Mullins, Robert A <robert.a.mullins@wv.gov>

Re: R30-04100045-2021 - specific comments on draft R30 permit

1 message

Mullins, Robert A <robert.a.mullins@wv.gov> Mon, Dec 6, 2021 at 9:32 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>

Got your comments. Will review them and send the final draft version of the permit and factsheet to notice.

On Mon, Dec 6, 2021 at 9:27 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Robert,
>
> I've confirmed with Theresa/Latham that the attached documents reflect our comments on the revised permit.
>
> The only language changes we're requesting are to the Fact Sheet.
>
> Please reach out if you have any questions.
>
> Also, I'm sending this from my iPhone so I'd ask you confirm receipt.
>
> Thanks!
>
> Chris Blume
> RPS
> 312-576-8058
>
> Sent from my iPhone
>
> Begin forwarded message:
>
> > **From:** Christopher Blume <Christopher.Blume@rpsgroup.com>
> > **Date:** December 5, 2021 at 8:11:00 AM CST
> > **To:** Theresa Elliott <theresaelliott@lathampool.com>
> > **Subject: FW: R30-04100045-2021 - specific comments on draft R30 permit**
> >
> > Theresa,
> >
> > The attached documents only include a couple of comments from me.
> >
> > Looks like Robert did a pretty job of addressing our comments.
> >
> > I'm generally OK with Robert making the broad clarification in the Fact Sheet only about how certain R30 conditions related to 4W NESHAP "add-on controls" requirements only apply if (and when) the RTO is used to meet applicable O-HAP limits. This should be enough to blunt Bauerle's likely interest in the actual permit language.
> >
> > Otherwise, my prior comments on the EU Table / EU-1B CD and EP (Condition 1.1) went un-address … which is probably because such changes would need to be initiated through an R13 amendment. I'm not

necessarily concerned at this point, because it'll be better to address this after the RTO is actually up and running; and we address any pending changes related to CAM, etc.

Let me know if you have any other comments.

Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Wednesday, December 1, 2021 2:11 PM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Cc: Theresa Elliott <theresaelliott@lathampool.com>
Subject: Re: R30-04100045-2021 - specific comments on draft R30 permit

I have reviewed your comments that you sent and address those that seemed to be requests for changes and not just your notes on the permit.

- On the address I have updated it to the current one.
- After checking with the R13 permit writer that the requested language changes to conditions 4.2.2, 4.2.6, and 4.4.3. would not need to go through them first. I have made the changes.
- No change will be made to condition 5.2.3 since language comes directly from the underlying R13 permit condition.
- No change will be made to condition 6.1.2 since most of the language comes from the underlying R13 permit condition and indicates your planned method of compliance.
- For conditions 6.1.5, 6.2.2, 6.2.3, 6.3.1, 6.3.2, and 6.4.2. This language comes directly from Subpart 4W, I would like to keep the language the same as the regulation. I have added something to the fact sheet to indicate how you are currently using the "weighted averaging" method, but have included the option for using an add-on control device for operational flexibility and then listed which conditions would apply only if the add-on control device is used to demonstrate compliance with 4W.
- For the comments on SS, I don't think we can add specific citations for SS. There are different requirements for different parts of the control device. There are requirements for the vents at the work stations that lead to the Rotary Concentrator which has its own requirements, then the thermal Oxidizer and its requirements. To include all of these requirements would make the permit confusing, so I will be leaving them incorporated by reference.

I attached the Pre-draft Permit and fact sheet for your further review. I will be sending the Permit to Notice early next week.

On Wed, Nov 24, 2021 at 12:36 PM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hi Robert,

The attached document includes specific comments that Latham would like to be address before the R30 permit is finalized.

After you've taken a look, let us know if you'd like to discuss how WVDEP may be able to accommodate our desired changes.

Thanks, and have a safe and happy Thanksgiving Weekend!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Christopher Blume
Sent: Sunday, November 21, 2021 7:51 PM
To: Mullins, Robert A <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>
Subject: RE: R30-04100045-2021 - add'l time to provide comments / call Nov 22nd @ 11 AM EST

Hello Robert,

I hope you had an enjoyable break from work.

Attached are our current, general comments; which we look forward to discussing with you tomorrow, Monday, November 22nd, at 11 AM Eastern.

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A robert.a.mullins@wv.gov
Sent: Friday, November 12, 2021 9:13 AM
To: Christopher Blume Christopher.Blume@rpsgroup.com
Subject: Re: R30-04100045-2021 - add'l time to provide comments / call on Mon Nov 22nd ?

CAUTION: This email originated from outside of RPS.

Christopher,

11 AM on Monday November 22nd is fine with me. It will give me a few hours to review any written comments you send me next week before the call.

On Fri, Nov 12, 2021 at 10:06 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Robert,
>
> Latham will submit final, written comments of the draft R30 permit on or before Wed, Nov 24th.
>
> We're not in a position to pose any well-thought questions today, but do intend to send you at least some written comments next week.
>
> Theresa and I are available anytime on Mon, Nov 22nd for a call. How about 11 AM Eastern time? If that doesn't work, please revert with your preferred time frame(s).
>
> Thanks!
>
> **Christopher Blume, P.E.**
>
> Vice President
> RPS | North America
> **M** +1 312 576 8058
> **E** christopher.blume@rpsgroup.com
>
> ---
>
> **From:** Mullins, Robert A <robert.a.mullins@wv.gov>
> **Sent:** Friday, November 12, 2021 8:04 AM
> **To:** Christopher Blume <Christopher.Blume@rpsgroup.com>
> **Subject:** Re: R30-04100045-2021 - add'l time to provide comments / call on Mon Nov 22nd ?
>
> **CAUTION:** This email originated from outside of RPS.
>
> That if fine we can schedule a call and address your comments before I propose the Permit. If you want to e-mail me some questions today, feel free to. I'll try to answer them before I leave.
>
> On Fri, Nov 12, 2021 at 8:54 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:
>
> > In that case, Robert, it would be very helpful to Latham if you could allow an additional 8 days to provide comments; effectively pushing back the due date to Nov 24th ?
> >
> > If you can do that, I'll get with Theresa and propose a few call times for Mon, Nov 22nd .

How does that sound?

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Friday, November 12, 2021 7:50 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: Re: R30-04100045-2021 - call on Mon Nov 15th ?

I'm available this morning from now till 3pm. As for the due for comment that was just the standard to 2 weeks I give before going to notice it not on of the official comment period due dates. It mainly given so that i can move on if i don't hear back from a company in a reasonable time.

Thanks,

Robert.

On Fri, Nov 12, 2021 at 8:15 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hi Robert,
>
> We we're hoping to speak with you before the Nov 16th due date for comments on the draft R30 permit.
>
> By chance, would you have time for a brief call sometime today, preferrable in the morning?
>
> Please let us know.
>
> Thanks!
>
> **Christopher Blume, P.E.**
>
> Vice President
> RPS | North America
> **M** +1 312 576 8058
> **E** christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Friday, November 12, 2021 7:06 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: Re: R30-04100045-2021 - call on Mon Nov 15th ?

CAUTION: This email originated from outside of RPS.

Christopher,

I will be on vacation next week (Nov. 15 - 19). I will be available on November 22 - 24 between 7:30am - 3pm. Feel free to schedule a meeting on any of those days.

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

On Wed, Nov 10, 2021 at 4:16 PM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hello Robert,
>
> We'd like to schedule a call with you on Monday, November 15th to review some of the additions in the draft R30 permit; especially those related to the CAM Rule and "add-on controls" as referenced in the 4W NESHAP.
>
> How does your schedule look that day at or after 11 AM Eastern time?
>
> Please let us know and I'll send out a Teams Meeting invitation.
>
> Thanks!
>
> **Christopher Blume, P.E.**
>
> Vice President
> RPS | North America
> **M** +1 312 576 8058
> **E** christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Tuesday, November 2, 2021 12:07 PM
To: mattrowe@lathampool.com; Chrisfindley@lathampool.com; Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: R30-04100045-2021

CAUTION: This email originated from outside of RPS.

Attached are the Pre-Draft Title Permit Renewal and Fact Sheet for Latham Pool Products, Inc's Viking Pools - WV / Jane Lew facility. Please review the documents and respond with any questions or comments by November 16, 2021 so that I may address said questions or comments before sending the permit Out ot Notice.

Note: Permitting actions R30-04100045-2017(MM02) and R30-04100045-2017(MM03) were combined with the Title V renewal.

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--

Robert Mullins

WV Department of Environmental Protection

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Robert Mullins

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--

Robert Mullins

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Phone: (304)926-0499 ext. 41286

West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04100045-2022**
Application Received: **April 8, 2021 (Renewal), June 10, 2021 (MM02), October 4, 2021 (MM03)**
Plant Identification Number: **03-54-041-00045**
Permittee: **Latham Pool Products, Inc.**
Facility Name: **Viking Pools - WV / Jane Lew**
Mailing Address: **P.O. Box 550, Jane Lew, WV 26378**

Physical Location:	Jane Lew , Lewis County, West Virginia
UTM Coordinates:	552.3 km Easting • 4328.1 km Northing • Zone 17
Directions:	From Interstate 79, take exit 105 and proceed west on WV County Route 7 for approximately 0.5 miles. Turn left on Lewis County Industrial Park Road (County Route 78) and proceed approximately 0.5 miles to the plant site on the left.

Facility Description

Viking Pool's Jane Lew facility manufactures swimming pools, spas, and related products made of reinforced plastic (referred to as reinforced plastic composite). There are two production lines at the facility (i.e. Blue Viking Building and Green CPC Building). The manufacturing process is a semi-continuous process consisting typically of between 6-10 steps. Actual number of steps can be more or less than this range. Pools and spas are manufactured by applying multiple layers of gel coat and resins to a plastic mold. Gel coats are used to provide color to the pools. Additional steps consist of the fabrication of structural layers which can be application of resins mixed with structural additives (e.g. ceramic powder, fiberglass strands or mat, etc.). The layers are sprayed in multiple steps with time allowed between sprays for the coatings to "cure" (polymerization of the resin monomer contained in the coatings). The coating is cured at room temperature.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	**Potential Emissions**	**2020 Actual Emissions**
Carbon Monoxide (CO)	0.37	Not Reported
Nitrogen Oxides (NO_X)	0.43	Not Reported
Particulate Matter ($PM_{2.5}$)	6.6	0.32
Particulate Matter (PM_{10})	6.6	0.90
Total Particulate Matter (TSP)	6.6	2.78
Sulfur Dioxide (SO_2)	0.01	Not Reported
Volatile Organic Compounds (VOC)	178.1	128.62

PM_{10} is a component of TSP.

Hazardous Air Pollutants	**Potential Emissions**	**2020 Actual Emissions**
Styrene	128.3	108.60
Methyl Methacrylate	14.9	14.36
Ethylbenzene	<0.02	Not Reported
Dimethyl Phthalate	<0.02	<0.01
Total HAPs	143.24	122.97

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

Title V Program Applicability Basis

This facility has the potential to emit 178.1 tpy VOC, 128.3 tpy Styrene, 14.9 tpy Methyl Methacrylate, and 143.24 tpy Total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Latham Pool Products, 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:	45CSR6	Open burning prohibited.
	45CSR7	To Prevent And Control Particulate Matter Air Pollution from Manufacturing Processes And Associated Operations
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits
	45CSR20	Good Engineering Practice as Applies To Stack Heights

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R 63 Subpart WWWW	NESHAP: Reinforced Plastics Composites Production
State Only:	45CSR4	No objectionable odors.

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)*
R13-2332J	October 7, 2021	

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

Determinations and Justifications

This is the third renewal of this Title V permit and has been combined with Minor Modifications R30-04100045-2017(MM02) and R30-04100045-2017(MM03).

R30-04100045-2017(MM02)

This modification is to convert one vinyl ester resin application station to a gelcoat application station, which will be routed to the rotary concentrator/regenerative thermal oxidizer (RC/RTO) and to increase the number of material application stations routed to the RC/RTO from four to six. Correspondingly, the number of material application stations not routed to the RC/RTO will decrease from four to two.

- The above changes do not result in any changes to the Title V Permit since all the application stations are existing parts of EU-1B and there are no changes to the permitted emissions and there were no changes to R13-2332I.

R30-04100045-2017(MM03)
This modification is to incorporate language changes made to R13-2332J.

- The language of condition 4.1.4 was updated. The updated language accurately reflects what the company proposed in permit application R13-2332H (and what was included in said application's emission calculations). Additionally, this language change was requested in permit application R13-2332I but was erroneously omitted.

- Condition 6.1.2 language was updated to allow Latham to use any of the four methods of determining compliance with the emissions limits of 40 CFR 63 Subpart WWWW instead of limiting them to one method. Since all four methods are now available to be used, all of 40 CFR §63.5810 was included in the condition instead of just 40 CFR §63.5810(c).

R30-04100045-2021

Section 4.0 Manufacturing Process Requirements [EP-03, EP-04, EP-11, EP-12]

- There has been no change to the applicable requirements of 45CSR7, 45CSR6 and 45CSR20 since the last renewal.

- Latham requested additional language to condition 4.2.2, 4.26, and 4.4.3. These langage changes involve recordkeeping to document when the dates and times RTO is in operation and being used to control emissions to better account for its reduction in VOCs.

- R30-04100045-2017(SM02) added a rotary concentrator and regenerative thermal oxidizer (RTO) as a control device (CD-06) to EU-1B. EU-1B is a Pollutant-Specific Emissions Unit (PSEU) for VOC subject to Compliance Assurance Monitoring (CAM) under 40 CFR 64 since potential VOC emissions exceed the major source threshold before controls and control device CD-06 is used to demonstrate compliance with the VOC emission limits in condition 4.1.5. The CAM requirements were added to the Title V permit as follows:

    - Added 40 C.F.R. §§64.3(a) and 64.6(c) to the citation of condition 4.1.6 establishing the performance indicators of 1,500 ºF in the combustion chamber of the RTO.
    - Added conditions 4.1.9 – 4.1.14 to incorporate the applicable requirements of 40 C.F.R. 64.
    - Added 40 C.F.R. §64.6(c) to the citation of condition 4.2.6 requiring hourly monitoring of the RTO combustion chamber temperature.
    - Added condition 4.4.5 with 40 C.F.R. 64 general recordkeeping requirements.
    - Added condition 4.5.2 with 40 C.F.R. 64 general reporting requirements.

Section 5.0 Mold Fabrication/Repair and Research and Development Requirements [EP-01, EP-02, EP-07, EP-08, EP-10]

- There has been no change to the applicable requirements of 45CSR7 and 45CSR20 since the last renewal.

Section 6.0 40 CFR Part 63, Subpart WWWW - Specific Requirements

- 40 CFR 63 Subpart WWWW was last updated on March 20, 2020. The following changes were made to section 6.0.

    - Updated condition 6.1.4 to include all the general requirements of 40 CFR §63.5835.

- Updated condition 6.1.5 to include all the continuous compliance options of 40 CFR §63.5900(a).
- Added condition 6.1.6 to include the requirement of 40 CFR §63.5900(c) to meet the applicable organic HAP emission limits and work practice standards at all times.
- Added conditions 6.2.2 and 6.2.3 to include monitoring and data collection when using an add-on control device.
- Added the testing requirements of 40 CFR §63.5845 and §63.5850 (conditions 6.3.1 and 6.3.2) now that there is an add-on control device (RC/RTO) that requires testing if the method used to demonstrate compliance with the emission limits of Table 6.1.2 requires the use of a control device.
- Added the recordkeeping requirements of 40 CFR §63.5915(b) for an add-on control device as condition 6.4.2.
- Added the recordkeeping requirements of 40 CFR §63.5920 as condition 6.4.5.
- Removed old condition 6.5.1.d since the underlying requirement was removed from 40 CFR 63 subpart WWWW on March 20, 2020.
- Added condition 6.5.2 to incorporate the 40 CFR §63.5900(b) requirement to report deviations from each standard.
- Added condition 6.5.3 to incorporate 40 CFR §63.5912 which was added to 40 CFR 63 subpart WWWW to specify how the permittee submits reports.

Note: The facility currently uses the 40 CFR §63.5810(c) "weighted average" method to demonstrate compliance with the HAP emission limits of 40 CFR 63 Subpart WWWW. This method does not use a control device to achieve compliance with the HAP limits, but for operation flexibility the option to use an add-on control device was added. The following conditions contain requirements related to the use of the add-on control device that are only applicable if the control device is being used to demonstrate with 40 CFR 63 Subpart WWWW emission limits: 6.1.2.a, 6.1.5.a, 6.2.2, 6.2.3, 6.3.1, 6.3.2, and 6.4.2.

Non-Applicability Determinations

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

a. 45CSR§7-3.7. - The facility does not have storage structures which produce particulate emissions.
b. 45CSR17 - The facility is not subject to 45CSR17 because it is subject to 45CSR7.
c. 45CSR21 - The facility is not in a county regulated by this rule.
d. 45CSR27 - The facility is not a source of toxic air pollutants.

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: (Date of Notice Publication)
Ending Date: (Publication Date PLUS 30 Days)

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert Mullins

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)

(**Choose**) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.

Mullins, Robert A <robert.a.mullins@wv.gov>

Re: Latham Company Comments

1 message

McCumbers, Carrie <carrie.mccumbers@wv.gov> Mon, Nov 29, 2021 at 9:38 AM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>

For 4.2.2, it appears they want language to account for the reduction in VOC emissions from the RTO. I'm not sure about adding this since the R13 permit did not include this requirement. Since there is an overall limit in condition 4.1.1 and a limit for the RTO in condition 4.1.6, did the R13 permit writer intend for the 4.1.1 limits to be based on material throughput that was uncontrolled or did they include RTO usage in these limits?

For 4.2.6, I think maybe you should include "and being used to control emissions" after the word "operation" in the first sentence. That would make the requirement similar to what is written in condition 4.1.6.

For 4.4.3, my response is similar to what I said about 4.2.2. Did the R13 permit writer intend for the condition 4.1.1 limits to account for the RTO emission reductions?

For condition 5.2.3, I don't think we should make this change since it comes from the R13 permit and condition 4.2.5 also references a "bank of filter media".

For condition 6.1.2, they want to strike through "including the weighted average method 40 CFR 63.5810(c) which is exerted below as 6.1.2.c". I don't think we should make this change since it is from the R13 permit and indicates which method of compliance they plan on using.

For conditions 6.1.5, 6.2.2, 6.2.3, 6.3.1, 6.3.2, and 6.4.2, isn't this written directly from Subpart 4W? I would like to keep the language the same as the regulation. We could add something to the fact sheet to indicate how they plan to use daily weighted averaging, but we have included the option for using an add-on control device and then list which conditions would apply only if the add-on control device is used to demonstrate compliance with 4W. I think a lot of the comments are related to clarifying when the RTO will be required to be used. From their comments, it seems like they can bypass the RTO and are not required to use it to control emissions all the time.

For the comments on SS, I don't think we can add specific citations for SS. There are several requirements for closed vent systems and the thermal oxidizer which would apply if they are complying with 4W using a control device. I think it would be confusing to add those requirements in as well, especially if they are not complying with 4W by using the RTO.

I saw an additional comment on page 1 about the address. If the physical address needs changed, it will also need changed in the notice.

On Mon, Nov 29, 2021 at 7:47 AM Mullins, Robert A <robert.a.mullins@wv.gov> wrote:

> I received comments from Latham Pools on their Pre-Draft Permit last week. Having reviewed them, I think most of the stuff in red is their personal notes.
>
> Conditions 4.2.2, 4.2.6, 4.4.3 in Section 4.0 have comments that appear to all be requested changes to R13 Conditions.
>
> Conditions 6.1.5, 6.2.2, 6.2.3, 6.3.1, and 6.4.2 request language specifically state when the control device is used to meet HAP Limits. They Also want me to give specific Subpart SS citations where it is given as part of the 4W requirements.
>
> Can you look through them and give me your opinion on the comments.
>
> Thanks,
> R.A.

Mullins, Robert A <robert.a.mullins@wv.gov>

RE: R30-04100045-2021 - specific comments on draft R30 permit

1 message

Christopher Blume <Christopher.Blume@rpsgroup.com> Wed, Nov 24, 2021 at 12:36 PM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>

Hi Robert,

The attached document includes specific comments that Latham would like to be address before the R30 permit is finalized.

After you've taken a look, let us know if you'd like to discuss how WVDEP may be able to accommodate our desired changes.

Thanks, and have a safe and happy Thanksgiving Weekend!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Christopher Blume
Sent: Sunday, November 21, 2021 7:51 PM
To: Mullins, Robert A <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>
Subject: RE: R30-04100045-2021 - add'l time to provide comments / call Nov 22nd @ 11 AM EST

Hello Robert,

I hope you had an enjoyable break from work.

Attached are our current, general comments; which we look forward to discussing with you tomorrow, Monday, November 22nd, at 11 AM Eastern.

Christopher Blume, P.E.

Vice President
RPS | North America

M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A robert.a.mullins@wv.gov
Sent: Friday, November 12, 2021 9:13 AM
To: Christopher Blume Christopher.Blume@rpsgroup.com
Subject: Re: R30-04100045-2021 - add'l time to provide comments / call on Mon Nov 22nd ?

