

Facility Location: 210 State Route 956
Rocket Center, Mineral County, West Virginia 26726
Mailing Address: Same as above
Facility Description: Development and Manufacturing Facility
NAICS Codes: 336415
UTM Coordinates: 686.5 km Easting • 4,381.2 km Northing • Zone 17
Permit Type: Construction
Description of Change: This action is for the installation of a new production line for a new product.

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 subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Z-1S	Fugitive	Mandrel Release Coating Table	2017	N/A	
Z-2S	Fugitive	Adapter Degreasing Table	2017	N/A	
Z-3S	Z-3E	BR-127 Primer Booth	2017	2 gal/hr	Z-1C
Z-4S	Z-4E	Adapter/BR-127 Oven	2017	N/A	
Z-5S	Fugitive	Interior Degreasing Exhaust & Drying	2017	N/A	
Z-7S	Z-7E	Chemlok Mixing Hood	2017	N/A	
Z-8S	Z-8E	Chemlok Application Booth	2017	1 gal/hr	Z-2C
Z-9S	Z-9E	Chemlok/bondliner Application Booth	2017	N/A	Z-5C
Z-10S	Fugitive	Insulator Prep Exhaust	2017	N/A	
Z-11S	Z-11E	Oven for Insulator Drying	2017	N/A	
Z-12S	Z-12E	Bondliner Mixing Hood	2017	N/A	
Z-13S	Z-13E	Bondliner Application Booth	2017	1 gal/hr	Z-3C
Z-14S	Z-14E	Bondliner Drying Station	2017	N/A	
Z-15S	Z-15E	Case Machining	2017	2 units/hr	Z-4C
Z-16S	Fugitive	End Closure Adapter Wiping Station	2017	N/A	
Control Devices					
1C		Global Finishing Solutions Wave Filter	2017	90.00% efficiency	
2C		Global Finishing Solutions Wave Filter	2017	90.00% efficiency	
3C		Global Finishing Solutions Wave Filter	2017	90.00% efficiency	
5C		Global Finishing Solutions Wave Filter	2017	90.00% efficiency	

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
	4C	Aget Manufacturing Company Model: 30SN100-PL-SP Dry Cyclone Collector	2017	80.00% efficiency	
		13.5 oz. Napped Polypropylene Sateen Fabric Filter with Cab-O-Sil preload powder	2017	99.93% efficiency	

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

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5 μm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10μm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	Pph	Pounds per Hour
DAQ	Division of Air Quality	Ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	Psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Act 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 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 R13-3334, 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; and
- 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.]
- 3.1.7. 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]

3.2. 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:

DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

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

DAQ Compliance and Enforcement¹:

DEPAirQualityReports@wv.gov

¹For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status Reports, Initial Notifications, etc.

- 3.5.4. **Operating Fee** In accordance with 45CSR30 – Operating Permit Program, 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. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 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. The permittee is permitted to operate the rocket motor chamber preparation process, Building 256 in accordance with the Emission Limitations and Standards as specified below:

Emission Point I.D. No.		Maximum PM10 Emission Limitation		Maximum VOC Emission Limitation		HAP Emission Limitation	
		Lb/hr	Ton/year	Lb/hr	Ton/year	Lb/hr	Ton/year
Z-1E	Mandrel Release Coating	N/A	N/A	4.06	1.58	N/A	N/A
Z-2E	Adapter Degreasing Table	N/A	N/A	3.73	0.97	N/A	N/A
Z-3E	BR-127 Primer Booth	0.02	0.01	3.53	0.92	0.04	0.01
Z-4E	Adapter/BR-127 Oven	N/A	N/A	0.19	0.05	0.01	0.01
Z-5E	Interior Degreasing Exhaust & Drying	N/A	N/A	9.87	2.44	N/A	N/A
Z-7E	Chemlok Mixing Hood Chemlok 205/234X & Bondliner	N/A	N/A	0.8	0.1	0.45	0.06
Z-8E	Chemlok/Bondliner Application Booth Chemlok 205/234X/ Bondliner/Cleanup	0.03	0.01	4.0	3.63	3.50	1.81
Z-9E	Chemlok/Bondliner Application Booth Chemlok 205/234X/ Bondliner/Cleanup	0.03	0.01	4.0	3.63	3.50	1.81
Z-10E	Insulator Prep Exhaust	N/A	N/A	9.38	2.44	N/A	N/A
Z-11E	Insulator Dryer Oven	N/A	N/A	0.49	0.13	N/A	N/A
Z-12E	Bondliner Mixing Hood Chemlok 205/234X & Bondliner	N/A	N/A	0.8	0.1	0.45	0.06

