 (FOR COATINGS)**

Name of the Facility

Date \_\_/\_\_/

This record must be maintained at the facility until \_\_/\_\_/

<b>Name of Coating</b>	<b>Manufacturer and ID Number of Coating</b>	<b>No. of Gallons per hour</b>	<b>Coating Density (lb/gal)</b>	<b>VOC Weight (%)</b>	<b>Mass of VOC Per Volume of Coating as Applied (lb/hr)*</b>
Total					
12-month Rolling Total					

\* Coating (gal/hr) X Coating Density (lb/gal) X VOC Weight (%) = Mass of VOC (lb/hr)

### CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup> \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title \_\_\_\_\_  
(please print or type) Name Title

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

- 
- <sup>1</sup> This form shall be signed by a “Responsible Official.” “Responsible Official” means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
    - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
    - (ii) the delegation of authority to such representative is approved in advance by the Director;
  - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
  - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
  - d. The designated representative delegated with such authority and approved in advance by the Director.