CAUTION: This email originated from outside of RPS.

Christopher,

11 AM on Monday November 22nd is fine with me. It will give me a few hours to review any written comments you send me next week before the call.

On Fri, Nov 12, 2021 at 10:06 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Robert,
>
> Latham will submit final, written comments of the draft R30 permit on or before Wed, Nov 24th.
>
> We're not in a position to pose any well-thought questions today, but do intend to send you at least some written comments next week.
>
> Theresa and I are available anytime on Mon, Nov 22nd for a call. How about 11 AM Eastern time? If that doesn't work, please revert with your preferred time frame(s).
>
> Thanks!
>
> **Christopher Blume, P.E.**
>
> Vice President
> RPS | North America
> **M** +1 312 576 8058
> **E** christopher.blume@rpsgroup.com
>
> ---
>
> **From:** Mullins, Robert A <robert.a.mullins@wv.gov>
> **Sent:** Friday, November 12, 2021 8:04 AM
> **To:** Christopher Blume <Christopher.Blume@rpsgroup.com>
> **Subject:** Re: R30-04100045-2021 - add'l time to provide comments / call on Mon Nov 22nd ?
>
> **CAUTION:** This email originated from outside of RPS.

That if fine we can schedule a call and address your comments before I propose the Permit. If you want to e-mail me some questions today, feel free to. I'll try to answer them before I leave.

On Fri, Nov 12, 2021 at 8:54 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> In that case, Robert, it would be very helpful to Latham if you could allow an additional 8 days to provide comments; effectively pushing back the due date to Nov 24th ?
>
> If you can do that, I'll get with Theresa and propose a few call times for Mon, Nov 22nd .
>
> How does that sound?

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Friday, November 12, 2021 7:50 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: Re: R30-04100045-2021 - call on Mon Nov 15th ?

I'm available this morning from now till 3pm. As for the due for comment that was just the standard to 2 weeks I give before going to notice it not on of the official comment period due dates. It mainly given so that i can move on if i don't hear back from a company in a reasonable time.

Thanks,

Robert.

On Fri, Nov 12, 2021 at 8:15 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hi Robert,
>
> We we're hoping to speak with you before the Nov 16th due date for comments on the draft R30 permit.
>
> By chance, would you have time for a brief call sometime today, preferrable in the morning?
>
> Please let us know.

Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Friday, November 12, 2021 7:06 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: Re: R30-04100045-2021 - call on Mon Nov 15th ?

Christopher,

I will be on vacation next week (Nov. 15 - 19). I will be available on November 22 - 24 between 7:30am - 3pm. Feel free to schedule a meeting on any of those days.

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

On Wed, Nov 10, 2021 at 4:16 PM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hello Robert,
>
> We'd like to schedule a call with you on Monday, November 15th to review some of the additions in the draft R30 permit; especially those related to the CAM Rule and "add-on controls" as referenced in the 4W NESHAP.
>
> How does your schedule look that day at or after 11 AM Eastern time?
>
> Please let us know and I'll send out a Teams Meeting invitation.

Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Tuesday, November 2, 2021 12:07 PM
To: mattrowe@lathampool.com; Chrisfindley@lathampool.com; Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: R30-04100045-2021

CAUTION: This email originated from outside of RPS.

Attached are the Pre-Draft Title Permit Renewal and Fact Sheet for Latham Pool Products, Inc's Viking Pools - WV / Jane Lew facility. Please review the documents and respond with any questions or comments by November 16, 2021 so that I may address said questions or comments before sending the permit Out ot Notice.

Note: Permitting actions R30-04100045-2017(MM02) and R30-04100045-2017(MM03) were combined with the Title V renewal.

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RPS Group Plc web link: http://www.rpsgroup.com

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

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RPS Group Plc web link: http://www.rpsgroup.com

Pre-DPPermit_R30-04100045-2022 TE Comments -cb 11-24-2021.pdf
596K

West Virginia Department of Environmental Protection

Harold D. Ward
Cabinet Secretary

Permit to Operate

Pursuant to
Title V
of the Clean Air Act

Issued to:
Latham Pool Products, Inc.
Viking Pools-WV/Jane Lew
R30-04100045-2022

Laura M. Crowder
Director, Division of Air Quality

Issued: [Date of issuance] • *Effective: [Equals issue date plus two weeks]*
Expiration: [5 years after issuance date] • *Renewal Application Due: [6 months prior to expiration]*

Permit Number: **R30-04100045-2022**
Permittee: **Latham Pool Products, Inc.**
Facility Name: **Viking Pools-WV/Jane Lew**
Permittee Mailing Address: **P.O. Box 550, Jane Lew, WV 26378**

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:	Jane Lew, Lewis County, West Virginia
Facility Mailing Address:	439 Industrial Pkwy, Jane Lew, WV 26378
Telephone Number:	304-884-6954
Type of Business Entity:	LLC
Facility Description:	Reinforced Composite Plastic Manufacturing
SIC Codes:	3089
UTM Coordinates:	552.3 km Easting • 4328.1 km Northing • Zone 17

Permit Writer: Robert Mullins

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

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
EU-1A	EP-01, EP-02	Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	2010	N/A	CD-01 Fabric Filter
	EP-07	Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	2010	N/A	CD-03 Fabric Filter
	EP-10	Mold Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	2020	N/A	CD-04 Fabric Filter
	EP-08	Final Mold Prep (Green CPC Building)	2010	N/A	None
EU-1B	EP-03, EP-04, EP-11, EP-12	Manufacturing Process (Green CPC Building)	2010	N/A	CD-02 Fabric Filter CD-05 Fabric Filter CD-06 RTO
EU-02	EP-09/ Fugitive	Finishing Area	2010	N/A	None
EU-03	N/A	Material Storage Area	1999	N/A	None

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
R13-2332J	October 7, 2021

Summary of Figure F-2

Emission Unit ID	Emission Unit Description	Control Device		Emission Point ID	CB comments:
EU-1B	Manufacturing Process (Green CPC Building)	--	[RC by-pass]	EP-03	
		CD-02	Fabric Filter	EP-03, EP-12	GC/VE filter: to EP-03 or EP-12
		CD-05	Fabric Filter	EP-04	GP filter
		CD-06	Rotary Concentrator	EP-12	RC exhaust
		CD-06	RTO	EP-11	RTO exhaust

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

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

Note:
We reasonably anticipate the following two scenarios:
1. 4W NESHAP compliance w/o taking credit for the RC/RTO (current situation, and more likely).

2. Use of the RC/RTO to comply with 4W NESHAP (less likely, but possible).

However, for simplicity sake, Latham may prefer to have this R30 permit issued under the assumption that the RC/RTO will NOT be used to comply with 4W NESHAP limits ...

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.
[45 CSR§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]

3.2. Monitoring Requirements

3.2.1. None.

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) 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. and 45CSR13 - Permit R13-2332, Conditions 4.4.1. and 5.3.1.]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

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.]

3.5. 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:

Section Chief
U. S. Environmental Protection Agency, Region III
Enforcement and Compliance Assurance Division
Air Section (3ED21)
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.]

3.5.10. The permittee shall implement the recommendations in Section 6.0 of the Odor Control Plan dated August 25, 2020, as necessary, to prevent objectionable odors. The permittee shall revise the said plan upon written request by the Director. The plan will be revised to include the identification of control devices

and/or changes in operating procedures designed to reduce styrene emissions that have been recognized as sources of objectionable odor complaints received. The plan will be submitted within 90 days of receipt of the written request unless granted an extension by the Director. The plan will document the efforts undertaken by the permittee that are designed to reduce or eliminate styrene odors caused by emissions from the facility.
[45CSR13 - Permit R13-2332, Condition 3.5.6.; Odor Control Plan - Dated August 25, 2020]

3.6. Compliance Plan

3.6.1. None.

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. 45CSR§7-3.7. - The facility does not have storage structures which produce particulate emissions.
b. 45CSR17 - The facility is not subject to 45CSR17 because it is subject to 45CSR7.
c. 45CSR21 - The facility is not in a county regulated by this rule.
d. 45CSR27 - The facility is not a source of toxic air pollutants.

4.0. Manufacturing Process Requirements [EP-03, EP-04, EP-11, EP-12]

4.1. Limitations and Standards

4.1.1. The permittee is authorized to operate fiberglass reinforced plastic composite manufacturing process using the open molding technique at the facility, and associated mold fabrication/repair, and research & development activities (see Section 5.0). Such operation shall be subject to the following emission and operating limitations:

Table 4.1.1

	VOC (tpy)	PM (tpy)
EU-1A & EU-1B combined	177.4	4.2

a. Compliance with the annual emissions limits in Table 4.1.1 shall be demonstrated on a calendar year basis for 2021 and on a rolling 12-month total thereafter beginning in January 2022. Visible emissions from emissions points EP-03 and EP-04 shall not exceed 20% opacity except for any period or periods aggregating no more than five minutes in any sixty minute period, which the visible emissions is less than 40% opacity during that period(s).
[45CSR§§7-3.1., 3.2., and 4.1.]

b. Total VOC emissions from the manufacturing of composite products, which exclude mold construction and repair, at the facility shall not exceed 166.8 pounds per hour (when the RTO is being bypassed).

c. When applying a layer of vinyl ester (VE) resin or general purpose resin to a product, the permittee shall employ and maintain application equipment (spray gun) utilizing the fluid impingement technology (FIT), which is classified as non-atomized spray technology, or other non-atomizing spray gun. The use and servicing of such application equipment shall be performed in accordance with the manufacturer specifications at all times. A copy of the manufacturer's specifications shall be maintained on site.

d. The permittee shall operate all spray guns at the lowest pressure that produces an acceptable spray pattern. The pump setting for non-atomizing spray guns shall not exceed settings listed in Table 4.1.1.d.

Table 4.1.1.d. Maximum Pump Pressure and Ratio

Resin Type	Maximum Pump Pressure (psig)	Maximum Pump Ratio
VE Resin	70	6:1
General Purpose Resin	70	6:1

The permittee shall provide all production personnel who use mechanical, non-atomized application equipment (e.g. FIT spray guns) formal training on its use in accordance with the manufacturer instructions and specifications on an annual basis. Any production personnel newly assigned to use non-atomizing spray equipment shall be trained within the first 30 days of assignment. Such training

shall include training on the proper spray pattern at the lowest possible air pressure to achieve a correct spray pattern. The permittee shall maintain records of such training in accordance with 3.4.2. of this permit.

e. The permittee is only permitted to perform the application of gel coat or polyester resin in the manufacturing area that is ventilated through emission points EP-03, and EP-04. This requirement applies to manual or spray application techniques. Such ventilation system and enclosure shall be maintained in such that the area meets the requirements of a permanent total enclosure specified in U.S. EPA Method 204. As a primary indicator of achieving this permanent total enclosure requirement the average facial velocity of air through all natural draft opening shall be at least 200 feet per minute. **[45CSR§7-5.1.]**

f. The permittee shall use a fabric filter media that has a manufacturer rated removal efficiency of no less than 90% for PM to control particulate matter being emitted to the atmosphere through emission points EP-03, and EP-04. Such media shall be replaced once the pressure drop across the media falls outside of the manufacturer specifications or a pressure drop that the permittee has established to yield no visible emissions from the corresponding emission points using Method 22 observations. If the filters undergo a malfunction as observed through the monitoring requirement listed in Condition 4.2.5. of this permit, the filters shall be replaced no later than the next manufacturing day. **[45CSR§§7-3.1. and 7-5.1.]**

g. The permittee shall have all interior and exterior openings in the mechanically ventilated areas of the manufacturing areas closed at all times when engaged in manufacturing composite products, except to allow the flow of raw materials, equipment, and personnel. When introducing new molds or removing finished products, the permittee shall minimize the duration that both overhead doors are open at the same time. The permittee shall install and maintain in good working order all doors and walls on all interior and exterior openings to ensure compliance with item f. of this condition. **[45CSR§4-3.1 and 45CSR§7-5.1]**

[45CSR13 - Permit R13-2332, Condition 4.1.1.]

4.1.2. The permittee shall construct and maintain exhaust stack(s) heights for Emission Points EP-03 and EP-04 at a minimum height of 62 feet above the ground. These stacks shall not contain any obstacles that would reduce or block the flow of exhaust gases through the stack to the atmosphere. **[45CSR§20-2.4. and 45CSR13 - Permit R13-2332, Condition 4.1.2.]**

4.1.3. The air drying of any container to remove VOCs is prohibited at the facility. **[45CSR13 - Permit R13-2332, Condition 4.1.3.]**

4.1.4. The rotary concentrator and regenerative thermal oxidizer (CD-06) shall be designed, manufactured, operated and maintained so as to achieve a minimum overall efficiency of at least 90% in the control of the VOC emissions routed to CD-06 from EU-1B. **[45CSR13 - Permit R13-2332, Condition 4.1.4.]**

4.1.5. Emissions from the RTO shall not exceed the following.

Table 4.1.5.

CO		NO_X		SO_2		PM		VOC	
lb/hr	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**
0.09	0.37	0.10	0.43	0.01	0.01	0.01	0.04	16.69	73.10

Compliance with the above PM limit shall also demonstrate compliance with PM limit of 45CSR§6-4.1.

[45CSR13 - Permit R13-2332, Condition 4.1.5.; 45CSR§6-4.1]

Note:
The RTO is subject to CAM Rule requirements whenever it is operated and being used to control (VOC) emissions.

4.1.6. The RTO combustion chamber shall be maintained at a temperature of at least 1,500 degrees Fahrenheit anytime the RTO is in operation and being used to control emissions; or a lower temperature demonstrated to the satisfaction of WVDEP to achieve equivalent destruction efficiency.
[45CSR13 - Permit R13-2332, Condition 4.1.6.; 40 CFR §§64.3(a) and 64.6(c); 45CSR§30-5.1.c]

4.1.7. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.10. and 45CSR13 - Permit R13-2332, Condition 4.1.7.]

4.1.8. No person shall cause or allow emission of smoke into the atmosphere from any incinerator which is twenty percent (20%) opacity or greater.
[45CSR§6-4.3](EP-12)

Note: upon issuance of this R30 permit.

4.1.9. **Commencement of operation.** The owner or operator shall conduct the monitoring required under 40 C.F.R. 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to § 64.6(d).
[40 CFR §64.7(a); 45CSR§30-5.1.c]

4.1.10. **Proper maintenance.** At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR §64.7(b); 45CSR§30-5.1.c]

4.1.11. **Continued operation.** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to

provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[40 CFR §64.7(c); 45CSR§30-5.1.c]

4.1.12. **Response to excursions or exceedances.**

Note:
Since it is essentially allowed under both R13 and R30 permits, I believe that in the event of any type of equipment malfunction the RTO can simply be by-passed to avoid or limit the burden of response and/or reporting obligations.

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR §64.7(d); 45CSR§30-5.1.c]

4.1.13. **Documentation of need for improved monitoring.** After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters
[40 CFR §64.7(e); 45CSR§30-5.1.c]

4.1.14. **Quality improvement plan (QIP) requirements.**

Note:
A QIP is not required at present; but could be in the future depending on how well the system operates with respect to CAM Rule/Plan requirements.

a. Based on the results of a determination made under § 64.7(d)(2), the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with § 64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

1. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

2. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

   i. Improved preventive maintenance practices.

   ii. Process operation changes.

   iii. Appropriate improvements to control methods.

   iv. Other steps appropriate to correct control performance.

   v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (b)(2)(i) through (iv) of this section).

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to § 64.7(d)(2) the Administrator or the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

   1. Failed to address the cause of the control device performance problems; or

   2. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[40 CFR §64.8; 45CSR§30-5.1.c]

4.2. Monitoring Requirements

4.2.1. For the purpose of determining compliance with the limits and requirements set forth in Condition 4.1.1 of this permit, the permittee shall monitor the type of equipment and the pressure of the supplied air to the spray equipment for each step of the manufacturing process at the beginning of each shift. Records of this monitoring shall be maintained in accordance with 3.4.2. of this permit.
[45CSR13 - Permit R13-2332, Condition 4.2.1.]

4.2.2. For the purpose of demonstrating compliance with the hourly VOC limit in Condition 4.1.1, the permittee shall determine the VOC emission rate in terms of pounds per hour on a monthly average, 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). The percentage of VOC monomer in the resin or gel coat shall be determined using the appropriate emission factor/procedure outlined in the ACMA UEF standards. The permittee may use data obtained from material safety data sheets (MSDS), Certificate of Analysis, or resin specifications from the manufacturer of the product. For 2021, compliance with the annual limit shall be on a calendar year basis. The 2021 calendar year emissions shall be calculated monthly and be the sum of all previous tons/month emissions for 2021. However, beginning in January 2022 and thenceforth, the annual limit will be based on a rolling 12 month total. 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 - Permit R13-2332, Condition 4.2.2.; 45CSR§30-5.1.c]

4.2.3. For the purpose of determining compliance with the requirements set forth in 4.1.1.e, the permittee shall develop a written procedure for determining that the entire ventilation system is operating properly. This check shall be performed in accordance with the written procedure and performed on a weekly basis. The permittee shall maintain records of such checks in accordance with 3.4.2 of this permit. A copy of the written procedure shall be maintained on site at all times.
[45CSR13 - Permit R13-2332, Condition 4.2.3.]

Note:
Weekly inspection of the "entire ventilation system", which will include the RTO.

2.4. For the purpose of determining compliance with the opacity limits set forth in 4.1.1.a, the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit.

The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in References 1 and 2 from 40 CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of 45CSR7A as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A 45CSR7A observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

[45CSR13 - Permit R13-2332, Condition 4.2.4.]

4.2.5. The permittee shall monitor pressure drop across each bank of filter media (CD-02) at the facility (as referenced in Condition 4.1.1.f.) at least once per operating day. During this daily monitoring operation, the facility shall record the following:

a. Date and time of inspection

b. Name and title of inspector

c. Visible condition of filter

d. Pressure drop reading

e. Documentation of replacement of filter (if applicable)

f. Reason for replacement of filter (if applicable)

Records of said monitoring shall be maintained in accordance with Condition 3.4.2.

[45CSR13 - Permit R13-2332, Condition 4.2.5.]

4.2.6. The temperature of the RTO combustion chamber shall be monitored and recorded on at least an hourly basis anytime the RTO is in operation. The temperature of the RTO shall be recorded using a thermocouple in the combustion chamber with a minimum accuracy of 1 ℉. The thermocouple shall be installed, maintained, operated, and tested according to manufacturer's recommendations.
[45CSR13 - Permit R13-2332, Condition 4.2.6.; 40 CFR §64.6(c); 45CSR§30-5.1.c]

4.3. Testing Requirements

4.3.1. None.

4.4. Recordkeeping Requirements

4.4.1. **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 - Permit R13-2332, Condition 4.4.2.]

4.4.2. **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

Note:
We will need to develop and document an Potential Excess Emissions Event Evaluation procedure. The procedure should incorporate, as appropriate and allowable, the ability to by-pass the RTO.

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 - Permit R13-2332, Condition 4.4.3.]

4.4.3. For the purpose of demonstrating compliance with the emission limitation set forth in Condition 4.1.1, the permittee shall maintain the following records on a monthly basis:

a. Type of resin(s) used, the associated amount of each and the application method used to apply the resin;

b. Content of the VOC monomer and VOC of each resin;

c. Amount of catalyst consumed; and

d. Hours of operation in which manufacturing products was occurring during the month.

e. Such records shall be maintained in accordance with 3.4.2. of this permit.

[45CSR13 - Permit R13-2332, Condition 4.4.4.]

4.4.4. The permittee shall maintain records of all monitoring data required by condition 4.2.4. documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80 deg F, 6 - 10 mph NE wind) during the visual emission check(s). An example form is supplied in the Appendix. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall be maintained per the requirements of 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.
[45CSR13 - Permit R13-2332, Condition 4.4.5.]

4.4.5. **General recordkeeping requirements.**

a. The owner or operator shall comply with the recordkeeping requirements specified in § 70.6(a)(3)(ii) of this chapter. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to § 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR §64.9(b); 45CSR§30-5.1.c]

4.5. Reporting Requirements

4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observations using 45CSR7A must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
[45CSR13 - Permit R13-2332, Condition 4.5.1.]

