

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on June 19, 2012.

Permit Number: **R30-06700025-2012**
Application Received: **September 3, 2013**
Plant Identification Number: **067-00025**
Permittee: **SMR Technologies, Inc.**
Mailing Address: **93 Nettie-Fenwick Road, Fenwick, WV 26202-9718**

Permit Action Number: *SM01* Revised: *February 19, 2014*

Physical Location: Fenwick, Nicholas County, West Virginia
UTM Coordinates: 536.20 km Easting • 4,230.90 km Northing • Zone 17
Directions: The facility is located along WV Route 39 in Fenwick, WV.

Facility Description

The facility produces a variety of rubber fabric products. Fabric, zippers, cements, and solvents are received from off site. Zippers are attached to some pieces with a heated press. Some fabric is buffed before it is assembled and glued. Solvents are used to clean the fabric and thin adhesives. The pieces are then air or heat cured. The SIC codes for this facility are 3069 and 3624. This modification addresses the addition of an existing and a new emergency generator to this permit.

Emissions Summary

The following changes in this facility's Potential to Emit (PTE) are associated with this modification:

Pollutant	Change in PTE (TPY)
CO	+2.55
NO _x	+4.43
PM ₁₀	+0.71
SO ₂	+1.62
VOCs	+0.03
Total HAPs	+0.00508

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 16.7 TPY of Toluene. Due to this facility's potential to emit over 10 tons per year of a single HAP, SMR Technologies, 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	General permit
	45CSR16	NSPS pursuant to 40 C.F.R. Part 60
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	40CFR60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
	40CFR63, Subpart ZZZZ	RICE MACT

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>)
G60-C058	11/18/2013	

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

The following changes have been made to this permit to address permitting of the emergency generators:

- The emergency generators (Emission Units: 500 and 501) were added to the emission units table.
- Non-applicability of 40 C.F.R. 60, Subpart JJJJ was addressed in condition 3.7.2.
- Section 7 was added specifically to address the emergency generator requirements from G60-C058 and applicability to 40 C.F.R. 63, Subpart ZZZZ:
 - The following conditions were added to address emergency generator requirements from G60-C058:
 - Condition 7.1.1 limits generator operation to no more than 500 hours per year.
 - Condition 7.1.2 sets hourly and annual emission limits for the generators.
 - Condition 7.1.3 states the facility must comply with sections 1-7 of Class II General Permit G60-C.
 - Conditions 7.2.1, 7.3.1, 7.4.1, and 7.5.1 refer to Class II General Permit G60-C for monitoring, testing, recordkeeping, and reporting requirements.
 - Class II General Permit G60-C is included in Appendix F.
 - The following conditions were added to address applicability to 40 C.F.R. 63, Subpart ZZZZ (Note: According to this rule, both generators are considered new engines rated over 500 hp and located at a major source of HAPs):
 - Condition 7.1.4 was added addressing fuel requirements as specified in 40 C.F.R. § 63.6604(c) for both emergency generators.
 - Condition 7.1.5 was added addressing continuous compliance requirements as specified in 40 C.F.R. §§63.6605 and 6640(f) for both emergency generators.
 - Condition 7.5.2 was added addressing notification requirements as specified in 40 C.F.R. §63.6645(f) for both emergency generators.
 - Condition 7.5.3 was added addressing reporting requirements as specified in 40 C.F.R. §63.6650(h) for both emergency generators.

40 C.F.R. 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: Both generators are subject to this subpart since they commenced construction after July 11, 2005 and were manufactured after April 1, 2006. Requirements from this rule are addressed in G60-C058. Generator 501 is certified, and 500 is not certified.

Non-Applicability Determinations

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

40 C.F.R. 60, Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: The generators are powered by diesel engines, which are not spark-ignition engines.

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: January 2, 2014
Ending Date: February 3, 2014

Point of Contact

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

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
Rex.E.Compston@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.