Z-13E	Chemlok/Bondliner Application Booth Chemlok 205/234X/ Bondliner/Cleanup	0.03	0.01	4.0	3.63	3.50	1.81
Z-15E	Case Machining	0.04*	0.122*	N/A	N/A	N/A	N/A
Z-16E	Exhaust for End Closure Adapter Wipes	N/A	N/A	2.5	0.64	N/A	N/A

* Compliance with this emission limit demonstrates compliance with 45 CSR 7-4.1

4.1.2. The facility may only use the coatings as described in the permit application.

4.1.3. For the purpose of determining compliance with the emission limitations set forth in Section 4.1.1, the facility shall maintain a daily record of batch production and shall record this production for condition 4.1.4 (a)-(k). The maximum lots per year shall not exceed 260 mandrel units (1 unit equal 24 casings).

4.1.4. For purposes of demonstrating compliance with the Emission Limitations and Standards of Section 4.1.1, the permittee shall operate as follows:

- (a) The maximum number of mandrel units to be coated in a day is 24 units (1 Lot) at emission unit 1S. The maximum daily mold release agent (Frekote 700-NC) used at the Mandrel Release Coating Application Table shall not exceed 12.18 lb/day.
- (b) The maximum number of units to be processed per day at emission unit 2S is 48 units. The maximum usage of IPA to be used shall not exceed 4.94 lb/day and 2.52 lb/day of methyl ethyl ketone (MEK).
- (c) The maximum number of units to be processed/sprayed per day at emission unit 3S is 48 units. The maximum usage of Corrosion Inhibiting Primer (BR-127) to be used shall not exceed 7.06 lb/day. The maximum units to be charged to the oven (4S) shall not exceed 48 units/day.
- (d) The maximum number of units to be processed per day at emission unit 5S is 24 units. The maximum usage of IPA to be used shall not exceed 18.76 lb/day. The maximum units to be dried at the degreasing drying station (6S) shall not exceed 24 units/day.
- (e) The maximum number of units to be processed/sprayed per day at emission unit 7S is 24 units. The maximum usage of Chemlok 205/MEK mix and Chemlok 234/Toulene mix, and Bondliner (BL-004) shall not exceed 1.88 gallons/day, 2.34 gallons/day, and 2 gallons/day respectively.
- (f) The maximum number of units to be processed/sprayed per day at emission unit 8S is 24 units. The maximum usage of Chemlok 205/MEK mix, Chemlok 234/Toulene mix, and Bondliner (BL-004) shall not exceed 3.46 lb/hr, 3.84 lb/hr, and 4.89 lb/hr respectively. Cleanup operations at emission unit 8S shall not exceed 2 gallons/day of MEK and 2 gallons/day of Toulene. The maximum units to be dried at the Application Booth (8S) shall not exceed 24 units/day.
- (g) The maximum number of units to be processed per day at emission unit 9S is 24 units. The maximum usage of Chemlok 205/MEK mix, Chemlok 234/Toulene mix, and Bondliner (BL-004) shall not exceed 3.46 lb/hr, 3.84 lb/hr, and 4.89 lb/hr respectively. Cleanup operations at emission unit 9S shall not exceed 2 gallons/day of MEK and 2 gallons/day of Toulene. The maximum units to be dried at the Application Booth (9S) shall not exceed 24 units/day.
- (h) The maximum number of units to be processed/sprayed per day at emission unit 12S is 24 units. The maximum usage of Chemlok 205/MEK mix, Chemlok 234/Toulene mix, and Bondliner (BL-004) to be prepared shall not exceed 1.88 gallons/day, 2.34 gallons/day, and 1.8 gallons/day respectively.

- (i) The maximum number of units to be processed/sprayed per day at emission unit 13S is 24 units. The maximum usage of Chemlok 205/MEK mix, Chemlok 234/Toulene mix, and Bondliner (BL-004) shall not exceed 3.46 lb/hr, 3.84 lb/hr, and 4.89 lb/hr respectively. Cleanup operations at emission unit 13S shall not exceed 2 gallons/day of MEK and 2 gallons/day of Toulene. The maximum units to be dried at the Chemlok drying station (13S) shall not exceed 24 units/day.
- (j) The maximum number of units to be processed/machined per day at emission unit 15S is 2 cases/hr. The yearly maximum for this emission unit is 6,240 cases/year (260 lots/year).
- (k) The maximum number of units to be processed per day at emission unit 16S is 48 units. The maximum usage of IPA to be used shall not exceed 4.94 lb/day.