4.5.2. **General reporting requirements.**

Note:
We understand that CAM-required reporting can be incorporated into the established semiannual reporting routine.

a. On and after the date specified in § 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with § 70.6(a)(3)(iii) of this chapter.

b. A report for monitoring under this part shall include, at a minimum, the information required under § 70.6(a)(3)(iii) of this chapter and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in § 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 CFR §64.9(a); 45CSR§30-5.1.c]

4.6. Compliance Plan

4.6.1. None.

5.0. Mold Fabrication/Repair and Research and Development Requirements [EP-01, EP-02, EP-07, EP-08, EP-10]

5.1. Limitations and Standards

5.1.1. The permittee may construct molds used in the open molding process at the permitted facility. The amount of resin(s) used to manufacture these molds shall be counted against the emission limits stated above in Table 4.1.1 of this permit. Such operation shall be subject to the following emission and operating limits:

a. The permittee shall use a fabric filter media that has a manufacturer rated removal efficiency of no less than 90% for PM to control particulate matter being emitted to the atmosphere through emission points EP-01, and EP-02. Such media shall be replaced once the pressure drop across the media falls outside of the manufacturer specifications or a pressure drop that the permittee has established to yield no visible emissions from the corresponding emission points using Method 22 observations. If the filters undergo a malfunction as observed through the monitoring requirement listed in Condition 5.2.3. of this permit, the filters shall be replaced no later than the next manufacturing day.
[45CSR§§7-3.1. and 7-5.1.]

b. The permittee shall have all interior and exterior openings in the mechanically ventilated areas of the manufacturing areas closed at all times when engaged in manufacturing composite products, except to allow the flow of raw materials, equipment, and personnel. When introducing new molds or removing finished products, the permittee shall minimize the duration that both overhead doors are open at the same time. The permittee shall install and maintain in good working order all doors and walls on all interior and exterior openings to ensure compliance with item a. of this condition.
[45CSR§4-3.1 and 45CSR§7-5.1]

c. Visible emissions from emissions points EP-01 and EP-02 shall not exceed 20% opacity except for any period or periods aggregating no more than five minutes in any sixty minute period, which the visible emissions is less than 40% opacity during that period(s).
[45CSR§§7-3.1., 3.2., and 4.1.]

[45CSR13 - Permit R13-2332, Condition 5.1.2.]

5.1.2. Emissions generated from mold sanding and/or grinding activities shall be controlled by a central vacuum system vented to a particulate matter control device identified as CD-03 and CD-04. Said vacuum system with control device shall be designed, installed, operated and maintained so as to achieve a minimum overall control efficiency of 90%.
[45 CSR §7-5.1.] [45CSR13 - Permit R13-2332, Condition 5.1.3.]

5.1.3. The permittee shall construct and maintain exhaust stack(s) heights for Emission Points EP-01 and EP-02 at a minimum of 50 feet above the ground. These stacks shall not contain any obstacles that would reduce or block the flow of exhaust gases through the stack to the atmosphere.
[45CSR§20-2.4; 45CSR13 - Permit R13-2332, Condition 5.1.4.]

5.2. Monitoring Requirements

5.2.1. For the purpose of determining compliance with the emission limits set forth in 4.1.1 of this permit, the permittee shall determine the VOC emission rate using the following information pertaining to each material used in mold building and maintenance operation on a monthly basis:

a. Type and amount of material used;

b. Total VOC and VOC Monomer content.

[45CSR13 - Permit R13-2332, Condition 5.2.1.]

5.2.2. To determine compliance with the annual emission limit referenced in 4.1.1, the permittee shall determine the emission rate on a calendar year basis for 2021, and thereafter on a 12 month rolling total basis beginning January 2022. The 2021 calendar year emissions shall be calculated monthly and be the sum of all previous tons/month emissions for 2021. 12 month rolling total emissions shall be determined 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 - Permit R13-2332, Condition 5.2.2.; 45CSR§30-5.1.c]

5.2.3. The permittee shall monitor pressure drop across each ~~bank of~~ filter ~~media~~ (CD-01, CD-03 and CD-04) at the facility (as referenced in Condition 5.1.1.a.) at least once per operating day. During this daily monitoring operation, the facility shall record the following:

a. Date and time of inspection

b. Name and title of inspector

c. Visible condition of filter

d. Pressure drop reading

e. Documentation of replacement of filter (if applicable)

f. Reason for replacement of filter (if applicable)

Records of said monitoring shall be maintained in accordance with Condition 3.4.2.

[45CSR13 - Permit R13-2332, Condition 5.2.3.]

5.3. Testing Requirements

5.3.1. None.

5.4. Recordkeeping Requirements

5.4.1. **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 - Permit R13-2332, Condition 5.3.2.]

5.4.2. **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 - Permit R13-2332, Condition 5.3.3.]

5.4.3. The permittee shall maintain records of the monitoring from 5.2.1.and 5.2.2. in accordance with 3.4.2. of this permit.
[45CSR13 - Permit R13-2332, Condition 5.3.4.]

5.5. Reporting Requirements

5.5.1. None.

5.6. Compliance Plan

5.6.1. None.

6.0. 40 CFR Part 63, Subpart WWWW - Specific Requirements

6.1. Limitations and Standards

6.1.1. The permittee shall comply with all applicable requirements as set forth in 40 CFR Part 63, Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production." The following requirements are from this Subpart and applicable to the permitted operation. **[45CSR13 - Permit R13-2332, Condition 6.1.1.]**

6.1.2. The permittee shall operate 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 CFR part 63, subpart WWWW and provided in the following table (excerpt).

Table 6.1.2. - Organic HAP Limits

Operation Type	Use	Organic HAP Emission Limit (lb/ton)
Open Molding CR/HS	Mechanical Resin Application	113
Open Molding non-CR/HS	Mechanical Resin Application	88
Open Molding Tooling	Mechanical Resin Application	254
Open Molding Tooling	Manual Resin Application	157
Open Molding Gel coat	Tooling Gel Coat	440
Open Molding Gel coat	White/Off White Gel Coating	267
Open Molding Gel coat	All Other Pigmented Gel Coating	377
Open Molding Gel coat	CR/HS or High Performance Gel Coating	605
Open Molding Gel coat	Clear Production Gel Coating	522

[40 CFR §63.5805(b) and Table 3 to Subpart WWWW of Part 63 – Emission Limits]

Compliance with the above listed emission limits shall be demonstrated using any of the four (4) methods referenced in 40 CFR §63.5810~~, including the "weighted average" method 40 CFR §63.5810(c) which is exerted below as 6.1.2.c~~.

a. **Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to 40 CFR 63 Subpart WWWW.**

1. Calculate your 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. You must calculate organic HAP emissions factors for each different process

stream by using the appropriate equations in Table 1 to 40 CFR 63 Subpart WWWW 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 vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. 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 40 CFR 63 Subpart WWWW, 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 40 CFR §63.5810 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.

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 6.1.2. (Table 3 to 40 CFR 63 Subpart WWWW). 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 40 CFR §§63.5810(b) through (d), 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 6.1.2. (Table 3 to 40 CFR 63 Subpart WWWW) that applies to you.

1. i. Group the process streams described in 40 CFR §63.5810(a) by operation type and resin application method or gel coat type listed in Table 6.1.2. (Table 3 to 40 CFR 63 Subpart WWWW) 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 40 CFR §63.5810(a)(1) 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 40 CFR §63.5810.

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

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 40 CFR §63.5810(a), subject to the limitations described in 40 CFR §63.5810(a)(2), and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in 40 CFR §63.5810(d).

2. Compare each organic HAP emissions factor calculated in 40 CFR §63.5810(b)(1) with its corresponding organic HAP emissions limit in Table 6.1.2. (Table 3 or 5 to 40 CFR 63 Subpart WWWW). 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 6.1.2. (Table 3 or 5 to Subpart WWWW of Part 63 that applies to the facility). When using this option, the permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations at the facility.

1. Each month calculate the weighted average organic HAP emissions limit for all open molding operations 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 6.1.2. (Table 3 or 5 to Subpart WWWW of Part 63) for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding 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 over the last 12 months as shown in Equation 3 of this section.

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

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Table 6.1.2. (Tables 3 or 5 of Subpart WWWW of Part 63);

$Material_i$ = 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. To do this, multiply your actual open molding operation organic HAP emissions factors calculated in paragraph (b)(1) of 40 CFR §63.5810 and the amount of neat resin plus and neat gel coat plus used in each open molding 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 operations as shown in Equation 4 of this section.

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

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 Equation 3 and Equation 4 of this section. If each 12-month rolling average organic HAP emissions factor (Eq. 4) is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit (Eq. 3), then the facility is 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 40 CFR §63.5810(d)(1). Table 7 to 40 CFR Subpart WWWW 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 40 CFR 63 Subpart WWWW, the resin is in compliance.

2. You may also use a weighted average organic HAP content for each application method described in 40 CFR §63.5810(d)(1). Calculate the weighted average organic HAP content monthly. Use Equation 2 in 40 CFR §63.5810(b)(1) 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 40 CFR 63 Subpart WWWW..

3. You may simultaneously use the averaging provisions in 40 CFR §63.5810(b) or (c) to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in 40 CFR §§63.5810(d)(1) and (2). However, any resins for which you claim compliance under the option in 40 CFR §§63.5810(d)(1) and (2) may not be included in any of the averaging calculations described in 40 CFR §63.5810(b) or (c).

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 40 CFR §63.5810(d)(1) unless you elect to include that resin in the averaging calculations described in 40 CFR §63.5810(d)(2).

[40 CFR §§63.5805(b), 63.5810 and Table 3 to Subpart WWWW of Part 63 – Emission Limits, 45CSR34 and 45CSR13 - Permit R13-2332, Condition 6.1.2.]

6.1.3. The permittee shall comply with applicable work practices standards from 40 CFR 63, Table 4 of Subpart WWWW as provided in the following table, Table 6.1.3.:

Table 6.1.3. - 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 as a cleaner 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.
For an existing HAP-containing materials 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 materials storage tanks may be vented as necessary for safety.
All mixing operations[1]	The permittee shall install and use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to one inch are permissible around the mixer shafts and any required instrumentation.
All mixing operations[1]	The permittee shall close any mixer vents when actual mixing is occurring, except that venting 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 when adding materials or changing covers to the mixing vessels.

[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 CFR §63.5805(b) & Table 4 to Subpart WWWW of Part 63, 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.1.3.]

6.1.4. **General Requirements.**

a. The permittee must be in compliance at all times with the work practice standards in Table 4 to 40 CFR 63 Subpart WWWW, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP

content limits in Table 7 to 40 CFR 63 Subpart WWWW, as applicable, that you are meeting without the use of add-on controls.

b. The permittee must be in compliance with all organic HAP emissions limits in 40 CFR 63 Subpart WWWW that you meet using add-on controls at all times.

c. The affected sources as defined in 40 CFR §63.5790(b) located at this facility shall be operated and maintained according to the provisions in 40 CFR §63.6(e)(1)(i).
[45CSR13 - Permit R13-2332, Condition 6.1.4.]

[40 CFR §63.5835, 45CSR34]

6.1.5. You must demonstrate continuous compliance with each standard in 40 CFR §63.5805 that applies to you according to the methods specified below:

N/A if RC/RTO is not used to comply with 4W NESHAP

a. ~~Compliance with organic HAP emissions limits for sources using add-on control devices is demonstrated~~ following the procedures in 40 CFR part 63, subpart SS. Sources using add-on controls may also use continuous emissions monitors to demonstrate continuous compliance as an alternative to control parameter monitoring.

b. Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 6.1.2, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in § 63.5895(d).

c. Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to 40 CFR 63 subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to 40 CFR 63 subpart WWWW, as discussed in § 63.5895(d).

d. Compliance with the work practice standards in Table 4 to 40 CFR 63 subpart WWWW is demonstrated by performing the work practice required for your operation.

[40 CFR §63.5900(a), 45CSR34]

6.1.6. You must meet the organic HAP emissions limits and work practice standards that apply to you at all times.
[40 CFR §63.5900(c), 45CSR34]

6.2. Monitoring Requirements

6.2.1. The permittee shall collect the appropriate records in accordance with 40 CFR §63.5895 for the corresponding selected compliance option in 40 CFR §63.5810. This requirement may not supersede or replace the monitoring requirements in Section 4.2 of this permit.

You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 6.1.2. Resin use records may be based on purchase records if you can reasonably estimate how the

resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

[40 CFR §63.5895(c), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.2.1.]

6.2.2. During production, you must collect and keep a record of data as indicated in 40 CFR Part 63, subpart SS, if you are using an add-on control device.
[40 CFR §63.5895(a), 45CSR34]

6.2.3. You must monitor and operate all add-on control devices according to the procedures in 40 CFR part 63, subpart SS.
[40 CFR §63.5855, 45CSR34]

6.3. Testing Requirements

6.3.1. The permittee must conduct a performance test every 5 years following the initial performance test for any ~~standard~~ you meet with an add-on control device.
[40 CFR §63.5845, 45CSR34]

6.3.2. The permitte must conduct performance tests, performance evaluations, and design evaluations as follows:

a. If you are using any add-on controls to meet an organic HAP emissions limit in 40 CFR 63 subpart WWWW, you must conduct each performance test, performance evaluation, and design evaluation in 40 CFR 63, subpart SS, that applies to you. The basic requirements for performance tests, performance evaluations, and design evaluations are presented in Table 6 to 40 CFR 63 subpart WWWW.

b. Each performance test must be conducted according to the requirements in § 63.7(e)(1) and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

c. Each performance evaluation must be conducted according to the requirements in § 63.8(e) as applicable and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

d. You may not conduct performance tests or performance evaluations during periods of startup, shutdown, or malfunction, as specified in § 63.7(e)(1).

e. You must conduct the control device performance test using the emission measurement methods specified in paragraphs 40 CFR §§63.5850(e)(1) through (5).

1. Use either Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select the sampling sites.

2. Use Method 2, 2A, 2C, 2D, 2F or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.

3. Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If you use Method 25A, you must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If you use Method 18 and the number of organic HAP in the exhaust stream exceeds five, you must take into account the

use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. Do not use Method 18 to measure organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.

4. You may use American Society for Testing and Materials (ASTM) D6420-99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.) in lieu of Method 18 of 40 CFR part 60, appendix A, under the conditions specified in 40 CFR §§63.5850(c)(4)(i) through (iii).

   i. If the target compound(s) is listed in Section 1.1 of ASTM D6420-99 and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume.

   ii. If the target compound(s) is not listed in Section 1.1 of ASTM D6420-99, but is potentially detected by mass spectrometry, an additional system continuing calibration check after each run, as detailed in Section 10.5.3 of ASTM D6420-99, must be followed, met, documented, and submitted with the performance test report even if you do not use a moisture condenser or the compound is not considered soluble.

   iii. If a minimum of one sample/analysis cycle is completed at least every 15 minutes.

5. Use the procedures in EPA Method 3B of appendix A to 40 CFR part 60 to determine an oxygen correction factor if required by § 63.997(e)(2)(iii)(C). You may use American Society of Mechanical Engineers (ASME) PTC 19-10-1981-Part 10 (available for purchase from ASME, P.O. Box 2900, 22 Law Drive, Fairfield, New Jersey, 07007-2900, or online at www.asme.org/catalog) as an alternative to EPA Method 3B of appendix A to 40 CFR part 60.

f. The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.

g. If you are using a concentrator/oxidizer control device, you must test the combined flow upstream of the concentrator, and the combined outlet flow from both the oxidizer and the concentrator to determine the overall control device efficiency. If the outlet flow from the concentrator and oxidizer are exhausted in separate stacks, you must test both stacks simultaneously with the inlet to the concentrator to determine the overall control device efficiency.

h. During the test, you must also monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device.

[40 CFR §63.5850, 45CSR34]

6.4. Recordkeeping Requirements

6.4.1. The permittee shall maintain a copy of each notification and report that is required to be submitted to comply with 40 CFR part 63, 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 CFR §63.10(b)(2)(xiv).
[40 CFR §63.5915(a)(1), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.3.1.]

6.4.2. ~~If~~ you use an add-on control device, you must keep all records required in 40 CFR part 63, subpart SS, to show continuous compliance with this subpart.
[40 CFR §63.5915(b), 45CSR34]

6.4.3. You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Table 6.1.2.
[40 CFR §63.5915(c), 45CSR34]

6.4.4. You must keep a certified statement that you are in compliance with the work practice requirements in Table 6.1.3.
[40 CFR §63.5915(d), 45CSR34]

6.4.5. The permittee must keep records as follows:

a. You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to § 63.10(b)(1).

b. As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

c. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). You can keep the records offsite for the remaining 3 years.

d. You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

e. Any records required to be maintained by this part that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation.

[40 CFR §63.5920, 45CSR34]

6.5. Reporting Requirements

6.5.1. For the purpose of demonstrating compliance with the reporting requirements set forth in 40 CFR part 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 Table 6.1.2. of this permit and the work practice standards as defined in Table 6.1.3 of this permit during each reporting period. The permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established. 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 were no deviations from any organic HAP emission limitation (emission limit identified in Table 6.1.2.) and there are no deviations from the requirements for work practice standards in Table 6.1.3., a statement that there were no deviation from the organic HAP emission limitation or work practice standards during the reporting period.

e. For each deviation from an organic HAP emission limitation (Table 6.1.2.) and for each deviation from the requirements for work practice standards (Table 6.1.3.) that occurs during the reporting period, the compliance report must contain the following:

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

ii. 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, and 45CSR13 - Permit R13-2332, Condition 6.4.1.]

6.5.2. You must report each deviation from each standard in 40 CFR § 63.5805 that applies to you. The deviations must be reported according to the requirements in 40 CFR § 63.5910.
[40 CFR §63.5900(b), 45CSR34]

6.5.3. The permittee must submit reports as follows:

a. Within 60 days after the date of completing each performance test required by this subpart, you must submit the results of the performance test following the procedures specified in paragraphs (a)(1) through (3) of this section.

1. Data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert) at the time of the test. Submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). The data must be submitted in a file format generated through the use of the EPA's ERT. Alternatively, you may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA's ERT website.

2. Data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test. The results of the performance test must be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the ERT generated package or alternative file to the EPA via CEDRI.

3. Confidential business information (CBI). If you claim some of the information submitted under paragraph (a)(1) of this section is CBI, you must submit a complete file, including information

claimed to be CBI, to the EPA. The file must be generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described in paragraph (a)(1) of this section.

b. Within 60 days after the date of completing each continuous monitoring system (CMS) performance evaluation as defined in § 63.2, you must submit the results of the performance evaluation following the procedures specified in paragraphs (b)(1) through (3) of this section.

1. Performance evaluations of CMS measuring relative accuracy test audit (RATA) pollutants that are supported by the EPA's ERT as listed on the EPA's ERT website at the time of the evaluation. Submit the results of the performance evaluation to the EPA via CEDRI, which can be accessed through the EPA's CDX. The data must be submitted in a file format generated through the use of the EPA's ERT. Alternatively, you may submit an electronic file consistent with the XML schema listed on the EPA's ERT website.

2. Performance evaluations of CMS measuring RATA pollutants that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the evaluation. The results of the performance evaluation must be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the ERT generated package or alternative file to the EPA via CEDRI.

3. Confidential business information (CBI). If you claim some of the information submitted under paragraph (a)(1) of this section is CBI, you must submit a complete file, including information claimed to be CBI, to the EPA. The file must be generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described in paragraph (a)(1) of this section.

c. For sources that commence construction or reconstruction before or on May 17, 2019, you must submit to the Administrator semiannual compliance reports of the information required in § 63.5910(c),(d), (e), (f), and (i) beginning on September 16, 2020. For sources that commence construction or reconstruction after May 17, 2019, you must submit to the Administrator semiannual compliance reports of the information required in § 63.5910(c), (d), (e), (f), and (i) beginning on March 20, 2020, or upon startup, whichever is later.

d. If you are required to submit reports following the procedure specified in this paragraph (d), beginning on September 17, 2020, you must submit all subsequent reports to the EPA via CEDRI, which can be accessed through the EPA's CDX (https://cdx.epa.gov/). You must use the appropriate electronic report template on the CEDRI website (https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri) for this subpart. The report must be submitted by the deadline specified in this subpart, regardless of the method in which the report is submitted. If you claim some of the information

required to be submitted via CEDRI is CBI, submit a complete report, including information claimed to be CBI, to the EPA. The report must be generated using the appropriate form on the CEDRI website or an alternate electronic file consistent with the XML schema listed on the CEDRI website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph (d).

e. If you are required to electronically submit a report through CEDRI in the EPA's CDX, you may assert a claim of EPA system outage for failure to timely comply with the reporting requirement. To assert a claim of EPA system outage, you must meet the requirements outlined in paragraphs (e)(1) through (7) of this section.

1. You must have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either the EPA's CEDRI or CDX systems.

2. The outage must have occurred within the period of time beginning five business days prior to the date that the submission is due.
3. The outage may be planned or unplanned.

4. You must submit notification to the Administrator in writing as soon as possible following the date you first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.

5. You must provide to the Administrator a written description identifying:

i. The date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable;

ii. A rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage;

iii. Measures taken or to be taken to minimize the delay in reporting; and

iv. The date by which you propose to report, or if you have already met the reporting requirement at the time of the notification, the date you reported.

6. The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

7. In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved.

f. If you are required to electronically submit a report through CEDRI in the EPA's CDX, you may assert a claim of force majeure for failure to timely comply with the reporting requirement. To assert a claim of force majeure, you must meet the requirements outlined in paragraphs (f)(1) through (5) of this section.

1. You may submit a claim if a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning five business days prior to the date the submission is due. For the purposes of this section, a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the affected facility, its contractors, or any entity controlled by the affected facility that prevents you from complying with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (e.g., hurricanes, earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the affected facility (e.g., large scale power outage).

2. You must submit notification to the Administrator in writing as soon as possible following the date you first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.

