

Fact Sheet



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

Permit Number: **R30-00300026-2017**
Application Received: **January 19, 2017**
Plant Identification Number: **003-00026**
Permittee: **MAAX US Corp.**
Facility Name: **Martinsburg Facility**
Mailing Address: **718 Mid Atlantic Parkway, Martinsburg, WV 25404**

Revised: NA

Physical Location: Martinsburg, Berkeley County, West Virginia
UTM Coordinates: 246.4 km Easting • 4376.0 km Northing • Zone 18
Directions: From I81 take exit 16E go to stop light make a left, make an immediate left onto Mid Atlantic Parkway. Plant is located ½ mile on right.

Facility Description

MAAX US Corp. Martinsburg Facility is a fiberglass bath unit manufacturing facility covered by Standard Industrial Classification (SIC) Code 3088. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility uses the open-mold technique to manufacture these units. The facility consists of four gel coat booths, two lamination areas, a UTILE wall panel line (and future second line), trim area, and finish area.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2016 Actual Emissions
Carbon Monoxide (CO)	43.84	2.2
Nitrogen Oxides (NO _x)	10.82	2.62
Particulate Matter (PM _{2.5})	0.66	0.23
Particulate Matter (PM ₁₀)	0.66	0.23
Total Particulate Matter (TSP)	0.66	0.23
Sulfur Dioxide (SO ₂)	0.03	0.02
Volatile Organic Compounds (VOC)	202.2*	25.24

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2016 Actual Emissions
Styrene	202.2*	23.96
Methyl Methacrylate (MMA)	11.82**	0.8

Some of the above HAPs may be counted as PM or VOCs.

* The VOC and Styrene PTE are the R13-2006 permit limits during restoration of the Concentrator/RTO

**The increase in PTE for MMA is due to the new UTILE production line

Title V Program Applicability Basis

This facility has the potential to emit 202 tpy of VOC, 202 tpy of Styrene and 12 tpy of MMA. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, MAAX US Corp. 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR6	Open burning prohibited.
45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
45CSR11	Standby plans for emergency episodes.
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
WV Code § 22-5-4 (a) (14)	The Secretary Can Request Any Pertinent Information Such As Annual Emission Inventory Reporting.

45CSR30	Operating Permit Requirement
45CSR34	Emission Standards For Hazardous Air Pollutants
40 C.F.R. Part 61	Asbestos Inspection And Removal
40 C.F.R. Part 82, Subpart F	Ozone Depleting Substances
40 C.F.R. Part 63, Subpart WWWW	National Emissions Standards For Hazardous Air Pollutants: Reinforced Plastic Composites Production

State Only:

45CSR4	No objectionable odors
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Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2006E	January 25, 2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V permit which was issued on July 20, 2012 and modified on July 1, 2014. The renewal permit also includes the R13-2006E permit modification to remove the Pearl Line and install two (2) UTILE Lines. Since the UTILE Lines are new construction, the facility has twelve (12) months from start-up to submit a Title V permit modification application. The Title V Renewal application was due within the twelve-month period and therefore the UTILE Lines were included in the renewal application.

Significant changes to the most recent version of the Title V Permit consist of the following:

1) General Revisions:

- Per the company's request:
 - The company name has been revised to match the name as registered with the WV Secretary of State (i.e., MAAX US Corp.).
 - The facility zip code has been revised due to the postal service zip code change.
 - The UTM coordinates have been corrected. (They were incorrect in the previous applications and permits.)

