West Virginia Department of Environmental Protection
Division of Air Quality

Jim Justice
Governor

Austin Caperton
Cabinet Secretary

Permit to Operate

Pursuant to
Title V
of the Clean Air Act

Issued to:
MAAX US Corp.
Martinsburg Facility
R30-00300026-2017

William F. Durham
Director

Issued: December 12, 2017 • Effective: December 26, 2017
Expiration: December 12, 2022 • Renewal Application Due: June 12, 2022

Permit Number: **R30-00300026-2017**
Permittee: **MAAX US Corp.**
Facility Name: **Martinsburg Facility**
Permittee Mailing Address: **718 Mid Atlantic Parkway, Martinsburg, WV 25404**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	Martinsburg, Berkeley County, West Virginia
Facility Mailing Address:	Same as above
Telephone Number:	(304) 263-2525
Type of Business Entity:	Corporation
Facility Description:	Fiberglass Bath Unit Manufacturing Facility
SIC Codes:	Primary 3088; Secondary NA; Tertiary NA
UTM Coordinates:	246.4 km Easting • 4376.0 km Northing • Zone 18

Permit Writer: Frederick Tipane

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.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Table of Contents

1.0 Emission Units and Active R13, R14, and R19 Permits 3

2.0 General Conditions 5

3.0 Facility-Wide Requirements 14

Source-specific Requirements

4.0 Chop and Gel Guns, Resin Tanks, Saw/Grinders, Wax Application 23

5.0 40 C.F.R 63 Subpart WWWW 28

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
EU1	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU2	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU3	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU4	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU5	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU6	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU7	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU8	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU9	ST-1	Gel Gun (external mix atomized spray gun)	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU10	ST-1	Gel Gun (external mix atomized spray gun)	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU11	ST-1	Gel Gun (external mix atomized spray gun)	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU12	ST-1	Gel Gun (external mix atomized spray gun)	1987	68.5 lb/hr	RTO-C1 (Adsorber w/RTO)
EU12A	ST-1	Chop Gun (internal mix non-atomized spray gun)	1987	171 lb/hr	RTO-C1 (Adsorber w/RTO)
EU14	ST-4	Resin Storage Tank HT1	1987	5,000 gal	None
EU15	ST-5	Resin Storage Tank HT2	1987	5,000 gal	None
EU16	ST-6	Resin Storage Tank HT3	1987	5,000 gal	None
EU16A	ST-7	Resin Storage Tank HT4	2011	5,000 gal	None
EU13	ST-2	Trim Saws/Grinding Area	1987	6.24 lbs/hr	DC-1 (Mech Collectors)

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
EU13	ST-2	Saw/Grinders	2001	6.24 lbs/hr	DC-2 (Mech Collector)
EU17	ST-1	Natural Gas Fired RTO	1997	8MM btu/hr	N/A
EU18	ST-1	Mold Release Wax Application	2005	0.22 lbs/hr	RTO-C1 (Adsorber w/RTO)
		UTILE Production Equipment			
UGC	ST-1	UTILE Gelcoat Clear Gun (common)	2016		RTO-C1
UGP-1	ST-1	UTILE Gelcoat Pigment Gun (Line 1)	2016		RTO-C1
UR1-1	ST-1	UTILE Resin Gun 1 (Line 1)	2016		RTO-C1
UR1-2	ST-1	UTILE Resin Gun 1 (Line 2)	2017		RTO-C1
UGP-2	ST-1	UTILE Gelcoat Pigment Gun (Line 2)	2017		RTO-C1
UR2-1	ST-1	UTILE Resin Gun 2 (Line 1)	2016		RTO-C1
UR2-2	ST-1	UTILE Resin Gun 2 (Line 2)	2017		RTO-C1
	ST-1	Sanding and Trimming of the UTILE Sheets	2016		Dust Collection system & RTO-C1

Control Device ID	Control Device	Model No.	Control Efficiency	Controlled Pollutant
RTO-C1	Concentrator with Regenerative Thermal Oxidizer	Durr Custom Designed System	82% overall	VOCs, Styrene, Total Organic HAPs
DC-1	Mechanical Collector	Dust Control S3400	99.9%	PM
DC-2	Mechanical Collector	Dust Control S3400	99.9%	PM

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2006E	January 25, 2016

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.