3. You must provide to the Administrator:

   i. A written description of the force majeure event;

   ii. A rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event;

   iii. A description of measures taken or to be taken to minimize the delay in reporting; and

   iv. The date by which you propose to report, or if you have already met the reporting requirement at the time of the notification, the date you reported.

4. The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

5. In any circumstance, the reporting must occur as soon as possible after the force majeure event occurs.

[40 CFR §63.5912, 45CSR34]

6.6. Compliance Plan

6.6.1. None.

Appendix
EXAMPLE FORM

APPENDIX – Opacity Record

Date of Observation:
Data Entered by:
Reviewed by:
Date Reviewed:
Describe the General Weather Conditions:

Emission Point ID	Emission Point Description	Time of Observation	Visible Emissions? Yes/No	Consecutive Months of Visual Emissions	Comments

Mullins, Robert A <robert.a.mullins@wv.gov>

RE: R30-04100045-2021 - add'l time to provide comments / call Nov 22nd @ 11 AM EST

1 message

Christopher Blume <Christopher.Blume@rpsgroup.com> Sun, Nov 21, 2021 at 8:51 PM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>

Hello Robert,

I hope you had an enjoyable break from work.

Attached are our current, general comments; which we look forward to discussing with you tomorrow, Monday, November 22nd, at 11 AM Eastern.

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A robert.a.mullins@wv.gov
Sent: Friday, November 12, 2021 9:13 AM
To: Christopher Blume Christopher.Blume@rpsgroup.com
Subject: Re: R30-04100045-2021 - add'l time to provide comments / call on Mon Nov 22nd ?

CAUTION: This email originated from outside of RPS.

Christopher,

11 AM on Monday November 22nd is fine with me. It will give me a few hours to review any written comments you send me next week before the call.

On Fri, Nov 12, 2021 at 10:06 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Robert,
>
> Latham will submit final, written comments of the draft R30 permit on or before Wed, Nov 24th.

We're not in a position to pose any well-thought questions today, but do intend to send you at least some written comments next week.

Theresa and I are available anytime on Mon, Nov 22nd for a call. How about 11 AM Eastern time? If that doesn't work, please revert with your preferred time frame(s).

Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Friday, November 12, 2021 8:04 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: Re: R30-04100045-2021 - add'l time to provide comments / call on Mon Nov 22nd ?

CAUTION: This email originated from outside of RPS.

That if fine we can schedule a call and address your comments before I propose the Permit. If you want to e-mail me some questions today, feel free to. I'll try to answer them before I leave.

On Fri, Nov 12, 2021 at 8:54 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> In that case, Robert, it would be very helpful to Latham if you could allow an additional 8 days to provide comments; effectively pushing back the due date to Nov 24th ?
>
> If you can do that, I'll get with Theresa and propose a few call times for Mon, Nov 22nd .
>
> How does that sound?
>
> **Christopher Blume, P.E.**
>
> Vice President
> RPS | North America
> **M** +1 312 576 8058
> **E** christopher.blume@rpsgroup.com
>
> ---
>
> **From:** Mullins, Robert A <robert.a.mullins@wv.gov>
> **Sent:** Friday, November 12, 2021 7:50 AM

To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: Re: R30-04100045-2021 - call on Mon Nov 15th ?

CAUTION: This email originated from outside of RPS.

I'm available this morning from now till 3pm. As for the due for comment that was just the standard to 2 weeks I give before going to notice it not on of the official comment period due dates. It mainly given so that i can move on if i don't hear back from a company in a reasonable time.

Thanks,

Robert.

On Fri, Nov 12, 2021 at 8:15 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hi Robert,
>
> We we're hoping to speak with you before the Nov 16th due date for comments on the draft R30 permit.
>
> By chance, would you have time for a brief call sometime today, preferrable in the morning?
>
> Please let us know.
>
> Thanks!
>
> **Christopher Blume, P.E.**
>
> Vice President
> RPS | North America
> **M** +1 312 576 8058
> **E** christopher.blume@rpsgroup.com
>
> ---
>
> **From:** Mullins, Robert A <robert.a.mullins@wv.gov>
> **Sent:** Friday, November 12, 2021 7:06 AM
> **To:** Christopher Blume <Christopher.Blume@rpsgroup.com>
> **Subject:** Re: R30-04100045-2021 - call on Mon Nov 15th ?
>
> **CAUTION:** This email originated from outside of RPS.
>
> Christopher,
>
> I will be on vacation next week (Nov. 15 - 19). I will be available on November 22 - 24 between 7:30am - 3pm. Feel free to schedule a meeting on any of those days.

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

On Wed, Nov 10, 2021 at 4:16 PM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hello Robert,
>
> We'd like to schedule a call with you on Monday, November 15th to review some of the additions in the draft R30 permit; especially those related to the CAM Rule and "add-on controls" as referenced in the 4W NESHAP.
>
> How does your schedule look that day at or after 11 AM Eastern time?
>
> Please let us know and I'll send out a Teams Meeting invitation.
>
> Thanks!
>
> **Christopher Blume, P.E.**
>
> Vice President
> RPS | North America
> **M** +1 312 576 8058
> **E** christopher.blume@rpsgroup.com
>
> ---
>
> **From:** Mullins, Robert A <robert.a.mullins@wv.gov>
> **Sent:** Tuesday, November 2, 2021 12:07 PM
> **To:** mattrowe@lathampool.com; Chrisfindley@lathampool.com; Christopher Blume <Christopher.Blume@rpsgroup.com>
> **Subject:** R30-04100045-2021
>
> **CAUTION:** This email originated from outside of RPS.
>
> Attached are the Pre-Draft Title Permit Renewal and Fact Sheet for Latham Pool Products, Inc's Viking Pools - WV / Jane Lew facility. Please review the documents and respond with any questions or comments by November 16, 2021 so that I may address said questions or comments before sending the permit Out ot Notice.

Note: Permitting actions R30-04100045-2017(MM02) and R30-04100045-2017(MM03) were combined with the Title V renewal.

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RPS Group Plc web link: http://www.rpsgroup.com

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RPS Group Plc web link: http://www.rpsgroup.com

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

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Pre-DPPermit_R30-04100045-2022 TE Comments -cb 11-21-2021.pdf

 625K

West Virginia Department of Environmental Protection

Harold D. Ward
Cabinet Secretary

Permit to Operate

Pursuant to
Title V
of the Clean Air Act

Issued to:
Latham Pool Products, Inc.
Viking Pools-WV/Jane Lew
R30-04100045-2022

Laura M. Crowder
Director, Division of Air Quality

Issued: [Date of issuance] • *Effective: [Equals issue date plus two weeks]*
Expiration: [5 years after issuance date] • *Renewal Application Due: [6 months prior to expiration]*

Permit Number: **R30-04100045-2022**
Permittee: **Latham Pool Products, Inc.**
Facility Name: **Viking Pools-WV/Jane Lew**
Permittee Mailing Address: **P.O. Box 550, Jane Lew, WV 26378**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 C 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:	Jane Lew, Lewis County, West Virginia
Facility Change ...	439 Industrial Pkwy, Jane Lew, WV 26378
Telephone Number:	304-884-6954
Type of Business Entity:	LLC
Facility Description:	Reinforced Composite Plastic Manufacturing
SIC Codes:	3089
UTM Coordinates:	552.3 km Easting • 4328.1 km Northing • Zone 17

Permit Writer: Robert Mullins

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

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
EU-1A	EP-01, EP-02	Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	2010	N/A	CD-01 Fabric Filter
	EP-07	Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	2010	N/A	CD-03 Fabric Filter
	EP-10	Mold Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	2020	N/A	CD-04 Fabric Filter
	EP-08	Final Mold Prep (Green CPC Building)	2010	N/A	None
EU-1B	EP-03, EP-04, EP-11, EP-12	Manufacturing Process (Green CPC Building)	2010	N/A	CD-02 Fabric Filter CD-05 Fabric Filter CD-06 RTO
EU-02	EP-09/ Fugitive	Finishing Area	2010	N/A	None
EU-03	N/A	Material Storage Area	1999	N/A	None

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
R13-2332J	October 7, 2021

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

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

We reasonably anticipate the following two scenarios:
1. 4W NESHAP compliance w/o taking credit for the RC/RTO (current situation, and more likely).

2. Use of the RC/RTO to comply with 4W NESHAP (less likely, but possible).

However, for simplicity sake, Latham may prefer to have this R30 permit issued under the assumption that the RC/RTO will NOT be used to comply with 4W NESHAP limits ...

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.
[45 CSR§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]

3.2. Monitoring Requirements

3.2.1. None.

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) 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. and 45CSR13 - Permit R13-2332, Conditions 4.4.1. and 5.3.1.]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

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.]

3.5. 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:

Section Chief
U. S. Environmental Protection Agency, Region III
Enforcement and Compliance Assurance Division
Air Section (3ED21)
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.]

3.5.10. The permittee shall implement the recommendations in Section 6.0 of the Odor Control Plan dated August 25, 2020, as necessary, to prevent objectionable odors. The permittee shall revise the said plan upon written request by the Director. The plan will be revised to include the identification of control devices

and/or changes in operating procedures designed to reduce styrene emissions that have been recognized as sources of objectionable odor complaints received. The plan will be submitted within 90 days of receipt of the written request unless granted an extension by the Director. The plan will document the efforts undertaken by the permittee that are designed to reduce or eliminate styrene odors caused by emissions from the facility.
[45CSR13 - Permit R13-2332, Condition 3.5.6.; Odor Control Plan - Dated August 25, 2020]

3.6. Compliance Plan

3.6.1. None.

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. 45CSR§7-3.7. - The facility does not have storage structures which produce particulate emissions.
b. 45CSR17 - The facility is not subject to 45CSR17 because it is subject to 45CSR7.
c. 45CSR21 - The facility is not in a county regulated by this rule.
d. 45CSR27 - The facility is not a source of toxic air pollutants.

4.0. Manufacturing Process Requirements [EP-03, EP-04, EP-11, EP-12]

4.1. Limitations and Standards

4.1.1. The permittee is authorized to operate fiberglass reinforced plastic composite manufacturing process using the open molding technique at the facility, and associated mold fabrication/repair, and research & development activities (see Section 5.0). Such operation shall be subject to the following emission and operating limitations:

Table 4.1.1

	VOC (tpy)	PM (tpy)
EU-1A & EU-1B combined	177.4	4.2

a. Compliance with the annual emissions limits in Table 4.1.1 shall be demonstrated on a calendar year basis for 2021 and on a rolling 12-month total thereafter beginning in January 2022. Visible emissions from emissions points EP-03 and EP-04 shall not exceed 20% opacity except for any period or periods aggregating no more than five minutes in any sixty minute period, which the visible emissions is less than 40% opacity during that period(s).
[45CSR§§7-3.1., 3.2., and 4.1.]

b. Total VOC emissions from the manufacturing of composite products, which exclude mold construction and repair, at the facility shall not exceed 166.8 pounds per hour (when the RTO is being bypassed).

c. When applying a layer of vinyl ester (VE) resin or general purpose resin to a product, the permittee shall employ and maintain application equipment (spray gun) utilizing the fluid impingement technology (FIT), which is classified as non-atomized spray technology, or other non-atomizing spray gun. The use and servicing of such application equipment shall be performed in accordance with the manufacturer specifications at all times. A copy of the manufacturer's specifications shall be maintained on site.

d. The permittee shall operate all spray guns at the lowest pressure that produces an acceptable spray pattern. The pump setting for non-atomizing spray guns shall not exceed settings listed in Table 4.1.1.d.

Table 4.1.1.d. Maximum Pump Pressure and Ratio

Resin Type	Maximum Pump Pressure (psig)	Maximum Pump Ratio
VE Resin	70	6:1
General Purpose Resin	70	6:1

The permittee shall provide all production personnel who use mechanical, non-atomized application equipment (e.g. FIT spray guns) formal training on its use in accordance with the manufacturer instructions and specifications on an annual basis. Any production personnel newly assigned to use non-atomizing spray equipment shall be trained within the first 30 days of assignment. Such training

shall include training on the proper spray pattern at the lowest possible air pressure to achieve a correct spray pattern. The permittee shall maintain records of such training in accordance with 3.4.2. of this permit.

e. The permittee is only permitted to perform the application of gel coat or polyester resin in the manufacturing area that is ventilated through emission points EP-03, and EP-04. This requirement applies to manual or spray application techniques. Such ventilation system and enclosure shall be maintained in such that the area meets the requirements of a permanent total enclosure specified in U.S. EPA Method 204. As a primary indicator of achieving this permanent total enclosure requirement the average facial velocity of air through all natural draft opening shall be at least 200 feet per minute. **[45CSR§7-5.1.]**

f. The permittee shall use a fabric filter media that has a manufacturer rated removal efficiency of no less than 90% for PM to control particulate matter being emitted to the atmosphere through emission points EP-03, and EP-04. Such media shall be replaced once the pressure drop across the media falls outside of the manufacturer specifications or a pressure drop that the permittee has established to yield no visible emissions from the corresponding emission points using Method 22 observations. If the filters undergo a malfunction as observed through the monitoring requirement listed in Condition 4.2.5. of this permit, the filters shall be replaced no later than the next manufacturing day. **[45CSR§§7-3.1. and 7-5.1.]**

g. The permittee shall have all interior and exterior openings in the mechanically ventilated areas of the manufacturing areas closed at all times when engaged in manufacturing composite products, except to allow the flow of raw materials, equipment, and personnel. When introducing new molds or removing finished products, the permittee shall minimize the duration that both overhead doors are open at the same time. The permittee shall install and maintain in good working order all doors and walls on all interior and exterior openings to ensure compliance with item f. of this condition. **[45CSR§4-3.1 and 45CSR§7-5.1]**

[45CSR13 - Permit R13-2332, Condition 4.1.1.]

4.1.2. The permittee shall construct and maintain exhaust stack(s) heights for Emission Points EP-03 and EP-04 at a minimum height of 62 feet above the ground. These stacks shall not contain any obstacles that would reduce or block the flow of exhaust gases through the stack to the atmosphere. **[45CSR§20-2.4. and 45CSR13 - Permit R13-2332, Condition 4.1.2.]**

4.1.3. The air drying of any container to remove VOCs is prohibited at the facility. **[45CSR13 - Permit R13-2332, Condition 4.1.3.]**

4.1.4. The rotary concentrator and regenerative thermal oxidizer (CD-06) shall be designed, manufactured, operated and maintained so as to achieve a minimum overall efficiency of at least 90% in the control of the VOC emissions routed to CD-06 from EU-1B. **[45CSR13 - Permit R13-2332, Condition 4.1.4.]**

4.1.5. Emissions from the RTO shall not exceed the following.

Table 4.1.5.

CO		NO_X		SO_2		PM		VOC	
lb/hr	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**
0.09	0.37	0.10	0.43	0.01	0.01	0.01	0.04	16.69	73.10

Compliance with the above PM limit shall also demonstrate compliance with PM limit of 45CSR§6-4.1.

[45CSR13 - Permit R13-2332, Condition 4.1.5.; 45CSR§6-4.1]

4.1.6. The RTO combustion chamber shall be maintained at a temperature of at least 1,500 degrees Fahrenheit anytime the RTO is in operation and being used to control emissions; or a lower temperature demonstrated to the satisfaction of WVDEP to achieve equivalent destruction efficiency.
[45CSR13 - Permit R13-2332, Condition 4.1.6.; 40 CFR §§64.3(a) and 64.6(c); 45CSR§30-5.1.c]

4.1.7. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.10. and 45CSR13 - Permit R13-2332, Condition 4.1.7.]

4.1.8. No person shall cause or allow emission of smoke into the atmosphere from any incinerator which is twenty percent (20%) opacity or greater.
[45CSR§6-4.3](EP-12)

We are working through understanding how to time implement CAM Rule requirements.

4.1.9. **Commencement of operation.** The owner or operator shall conduct the monitoring required under 40 C.F.R. 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to § 64.6(d).
[40 CFR §64.7(a); 45CSR§30-5.1.c]

4.1.10. **Proper maintenance.** At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR §64.7(b); 45CSR§30-5.1.c]

4.1.11. **Continued operation.** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to

provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[40 CFR §64.7(c); 45CSR§30-5.1.c]

4.1.12. **Response to excursions or exceedances.**

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR §64.7(d); 45CSR§30-5.1.c]

4.1.13. **Documentation of need for improved monitoring.** After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters
[40 CFR §64.7(e); 45CSR§30-5.1.c]

4.1.14. **Quality improvement plan (QIP) requirements.**

So, a QIP is not required at present - right?

a. Based on the results of a determination made under § 64.7(d)(2), the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with § 64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

1. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

2. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

i. Improved preventive maintenance practices.

ii. Process operation changes.

iii. Appropriate improvements to control methods.

iv. Other steps appropriate to correct control performance.

v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (b)(2)(i) through (iv) of this section).

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to § 64.7(d)(2) the Administrator or the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

1. Failed to address the cause of the control device performance problems; or

2. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[40 CFR §64.8; 45CSR§30-5.1.c]

4.2. Monitoring Requirements

4.2.1. For the purpose of determining compliance with the limits and requirements set forth in Condition 4.1.1 of this permit, the permittee shall monitor the type of equipment and the pressure of the supplied air to the spray equipment for each step of the manufacturing process at the beginning of each shift. Records of this monitoring shall be maintained in accordance with 3.4.2. of this permit.
[45CSR13 - Permit R13-2332, Condition 4.2.1.]

4.2.2. For the purpose of demonstrating compliance with the hourly VOC limit in Condition 4.1.1, the permittee shall determine the VOC emission rate in terms of pounds per hour on a monthly average, 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). The percentage of VOC monomer in the resin or gel coat shall be determined using the appropriate emission factor/procedure outlined in the ACMA UEF standards. The permittee may use data obtained from material safety data sheets (MSDS), Certificate of Analysis, or resin specifications from the manufacturer of the product. For 2021, compliance with the annual limit shall be on a calendar year basis. The 2021 calendar year emissions shall be calculated monthly and be the sum of all previous tons/month emissions for 2021. However, beginning in January 2022 and thenceforth, the annual limit will be based on a rolling 12 month total. 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 - Permit R13-2332, Condition 4.2.2.; 45CSR§30-5.1.c]

4.2.3. For the purpose of determining compliance with the requirements set forth in 4.1.1.e, the permittee shall develop a written procedure for determining that the entire ventilation system is operating properly. This check shall be performed in accordance with the written procedure and performed on a weekly basis. The permittee shall maintain records of such checks in accordance with 3.4.2 of this permit. A copy of the written procedure shall be maintained on site at all times.
[45CSR13 - Permit R13-2332, Condition 4.2.3.]

4.2.4. For the purpose of determining compliance with the opacity limits set forth in 4.1.1.a, the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit.

The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in References 1 and 2 from 40 CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of 45CSR7A as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A 45CSR7A observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

[45CSR13 - Permit R13-2332, Condition 4.2.4.]

4.2.5. The permittee shall monitor pressure drop across each bank of filter media (CD-02) at the facility (as referenced in Condition 4.1.1.f.) at least once per operating day. During this daily monitoring operation, the facility shall record the following:

a. Date and time of inspection

b. Name and title of inspector

c. Visible condition of filter

d. Pressure drop reading

e. Documentation of replacement of filter (if applicable)

f. Reason for replacement of filter (if applicable)

Records of said monitoring shall be maintained in accordance with Condition 3.4.2.

[45CSR13 - Permit R13-2332, Condition 4.2.5.]

4.2.6. The temperature of the RTO combustion chamber shall be monitored and recorded on at least an hourly basis anytime the RTO is in operation. The temperature of the RTO shall be recorded using a thermocouple in the combustion chamber with a minimum accuracy of 1 ℉. The thermocouple shall be installed, maintained, operated, and tested according to manufacturer's recommendations.
[45CSR13 - Permit R13-2332, Condition 4.2.6.; 40 CFR §64.6(c); 45CSR§30-5.1.c]

We are verifying the accuracy of the equipment ...

Does this apply if the RC/RTO is NOT used to comply with the 4W NESHAP?

4.3. Testing Requirements

4.3.1. None.

4.4. Recordkeeping Requirements

4.4.1. **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 - Permit R13-2332, Condition 4.4.2.]

4.4.2. **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 - Permit R13-2332, Condition 4.4.3.]

4.4.3. For the purpose of demonstrating compliance with the emission limitation set forth in Condition 4.1.1, the permittee shall maintain the following records on a monthly basis:

a. Type of resin(s) used, the associated amount of each and the application method used to apply the resin;

b. Content of the VOC monomer and VOC of each resin;

c. Amount of catalyst consumed; and

d. Hours of operation in which manufacturing products was occurring during the month.

e. Such records shall be maintained in accordance with 3.4.2. of this permit.

[45CSR13 - Permit R13-2332, Condition 4.4.4.]

4.4.4. The permittee shall maintain records of all monitoring data required by condition 4.2.4. documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80 deg F, 6 - 10 mph NE wind) during the visual emission check(s). An example form is supplied in the Appendix. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall be maintained per the requirements of 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.
[45CSR13 - Permit R13-2332, Condition 4.4.5.]