4.1.5. Control Devices [Z-1C, Z-2C, Z-3C, and Z-5C] (GFS Single Stage Wave Filters as specified in the permit application) and [Z-4C] (Dry Cyclone Collector and Polypropylene Sateen Fabric Filter) shall be in use at any time the spray booths or the machining equipment are in use.

4.1.6 The particulate filters used in the paint spray booth and identified as control device Z-1C, Z-2C, Z-3C, and Z-5C shall be installed and maintained so as to achieve a minimum of 90% efficiency in the control of PM emissions from the Primer and Application Spray Booths. The filters are to be equipped with a manometer to measure the pressure drop across the filter bank to determine when the filters need to be replaced as needed as part of scheduled routine maintenance. The control device Z-4C shall be installed and maintained so as to achieve a minimum of 80% efficiency at the cyclone, and 99.93% efficiency at the fabric filter.
[45CSR§7-5.1.]

4.1.7 The facility shall comply with all applicable standard provisions of 40CFR63 Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities, provided, however, that compliance with any more stringent limitations set forth under Requirements of Sections 4.0 of this permit is demonstrated:

§ 63.744 Standards: Cleaning operations

- (a) Housekeeping measures. Each owner or operator of a new or existing cleaning operation subject to this subpart shall comply with the requirements in these paragraphs unless the cleaning solvent used is identified in Table 1 of this section or contains HAP and VOC below the de minimis levels specified in §63.741(f).
 - (1) Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.
 - (2) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
 - (3) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
- (b) Hand-wipe cleaning. Each owner or operator of a new or existing hand-wipe cleaning operation (excluding cleaning of spray gun equipment performed in accordance with paragraph (c) of this section) subject to this subpart shall use cleaning solvents that meet one of the requirements specified in paragraphs (b)(1), (b)(2), and (b)(3) of this section. Cleaning solvent solutions that contain HAP and VOC below the de minimis levels specified in § 63.741(f) are exempt from the requirements in paragraphs (b)(1), (b)(2), and (b)(3) of this section.

- (1) Meet one of the composition requirements in Table 1 of this section;
 - (2) Have a composite vapor pressure of 45 mm Hg (24.1 in. H₂O) or less at 20 °C (68 °F); or
 - (3) Demonstrate that the volume of hand-wipe solvents used in cleaning operations has been reduced by at least 60% from a baseline adjusted for production. The baseline shall be established as part of an approved alternative plan administered by the State. Demonstrate that the volume of hand-wipe cleaning solvents used in cleaning operations has been reduced by at least 60 percent from a baseline adjusted for production. The baseline shall be calculated using data from 1996 and 1997, or as otherwise agreed upon by the Administrator or delegated State Authority. The baseline shall be approved by the Administrator or delegated State Authority and shall be included as part of the facility's title V or part 70 permit.
- (c) Spray gun cleaning. Each owner or operator of a new or existing spray gun cleaning operation subject to this subpart in which spray guns are used for the application of coatings or any other materials that require the spray guns to be cleaned shall use one or more of the techniques, or their equivalent, specified in paragraphs (c)(1) through (c)(4) of this section. Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below the de minimis levels specified in § 63.741(f) are exempt from the requirements in paragraphs (c)(1) through (c)(4) of this section.
- (1)
 - (i) Enclosed system. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun.
 - (ii) If leaks are found during the monthly inspection required in § 63.751(a), repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed, and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
 - (2) Nonatomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
 - (3) Disassembled spray gun cleaning. Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
 - (4) Atomizing cleaning. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.
 - (5) Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the requirements of paragraph (c) of this section.
- (e) Exempt cleaning operations. The following cleaning operations are exempt from the requirements of paragraph (b) of this section:
- (1) Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;

- (2) Cleaning during the manufacture, assembly, installation, maintenance, or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, or hydrazine);
- (3) Cleaning and surface activation prior to adhesive bonding;
- (4) Cleaning of electronic parts and assemblies containing electronic parts;
- (5) Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to-air heat exchangers and hydraulic fluid systems;
- (6) Cleaning of fuel cells, fuel tanks, and confined spaces;
- (7) Surface cleaning of solar cells, coated optics, and thermal control surfaces;
- (8) Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft;
- (9) Cleaning of metallic and nonmetallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;
- (10) Cleaning of aircraft transparencies, polycarbonate, or glass substrates;
- (11) Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing;
- (12) Cleaning operations, using nonflammable liquids, conducted within five feet of energized electrical systems. Energized electrical systems means any AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections; and
- (13) Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR 82.4.

