

Fact Sheet



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

Permit Number: **R30-06700025-2017**
Application Received: **December 19, 2016**
Plant Identification Number: **067-00025**
Permittee: **SMR Technologies, Inc.**
Mailing Address: **93 Nettie-Fenwick Road, Fenwick, WV 26202-9718**

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

Facility Description

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

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2016 Actual Emissions
Carbon Monoxide (CO)	15.18	1.20
Nitrogen Oxides (NO _x)	25.80	1.51
Particulate Matter (PM ₁₀)	4.75	0.63
Total Particulate Matter (TSP)	4.75	0.63
Sulfur Dioxide (SO ₂)	36.90	0.06
Volatile Organic Compounds (VOC)	42.47	19.33

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2016 Actual Emissions
Toluene	16.7	5.07
Hexane	7.2	1.14
Miscellaneous HAPs	0.5	0.24
Formaldehyde	<0.5	< 0.01
Total HAPs	33.7	< 6.46

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

Title V Program Applicability Basis

This facility has the potential to emit 16.7 TPY of toluene and 33.7 TPY of total HAPs. Due to this facility's potential to emit over 10 tons per year of a single HAP and over 25 TPY of aggregate HAPs, SMR Technologies, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

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

Federal and State:	45CSR2	Combustion of fuel in indirect heat exchangers
	45CSR6	Open burning prohibited.
	45CSR7	Particulate air pollution from manufacturing process operations
	45CSR10	Emissions of sulfur oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction
	45CSR16	NSPS pursuant to 40 C.F.R. Part 60

WV Code § 22-5-4 (a) (14) 45CSR30 45CSR34 40 C.F.R. Part 60, Subpart Dc 40 C.F.R. 60, Subpart IIII 40 C.F.R. Part 61 40 C.F.R. 63, Subpart ZZZZ 40 C.F.R. Part 63, Subpart DDDDD 40 C.F.R. Part 82, Subpart F State Only: 45CSR4	The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63 NSPS for small industrial-commercial-institutional steam generating units Standards of Performance for Stationary Compression Ignition Internal Combustion Engines Asbestos inspection and removal RICE MACT National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters Ozone depleting substances 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 (if any)
R13-0415B	12/11/2007	
G60-C058	11/18/2013	

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

Determinations and Justifications

- 1) Significant Modification SM01 (February 19, 2014) - addressed the addition of an existing and a new emergency generator to the Title V permit. The engines were constructed under General Permit G60-C058 (Emission Unit IDs 500 and 501 respectively).
- 2) Emission Units Table 1.1 – existing Onan Emergency Generator installed in 1989 (Emission Unit ID 502) was added; emission point IDs EP500 and EP501 were assigned for the emergency

generators 500 and 501 (respectively). Also, an existing 4,000 gal Fuel Oil Storage Tank (Emission Point ID: Stack #511) was added.

- 3) Section 7.0 – applicable requirements of 40 C.F.R. 63 Subpart ZZZZ were added for the generator 502 under conditions 7.1.5, 7.1.6, 7.2.2, 7.2.3, 7.4.2, 7.5.4 and 7.5.5. Emergency generators 500 and 501 are also subject to 40 C.F.R. 63 Subpart ZZZZ, but Subpart ZZZZ requirements are not covered by the General Permit G60-C. Therefore, they were included with this permit during the Significant Modification SM01 (see item (1) above) under conditions 7.1.4, 7.1.5, 7.5.2 and 7.5.3. However, during this renewal condition 7.1.5 was expanded to include applicable sections 40 C.F.R. §§63.6605 and 63.6640(f) instead of just incorporating them by reference.

40 CFR 63 Subpart ZZZZ Applicability Table for generators 500, 501 and 502

Engine Emission Unit ID	Design Capacity	Ignition	Use/Type	Year installed	Source of HAPs
500	519 bhp	Compression Ignition (CI)	Emergency	2005 (new)	Major
501	670 bhp	Compression Ignition (CI)	Emergency	2013 (new)	Major
502	30 hp	Spark Ignition (SI)	Emergency	1989 (existing)	Major

Also, per 40 C.F.R. §60.4200(a)(2)(i), emergency generators 500 and 501 are subject to requirements of 40 C.F.R. 60 Subpart IIII since they commenced construction after July 11, 2005 and were manufactured after April 1, 2006.

40 CFR 60 Subpart IIII Applicability Table for generators 500 and 501

Engine Emission Unit ID	Design Capacity	Engine Type	Displacement per cylinder	Use/Type	Year installed
500	519 bhp	Not Fire pump	15.2 L	Emergency	2005
501	670 bhp	Not Fire pump	14.64 L	Emergency	2013

Emergency generator 501 must comply with the emission standards specified in 40 C.F.R. §60.4205(b), therefore per 40 C.F.R. §60.4211(c) it was purchased certified to these emission standards by its manufacturer (Caterpillar). Emergency generator 500 is subject to the emission standards specified in 40 C.F.R. §60.4205(a), and is not required to be certified by its manufacturer, but it must demonstrate compliance with these standards according to one of the methods, specified in 40 C.F.R. §§60.4211(b)(1) through (b)(5). Both emergency generators are covered by General Permit Registration G60-C058 and G60-C that includes requirements of 40 C.F.R. 60 Subpart IIII (*Section 7.0 Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40CFR60 Subpart IIII)*). For clarification purposes, condition numbers of the general permit's 40 C.F.R. 60 Subpart IIII requirements, applicable to the emergency generators 500 and 501, were included with the following existing conditions of this permit: 7.1.1, 7.1.2, 7.1.3, 7.2.1, 7.3.1, 7.4.1 and 7.5.1. In addition, the following portion of the 40 C.F.R. 60 Subpart IIII §60.4205(a), not included with the general permit under requirement 7.1.5, was included with the existing requirement 7.1.3 to cover Emission Standards, applicable to the emergency generator 500: "Owners and operators of pre-2007 model year emergency stationary

CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder”.