4.4.5. **General recordkeeping requirements.**

a. The owner or operator shall comply with the recordkeeping requirements specified in § 70.6(a)(3)(ii) of this chapter. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to § 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR §64.9(b); 45CSR§30-5.1.c]

4.5. Reporting Requirements

4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observations using 45CSR7A must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
[45CSR13 - Permit R13-2332, Condition 4.5.1.]

4.5.2. **General reporting requirements.**

We understand that CAM-required reporting can be incorporated into the established semiannual reporting routine.

a. On and after the date specified in § 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with § 70.6(a)(3)(iii) of this chapter.

b. A report for monitoring under this part shall include, at a minimum, the information required under § 70.6(a)(3)(iii) of this chapter and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in § 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 CFR §64.9(a); 45CSR§30-5.1.c]

4.6. Compliance Plan

4.6.1. None.

5.0. Mold Fabrication/Repair and Research and Development Requirements [EP-01, EP-02, EP-07, EP-08, EP-10]

5.1. Limitations and Standards

5.1.1. The permittee may construct molds used in the open molding process at the permitted facility. The amount of resin(s) used to manufacture these molds shall be counted against the emission limits stated above in Table 4.1.1 of this permit. Such operation shall be subject to the following emission and operating limits:

a. The permittee shall use a fabric filter media that has a manufacturer rated removal efficiency of no less than 90% for PM to control particulate matter being emitted to the atmosphere through emission points EP-01, and EP-02. Such media shall be replaced once the pressure drop across the media falls outside of the manufacturer specifications or a pressure drop that the permittee has established to yield no visible emissions from the corresponding emission points using Method 22 observations. If the filters undergo a malfunction as observed through the monitoring requirement listed in Condition 5.2.3. of this permit, the filters shall be replaced no later than the next manufacturing day.
[45CSR§§7-3.1. and 7-5.1.]

b. The permittee shall have all interior and exterior openings in the mechanically ventilated areas of the manufacturing areas closed at all times when engaged in manufacturing composite products, except to allow the flow of raw materials, equipment, and personnel. When introducing new molds or removing finished products, the permittee shall minimize the duration that both overhead doors are open at the same time. The permittee shall install and maintain in good working order all doors and walls on all interior and exterior openings to ensure compliance with item a. of this condition.
[45CSR§4-3.1 and 45CSR§7-5.1]

c. Visible emissions from emissions points EP-01 and EP-02 shall not exceed 20% opacity except for any period or periods aggregating no more than five minutes in any sixty minute period, which the visible emissions is less than 40% opacity during that period(s).
[45CSR§§7-3.1., 3.2., and 4.1.]

[45CSR13 - Permit R13-2332, Condition 5.1.2.]

5.1.2. Emissions generated from mold sanding and/or grinding activities shall be controlled by a central vacuum system vented to a particulate matter control device identified as CD-03 and CD-04. Said vacuum system with control device shall be designed, installed, operated and maintained so as to achieve a minimum overall control efficiency of 90%.
[45 CSR §7-5.1.] [45CSR13 - Permit R13-2332, Condition 5.1.3.]

5.1.3. The permittee shall construct and maintain exhaust stack(s) heights for Emission Points EP-01 and EP-02 at a minimum of 50 feet above the ground. These stacks shall not contain any obstacles that would reduce or block the flow of exhaust gases through the stack to the atmosphere.
[45CSR§20-2.4; 45CSR13 - Permit R13-2332, Condition 5.1.4.]

5.2. Monitoring Requirements

5.2.1. For the purpose of determining compliance with the emission limits set forth in 4.1.1 of this permit, the permittee shall determine the VOC emission rate using the following information pertaining to each material used in mold building and maintenance operation on a monthly basis:

a. Type and amount of material used;

b. Total VOC and VOC Monomer content.

[45CSR13 - Permit R13-2332, Condition 5.2.1.]

5.2.2. To determine compliance with the annual emission limit referenced in 4.1.1, the permittee shall determine the emission rate on a calendar year basis for 2021, and thereafter on a 12 month rolling total basis beginning January 2022. The 2021 calendar year emissions shall be calculated monthly and be the sum of all previous tons/month emissions for 2021. 12 month rolling total emissions shall be determined 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 - Permit R13-2332, Condition 5.2.2.; 45CSR§30-5.1.c]

5.2.3. The permittee shall monitor pressure drop across each bank of filter media (CD-01, CD-03 and CD-04) at the facility (as referenced in Condition 5.1.1.a.) at least once per operating day. During this daily monitoring operation, the facility shall record the following:

a. Date and time of inspection

b. Name and title of inspector

c. Visible condition of filter

d. Pressure drop reading

e. Documentation of replacement of filter (if applicable)

f. Reason for replacement of filter (if applicable)

Records of said monitoring shall be maintained in accordance with Condition 3.4.2.

[45CSR13 - Permit R13-2332, Condition 5.2.3.]

5.3. Testing Requirements

5.3.1. None.

5.4. Recordkeeping Requirements

5.4.1. **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 - Permit R13-2332, Condition 5.3.2.]

5.4.2. **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 - Permit R13-2332, Condition 5.3.3.]

5.4.3. The permittee shall maintain records of the monitoring from 5.2.1.and 5.2.2. in accordance with 3.4.2. of this permit.
[45CSR13 - Permit R13-2332, Condition 5.3.4.]

5.5. Reporting Requirements

5.5.1. None.

5.6. Compliance Plan

5.6.1. None.

6.0. 40 CFR Part 63, Subpart WWWW - Specific Requirements

6.1. Limitations and Standards

6.1.1. The permittee shall comply with all applicable requirements as set forth in 40 CFR Part 63, Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production." The following requirements are from this Subpart and applicable to the permitted operation. **[45CSR13 - Permit R13-2332, Condition 6.1.1.]**

6.1.2. The permittee shall operate 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 CFR part 63, subpart WWWW and provided in the following table (excerpt).

Table 6.1.2. - Organic HAP Limits

Operation Type	Use	Organic HAP Emission Limit (lb/ton)
Open Molding CR/HS	Mechanical Resin Application	113
Open Molding non-CR/HS	Mechanical Resin Application	88
Open Molding Tooling	Mechanical Resin Application	254
Open Molding Tooling	Manual Resin Application	157
Open Molding Gel coat	Tooling Gel Coat	440
Open Molding Gel coat	White/Off White Gel Coating	267
Open Molding Gel coat	All Other Pigmented Gel Coating	377
Open Molding Gel coat	CR/HS or High Performance Gel Coating	605
Open Molding Gel coat	Clear Production Gel Coating	522

[40 CFR §63.5805(b) and Table 3 to Subpart WWWW of Part 63 – Emission Limits]

Compliance with the above listed emission limits shall be demonstrated using any of the four (4) methods referenced in 40 CFR §63.5810, including the "weighted average" method 40 CFR §63.5810(c) which is exerted below ~~as 6.1.2.c.~~

Please refer to the issued R13 permit and our Class II application ...

a. ~~**Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to 40 CFR 63 Subpart WWWW.**~~

~~1. Calculate your 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. You must calculate organic HAP emissions factors for each different process~~

stream by using the appropriate equations in Table 1 to 40 CFR 63 Subpart WWWW 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 vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. 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 40 CFR 63 Subpart WWWW, 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 40 CFR §63.5810 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.

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 6.1.2. (Table 3 to 40 CFR 63 Subpart WWWW). 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 40 CFR §§63.5810(b) through (d), 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 6.1.2. (Table 3 to 40 CFR 63 Subpart WWWW) that applies to you.

1. i. Group the process streams described in 40 CFR §63.5810(a) by operation type and resin application method or gel coat type listed in Table 6.1.2. (Table 3 to 40 CFR 63 Subpart WWWW) 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 40 CFR §63.5810(a)(1) 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 40 CFR §63.5810.

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

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 40 CFR §63.5810(a), subject to the limitations described in 40 CFR §63.5810(a)(2), and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in 40 CFR §63.5810(d).

2. Compare each organic HAP emissions factor calculated in 40 CFR §63.5810(b)(1) with its corresponding organic HAP emissions limit in Table 6.1.2. (Table 3 or 5 to 40 CFR 63 Subpart WWWW). 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 6.1.2. (Table 3 or 5 to Subpart WWWW of Part 63 that applies to the facility). When using this option, the permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations at the facility.

1. Each month calculate the weighted average organic HAP emissions limit for all open molding operations 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 6.1.2. (Table 3 or 5 to Subpart WWWW of Part 63) for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding 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 over the last 12 months as shown in Equation 3 of this section.

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

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Table 6.1.2. (Tables 3 or 5 of Subpart WWWW of Part 63);

$Material_i$ = 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. To do this, multiply your actual open molding operation organic HAP emissions factors calculated in paragraph (b)(1) of 40 CFR §63.5810 and the amount of neat resin plus and neat gel coat plus used in each open molding 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 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 Equation 3 and Equation 4 of this section. If each 12-month rolling average organic HAP emissions factor (Eq. 4) is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit (Eq. 3), then the facility is 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 40 CFR §63.5810(d)(1). Table 7 to 40 CFR Subpart WWWW 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 40 CFR 63 Subpart WWWW, the resin is in compliance.~~

2. ~~You may also use a weighted average organic HAP content for each application method described in 40 CFR §63.5810(d)(1). Calculate the weighted average organic HAP content monthly. Use Equation 2 in 40 CFR §63.5810(b)(1) 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 40 CFR 63 Subpart WWWW..~~

3. ~~You may simultaneously use the averaging provisions in 40 CFR §63.5810(b) or (c) to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in 40 CFR §§63.5810(d)(1) and (2). However, any resins for which you claim compliance under the option in 40 CFR §§63.5810(d)(1) and (2) may not be included in any of the averaging calculations described in 40 CFR §63.5810(b) or (c).~~

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 40 CFR §63.5810(d)(1) unless you elect to include that resin in the averaging calculations described in 40 CFR §63.5810(d)(2).~~

[40 CFR §§63.5805(b), 63.5810 and Table 3 to Subpart WWWW of Part 63 – Emission Limits, 45CSR34 and 45CSR13 - Permit R13-2332, Condition 6.1.2.]

6.1.3. The permittee shall comply with applicable work practices standards from 40 CFR 63, Table 4 of Subpart WWWW as provided in the following table, Table 6.1.3.:

Table 6.1.3. - 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 as a cleaner 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.
For an existing HAP-containing materials 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 materials storage tanks may be vented as necessary for safety.
All mixing operations[1]	The permittee shall install and use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to one inch are permissible around the mixer shafts and any required instrumentation.
All mixing operations[1]	The permittee shall close any mixer vents when actual mixing is occurring, except that venting 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 when adding materials or changing covers to the mixing vessels.

[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 CFR §63.5805(b) & Table 4 to Subpart WWWW of Part 63, 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.1.3.]

6.1.4. **General Requirements.**

a. The permittee must be in compliance at all times with the work practice standards in Table 4 to 40 CFR 63 Subpart WWWW, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP

content limits in Table 7 to 40 CFR 63 Subpart WWWW, as applicable, that you are meeting without the use of add-on controls.

b. The permittee must be in compliance with all organic HAP emissions limits in 40 CFR 63 Subpart WWWW that you meet using add-on controls at all times.

c. The affected sources as defined in 40 CFR §63.5790(b) located at this facility shall be operated and maintained according to the provisions in 40 CFR §63.6(e)(1)(i).
[45CSR13 - Permit R13-2332, Condition 6.1.4.]

Subpar SS ? ... is this a typo ?

[40 CFR §63.5835, 45CSR34]

6.1.5. You must demonstrate continuous compliance with each standard in 40 CFR §63.5805 that applies to you according to the methods specified below:

N/A if RC/RTO is not used to comply with 4W NESHAP

a. Compliance with organic HAP emissions limits for sources using add-on control devices is demonstrated following the procedures in 40 CFR part 63, subpart SS. Sources using add-on controls may also use continuous emissions monitors to demonstrate continuous compliance as an alternative to control parameter monitoring.

b. Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 6.1.2, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in § 63.5895(d).

c. Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to 40 CFR 63 subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to 40 CFR 63 subpart WWWW, as discussed in § 63.5895(d).

d. Compliance with the work practice standards in Table 4 to 40 CFR 63 subpart WWWW is demonstrated by performing the work practice required for your operation.

[40 CFR §63.5900(a), 45CSR34]

6.1.6. You must meet the organic HAP emissions limits and work practice standards that apply to you at all times.
[40 CFR §63.5900(c), 45CSR34]

6.2. Monitoring Requirements

6.2.1. The permittee shall collect the appropriate records in accordance with 40 CFR §63.5895 for the corresponding selected compliance option in 40 CFR §63.5810. This requirement may not supersede or replace the monitoring requirements in Section 4.2 of this permit.

You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 6.1.2. Resin use records may be based on purchase records if you can reasonably estimate how the

resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

[40 CFR §63.5895(c), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.2.1.]

6.2.2. During production, you must collect and keep a record of data as indicated in 40 CFR Part 63, subpart SS, if you are using an add-on control device.
[40 CFR §63.5895(a), 45CSR34]

6.2.3. You must monitor and operate all add-on control devices according to the procedures in 40 CFR part 63, subpart SS.
[40 CFR §63.5855, 45CSR34]

N/A if RC/RTO is not used to comply with 4W NESHAP

6.3. Testing Requirements

6.3.1. The permittee must conduct a performance test every 5 years following the initial performance test for any standard you meet with an add-on control device.
[40 CFR §63.5845, 45CSR34]

6.3.2. The permitte must conduct performance tests, performance evaluations, and design evaluations as follows:

a. If you are using any add-on controls to meet an organic HAP emissions limit in 40 CFR 63 subpart WWWW, you must conduct each performance test, performance evaluation, and design evaluation in 40 CFR 63, subpart SS, that applies to you. The basic requirements for performance tests, performance evaluations, and design evaluations are presented in Table 6 to 40 CFR 63 subpart WWWW.

b. Each performance test must be conducted according to the requirements in § 63.7(e)(1) and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

c. Each performance evaluation must be conducted according to the requirements in § 63.8(e) as applicable and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

d. You may not conduct performance tests or performance evaluations during periods of startup, shutdown, or malfunction, as specified in § 63.7(e)(1).

e. You must conduct the control device performance test using the emission measurement methods specified in paragraphs 40 CFR §§63.5850(e)(1) through (5).

1. Use either Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select the sampling sites.

2. Use Method 2, 2A, 2C, 2D, 2F or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.

3. Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If you use Method 25A, you must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If you use Method 18 and the number of organic HAP in the exhaust stream exceeds five, you must take into account the

use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. Do not use Method 18 to measure organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.

4. You may use American Society for Testing and Materials (ASTM) D6420-99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.) in lieu of Method 18 of 40 CFR part 60, appendix A, under the conditions specified in 40 CFR §§63.5850(c)(4)(i) through (iii).

i. If the target compound(s) is listed in Section 1.1 of ASTM D6420-99 and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume.

ii. If the target compound(s) is not listed in Section 1.1 of ASTM D6420-99, but is potentially detected by mass spectrometry, an additional system continuing calibration check after each run, as detailed in Section 10.5.3 of ASTM D6420-99, must be followed, met, documented, and submitted with the performance test report even if you do not use a moisture condenser or the compound is not considered soluble.

iii. If a minimum of one sample/analysis cycle is completed at least every 15 minutes.

5. Use the procedures in EPA Method 3B of appendix A to 40 CFR part 60 to determine an oxygen correction factor if required by § 63.997(e)(2)(iii)(C). You may use American Society of Mechanical Engineers (ASME) PTC 19-10-1981-Part 10 (available for purchase from ASME, P.O. Box 2900, 22 Law Drive, Fairfield, New Jersey, 07007-2900, or online at www.asme.org/catalog) as an alternative to EPA Method 3B of appendix A to 40 CFR part 60.

f. The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.

g. If you are using a concentrator/oxidizer control device, you must test the combined flow upstream of the concentrator, and the combined outlet flow from both the oxidizer and the concentrator to determine the overall control device efficiency. If the outlet flow from the concentrator and oxidizer are exhausted in separate stacks, you must test both stacks simultaneously with the inlet to the concentrator to determine the overall control device efficiency.

h. During the test, you must also monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device.

[40 CFR §63.5850, 45CSR34]

6.4. Recordkeeping Requirements

6.4.1. The permittee shall maintain a copy of each notification and report that is required to be submitted to comply with 40 CFR part 63, 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 CFR §63.10(b)(2)(xiv).
[40 CFR §63.5915(a)(1), 45CSR34, and 45CSR13 - Permit R13-2332, Condition 6.3.1.]

N/A if RC/RTO is not used to comply with 4W NESHAP

6.4.2. If you use an add-on control device, you must keep all records required in 40 CFR part 63, subpart SS, to show continuous compliance with this subpart.
[40 CFR §63.5915(b), 45CSR34]

6.4.3. You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Table 6.1.2.
[40 CFR §63.5915(c), 45CSR34]

6.4.4. You must keep a certified statement that you are in compliance with the work practice requirements in Table 6.1.3.
[40 CFR §63.5915(d), 45CSR34]

6.4.5. The permittee must keep records as follows:

a. You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to § 63.10(b)(1).

b. As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

c. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). You can keep the records offsite for the remaining 3 years.

d. You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

e. Any records required to be maintained by this part that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation.

[40 CFR §63.5920, 45CSR34]

6.5. Reporting Requirements

6.5.1. For the purpose of demonstrating compliance with the reporting requirements set forth in 40 CFR part 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 Table 6.1.2. of this permit and the work practice standards as defined in Table 6.1.3 of this permit during each reporting period. The permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established. 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 were no deviations from any organic HAP emission limitation (emission limit identified in Table 6.1.2.) and there are no deviations from the requirements for work practice standards in Table 6.1.3., a statement that there were no deviation from the organic HAP emission limitation or work practice standards during the reporting period.

e. For each deviation from an organic HAP emission limitation (Table 6.1.2.) and for each deviation from the requirements for work practice standards (Table 6.1.3.) that occurs during the reporting period, the compliance report must contain the following:

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

ii. 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, and 45CSR13 - Permit R13-2332, Condition 6.4.1.]

6.5.2. You must report each deviation from each standard in 40 CFR § 63.5805 that applies to you. The deviations must be reported according to the requirements in 40 CFR § 63.5910.
[40 CFR §63.5900(b), 45CSR34]

6.5.3. The permittee must submit reports as follows:

N/A if RC/RTO is not used to comply with 4W NESHAP

a. Within 60 days after the date of completing each performance test required by this subpart, you must submit the results of the performance test following the procedures specified in paragraphs (a)(1) through (3) of this section.

1. Data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert) at the time of the test. Submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). The data must be submitted in a file format generated through the use of the EPA's ERT. Alternatively, you may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA's ERT website.

2. Data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test. The results of the performance test must be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the ERT generated package or alternative file to the EPA via CEDRI.

3. Confidential business information (CBI). If you claim some of the information submitted under paragraph (a)(1) of this section is CBI, you must submit a complete file, including information

claimed to be CBI, to the EPA. The file must be generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described in paragraph (a)(1) of this section.

b. Within 60 days after the date of completing each continuous monitoring system (CMS) performance evaluation as defined in § 63.2, you must submit the results of the performance evaluation following the procedures specified in paragraphs (b)(1) through (3) of this section.

1. Performance evaluations of CMS measuring relative accuracy test audit (RATA) pollutants that are supported by the EPA's ERT as listed on the EPA's ERT website at the time of the evaluation. Submit the results of the performance evaluation to the EPA via CEDRI, which can be accessed through the EPA's CDX. The data must be submitted in a file format generated through the use of the EPA's ERT. Alternatively, you may submit an electronic file consistent with the XML schema listed on the EPA's ERT website.

2. Performance evaluations of CMS measuring RATA pollutants that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the evaluation. The results of the performance evaluation must be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the ERT generated package or alternative file to the EPA via CEDRI.

3. Confidential business information (CBI). If you claim some of the information submitted under paragraph (a)(1) of this section is CBI, you must submit a complete file, including information claimed to be CBI, to the EPA. The file must be generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described in paragraph (a)(1) of this section.

c. For sources that commence construction or reconstruction before or on May 17, 2019, you must submit to the Administrator semiannual compliance reports of the information required in § 63.5910(c),(d), (e), (f), and (i) beginning on September 16, 2020. For sources that commence construction or reconstruction after May 17, 2019, you must submit to the Administrator semiannual compliance reports of the information required in § 63.5910(c), (d), (e), (f), and (i) beginning on March 20, 2020, or upon startup, whichever is later.

d. If you are required to submit reports following the procedure specified in this paragraph (d), beginning on September 17, 2020, you must submit all subsequent reports to the EPA via CEDRI, which can be accessed through the EPA's CDX (https://cdx.epa.gov/). You must use the appropriate electronic report template on the CEDRI website (https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri) for this subpart. The report must be submitted by the deadline specified in this subpart, regardless of the method in which the report is submitted. If you claim some of the information

required to be submitted via CEDRI is CBI, submit a complete report, including information claimed to be CBI, to the EPA. The report must be generated using the appropriate form on the CEDRI website or an alternate electronic file consistent with the XML schema listed on the CEDRI website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph (d).

e. If you are required to electronically submit a report through CEDRI in the EPA's CDX, you may assert a claim of EPA system outage for failure to timely comply with the reporting requirement. To assert a claim of EPA system outage, you must meet the requirements outlined in paragraphs (e)(1) through (7) of this section.