2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NSPS**	New Source Performance Standards
CBI	Confidential Business Information	**PM**	Particulate Matter
CEM	Continuous Emission Monitor	**PM_{10}**	Particulate Matter less than 10μm in diameter
CES	Certified Emission Statement	**pph**	Pounds per Hour
C.F.R. *or* CFR	Code of Federal Regulations	**ppm**	Parts per Million
CO	Carbon Monoxide	**PSD**	Prevention of Significant Deterioration
C.S.R. *or* CSR	Codes of State Rules	**psi**	Pounds per Square Inch
DAQ	Division of Air Quality	**SIC**	Standard Industrial Classification
DEP	Department of Environmental Protection	**SIP**	State Implementation Plan
FOIA	Freedom of Information Act	**SO_2**	Sulfur Dioxide
HAP	Hazardous Air Pollutant	**TAP**	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	**TPY**	Tons per Year
HP	Horsepower	**TRS**	Total Reduced Sulfur
lbs/hr *or* lb/hr	Pounds per Hour	**TSP**	Total Suspended Particulate
LDAR	Leak Detection and Repair	**USEPA**	United States Environmental Protection Agency
m	Thousand	**UTM**	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	**VEE**	Visual Emissions Evaluation
mm	Million	**VOC**	Volatile Organic Compounds
mmBtu/hr	Million British Thermal Units per Hour		
$mmft^3$/hr *or* mmcf/hr	Million Cubic Feet Burned per Hour		
NA *or* N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		

2.3. Permit Expiration and Renewal

2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]

2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]

2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]

2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

2.5.1. This permit shall be reopened and revised under any of the following circumstances:

a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.

c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

a. The change must meet all applicable requirements and may not violate any existing permit term or condition.

b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield.

d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9.]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.
[45CSR§30-5.8]

2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.
[45CSR§30-5.8.a.]

2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or

b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.

b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. 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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. 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.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would 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.
[45CSR§30-5.1.f.2.]

2.17. Emergency

2.17.1. An "emergency" means any situation arising from sudden and reasonably 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.
[45CSR§30-5.7.a.]

2.17.2. 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 45CSR§30-5.7.c. are met.
[45CSR§30-5.7.b.]

2.17.3. 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. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, 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, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]

2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

2.19.1. 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 modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required 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.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. 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.
[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof. **[45CSR§30-5.6.a.]**

2.21.2. Nothing in this permit shall alter or affect the following:

a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. 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 defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding. **[45CSR§30-5.3.e.3.B. and 45CSR38]**

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect. **[45CSR§30-5.1.e.]**

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege. **[45CSR§30-5.1.f.4]**

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.

b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA. **[45CSR§30-5.1.a.2.]**

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person 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 or allow 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.
[40 C.F.R. §61.145(b) and 45CSR34]

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. **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]

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. §68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. §68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.1.9. 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 section 3.1.10. (*ST-2*)
[45CSR §7-3.1., 45CSR13, R13-2006, 4.1.3.b.]

3.1.10. The provisions of section 3.1.9 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (*ST-2*)
[45CSR §7-3.2. 45CSR13, R13-2006, 4.1.3.b.]

3.1.11. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of 45CSR7. (*ST-2*)
[45CSR §7-4.1.]

3.1.12. No person shall circumvent the provisions of 45CSR7 by adding additional gas to any exhaust or group of exhausts for the purpose of reducing the stack gas concentration.
[45CSR §7-4.3.]

3.1.13. 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.
** Note: "Stack", for the purpose of 45CSR7, means, but is not limited to, any duct, control equipment exhaust or similar apparatus, which is designed to vent gases containing particulate matter into the open air.*
[45CSR §7-4.12.and §2.40]

3.1.14. 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.]