Also, emergency generators 500 and 501 are subject to the requirements of *Section 5.0 Reciprocating Internal Combustion Engines* of the general permit. Therefore, for clarification purposes, the condition numbers of the applicable requirements were listed with the existing requirements of this permit 7.1.2, 7.1.3 and 7.4.1.

- 4) Requirements 4.1.9 and 4.1.10 – the placeholder language for the 40 C.F.R 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, was replaced with the requirements of this subpart (under condition 4.1.9) effective after the previous Title V renewal was issued, and applicable to the existing Boilers No. 1 and No. 2 per 40 C.F.R. §§63.7490(a)(1) and (d). Per 40 C.F.R. §63.7495(b) compliance date for existing boilers is no later than January 31, 2016.

Boiler Emission Unit ID	Emission Point ID	Design Capacity, mmBtu/hr	Boiler Subcategory	Year installed
Boiler No. 1	EP001	16.8	Unit designed to burn Gas 1 fuels	1978 (existing)
Boiler No. 2	EP007	24.5	Unit designed to burn Gas 1 fuels	2007 (existing)

In order for the boilers to comply with the definition of *Unit designed to burn gas 1 subcategory* (40 C.F.R. §63.7575), the following note was added to requirements 4.1.3 and 4.1.5 (the boilers’ emission limits): “Emission limits above are based on operating on either natural gas or #2 fuel oil for a maximum of 8,760 hours per year. However, this boiler is defined under 40 C.F.R. 63 Subpart DDDDD as a unit designed to burn gas 1 fuels, and is limited to burning liquid fuel (#2 fuel oil) for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, and burning liquid fuel during periods of gas curtailment or gas supply interruptions of any duration.”

The following applicable sections were left out of the permit for the reasons listed below:

- a) §63.7495 (b) – the existing boiler compliance date (no later than January 31, 2016) has passed and notification requirements were completed with submittal of the Notification of Compliance Status (NOCS) on June 6, 2013 (before the compliance date), and Report of one-time energy assessment was submitted on September 1, 2017.
- b) §63.7510 (e) – completed; the initial tune-up of the Boilers No. 1 and No. 2 described in §63.7540(a)(10)(i) through (vi) was completed before the compliance date specified in §63.7495 (January 31, 2016), and one-time energy assessment specified in Table 3 was completed on June 16, 2017.
- c) §§63.7530 (e) and (f), and 63.7545(e) – completed; a signed certification that the energy assessment was completed was not included with the NOCS; the NOCS contained only the results of the initial tune-up. The one-time energy assessment was done on June 16, 2017, and results were submitted on September 1, 2017.

Also, conditions 4.3.1, 4.4.2 and 4.5.2 were added to include applicable testing, recordkeeping and reporting requirements of the subpart. Per §63.7550(b)(5) (reporting requirement 4.5.2), the company may submit compliance reports at the same time as other periodic reports (such as Semi-Annual Monitoring reports).

Non-Applicability Determinations

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

40 C.F.R. 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels. The fuel oil storage tank (Emission Point ID: Stack #511) has a capacity of less than 75 m³.

40 C.F.R. 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Unit. The 16.8 MMBtu/hr boiler (001) was constructed prior to June 9, 1989; therefore, it is not subject to the requirements of 40 C.F.R. 60 Subpart Dc. However, 40 C.F.R. 60 Subpart Dc is applicable to the 24.5 MMBtu/hr boiler (007).

40 C.F.R. 60, Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The generators (500 and 501) are powered by diesel engines, which are not spark-ignition engines. The generator (502) is a spark ignition engine, but was constructed before the applicability date of 40 C.F.R. 60 Subpart JJJJ.

40 C.F.R. 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The generator 502 is not subject to this subpart since it was manufactured and commenced construction before the applicable dates listed in 40 C.F.R. §60.4200.

40 C.F.R. 63, Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities. The parts assembled at this facility are not critical to a vehicle's structural integrity or flight performance per 40 C.F.R. §64.741(f).

40 C.F.R. 63, Subpart OOOO - National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles. The facility is not subject to this MACT because the fabric is not coated on a continuous web.

40 C.F.R. 64 - Compliance Assurance Monitoring (CAM). This facility is not subject to CAM. The boilers (001 and 007), assembly tables, heat cure presses, generators (500, 501, and 502) and autoclaves are not equipped with control devices; for CAM to apply, an emission unit must have a control device, as specified in 40 C.F.R. §64.2(a)(2). The buffing booths (002 and 005) and paint booths (006 and 008) have control devices installed, but their pre-control device PTE for all regulated air pollutants is below the corresponding major source threshold; for CAM to apply, the PTE for an emission unit must be above the major source threshold, as specified in 40 C.F.R. §64.2(a)(3).

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: October 26, 2017
Ending Date: November 27, 2017

Point of Contact

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

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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.