1. You must have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either the EPA's CEDRI or CDX systems.

2. The outage must have occurred within the period of time beginning five business days prior to the date that the submission is due.
3. The outage may be planned or unplanned.

4. You must submit notification to the Administrator in writing as soon as possible following the date you first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.

5. You must provide to the Administrator a written description identifying:

i. The date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable;

ii. A rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage;

iii. Measures taken or to be taken to minimize the delay in reporting; and

iv. The date by which you propose to report, or if you have already met the reporting requirement at the time of the notification, the date you reported.

6. The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

7. In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved.

f. If you are required to electronically submit a report through CEDRI in the EPA's CDX, you may assert a claim of force majeure for failure to timely comply with the reporting requirement. To assert a claim of force majeure, you must meet the requirements outlined in paragraphs (f)(1) through (5) of this section.

1. You may submit a claim if a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning five business days prior to the date the submission is due. For the purposes of this section, a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the affected facility, its contractors, or any entity controlled by the affected facility that prevents you from complying with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (e.g., hurricanes, earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the affected facility (e.g., large scale power outage).

2. You must submit notification to the Administrator in writing as soon as possible following the date you first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.

3. You must provide to the Administrator:

   i. A written description of the force majeure event;

   ii. A rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event;

   iii. A description of measures taken or to be taken to minimize the delay in reporting; and

   iv. The date by which you propose to report, or if you have already met the reporting requirement at the time of the notification, the date you reported.

4. The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

5. In any circumstance, the reporting must occur as soon as possible after the force majeure event occurs.

[40 CFR §63.5912, 45CSR34]

6.6. Compliance Plan

6.6.1. None.

Appendix
EXAMPLE FORM

APPENDIX – Opacity Record

Date of Observation:
Data Entered by:
Reviewed by:
Date Reviewed:
Describe the General Weather Conditions:

Emission Point ID	Emission Point Description	Time of Observation	Visible Emissions? Yes/No	Consecutive Months of Visual Emissions	Comments

Mullins, Robert A <robert.a.mullins@wv.gov>

RE: R30-04100045-2021 - add'l time to provide comments / call on Mon Nov 22nd ?

4 messages

Christopher Blume <Christopher.Blume@rpsgroup.com> Fri, Nov 12, 2021 at 8:54 AM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>

In that case, Robert, it would be very helpful to Latham if you could allow an additional 8 days to provide comments; effectively pushing back the due date to Nov 24th ?

If you can do that, I'll get with Theresa and propose a few call times for Mon, Nov 22nd .

How does that sound?

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Friday, November 12, 2021 7:50 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: Re: R30-04100045-2021 - call on Mon Nov 15th ?

I'm available this morning from now till 3pm. As for the due for comment that was just the standard to 2 weeks I give before going to notice it not on of the official comment period due dates. It mainly given so that i can move on if i don't hear back from a company in a reasonable time.

Thanks,

Robert.

On Fri, Nov 12, 2021 at 8:15 AM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hi Robert,
>
> We we're hoping to speak with you before the Nov 16th due date for comments on the draft R30 permit.

By chance, would you have time for a brief call sometime today, preferrable in the morning?

Please let us know.

Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Friday, November 12, 2021 7:06 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: Re: R30-04100045-2021 - call on Mon Nov 15th ?

Christopher,

I will be on vacation next week (Nov. 15 - 19). I will be available on November 22 - 24 between 7:30am - 3pm. Feel free to schedule a meeting on any of those days.

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

On Wed, Nov 10, 2021 at 4:16 PM Christopher Blume <Christopher.Blume@rpsgroup.com> wrote:

> Hello Robert,
>
> We'd like to schedule a call with you on Monday, November 15th to review some of the additions in the draft R30 permit; especially those related to the CAM Rule and "add-on controls" as referenced in the 4W NESHAP.

How does your schedule look that day at or after 11 AM Eastern time?

Please let us know and I'll send out a Teams Meeting invitation.

Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Tuesday, November 2, 2021 12:07 PM
To: mattrowe@lathampool.com; Chrisfindley@lathampool.com; Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: R30-04100045-2021

CAUTION: This email originated from outside of RPS.

Attached are the Pre-Draft Title Permit Renewal and Fact Sheet for Latham Pool Products, Inc's Viking Pools - WV / Jane Lew facility. Please review the documents and respond with any questions or comments by November 16, 2021 so that I may address said questions or comments before sending the permit Out ot Notice.

Note: Permitting actions R30-04100045-2017(MM02) and R30-04100045-2017(MM03) were combined with the Title V renewal.

This e-mail message and any attached file is the property of the sender and is sent in confidence to the addressee only.

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RPS Group Plc web link: http://www.rpsgroup.com

Mullins, Robert A <robert.a.mullins@wv.gov> Fri, Nov 12, 2021 at 9:04 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>

That if fine we can schedule a call and address your comments before I propose the Permit. If you want to e-mail me some questions today, feel free to. I'll try to answer them before I leave.

[Quoted text hidden]

Christopher Blume <Christopher.Blume@rpsgroup.com> Fri, Nov 12, 2021 at 10:05 AM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>

Robert,

Latham will submit final, written comments of the draft R30 permit on or before Wed, Nov 24th.

We're not in a position to pose any well-thought questions today, but do intend to send you at least some written comments next week.

Theresa and I are available anytime on Mon, Nov 22nd for a call. How about 11 AM Eastern time? If that doesn't work, please revert with your preferred time frame(s).

[Quoted text hidden]
[Quoted text hidden]

Mullins, Robert A <robert.a.mullins@wv.gov> Fri, Nov 12, 2021 at 10:12 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>

Christopher,

11 AM on Monday November 22nd is fine with me. It will give me a few hours to review any written comments you send me next week before the call.
[Quoted text hidden]

Mullins, Robert A <robert.a.mullins@wv.gov>

RE: R30-04100045-2021 - call on Mon Nov 15th ?

4 messages

Christopher Blume <Christopher.Blume@rpsgroup.com> Wed, Nov 10, 2021 at 4:16 PM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>, Chris Findley <chrisfindley@lathampool.com>

Hello Robert,

We'd like to schedule a call with you on Monday, November 15th to review some of the additions in the draft R30 permit; especially those related to the CAM Rule and "add-on controls" as referenced in the 4W NESHAP.

How does your schedule look that day at or after 11 AM Eastern time?

Please let us know and I'll send out a Teams Meeting invitation.

Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Tuesday, November 2, 2021 12:07 PM
To: mattrowe@lathampool.com; Chrisfindley@lathampool.com; Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: R30-04100045-2021

CAUTION: This email originated from outside of RPS.

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Note: Permitting actions R30-04100045-2017(MM02) and R30-04100045-2017(MM03) were combined with the Title V renewal.

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

Mullins, Robert A <robert.a.mullins@wv.gov> Fri, Nov 12, 2021 at 8:06 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>

Christopher,

I will be on vacation next week (Nov. 15 - 19). I will be available on November 22 - 24 between 7:30am - 3pm. Feel free to schedule a meeting on any of those days.

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

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Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

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> We'd like to schedule a call with you on Monday, November 15th to review some of the additions in the draft R30 permit; especially those related to the CAM Rule and "add-on controls" as referenced in the 4W NESHAP.
>
> How does your schedule look that day at or after 11 AM Eastern time?
>
> Please let us know and I'll send out a Teams Meeting invitation.
>
> Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <robert.a.mullins@wv.gov>
Sent: Tuesday, November 2, 2021 12:07 PM
To: mattrowe@lathampool.com; Chrisfindley@lathampool.com; Christopher Blume <Christopher.Blume@rpsgroup.com>
Subject: R30-04100045-2021

CAUTION: This email originated from outside of RPS.

Attached are the Pre-Draft Title Permit Renewal and Fact Sheet for Latham Pool Products, Inc's Viking Pools - WV / Jane Lew facility. Please review the documents and respond with any questions or comments by November 16, 2021 so that I may address said questions or comments before sending the permit Out ot Notice.

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[Quoted text hidden]

Christopher Blume <Christopher.Blume@rpsgroup.com> Fri, Nov 12, 2021 at 8:15 AM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>

Hi Robert,

We we're hoping to speak with you before the Nov 16th due date for comments on the draft R30 permit.

By chance, would you have time for a brief call sometime today, preferrable in the morning?

Please let us know.

[Quoted text hidden]
[Quoted text hidden]

Mullins, Robert A <robert.a.mullins@wv.gov> Fri, Nov 12, 2021 at 8:49 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>

I'm available this morning from now till 3pm. As for the due for comment that was just the standard to 2 weeks I give before going to notice it not on of the official comment period due dates. It mainly given so that i can move on if i don't hear back from a company in a reasonable time.

Thanks,
Robert.
[Quoted text hidden]

Mullins, Robert A <robert.a.mullins@wv.gov>

R30-04100045-2021

1 message

Mullins, Robert A <robert.a.mullins@wv.gov> Tue, Nov 2, 2021 at 1:07 PM
To: mattrowe@lathampool.com, Chrisfindley@lathampool.com, Christopher Blume <christopher.blume@rpsgroup.com>

Attached are the Pre-Draft Title Permit Renewal and Fact Sheet for Latham Pool Products, Inc's Viking Pools - WV / Jane Lew facility. Please review the documents and respond with any questions or comments by November 16, 2021 so that I may address said questions or comments before sending the permit Out ot Notice.

Note: Permitting actions R30-04100045-2017(MM02) and R30-04100045-2017(MM03) were combined with the Title V renewal.

--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

2 attachments

Pre-DPPermit_R30-04100045-2022.pdf
572K

Pre-DPFactSheet_R30-04100045-2022.pdf
196K

Mullins, Robert A <robert.a.mullins@wv.gov>

R30-04100045-2017(MM03)

1 message

Mullins, Robert A <robert.a.mullins@wv.gov> Thu, Oct 7, 2021 at 12:03 PM
To: "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>, "jennifer.vanvlerah@epa.ohio.gov" <jennifer.vanvlerah@epa.ohio.gov>, "EP, Air Permit Notifications" <RA-EPAIRPERMITNOTIFI@pa.gov>, "thomas.ballou@deq.virginia.gov" <thomas.ballou@deq.virginia.gov>, "tamera.thompson@deq.virginia.gov" <tamera.thompson@deq.virginia.gov>, "jash@fs.fed.us" <jash@fs.fed.us>

This email serves as notification that on October 4, 2021, the WVDAQ received an application for a Title V minor modification for Latham Pool Products, Inc.'s Jane Lew facility, located in Lewis county, WV. The proposed changes involve adding clarifying language to conditions 4.1.4 and 6.1.2. As a result of this modification, facility PTE will not change. If you have any questions or comments about this Title V permit revision application, please contact me at your earliest convenience.

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

Mullins, Robert A <robert.a.mullins@wv.gov>

WV DAQ Title V Permit Application Status for Latham Pool Products, Inc.; Jane Lew

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Mon, Oct 4, 2021 at 3:23 PM
To: mattrowe@lathampool.com, Christopher.Blume@rpsgroup.com
Cc: "Mullins, Robert A" <robert.a.mullins@wv.gov>, Carrie McCumbers <carrie.mccumbers@wv.gov>

RE: Application Status

Latham Pool Products, Inc.

Jane Lew

Facility ID No. 041-00045

Application No. R30-04100045-2017 (MM03)

Dear Mr. Rowe,

Your application for a Title V Minor Modification Permit for Latham Pool Products, Inc.'s Jane Lew facility was received by this Division on October 4, 2021, and was assigned to Robert "R.A."Mullins.

Should you have any questions, please contact the assigned permit writer, Robert "R.A."Mullins, at 304-926-0499, extension 41286, or Robert.A.Mullins@wv.gov .

--

Stephanie Mink

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

Mullins, Robert A <robert.a.mullins@wv.gov>

Latham MM03 application

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Mon, Oct 4, 2021 at 3:22 PM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>

Here's the dated application and info sheet. The confirmation email will be going out in a few minutes.

Have a good evening

--

Stephanie Mink

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

2 attachments

R30-04100045-2017 (MM03) Latham Pools application.pdf
6905K

R30-04100045-2017 (MM03) info sheet.pdf
70K

Mullins, Robert A <robert.a.mullins@wv.gov>

Latham HAP emissions

4 messages

Mullins, Robert A <robert.a.mullins@wv.gov> Thu, Sep 23, 2021 at 9:36 AM
To: chrisfindley@lathampool.com, christopher.blume@rpsgroup.com

I'm working on the Title V renewal for Latham Pool Products' Jane Lew facility (R30-04100045-2021). The renewal application's Facility-Wide Emissions Summary does not go into enough detail of the HAP emissions. Can you provide a detailed list of HAP potential Emissions?

Thanks,
--

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

Christopher Blume <Christopher.Blume@rpsgroup.com> Thu, Sep 23, 2021 at 11:04 AM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>
Cc: "chrisfindley@lathampool.com" <chrisfindley@lathampool.com>, Theresa Elliott <theresaelliott@lathampool.com>

Hi Robert,

I am traveling today but should be able to make time later on to send you this HAP info.

Could you please specify how you want/need the HAP emissions broken down or otherwise expressed?

Chris Blume
RPS
312-576-8058

Sent from my iPhone

> On Sep 23, 2021, at 6:37 AM, Mullins, Robert A <robert.a.mullins@wv.gov> wrote:

[Quoted text hidden]

Mullins, Robert A <robert.a.mullins@wv.gov> Thu, Sep 23, 2021 at 11:14 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>

I just need the individual HAPs and their Potential Emissions. Currently all the HAPs are just listed as VOC HAPs. Also has the start-up testing on RTO been done? If so, does the CAM plan in the application need to be updated?

Thanks,
[Quoted text hidden]

Christopher Blume <Christopher.Blume@rpsgroup.com> Fri, Sep 24, 2021 at 11:03 AM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>, Chris Findley <chrisfindley@lathampool.com>

Robert,

The HAP potential emissions info is attached.

Installation, startup, commissioning, and testing of the RTO has been delayed; and the schedule is still in flux.

We will provide an anticipated time frame for both the testing and the CAM Plan update as soon as we are able.

Please let me know if there is anything else you need in these regards.

Thanks, and have a nice weekend.

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com
[Quoted text hidden]
[Quoted text hidden]

LPP WV - Title V Renewal - HAP info for R Mullins - 09-24-2021.pdf
61K

Latham Pool Products, Inc.
Jane Lew, WV
Potential Emissions Summary
Hazardous Air Pollutants

Hazardous Air Pollutant	Total Potential Emissions (ton/yr)
Styrene	128.3
MMA	14.9

Notes:
MMA = methyl methacrylate
Does not include negilgible quantities of ethylbenzene or dimethyl phthalate, the potential emissions of each are less than 0.02 ton/yr.

Mullins, Robert A <robert.a.mullins@wv.gov>

Latham Pools R13 Question?

3 messages

Mullins, Robert A <robert.a.mullins@wv.gov> Thu, Sep 23, 2021 at 8:46 AM
To: Steven R Pursley <steven.r.pursley@wv.gov>

I'm working on Latham Pools MM02 and Renewal and was incorporating the changes made in R13-2332I. The Engineer Eval says that the only change that would affect the Title V permit was clarification to condition 4.1.4, but the signed version of R13-2332I doesn't have any changes to condition 4.1.4. Was the change supposed to be that which was red lined in the Mod. Application?

Thanks,
R.A.

Pursley, Steven R <steven.r.pursley@wv.gov> Thu, Sep 23, 2021 at 8:48 AM
To: "Mullins, Robert A" <robert.a.mullins@wv.gov>

Right. It was a mistake. I know I made that change but I must have not saved the document after making it. They are getting ready to submit a class I update application so I can fix it.

Steve
[Quoted text hidden]

Mullins, Robert A <robert.a.mullins@wv.gov> Thu, Sep 23, 2021 at 8:52 AM
To: "Pursley, Steven R" <steven.r.pursley@wv.gov>

Ok, thanks.
[Quoted text hidden]

Mullins, Robert A <robert.a.mullins@wv.gov>

R30-04100045-2017(MM02)

1 message

Mullins, Robert A <Robert.A.Mullins@wv.gov> Tue, Jun 22, 2021 at 11:50 AM
To: "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>, "jennifer.vanvlerah@epa.ohio.gov" <jennifer.vanvlerah@epa.ohio.gov>, "EP, Air Permit Notifications" <RA-EPAIRPERMITNOTIFI@pa.gov>, "thomas.ballou@deq.virginia.gov" <thomas.ballou@deq.virginia.gov>, "tamera.thompson@deq.virginia.gov" <tamera.thompson@deq.virginia.gov>, "jash@fs.fed.us" <jash@fs.fed.us>

This email serves as notification that on June 10, 2021, the WVDAQ received an application for a Title V minor modification for Latham Pool Products, Inc.'s Jane Lew facility, located in Lewis county, WV. The proposed changes involve reconfiguring the Production Room to increase the number of material application stations routed to RC/RTO from 4 to 6, consisting of 3 atomized (gelcoat) application stations; and 3 non-atomized (resin) application stations, for application of either vinyl ester (VE)or general purpose (GP) resin.. This also decreases the number of non-atomized material application stations not routed to RC/RTO from 4 to 2, for application of either VE or GP resin. As a result of this modification, facility PTE will not change. If you have any questions or comments about this Title V permit revision application, please contact me at your earliest convenience.

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

Mullins, Robert A <robert.a.mullins@wv.gov>

[External] RE: R30-04100045-2017(MM02) Attachment S

1 message

Christopher Blume <Christopher.Blume@rpsgroup.com> Wed, Jun 16, 2021 at 8:42 AM
To: "Mullins, Robert A" <Robert.A.Mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>, Matt Rowe <MattRowe@lathampool.com>

CAUTION: External email. Do not click links or open attachments unless you verify sender.

Robert,

Attached is the signed/dated Attachment S you requested.

Please let me know if you require any additional information or clarification as you conduct your review of the application.

Thanks!

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Christopher Blume
Sent: Monday, June 14, 2021 8:48 AM
To: Mullins, Robert A <Robert.A.Mullins@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>; Matt Rowe <MattRowe@lathampool.com>
Subject: RE: R30-04100045-2017(MM02) Attachment S

Thanks, Robert.

We will email you the signed/dated Attachment S shortly.

Christopher Blume, P.E.

Vice President
RPS | North America
M +1 312 576 8058
E christopher.blume@rpsgroup.com

From: Mullins, Robert A <Robert.A.Mullins@wv.gov>
Sent: Monday, June 14, 2021 7:09 AM
To: Christopher Blume <Christopher.Blume@rpsgroup.com>; Theresa Elliott <theresaelliott@lathampool.com>; Matt Rowe <MattRowe@lathampool.com>
Subject: R30-04100045-2017(MM02) Attachment S

CAUTION: This email originated from outside of RPS.

Latham Pool Products, Inc's recent application for a Title V Administrative Amendment dated June 10, 2021, exceeds the scope of what is allowed under Title V Administrative Amendments. Therefore, it will processed as a Title V Minor Modification (R30-04100045-2017(MM02)). As A Title V minor Modification, I need the Attachment S Signed and dated. Please have the Attachment S signed and e-mail it back to me so that I can include it with the current application.

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

LPP WV - R 13 C2AU - Att S - 06-11-2021 - signed.pdf
1074K

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
☐ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☐ Section 111 NSPS (Subpart(s)_____)	☐ Section 112(d) MACT standards (Subpart(s)_____)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64) (1)
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)
(1) If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:	

2. Non Applicability Determinations
List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.
☐ **Permit Shield Requested** *(not applicable to Minor Modifications)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? ☒ Yes ☐ No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

A redline of excepts from both the current Reg 13 and Reg 30 permits is attached, reflecting requested language changes.

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-2332H	03/15 /2021	
R30-04100045-2017(SM02)	05/24/2021	
	/ /	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
N/A	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

7. Certification For Use Of Minor Modification Procedures ***(Required Only for Minor Modification Requests)***

Note:	*This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

i. Proposed changes do not violate any applicable requirement;

ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;

iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;

v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;

vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed): Matt Rowe *(Please use blue ink)* Date: 6 / 11 / 2021 *(Please use blue ink)*

Named (typed): *Matt Rowe* Title: *VP of EHS/Quality/Autocovers*

Note: Please check if the following included (if applicable):

☐	Compliance Assurance Monitoring Form(s) N/A
☒	Suggested Title V Draft Permit Language

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Mullins, Robert A <robert.a.mullins@wv.gov>

Latham MM02 Application

1 message

Mink, Stephanie R <Stephanie.R.Mink@wv.gov> Mon, Jun 14, 2021 at 10:41 AM
To: "Mullins, Robert A" <Robert.A.Mullins@wv.gov>

Here's the application and info sheet, I'm getting ready to index it in AX and send the confirmation email.