3.1.15. 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.]

3.1.16. The permittee is authorized to operate fiberglass reinforced plastic composite manufacturing using the open molding technique at the facility.
[45CSR13, R13-2006, 4.1.1.]

3.1.17. The permittee shall operate all spray guns at the lowest pressure that produces an acceptable spray pattern. The pump ratio for non-atomizing spray guns shall not exceed 11:1.
[45CSR13, R13-2006, 4.1.1.c.]

3.1.18. The permittee shall operate and maintain the spray equipment that is employing the non-atomizing spray technology in accordance with the spray equipment manufacturer's specification at all times. A copy of the manufacturer's specifications shall be maintained on site and made immediately available for inspection.
[45CSR13, R13-2006, 4.1.1.d.]

3.1.19. The permittee shall develop and implement a written training program and provide all production personnel formal training on the use of the non-atomizing resin application technology in accordance with the manufacturer's instructions and specifications on an annual basis. Such training shall focus on training the application operator on the proper spray pattern at the lowest possible air pressure to achieve a non-atomizing spray. New production personnel shall be trained within the first 30 days of being employed by the permittee. The permittee shall maintain records of such training in accordance with 3.4.2 of this permit.
[45CSR13, R13-2006, 4.1.1.e.]

3.1.20. The permittee is only permitted to perform the application of gel coat or polyester resin in the spray booths that are ventilated to the concentrator/RTO control device. This requirement applies to manual or spray application techniques.
[45CSR13, R13-2006, 4.1.1.f.]

3.1.21. The air drying of any container to remove VOCs is prohibited.
[45CSR13, R13-2006, 4.1.4.]

3.1.22. **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.
[45CSR13, R13-2006, 4.1.7.]

3.2. Monitoring Requirements

3.2.1. For purposes of demonstrating compliance with 45CSR§§6-4.3., 6-4.4., 45CSR§§7-3.1., 7-3.2., permit conditions 4.1.2. and 4.1.3. of R13-2006 (Sections 4.1.1., 4.1.2., 3.1.9. and 3.1.10. of this permit), the permittee shall conduct visible emission checks of each emission point subject to an opacity limit once per month during periods of normal manufacturing operations using U.S. EPA Method 22. If during these

checks, or at any other time, visible emissions are observed at any emission point, compliance shall be determined by conducting additional observations in accordance with the visible emission test procedures in 45CSR§7A-2.1 for emission point ST-2 and U.S. EPA Method 9 for emission point ST-1 within 48 hours. If the additional observations determined that the opacity to be greater than the limit, than an evaluation to determine the cause of the exceedance shall be conducted within three (3) days, unless the cause of the exceedance is corrected within 24 hours. If after four consecutive months that no visible emissions were observed from the emission point, then the permittee may conduct such visible emission checks once each calendar quarter. If any visible emissions are observed during the quarterly checks, visible emission checks shall return to being performed each calendar month. Records shall be maintained in accordance with condition 3.4.2. of this permit and shall include all data required by U.S. EPA Methods 9 and 22, or the visible emission test procedure defined in 45CSR§7A-2.1, whichever is appropriate. These records shall include, at a minimum, the date and time of each visible emission check, the result of the visible emission check or observation, observer's name, and if appropriate all corrective actions taken.
[45CSR13, R13-2006, 4.2.3.]

3.2.2. The permittee shall inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of all such inspections and scheduled and non-scheduled maintenance. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the monthly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.
[45CSR§30-5.1.c.]

3.2.3. If utilized, the permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. These records shall be maintained on site for a period of no less than five (5) years.
[45CSR§30-5.1.c.]

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, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are 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.

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 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.

3. A statement of compliance or non-compliance with each permit or rule condition.

[WV Code §§ 22-5-4(a)(14-15) 45CSR7 and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** 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.

[45CSR§30-5.1.c.2.A. 45CSR13, R13-2006, 4.4.1.]

3.4.2. **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.
[45CSR§30-5.1.c.2.B. 45CSR13, R13-2006, 3.4.1.]