- Throughout the renewal permit, where appropriate, the citations of authority have been updated to match the R13-2006E condition numbers.
- 2) Title V Boilerplate changes:**
- **Conditions 3.5.3., 3.5.5. and 3.5.6.** - These conditions were revised to require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.
- 3) Emission Units Table Section 1.1** – The following changes have been made to the equipment table:
- Removed from the description, the make and model of the resin and gelcoat spray guns per the company’s request. The only relevant descriptors are the type of material applied, mix methods and MACT process classification (e.g., atomized or non-atomized). This allows for flexibility in using other equivalent guns from other manufacturers.
 - The description for EU12A has been corrected.
 - The acrylic Molding Station EU19 has been deleted since it has been removed from the facility.
 - The new UTILE Production Equipment has been added.
- 4) Condition 3.1.10.** – The citation of authority for this Title V permit condition is from 45CSR§7-3.2. and R13-2006, 4.1.3.b. R13-2006, 4.1.3.c shows the citation of authority as 45CSR§7-3.2. However, the requirement in 4.1.3.c. is from 45CSR§6-4.3. and §6-4.4. The requirements in 4.1.3.b. are from 45CSR§7-3.1. and §7-3.2. Therefore, this condition has the correct citation from Permit R13-2006.
- 5) Condition 3.1.13.** – The 45CSR7 definition of “Stack” has been added as a note to aid in clarification that the exhaust gas duct runs between process enclosures and the control system do not need flow straightening devices because the ducts do not vent gasses containing particulate matter to the open air and therefore are not defined as a stack.
- 6) Condition 3.7.2.** – At the company’s request, 40 CFR Part 64 (CAM) has been added as a non-applicable requirement in the permit shield.
- 7) Condition 4.1.1. (current permit)** – Since this requirement is less stringent than the particulate matter pounds per hour (lb/hr) limit in condition 4.1.7. (current permit), it has been streamlined with condition 4.1.7. Condition 4.1.1 of the current permit has been deleted and the subsequent conditions have been renumbered.
- 8) Condition 4.1.2. (renewal permit)** – Like the discussion in item 4) above, the citation of authority for this Title V permit condition is from 45CSR§6-4.4. and R13-2006, 4.1.3.c. As discussed above, R13-2006, 4.1.3.c. has the incorrect citation of authority. Since the requirements in 4.1.3.c. are from 45CSR§6-4.3. and §6-4.4., the citation of authority in the Title V permit is correct.
- 9) Condition 4.1.6. (renewal permit)** – Updated the VOC limits in Table 4.1.6.a in accordance with permit R13-2006E for the new UTILE Lines. Also added streamlining language for 45CSR§6-4.1. (see item 6 above)
- 10) Condition 4.1.15. (current permit)** – This condition has been deleted since the Pearl Line has been removed.
- 11) Condition 4.1.14. (renewal permit)** – Added the R13-2006E requirements for the new UTILE Line.

12) **Condition 4.2.1.** – Updated this condition to the R13-2006E language to account for the new UTILE Line.

13) **Condition 4.3.2.** – Per the company’s request the CO and NO_x testing requirement in this condition has been deleted. Condition 4.1.6. (R13-2006E, 4.1.1.b.) contains a compliance method for the CO and NO_x limits. To demonstrate compliance with the CO & NO_x limits records of the monthly consumption rate for the RTO shall be kept. Condition 4.4.3. has been added to the Title V permit to maintain records of the monthly consumption rate of the RTO.

The requirements from R13-2006E, 4.3.2. for testing following the start-up of the second UTILE Line or completion of the installation of the 5th concentrator wheel for the C1/RTO are now contained in this condition.

14) **Condition 4.4.3.** – Added recordkeeping for the monthly consumption rate of the RTO.

15) **Condition 5.1.2.** – Added “Open molding gel coat” HAP emission limits for the UTILE Line.

Non-Applicability Determinations

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

- a. **40 CFR 63 Subpart PPPP (*National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*)** – The facility meets the applicability criteria of 40 CFR 63 Subpart WWW and therefore Subpart PPPP is not applicable per 40 CFR §63.4481(c)(6).
- b. **40 CFR Part 64 (*Compliance Assurance Monitoring*)** – Since the facility is Subject to 40 CFR 63 Subpart WWW proposed after November 15, 1990, CAM is not applicable for HAPs per 40 CFR§64.2(b)(1)(i). For VOCs (mostly HAPS) the current Title V permit specifies a continuous compliance determination method (i.e., continuous measurement of the RTO combustion chamber temperature with a chart recorder). Therefore, CAM is not applicable for VOCs per 40 CFR§64.2(b)(1)(vi).

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: Friday, October 27, 2017
Ending Date: Monday, November 27, 2017

Point of Contact

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

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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478
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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.