Stephanie Mink

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

2 attachments

R30-04100045-2017 (MM02) application.pdf
1476K

R30-04100045-2017 (MM02) info sheet.pdf
70K

Mullins, Robert A <robert.a.mullins@wv.gov>

WV DAQ Title V Permit Application Status for Latham Pool Products, Inc.; Jane Lew

1 message

Mink, Stephanie R <Stephanie.R.Mink@wv.gov> Mon, Jun 14, 2021 at 10:43 AM
To: Matt Rowe <MattRowe@lathampool.com>, "chrisfindley@lathampool.com" <chrisfindley@lathampool.com>, Christopher Blume <Christopher.Blume@rpsgroup.com>
Cc: "Mullins, Robert A" <Robert.A.Mullins@wv.gov>, "McCumbers, Carrie" <Carrie.McCumbers@wv.gov>

RE: Application Status

Latham Pool Products, Inc.

Jane Lew

Facility ID No. 041-00045

Application No. R30-04100045-2017 (MM02)

Dear Mr. Rowe,

Your application for a Title V Minor Modification Permit for Latham Pool Products, Inc.'s Jane Lew facility was received by this Division on June 10, 2021, and was assigned to Robert "R.A." Mullins.

Should you have any questions, please contact the assigned permit writer, Robert "R.A." Mullins, at 304-926-0499, extension 41286, or Robert.A.Mullins @wv.gov.

Stephanie Mink

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

Mullins, Robert A <robert.a.mullins@wv.gov>

[External] Read: Completeness Determination, Latham Pool Products' Inc. , Application No.: R30-04100045-2021

1 message

Chris Findley <chrisfindley@lathampool.com> Fri, May 28, 2021 at 9:49 AM
To: "Mullins, Robert A" <Robert.A.Mullins@wv.gov>

CAUTION: External email. Do not click links or open attachments unless you verify sender.

---------- Forwarded message ----------
From: Chris Findley <chrisfindley@lathampool.com>
To: "Mullins, Robert A" <Robert.A.Mullins@wv.gov>
Cc:
Bcc:
Date: Fri, 28 May 2021 13:49:55 +0000
Subject: [External] Read: Completeness Determination, Latham Pool Products' Inc. , Application No.: R30-04100045-2021

Your message

To: Chris Findley
Subject: Completeness Determination, Latham Pool Products' Inc. , Application No.: R30-04100045-2021
Sent: Friday, May 28, 2021 9:39:43 AM (UTC-05:00) Eastern Time (US & Canada)

was read on Friday, May 28, 2021 9:49:55 AM (UTC-05:00) Eastern Time (US & Canada).

Mullins, Robert A <robert.a.mullins@wv.gov>

[External] Delivered: Completeness Determination, Latham Pool Products' Inc. , Application No.: R30-04100045-2021

1 message

postmaster@rpsgroup.onmicrosoft.com <postmaster@rpsgroup.onmicrosoft.com> Fri, May 28, 2021 at 9:39 AM
To: Robert.A.Mullins@wv.gov

CAUTION: External email. Do not click links or open attachments unless you verify sender.

---------- Forwarded message ----------
From: <postmaster@rpsgroup.onmicrosoft.com>
To: <Robert.A.Mullins@wv.gov>
Cc:
Bcc:
Date: Fri, 28 May 2021 13:39:50 +0000
Subject: [External] Delivered: Completeness Determination, Latham Pool Products' Inc. , Application No.: R30-04100045-2021

Your message has been delivered to the following recipients:

Christopher Blume (Christopher.Blume@rpsgroup.com)

Subject: Completeness Determination, Latham Pool Products' Inc. , Application No.: R30-04100045-2021

Final-Recipient: rfc822;Christopher.Blume@rpsgroup.com
Action: delivered
Status: 2.0.0
Diagnostic-Code: smtp;250 2.0.0 OK
X-Display-Name: Christopher Blume

noname
33K

Mullins, Robert A <robert.a.mullins@wv.gov>

Completeness Determination, Latham Pool Products' Inc. , Application No.: R30-04100045-2021

1 message

Mullins, Robert A <Robert.A.Mullins@wv.gov> Fri, May 28, 2021 at 9:39 AM
To: Matt Rowe <MattRowe@lathampool.com>, "chrisfindley@lathampool.com" <chrisfindley@lathampool.com>, Christopher Blume <Christopher.Blume@rpsgroup.com>

Your Title V renewal application for a permit to operate the above referenced facility was received by this Division on April 8, 2021. After review of said application, it has been determined that the application is administratively complete as submitted. Therefore, the above referenced facility qualifies for an Application Shield.

The applicant has the duty to supplement or correct the application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

The submittal of a complete application shall not affect the requirement that any source have all **preconstruction permits** required under the rules of the Division.

If during the processing of this application it is determined that additional information is necessary to evaluate or take final action on this application, a request for such information will be made in writing with a reasonable deadline for a response. Until which time as your renewal permit is issued or denied, please continue to operate this facility in accordance with 45CSR30, section 6.3.c. which states: *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.* This protection shall cease to apply if, subsequent to the completeness determination made pursuant to paragraph 6.1.d. of 45CSR30 and as required by paragraph 4.1.b., the applicant fails to submit by the deadline specified in writing any additional information identified as being needed to process the application.

Please remember, **failure of the applicant to timely submit information required or requested to process the application may cause the Application Shield to be revoked.** Should you have any questions regarding this determination, please contact me.

Sincerely,

Robert Mullins

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Phone: (304)926-0499 ext. 41286

Mullins, Robert A <robert.a.mullins@wv.gov>

WV DAQ Title V Permit Application Status for Latham Pool Products, Inc.; Jane Lew

1 message

Mink, Stephanie R <Stephanie.R.Mink@wv.gov> Thu, Apr 8, 2021 at 9:10 AM
To: Matt Rowe <MattRowe@lathampool.com>, "chrisfindley@lathampool.com" <chrisfindley@lathampool.com>, Christopher Blume <Christopher.Blume@rpsgroup.com>
Cc: "Mullins, Robert A" <Robert.A.Mullins@wv.gov>, "McCumbers, Carrie" <Carrie.McCumbers@wv.gov>

RE: Application Status

Latham Pool Products, Inc.

Jane Lew

Facility ID No. 041-00045

Application No. R30-04100045-2021

Dear Mr. Rowe,

Your application for a Title V Renewal Permit for Latham Pool Products, Inc.'s Jane Lew facility was received by this Division on April 8, 2021, and was assigned to Robert "R.A." Mullins.

Should you have any questions, please contact the assigned permit writer, Robert "R.A." Mullins, at 304-926-0499, extension 41286, or Robert.A.Mullins @wv.gov.

Stephanie Mink

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

Mullins, Robert A <robert.a.mullins@wv.gov>

Latham Pool renewal

1 message

Mink, Stephanie R <Stephanie.R.Mink@wv.gov> Thu, Apr 8, 2021 at 9:06 AM
To: "Mullins, Robert A" <Robert.A.Mullins@wv.gov>

Here is the dated application and info sheet for the Latham renewal. I'll be sending the confirmation email in a few minutes.

Stephanie Mink

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

2 attachments

Latham Renewal R30-04100045-2021.pdf
9670K

R30-04100045-2021 info sheet.pdf
69K

Mullins, Robert A <robert.a.mullins@wv.gov>

Fwd: [EXTERNAL] [Latham Pool Products; Jane Lew]

1 message

McCumbers, Carrie <carrie.mccumbers@wv.gov> Thu, Apr 8, 2021 at 7:56 AM
To: "Stephanie R. Mink" <stephanie.r.mink@wv.gov>, "Robert.A.Mullins@wv.gov" <robert.a.mullins@wv.gov>

Please assign this renewal to R.A. as R30-04100045-2021.

Thanks,
Carrie

---------- Forwarded message ---------
From: **Christopher Blume** <Christopher.Blume@rpsgroup.com>
Date: Thu, Apr 8, 2021 at 7:47 AM
Subject: [EXTERNAL] [Latham Pool Products; Jane Lew]
To: DEPAirQualityPermitting@wv.gov <DEPAirQualityPermitting@wv.gov>, McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Cc: Theresa Elliott <theresaelliott@lathampool.com>

Dear Ms. McCumbers & WVDEP DAQ Permitting Section,

Attached, please find the Title V Permit renewal application for Latham Pool Products' Jane Lew facility; along with an "email cover letter template".

We are expecting to receive in reply an "Application Status" containing instructions on how to pay the associated fees by credit card.

Please contact me directly if you have any questions in the interim.

Sincerely,

Christopher Blume, P.E.

Vice President
RPS | North America
135 S. LaSalle Street
Suite 3500
Chicago IL 60603, USA
T +1 312 541 4200 **F** +1 312 541 0340
D +1 312 262 4371 **M** +1 312 576 8058
E christopher.blume@rpsgroup.com

2 attachments

LPP WV - Title V Renewla app - Email Cover Letter fillable rev 3-18 - 04-08-2021.pdf
570K

LPP WV - Title V Renewal app - FINAL 04-08-2021.pdf
11281K

Received
April 8, 2021
WV DEP/Div of Air Quality

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Latham Pool Products; Jane Lew
[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only): 041-00045
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R13-2332H; R30-04100045-2017

- Type of NSR Application (check all that apply):
  - ☐ Construction
  - ☐ Modification
  - ☐ Class I Administrative Update
  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:
  - ☐ Title V Initial
  - ☑ Title V Renewal
  - ☐ Administrative Amendment**
  - ☐ Minor Modification**
  - ☐ Significant Modification**
  - ☐ Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

- Payment Type:
  - ☑ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - ☐ Check (Make checks payable to: WVDEP – Division of Air Quality)
    Mail checks to:
    WVDEP – DAQ – Permitting
    Attn: NSR Permitting Secretary
    601 57th Street, SE
    Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - ☐ Responsible Official/Authorized Representative
    - Name:
    - Email:
    - Phone Number:
  - ☐ Company Contact
    - Name:
    - Email:
    - Phone Number:
  - ☑ Consultant
    - Name: Chris Blume
    - Email: Christopher.Blume@rpsgroup.com
    - Phone Number: (312) 576-8058

Sent via Email this Date

April 8, 2021

135 S. LaSalle Street,
Suite 3500
Chicago IL 60603
T +1 312 541 4200

Attn: Carrie McCumbers
Title V Program Manager
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: Latham Pool Products, Inc. – Jane Lew
Title V Permit Renewal Application

Dear Ms. McCumbers:

Consistent with the Division of Air Quality (DAQ) guidance during the Covid-19 pandemic, RPS is submitting via email the attached Title V Permit renewal application on behalf of the Jane Lew facility of Latham Pool Products, Inc. (Latham).

Any associated application fee due will be timely paid electronically in accordance with Covid-19-related procedures established by the DAQ.

This application has been compiled in accordance with DAQ guidance and the "Title V Permit Application Checklist for Administrative Completeness".

We have included a Compliance Assurance Monitoring (CAM) Plan Form in Attachment H. Please note that the add-on control device referenced therein (the "RC/RTO") is currently scheduled to be installed in mid-May 2021, and soon thereafter become fully operational. As such, much of the technical details related to CAM rule requirements is not readily available at this time.

Latham intends to conduct "start-up" testing of the RC/RTO sometime in the late-May or early-June time frame, which should yield additional and validated information related to the monitoring approach reflected in the CAM plan.

Latham and RPS look forward to working with WVDEP on this matter. Please contact me directly at (312) 262-4371 or Christopher.Blume@rpsgroup.com if you require any additional information or clarification to act upon this application.

Sincerely,

RPS

Christopher Blume, P.E.
Vice President

Att: Title V Permit Renewal Application

cc: Theresa Elliott

www.rpsgroup.com

Latham Pool Products, Inc.
Jane Lew, West Virginia
Title V Permit Renewal Application
Table of Contents

General Application Forms

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

Received
April 8, 2021
WV DEP/Div of Air Quality

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. **Name of Applicant (As registered with the WV Secretary of State's Office):**
Latham Pool Products, Inc.

2. Facility Name or Location:
Jane Lew, WV

3. DAQ Plant ID No.:
041 -- 00045

4. Federal Employer ID No. (FEIN):
27-1694029

5. **Permit Application Type:**

- ☐ Initial Permit — When did operations commence? N/A
- ☑ Permit Renewal — What is the expiration date of the existing permit? 01-10-2022
- ☐ Update to Initial/Renewal Permit Application

6. Type of Business Entity:

☑ Corporation ☐ Governmental Agency ☐ LLC
☐ Partnership ☐ Limited Partnership

7. Is the Applicant the:

☐ Owner ☐ Operator ☑ Both

If the Applicant is not both the owner and operator, please provide the name and address of the other party.

8. Number of onsite employees: ~200

9. Governmental Code:

- ☑ Privately owned and operated; 0
- ☐ Federally owned and operated; 1
- ☐ State government owned and operated; 2
- ☐ County government owned and operated; 3
- ☐ Municipality government owned and operated; 4
- ☐ District government owned and operated; 5

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☑ No

If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's *"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"* guidance.

11. Mailing Address		
Street or P.O. Box: P.O. Box 550		
City: Jane Lew	**State:** WV	**Zip:** 26378 -
Telephone Number: (304) 884 - 6700	**Fax Number:** (304) 884 - 8100	

12. Facility Location		
Street: 176 Viking Drive	**City:** Jane Lew	**County:** Lewis
UTM Easting: 552.2 km	**UTM Northing:** 4328.1 km	**Zone:** ☑ 17 or ☐ 18
Directions: N/A		
Portable Source? ☐ Yes ☑ No		
Is facility located within a nonattainment area? ☐ Yes ☑ No		**If yes, for what air pollutants?**
Is facility located within 50 miles of another state? ☑ Yes ☐ No		**If yes, name the affected state(s).** Pennsylvania
Is facility located within 100 km of a Class I Area[1]? ☑ Yes ☐ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☐ No		**If yes, name the area(s).** Dolly Sods Wilderness Area Otter Creek Wilderness Area

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information		
Responsible Official: Matt Rowe		**Title:** VP, EHS
Street or P.O. Box: 787 Watervliet Shaker Road		
City: Latham	**State:** NY	**Zip:** 12110 -
Telephone Number: (800) 833 - 3800	**Fax Number:** ( ) -	
E-mail address: mattrowe@lathampool.com		
Environmental Contact: Chris Findley		**Title:** FG EHS Lead
Street or P.O. Box: 176 Viking Drive		
City: Jane Lew	**State:** WV	**Zip:** 26378 -
Telephone Number: (304) 884 - 6954	**Fax Number:** ( ) -	
E-mail address: chrisfindley@lathampool.com		
Application Preparer: Christopher Blume, P.E.		**Title:** VP
Company: RPS		
Street or P.O. Box: 135 S. LaSalle Street, Suite 3500		
City: Chicago	**State:** IL	**Zip:** 60603 -
Telephone Number: (312) 541 - 4371	**Fax Number:** (312) 541 - 0340	
E-mail address: christopher.blume@rpsgroup.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Fiberglass Reinforced Composites Manufacturing	Swimming Pools, Spas, and Related Products	326199	

Provide a general description of operations.

Open molding of composites using thermoset gelcoats and resins; mold fabrication, maintenance and repair; ancillary activities (raw material storage, research and development, outfitting).

15. Provide an **Area Map** showing plant location as **ATTACHMENT A.**

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B.**

    For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C.** Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
☐ SIP	☐ FIP
☑ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☑ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☐ Section 111 NSPS	☐ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☑ **C**ompliance **A**ssurance **M**onitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR40)
☐ CAIR SO_2 Trading Program (45CSR41)	

19. Non Applicability Determinations

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

The following 4W NESHAP Table 3 Organic HAP Emission Limits do not apply because the Vinyl Ester Resin in use at the facility has been agreed to meet the definition of "High strength resins" and tested to show it meets the definition of "Corrosion-resistant resin" (40 CFR 63.5935):

2. open molding--non-CR/HS
   a. mechanical resin application: 88 lb/ton (does not apply to Vinyl Ester Resin)
6. open molding—gel coat
   b. white/off white pigmented gel coating: 267 lb/ton
   c. all other pigmented gel coating: 377 lb/ton
   e. fire retardant gel coat: 854 lb/ton
   f. clear production gel coat: 522 lb/ton

☑ Permit Shield

19. Non Applicability Determinations *(Continued)* - *Attach additional pages as necessary.*

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

N/A

☐ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*).

Modification Permit No. R13-2332H:
- Condition 3.1 - Facility-wide Limitations and Standards
- Condition 4.1 - Source-specific Limitations and Standards
- Condition 5.1 - Mold Fabrication/Repair, and Research & Development Limitations and Standards
- Condition 6.1 - 40 CFR 63 Subpart WWWW Limitations and Standards

☑ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Modification Permit No. R13-2332H:
- Condition 3.2 - Facility-Wide Monitoring Requirements
- Condition 3.3 - Facility-Wide Testing Requirements
- Condition 3.4 - Facility-Wide Recordkeeping Requirements
- Condition 3.5 - Facility-Wide Reporting Requirements
- Condition 4.2 - Source-Specific Monitoring Requirements
- Condition 4.3 - Source-Specific Testing Requirements
- Condition 4.4 - Source-Specific Recordkeeping Requirements
- Condition 4.5 - Source-Specific Reporting Requirements
- Condition 5.2 - Mold Fabrication/Repair, and Research & Development Monitoring Requirements
- Condition 5.3 - Mold Fabrication/Repair, and Research & Development Testing Requirements
- Condition 5.4 - Mold Fabrication/Repair, and Research & Development Recordkeeping Rqmnts.
- Condition 5.5 - Mold Fabrication/Repair, and Research & Development Reporting Requirements
- Condition 6.2 - 40 CFR 63 Subpart WWWW-Specific Monitoring Requirements
- Condition 6.3 - 40 CFR 63 Subpart WWWW-Specific Testing Requirements
- Condition 6.4 - 40 CFR 63 Subpart WWWW-Specific Recordkeeping Requirements
- Condition 6.5 - 40 CFR 63 Subpart WWWW-Specific Reporting Requirements

Are you in compliance with all facility-wide applicable requirements? ☑ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.** N/A

20. Facility-Wide Applicable Requirements *(Continued)* - *Attach additional pages as necessary.*

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

N/A

☑ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/ reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

N/A

Are you in compliance with all facility-wide applicable requirements? ☐ Yes ☐ No N/A

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.** N/A

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
R13-2332H	03/15/2021	None
R30-04100045-2017(MM01)	06/30/2020	None

22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance	Permit Condition Number
N/A		

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]*	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	0.37
Nitrogen Oxides (NO_X)	0.43
Lead (Pb)	--
Particulate Matter ($PM_{2.5}$)[1]	--
Particulate Matter (PM_{10})[1]	--
Total Particulate Matter (TSP)	6.6
Sulfur Dioxide (SO_2)	0.01
Volatile Organic Compounds (VOC)	178.1
Hazardous Air Pollutants[2]	Potential Emissions
Included in VOC	> 10 (single HAP)
Included in VOC	> 25 (all HAPs)
Regulated Pollutants other than Criteria and HAP	Potential Emissions
N/A	

[1] $PM_{2.5}$ and PM_{10} are components of TSP.
[2] For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

* Based on Table N-4 from Application for Permit No. R13-2332H.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)		
☑	1.	Air compressors and pneumatically operated equipment, including hand tools.
☑	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☑	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
☑	4.	Bathroom/toilet vent emissions.
☑	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☑	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
☐	7.	Blacksmith forges.
☐	8.	Boiler water treatment operations, not including cooling towers.
☑	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☑	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☑	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☑	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☐	14.	Demineralized water tanks and demineralizer vents.
☐	15.	Drop hammers or hydraulic presses for forging or metalworking.
☐	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
☐	17.	Emergency (backup) electrical generators at residential locations.
☐	18.	Emergency road flares.
☐	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:

24. Insignificant Activities (Check all that apply)		
☐	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☑	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
☑	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☑	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☑	26.	Fire suppression systems.
☑	27.	Firefighting equipment and the equipment used to train firefighters.
☐	28.	Flares used solely to indicate danger to the public.
☑	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
☐	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☑	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☐	33.	Hydraulic and hydrostatic testing equipment.
☑	34.	Indoor or outdoor kerosene heaters.
☑	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☐	37.	Laundry activities, except for dry-cleaning and steam boilers.
☐	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☐	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.

24. Insignificant Activities (Check all that apply)		
☑	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
☑	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
☐	43.	Process water filtration systems and demineralizers.
☑	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
☑	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☐	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☑	50.	Space heaters operating by direct heat transfer.
☐	51.	Steam cleaning operations.
☐	52.	Steam leaks.
☐	53.	Steam sterilizers.
☐	54.	Steam vents and safety relief valves.
☐	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
☐	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
☐	57.	Such other sources or activities as the Director may determine.
☐	58.	Tobacco smoking rooms and areas.
☐	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table

Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**.

26. Emission Units

For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.