3.4.3. **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§30-5.1.c. State-Enforceable only.]

3.4.4. **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.
[45CSR13, R13-2006, 4.4.2.]

3.4.5. **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.

[45CSR13, R13-2006, 4.4.3.]

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.
[45CSR§§30-4.4. *and* 5.1.c.3.D.]

3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]

3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, 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 or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as 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 SE
Charleston, WV 25304

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 Enforcement[1]:
DEPAirQualityReports@wv.gov

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

3.5.4. **Certified emissions statement.** 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.
[45CSR§30-8.]

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

DAQ:
DEPAirQualityReports@wv.gov

US EPA:
R3_APD_Permits@epa.gov

[45CSR§30-5.3.e.]

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

DAQ:
DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.
[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

3.6.1. N/A

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

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 WWWW 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 WWWW 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).

4.0 Chop and Gel Guns, Resin Tanks, Saw/Grinders, Wax Application [emission point ID(s): ST-1, ST-2]

4.1. Limitations and Standards

4.1.1. Visible Emissions from the RTO stack (Emission Point ST-1) shall not exceed twenty (20) percent opacity. **[45CSR §6-4.3., 45CSR13, R13-2006, 4.1.2.f.]**

4.1.2. The provisions of section 4.1.1 shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up. **[45CSR §6-4.4., 45CSR13, R13-2006, 4.1.3.c.]**

4.1.3. No person shall cause, suffer, allow or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator (i.e., RTO-C1) which are large enough to be individually distinguished in the open air. **[45CSR §6-4.5.]**

4.1.4. Incinerators (i.e., RTO-C1), including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors. **[45CSR §6-4.6.]**

4.1.5. Emissions of VOCs from the four resin storage tanks shall not exceed 400 pounds per year. Such vessels shall be vented in a manner that is consistent with good engineering practices for polyester resin storage vessels and located inside of a structure with a roof. **[45CSR13, R13-2006, 4.1.5.]**

4.1.6. Emissions released to the atmosphere from emission point ST-1 shall not exceed the following rates on a pollutant basis except for VOCs, while the concentrator/RTO is being restored as permitted under condition 4.2.1. During the restoration phase as permitted under condition 4.2.1, alternative emission rate for VOCs, from emission point ST-1 shall not exceed the rates listed in Table 4.1.6.b.

Table 4.1.6.a - Emission Limits for Emission Point ST-1 (Concentrator/RTO Stack)

Pollutant	Hourly Rate (lb/hr)	Annual Emissions (TPY)
PM_{10}	0.15	0.66
PM	0.15*	0.66
Oxides of Nitrogen (NO_x)	2.47	10.82
Carbon Monoxide (CO)	10.01	43.84
VOC	36.60	128.34

** Compliance with this Streamlined PM hourly rate limit assures compliance with 45CSR§6-4.1.*

An indicator that compliance with the PM_{10}/PM limit is being maintained is by observing zero visible emissions; An indicator that compliance with the CO & NO_x limits is being maintained is if the monthly consumption rate for the RTO is at or less than 5.7 MMCF per month.

Table 4.1.6.b. - Alternative Emission Limits for Emission Point ST-1 (Concentrator/RTO Stack)

Pollutant	Hourly Rate (lb/hr)	Total Emissions Allowed during the Restoration Phase (tons)
VOC	93.6	202.2

[45 CSR§6-4.1., 45CSR13, R13-2006, 4.1.1.a. and 4.1.1.b.]

4.1.7. Emissions of particulate matter and particulate matter less than ten (10) microns emitted from emission point ST-2 shall not exceed 0.01 pounds per hour and 0.06 tons per year.
[45CSR13, R13-2006, 4.1.3.a.]

4.1.8. The permittee shall operate and maintain the particulate matter control devices identified as DC-1 and DC-2 with a pressure drop across each control device not to exceed 3 kPa. Compliance with this condition constitutes compliance with condition 4.1.7. of this permit.
[45CSR13, R13-2006, 4.1.3.d.]