Table 1 Composition Requirements for Approved Cleaning Solvents

Cleaning solvent type	Composition requirements
Aqueous.....	Cleaning solvents in which water is the primary ingredient (>=80 percent of must be water). Detergents, surfactants, and bioenzyme mixtures and nutrients may be combined with the water along with a variety of additives, such as organic solvents (e.g., high boiling point alcohols), builders, inhibitors, emulsifiers, pH buffers, and antifoaming agents. Aqueous solutions must have a flash point greater than 93 °C (200° F) (as reported by the manufacturer), and the solution must be miscible with water.
Hydrocarbon-based.....	Cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons and have a maximum vapor pressure of 7 mm Hg at 20 °C (3.75 in. H ₂ O and 68 °F). These cleaners also contain no HAP.

§63.745 Standards: Primer, topcoat, and specialty coating application operations.

(a) Each owner or operator of a new or existing primer, topcoat, or specialty coating application operation subject to this subpart shall comply with the requirements specified in paragraph (c) of this section for those coatings that are uncontrolled (no control device is used to reduce organic HAP emissions from the operation), and in paragraph (d) of this section for those coatings that are controlled (organic HAP emissions from the operation are reduced by the use of a control device). Aerospace equipment that is no longer operational, intended for public display, and not easily capable of being moved is exempt from the requirements of this section.

(b) Each owner or operator shall conduct the handling and transfer of primers, topcoats, and specialty coatings to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

(c) *Uncontrolled coatings—organic HAP and VOC content levels.* Each owner or operator shall comply with the organic HAP and VOC content limits specified in paragraphs (c)(1) through (6) of this section for those coatings that are uncontrolled.

(5) Organic HAP emissions from specialty coatings shall be limited to an organic HAP content level of no more than the HAP content limit specified in Table 1 of this section for each applicable specialty coating type.

(6) VOC emissions from specialty coatings shall be limited to a VOC content level of no more than the VOC content limit specified in Table 1 of this section for each applicable specialty coating type.

(d) *Controlled coatings—control system requirements.* Each control system shall reduce the operation's organic HAP and VOC emissions to the atmosphere by 81% or greater, taking into account capture and destruction or removal efficiencies, as determined using the procedures in §63.750(g) when a carbon adsorber is used and in §63.750(h) when a control device other than a carbon adsorber is used.

§ 63.748 Standards: Handling and storage of waste.

- (a) Except as provided in § 63.741(e), the owner or operator of each facility subject to this subpart that produces a waste that contains HAP shall conduct the handling and transfer of the waste to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

[40 C.F.R. 63, Subpart GG]

4.1.8. The pertinent sections of 45CSR7 applicable to this facility include, but are not limited to, the following:

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 subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7
[45CSR§7-3.1.]

No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to 45CSR§7- 5.1 is required to have a full enclosure and be equipped with a particulate matter control device.
[45CSR§7-3.7]

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]

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]

4.1.9. **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.

- a. Compliance with Section 3 of 45CSR7 (Requirement 4.1.8 of this Permit) for paint booths and related equipment (Emission Points Z-3E, Z-8E, Z-9E, and Z-13E) shall be determined by conducting fabric filter checks prior to each use of the equipment. These checks shall include review to ensure filters are properly fitted to the unit, that no holes exist, and that the filters are not overloaded. Any changes made to filters during the checks or any filter replacements shall be recorded.
- b. Compliance with Section 3 of 45CSR7 (Requirement 4.1.8 of this Permit) for the machining center (Emission Point Z-15E) shall be determined by continuous monitoring of the pressure drop across the filter. The monitor shall be equipped with an alarm that shall sound if the pressure drop is inadequate. Upon receiving an alarm, the equipment must shut down until the filters are cleaned or replaced. Preventative maintenance shall be performed and recorded on the manometer and alarm at least annually.