4.1.9. The combustion chamber temperature shall be set at 1575°F at all times while RTO is functioning during any production day. Compliance with this limit shall be demonstrated with a chart recorder indicating continuous temperature measurement. Variations of temperature are allowed while chamber temperature adjusts to the set point during startup, process fluctuations, and shutdown.
[45CSR13, R13-2006, 4.1.2.b.]

4.1.10. The supplemental fuel for the RTO shall be natural gas.
[45CSR13, R13-2006, 4.1.2.a.]

4.1.11. The permittee is permitted to shut down the entire control device which includes the RTO when there is no production line in operation.
[45CSR13, R13-2006, 4.1.2.c.]

4.1.12. The [concentrator/RTO] control system includes the concentrator, RTO, and associated ductwork to include the ductwork used in the capture system.
[45CSR13, R13-2006, 4.1.2.d.]

4.1.13. The [concentrator/RTO] capture system shall be operated and maintained at a negative pressure in the ductwork going to the control device.
[45CSR13, R13-2006, 4.1.2.e.]

4.1.14. The exhaust of trimming and sanding operations of UTILE process shall be vented to a particulate matter control device(s) and vented back inside of the manufacturing building at all times when engaging of such activities.
[45CSR13, R13-2006, 4.1.6.]

4.2. Monitoring Requirements

4.2.1. The permittee shall perform the following as a periodic monitoring plan for the Durr concentrator/RTO control system in which:

a. The permittee shall collect and replace a set of five (six*) styrene detector tubes every calendar month:

- Four (Five*) styrene concentration tubes will be in each of the outlets of the concentrator units;
- One styrene concentration tube will be in the process exhaust duct from the plant to the control system.
- The styrene detector tubes shall be capable of detecting a styrene concentration ranging from 2 ppm to at least 300 ppm with an accuracy of ± 15%. All tubes shall be analyzed within the same day to determine the styrene concentration in each tube. The average of the four concentration samples from the outlets will be compared to the process exhaust concentration sample using the following monthly screening equation:

$$Adsorption\ Efficiency\ (\%) = 100\% - \frac{(Outlet1 + Outlet2 + Outlet3 + Outlet4)(+Outlet5)^{*}/4(5)^{*}}{Process\ Exhaust/100}$$

* - These changes will go into effect once the fifth preconcentrator wheel is installed. The sum of the outlet concentration will be divided by number of outlets.

b. If the monthly detector tube readings return an average concentrator adsorption efficiency of 83% or less, the permittee shall determine the adsorption efficiency of the concentrator by measuring the styrene concentration in the concentrator inlets and outlets in accordance with U.S. EPA Method 18 test. This testing shall determine the average adsorption efficiency during an entire eight-hour work shift. The permittee shall execute this testing within sixty (60) days after discovering that the efficiency is at or below 83%. This performance testing shall be conducted at a production rate under normal operating conditions. This testing shall be conducted in accordance with condition 3.3.1 and using acceptable test methods.

c. If the results of the performance testing from 4.2.1.b. confirm that the average adsorption efficiency of the concentrator is at or below 83%, then the permittee shall complete restoration of the Durr concentrator/RTO control system, which is identified as RTO-C1, within 180 days after the permittee received the results of the testing required in condition 4.2.1.b. At that time, the VOC limits of Table 4.1.6.b. are triggered. The limits of Table 4.1.6.b. shall remain in effect for a period not to exceed 180 days or once restoration is complete, whichever comes first. Restoration of the control system shall consist of the following four actions:

- Adjust the Durr control system timing and operating parameters;
- Replace the air-seal gaskets in the four individual concentrator units if needed;
- Upgrade the thermal mass (ceramic block) in the regenerative thermal oxidizer (RTO) unit if needed; and
- Replace the carbon adsorption media blocks in the four individual concentrator units.

[45CSR13, R13-2006, 4.2.1.]

4.2.2. For the purpose of ensuring compliance with the limits in conditions 3.1.9., 3.1.10., 4.1.7 and 4.1.8 of this permit, the permittee shall monitor and record the pressure drop across each of the control devices identified

as DC-1 and DC-2 on a semi-monthly basis. The filter for the dust collectors shall be inspected at least once per month and be replaced if necessary. Such records shall be maintained in accordance with 3.4.2 of this permit.
[45CSR13, R13-2006, 4.2.2.]

4.2.3. For the purpose of demonstrating compliance with the VOC limits in Condition 4.1.6., the permittee shall determine the VOC emission rate in terms of pounds per hour on a monthly average and a 12-month rolling total in terms of tons per year, which will be based on the material applied during each respective month, application method, and hours the facility operated during the month. The emission factors published in the most current version of the American National Standard Estimating Emission Factors from Open Molding and Other Composite Processes (ACMA UEF) shall be used. The percentage of VOC monomer in the resin or gel coat shall be used with the appropriate emission factor/procedure outline in the ACMA UEF standards to determine the VOC emissions. The permittee may use data obtained from material safety data sheets (MSDS), Certificate of Analysis, or resin specifications from the manufacturer of the product. This 12-month rolling total shall be conducted no later than 30 days from the end of the previous month. A 12 month rolling total shall mean the sum of the individual material consumed at any given time for the previous twelve (12) consecutive months.
[45CSR13, R13-2006, 4.2.4.]

4.2.4. For purpose of demonstrating on-going compliance with conditions 4.1.1. and 4.1.9. through 4.1.13., the permittee shall measure the negative pressure environment through the exhaust duct pressure measured by the RTO control board on a daily basis. Records of such monitoring shall be maintained in accordance with 3.4.2. of this permit.
[45CSR13, R13-2006, 4.2.5.]

4.2.5. For purpose of demonstrating compliance with conditions 4.1.1., 4.1.9. through 4.1.13., and 3.1.22., the permit shall maintain a log of issues with the concentrator/RTO control device. Such log shall include a description of the issue, corrective action taken, date, length of time of the issue, and is or is not causing a deviation of emission limit or monitored parameter. Such log shall be maintained in accordance with Condition 3.4.2.
[45CSR13, R13-2006, 4.2.6.]

4.3. Testing Requirements

4.3.1. During the performance testing using U.S. EPA Method 18 or Method 25A testing on the control device identified as RTO-C1 or only the concentration part of the unit, the permittee shall conduct concurrent styrene detector tube testing. Results of such testing shall be included with the submitted results of the Method 18 or 25A testing to the Director.
[45CSR13, R13-2006, 4.3.1.]

4.3.2. After 180 days after start-up the second UTILE Process Line or completion of installation of the 5th concentrator wheel for the C1/RTO control device, the permittee shall conduct a test and evaluation of the manufacturing building to determine if the modification of the collection system for the C1/RTO control device meets the criteria of a permanent total enclosure in accordance with U.S. EPA Method 204.
[45CSR13, R13-2006, 4.3.2.]

4.4. Recordkeeping Requirements

4.4.1. Please refer to Section 3.4. of this permit.

4.4.2. The permittee shall maintain records of usage, MSDS, certificate of analysis, and other information used to determine actual VOC emission rate as required in Condition 4.1.6. Such records shall be maintained in accordance with Condition 3.4.2.
[45CSR13, R13-2006, 4.4.4.]

4.4.3. For purpose of demonstrating compliance with the CO and NO_x limits in conditions 4.1.6., the permittee shall maintain records of the monthly consumption rate for the RTO.
[45CSR§30-5.1.c.]

4.5. Reporting Requirements

4.5.1. If the results of the performance testing from 4.2.1.c. confirm that the average adsorption efficiency of the concentrator RTO-C1 is at or below 83%, then the permittee shall notify the Director in writing within ten (10) days of permittee having received these results.
[45CSR13, R13-2006, 4.5.1.]