4.2.2. For the purpose of determining compliance with the PM₁₀ limitations set forth in Section 4.1, the facility shall maintain a filter replacement logsheet for the filter banks for Emission Points Z-3E, Z-8E, Z-9E, and Z-13E. These logsheets shall be maintained on site for a period of five (5) years. Certified copies of the logsheets shall be made available to the Director or his duly-authorized representative upon request.

4.2.3. For the purpose of determining compliance with the PM₁₀ and VOC limitations set forth in Section 4.1, the facility shall maintain daily usage records at the primer and application spray booths. Daily and year-to-date (YTD) VOC emissions shall be calculated on a monthly basis using these records. Because PM₁₀ emissions after controls are relatively small, these emissions shall be calculated only once a year. Example logsheets are given in Attachment 1-12. These logsheets shall be maintained on site for a period of five (5) years. Certified copies of the logsheets shall be made available to the Director or his duly-authorized representative upon request.

- 4.2.4. The facility shall comply with all applicable monitoring requirements of 40CFR63 Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities, provided, however, that compliance with any more stringent limitations set forth under Requirements of Sections 4.2 of this permit is demonstrated:

§ 63.751 Monitoring requirements.

(a) *Enclosed spray gun cleaners.* Each owner or operator using an enclosed spray gun cleaner under § 63.744(c)(1) shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.

[40 C.F.R. 63, Subpart GG]

4.3. Testing Requirements

[Reserved]

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** 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.
- 4.4.2. **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.
- 4.4.3. **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.
- 4.4.4. The permitted facility shall comply with all the applicable recordkeeping provisions of the 40CFR63 Subpart GG National Emission Standards for Aerospace Manufacturing and Rework Facilities, provided, however, that compliance with any more stringent limitations set forth under Requirements of Section 4.4. of this permit, is demonstrated:

§ 63.752 Recordkeeping requirements.

(b) Cleaning operation. Each owner or operator of a new or existing cleaning operation subject to this subpart shall record the information specified in paragraphs (b)(1) through (b)(5) of this section, as appropriate.

- (1) The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
- (2) For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in § 63.744(b)(1) (Section 3.1.9 of this Permit) or for semi-aqueous cleaning solvents used for flush cleaning operations:
 - (i) The name of each cleaning solvent used;
 - (ii) All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements; and
 - (iii) Annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
- (3) For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in § 63.744(b)(1) (Section 3.1.9 of this Permit), but does comply with the vapor pressure requirement in § 63.744(b)(2) (Section 3.1.9 of this Permit):
 - (i) The name of each cleaning solvent used;
 - (ii) The composite vapor pressure of each cleaning solvent used;
 - (iii) All vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent; and
 - (iv) The amount (in gallons) of each cleaning solvent used each month at each operation.
- (4) For each cleaning solvent used for the exempt hand-wipe cleaning operations specified in § 63.744(e)(Section 3.1.9 of this Permit), that does not conform to the vapor pressure or composition requirements of § 63.744(b) (Section 3.1.9 of this Permit):
 - (i) The identity and amount (in gallons) of each cleaning solvent used each month at each operation; and
 - (ii) A list of the processes set forth in § 63.744(e) (Section 3.1.9 of this Permit), to which the cleaning operation applies.
- (5) A record of all leaks from enclosed spray gun cleaners identified pursuant to § 63.751(a) (Section 3.2.4 of this Permit) that includes for each leak found:
 - (i) Source id/entification;
 - (ii) Date leak was discovered; and

(iii) Date leak was repaired.

[40 C.F.R. 63, Subpart GG]

- 4.4.5. To demonstrate compliance with the Requirement 4.1.6 (45CSR§7-5.1) the company shall keep records of maintenance and operations of fugitive dust control systems.
[45CSR§30-5.1.c]

4.5. Reporting Requirements

- 4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observation using 45CSR§7A must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
- 4.5.2. The permitted facility shall comply with all applicable reporting provisions of 40CFR63 Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities, provided, however, that compliance with any more stringent limitations set forth under Requirements of Sections 4.0 of this Permit, is demonstrated:

§ 63.753 Reporting requirements.

(b) Cleaning operation. Each owner or operator of a cleaning operation subject to this subpart shall submit the following information:

- (1) Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify:
- (i) Any instance where a noncompliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation;
 - (ii) A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in § 63.744(b)(1) (Section 3.1.9 of this Permit);
 - (iii) Any instance where a noncompliant spray gun cleaning method is used;
 - (iv) Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
 - (v) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.

[40 C.F.R. 63, Subpart GG]

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.

Signature¹ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

¹ 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.