4.5.2. The permittee shall submit a detail report of the scope of work performed during the restoration of control device RTO-C1 within 30 days after completion of the restoration to the Director. Such report shall contain either the total amount of VOC emissions during the restoration or the 12-month rolling VOC emission rates for each month during the restoration.
[45CSR13, R13-2006, 4.5.2.]

4.5.3. To coincide with the reporting requirement of Condition 5.5.1., the permittee shall include the following information:

- The actual VOC emission rate for each calendar month and 12 month rolling total for each month of the reporting period from emission point ST-1.

- The concentrator adsorption efficiency for each calendar month of the Durr concentrator/RTO system as required in Condition 4.2.1.a.

[45CSR13, R13-2006, 4.5.3.]

4.6. Compliance Plan

4.6.1. N/A

5.0 40 C.F.R 63 Subpart WWWW

Note: In this section "this subpart" means 40 C.F.R 63 Subpart WWWW, "you" means the permittee.

5.1. Limitations and Standards

5.1.1. The permittee shall comply with all applicable requirements as set forth in 40 C.F.R 63 Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." The following requirements are from this subpart and applicable to the permitted operation. **[45CSR13, R13-2006, 5.1.1., 45CSR34]**

5.1.2. The permittee shall limit its operations at the facility in such a manner that the HAP emissions are equal to or less than the maximum limits for each operation as defined in Table 3 of 40 C.F.R 63 Subpart WWWW and provided in the following table, Table 5.1.2.

Table 5.1.2. Organic HAP Limits

Operation Type	Use	Organic HAP Emissions Limit (lb/ton)[1]
Open molding non-corrosion resistant and/or high strength	Mechanical Resin Application	88
Open molding tooling	Manual Resin Application	157
Open molding gel coat	Tooling gel coat	440
Open molding gel coat	White/off white pigmented gel coat	267
Open molding gel coat	All other pigmented gel coat	377
Open molding gel coat	Clear Production Gel Coat	522

[1] Organic HAP emission limits are expressed as lb of HAPs per ton of resin applied. The permittee must be at or below these valves based on a 12-month rolling average.

Compliance with the above listed emission limits shall be demonstrated using one of the four methods. The permittee may switch between listed compliance options (See 40 CFR §§63.5810(a) – (d)). However, the permittee must provide notice in accordance with 40 CFR §63.5905(b), and when changing to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option that the permittee is changing to:

(a) *Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit.*

(1) Calculate the actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The permittee must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in 40 CFR §63.5796. The emission factor calculation should include any and all emission reduction techniques

used including any add-on controls. If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in 40 CFR §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to Subpart WWWW of Part 63, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\text{\% Control Efficiency}}{100} \qquad \text{(Eq. 1)}$$

Where:

Percent Control Efficiency = a value calculated from organic HAP emissions test measurements made according to the requirements of 40 CFR §63.5850 to this subpart.

(2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

(b) *Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.* Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.

(1) (i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^{n}\text{Material}_i} \qquad \text{(Eq. 2)}$$

Where:

Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i, lbs/ton;

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;

n = number of process streams where you calculated an organic HAP emissions factor.

(ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.

(2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

(c) *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n} (EL_i * Material_i)}{\sum_{i=1}^{n} Material_i} \qquad \text{(Eq. 3)}$$

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n = number of operations.

(2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation

organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Operation EF}_i * \text{Material}_i)}{\sum_{i=1}^{n} Material_i} \quad \text{(Eq. 4)}$$

Where:

Actual Individual EF_i = Actual organic HAP emissions factor for operation type i, lbs/ton;

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n = number of operations.

(3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

(d) *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

(1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

(2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

(3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.

(4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

[40 C.F.R §63.5805(b) and §63.5810, 40 CFR 63 Subpart WWWW Table 3, 45CSR34, 45CSR13, R13-2006, 5.1.2]

5.1.3. The permittee shall comply with the applicable work practice standards from Table 4 of 40 C.F.R 63 Subpart WWWW and Permit R13-2006 as provided in Table 5.1.3. of this permit.

Table 5.1.3. Work Practice Standard

Operation	Work Practice Standard
For an existing cleaning operation.	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying to the mold or reinforcement.
For a new or existing HAP-containing material storage operation.	The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP- containing material storage tanks may be vented directly to the atmosphere as necessary for safety.
All mixing operations.[1]	The permittee shall install and use mixer covers with no visible gaps present in the mixer cover, except that gaps of up to 1 inch are permissible around the mixer shaft and any required instrumentation.
All mixing operations.[1]	The permittee shall close any mixer vents when actual mixing is occurring, except that vent is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95% efficient control device are exempt from this requirement.
All mixing operations.[1]	The permittee shall keep the mixer covers closed while actual mixing is occurring except that venting is allowed during adding of materials or as necessary prior to adding materials, or opening the cover for safety.

[1] Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin).

[40 C.F.R §63.5805(b), 40 CFR 63 Subpart WWWW Table 4, 45CSR34, 45CSR13, R13-2006, 5.1.3.]

5.1.4. The affected sources as defined in 40 C.F.R §63.5790(b) located at this facility shall be operated and maintained according to the provisions in 40 C.F.R §63.6(e)(1)(i).
[40 C.F.R §63.5835(c), 45CSR34, 45CSR13, R13-2006, 5.1.4.]

5.2. Monitoring Requirements

5.2.1. The permittee shall collect the appropriate records in accordance with 40 C.F.R §63.5895 for the corresponding selected compliance option in 40 C.F.R §63.5810. This requirement may not supersede or replace the monitoring requirements in condition 3.2.1. and Section 4.2 of this permit.
[40 C.F.R §63.5895, 45CSR34, 45CSR13, R13-2006, 5.2.1.]

5.3. Testing Requirements

5.3.1. *Reserved*

5.4. Recordkeeping Requirements

5.4.1. The permittee shall maintain a copy of each notification and report that is required to be submitted to comply with Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee has submitted according to the requirements in 40 C.F.R §63.19(b)(2)(xiv).
[40 CFR §63.5915(a)(1), 45CSR34, 45CSR13, R13-2006, 5.4.1]

5.4.2. For the purposes of demonstrating compliance with HAP emission limits set forth in condition 5.1.2. and 40 C.F.R 63, Subpart WWWW, the permittee shall maintain records supporting one of the compliance options, as defined by Subpart WWWW.
[45CSR13, R13-2006, 5.4.2]

5.5. Reporting Requirements

5.5.1. For the purpose of demonstrating compliance with the reporting requirements set forth in 40 C.F.R 63, Subpart WWWW, the permittee shall prepare and submit a semi-annual compliance report addressing any deviations from the applicable emissions limitations as defined in 40 C.F.R §63.5805(b) and the work practice standards as defined in 40 C.F.R §63.5805(b) during each reporting period. Such reports shall be submitted by September 15 and March 15 of each year to the Director. Such report shall contain the following:

a. Name of the Permittee;

b. Statement by a responsible official with the official's name, title, and signature, certifying the truth, accuracy , and completeness of the content of the report;

c. Date of the report and beginning and ending dates of the reporting period;

d. If there was a startup, shutdown, or malfunction during the reporting period and the permittee took action consistent with the start-up, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i);

e. If there were no deviations from any organic HAP emission limitation (emission limit identified in Table 5.1.2.) and there are no deviations from the requirements for work practice standards in Table 5.1.3., a statement that there were no deviation from the organic HAP emission limitation or work practice standards during the reporting period.

f. For each deviation from an organic HAP emission limitation (Table 5.1.2.) and for each deviation from the requirements for work practice standards (Table 5.1.3.) that occurs during the reporting period, the compliance report must contain the following:

1. The total operating time of each affected source during the report period;

2. Information on the number, duration, and cause of deviation (including unknown cause, if applicable), as applicable, and the corrective action taken.

40 CFR §§63.5910(b)(5), (c) and (d), 45CSR34, 45CSR13, R13-2006, 5.5.1]

5.6. Compliance Plan

5.6.1. N/A