For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**. N/A

27. Control Devices

For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Matt Rowe	Title: Vice President, EHS

Responsible official's signature:

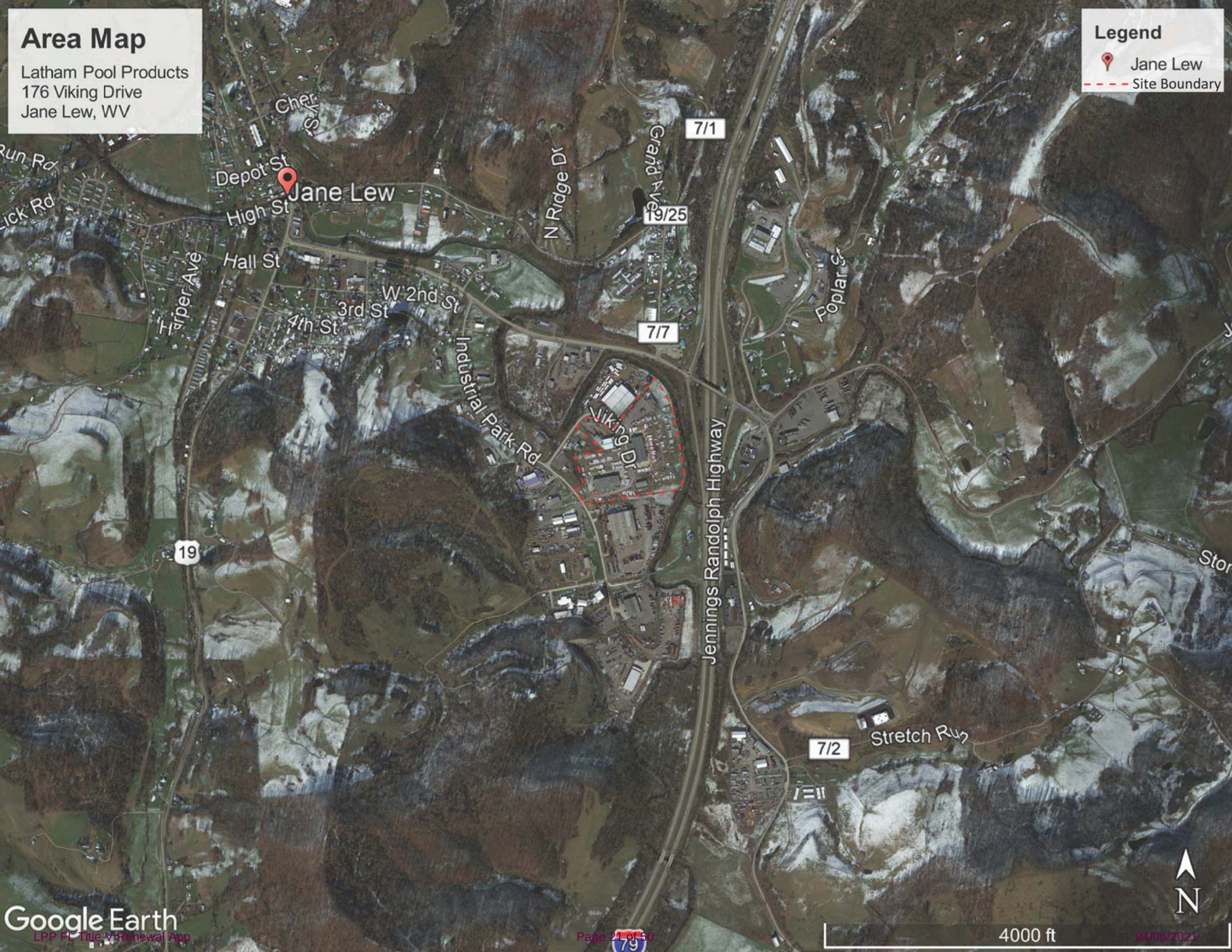
Signature: Matt Rowe (Must be signed and dated in blue ink) Signature Date: 4/6/2021

Note: Please check all applicable attachments included with this permit application:

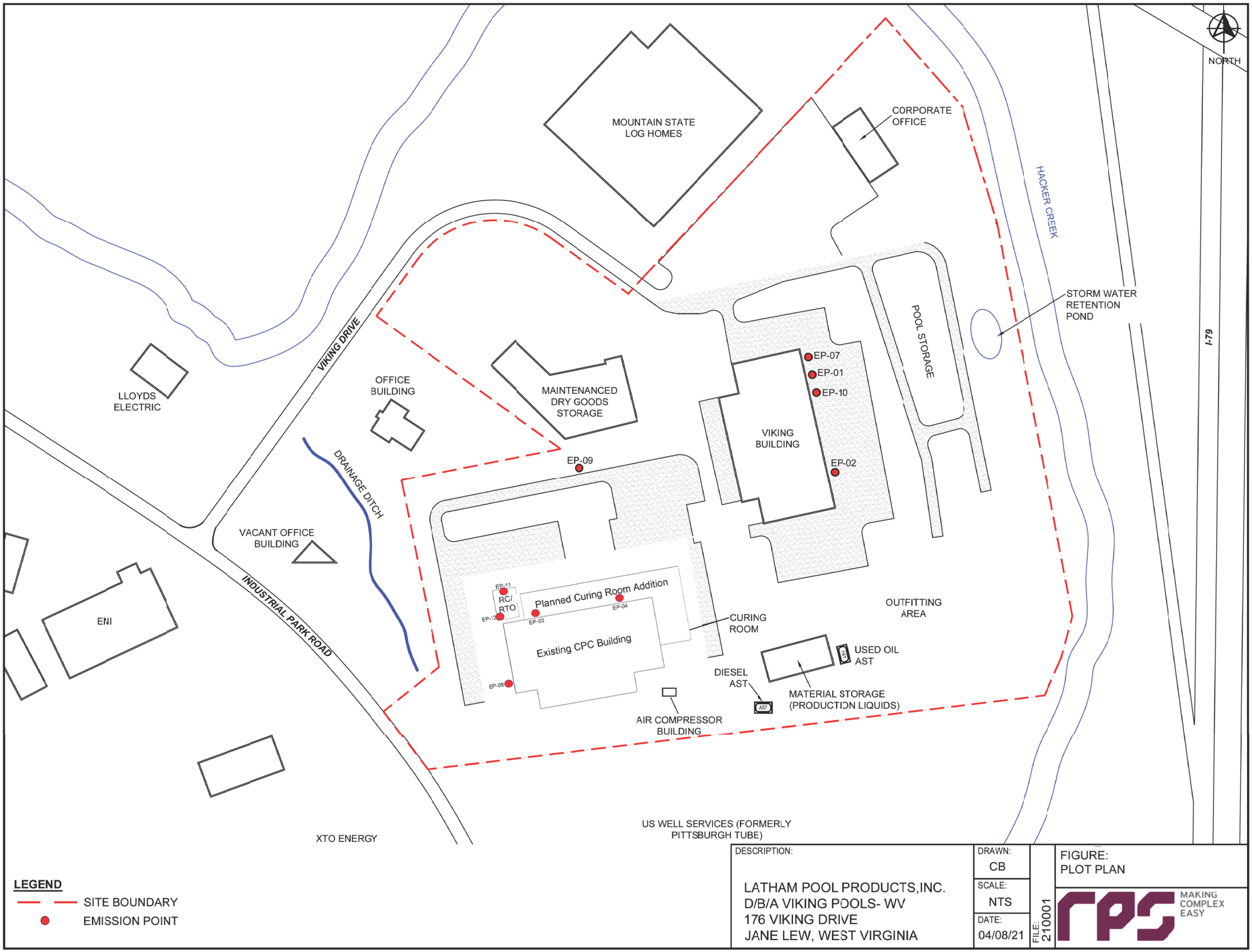
☑	ATTACHMENT A: Area Map
☑	ATTACHMENT B: Plot Plan(s)
☑	ATTACHMENT C: Process Flow Diagram(s)
☑	ATTACHMENT D: Equipment Table
☑	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s) N/A
☑	ATTACHMENT G: Air Pollution Control Device Form(s)
☑	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

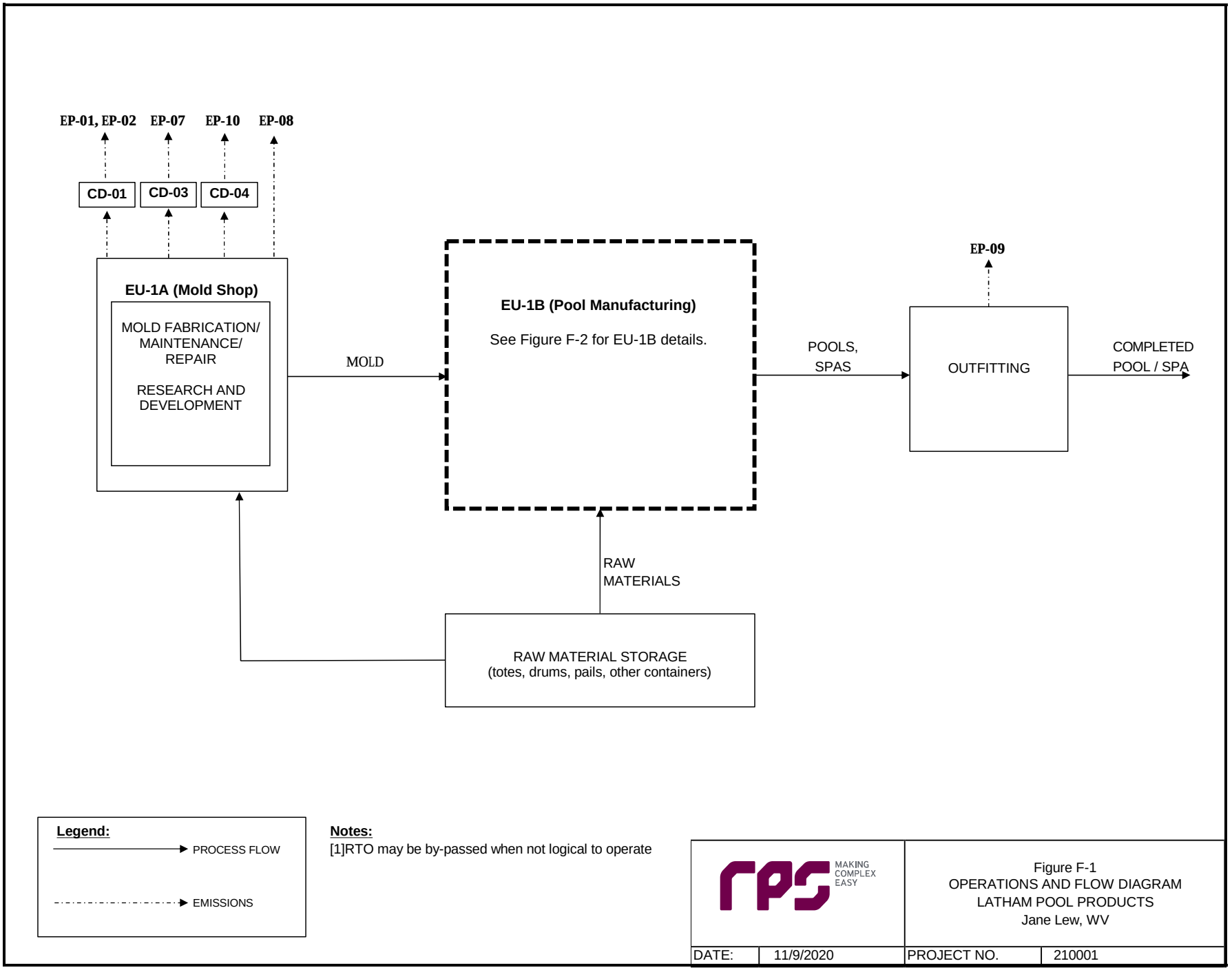
Attachment A
Area Map

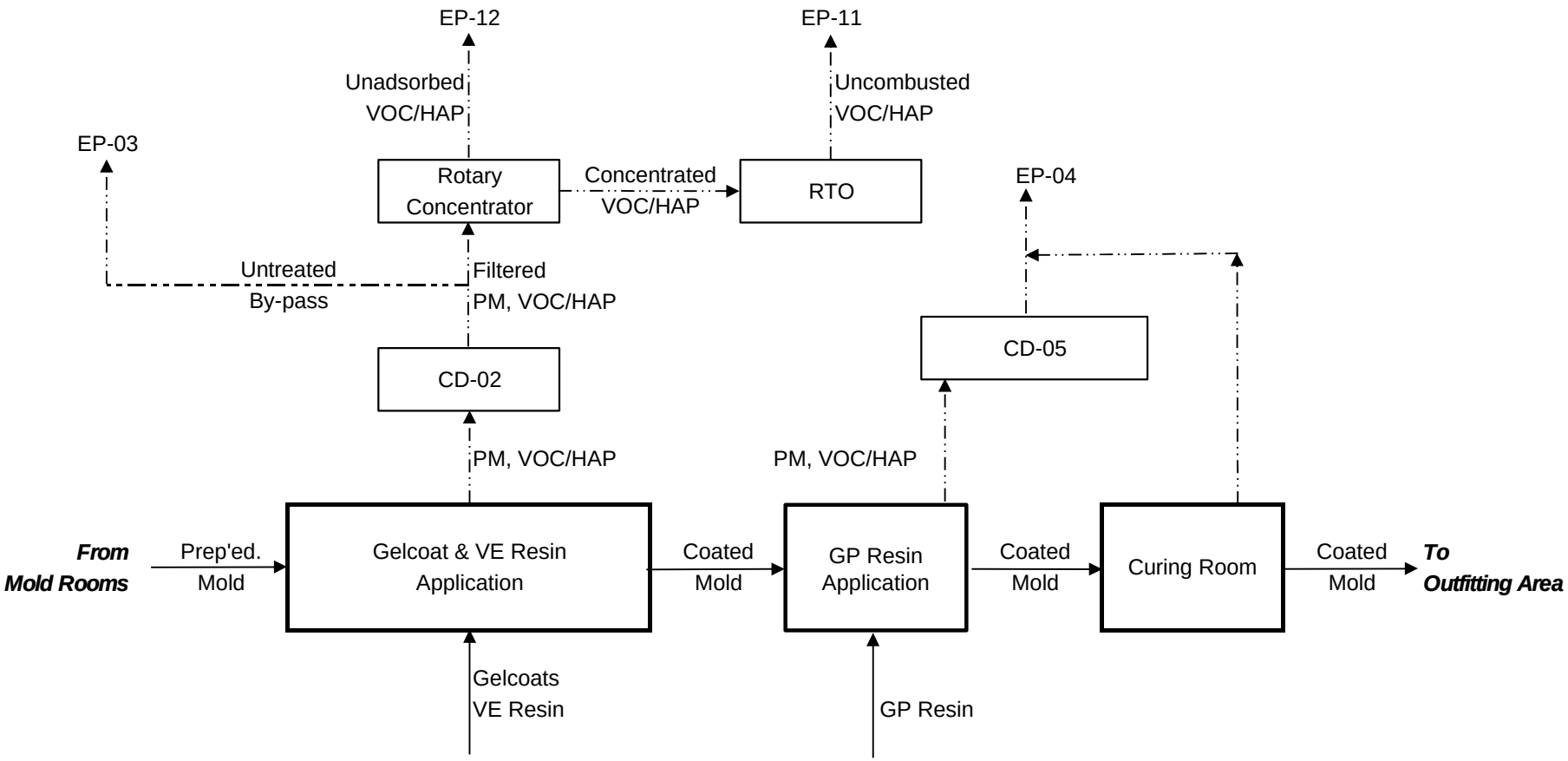

Area Map
Latham Pool Products
176 Viking Drive
Jane Lew, WV
Legend
Jane Lew
Site Boundary
Depot St
Jane Lew
High St
Hall St
W 2nd St
3rd St
4th St
Harper Ave
N Ridge Dr
Grand Ave
Industrial Park Rd
Viking Dr
Jennings Randolph Highway
Poplar St
Stretch Run
7/1
19/25
7/7
7/2
19
79
N
4000 ft
Google Earth

Attachment B
Plot Plan


NORTH
MOUNTAIN STATE LOG HOMES
CORPORATE OFFICE
HACKER CREEK
STORM WATER RETENTION POND
I-79
POOL STORAGE
VIKING DRIVE
LLOYDS ELECTRIC
OFFICE BUILDING
MAINTENANCED DRY GOODS STORAGE
VIKING BUILDING
EP-07
EP-01
EP-10
EP-02
EP-09
DRAINAGE DITCH
VACANT OFFICE BUILDING
INDUSTRIAL PARK ROAD
ENI
EP-11
RC/ RTO
EP-12
Planned Curing Room Addition
EP-03
EP-04
Existing CPC Building
EP-08
CURING ROOM
OUTFITTING AREA
USED OIL AST
DIESEL AST
MATERIAL STORAGE (PRODUCTION LIQUIDS)
AIR COMPRESSOR BUILDING
XTO ENERGY
US WELL SERVICES (FORMERLY PITTSBURGH TUBE)
LEGEND
SITE BOUNDARY
EMISSION POINT
DESCRIPTION:
LATHAM POOL PRODUCTS,INC.
D/B/A VIKING POOLS- WV
176 VIKING DRIVE
JANE LEW, WEST VIRGINIA
DRAWN: CB
SCALE: NTS
DATE: 04/08/21
FILE: 210001
FIGURE:
PLOT PLAN
MAKING COMPLEX EASY

Attachment C
Process Flow Diagrams


EP-01, EP-02
EP-07
EP-10
EP-08
CD-01
CD-03
CD-04
EU-1A (Mold Shop)
MOLD FABRICATION/ MAINTENANCE/ REPAIR
RESEARCH AND DEVELOPMENT
MOLD
EU-1B (Pool Manufacturing)
See Figure F-2 for EU-1B details.
EP-09
POOLS, SPAS
OUTFITTING
COMPLETED POOL / SPA
RAW MATERIALS
RAW MATERIAL STORAGE
(totes, drums, pails, other containers)
Legend:
PROCESS FLOW
EMISSIONS
Notes:
[1]RTO may be by-passed when not logical to operate
MAKING COMPLEX EASY
Figure F-1
OPERATIONS AND FLOW DIAGRAM
LATHAM POOL PRODUCTS
Jane Lew, WV
DATE: 11/9/2020
PROJECT NO. 210001



Legend:

Material/Process Flow

Emissions

Figure F-2
Pool Production Schematic Diagram
Process Flow and Emissions
Latham Pool Products
Jane Lew, WV

Date: 11/12/2020 Project No.: 210001

Attachment D
Title V Equipment Table

ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID[1]	Control Device[1]	Emission Unit ID[1]	Emission Unit Description	Design Capacity	Year Installed/ Modified
EP-01	CD-01	EU-1A	Mold Shop - Exhaust System Stack	per R13-2332H	2021
EP-02	CD-01	EU-1A	Mold Shop - Exhaust System Stack	per R13-2332H	2021
EP-03	CD-02	EU-1B	Pool Manufacturing - GC & VE RTO By-pass Stack	per R13-2332H	2021
EP-04	CD-05	EU-1B	Pool Manufacturing - GP Exhaust Stack	per R13-2332H	2021
--					
--					
EP-07	CD-03	EU-1A	Mold Shop - Dust Collector1 Exhaust Stack	per R13-2332H	2021
EP-08	--	EU-1A	Mold Final Prep (Green CPC Bldg) - Fugitive	per R13-2332H	2021
EP-09	--	EU-2	Outfitting/touch-up - Fugitive	per R13-2332H	2021
EP-10	CD-04	EU-1A	Mold Shop - Dust Collector2 Exhaust Stack	per R13-2332H	2021
EP-11	CD-06	EU-1B	GC & VE - RTO Exhaust	per R13-2332H	2021
EP-12	CD-06	EU-1B	GC & VE - RC Exhaust	per R13-2332H	2021
			Notes:		
			GC = gelcoat		
			VE = vinyl ester resin		
			GP = general purpose resin		
			Mold Shop = Blue Viking Bldg		
			Pool Manufacturing = Green CPC Bldg		
			Dust Collector = fka EuroVac (fabric filter)		
			RTO = regenerator thermal oxidizer		
			RC = rotary concentrator		

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

Attachment E
Emission Unit Forms

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EU-1A	Mold Shop	CD-01, CD-03, CD-04

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Mold fabrication/repair, and research and development

Manufacturer:	**Model number:**	**Serial number:**
N/A	N/A	N/A
Construction date: (MM/DD/YYYY) / /	**Installation date:** (MM/DD/YYYY) / /	**Modification date(s):** (MM/DD/YYYY) / / ; / / 2021 / / ; / /

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

N/A

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
N/A	N/A	8,760 hr/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes ✓ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: N/A	**Type and Btu/hr rating of burners:** N/A

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	--	included w/ EU-1B
Nitrogen Oxides (NO_X)	--	included w/ EU-1B
Lead (Pb)	--	--
Particulate Matter ($PM_{2.5}$)	--	--
Particulate Matter (PM_{10})	--	--
Total Particulate Matter (TSP)	--	included w/ EU-1B
Sulfur Dioxide (SO_2)	--	included w/ EU-1B
Volatile Organic Compounds (VOC)	--	included w/ EU-1B
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
included w/ EU-1B		
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
N/A		

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Modification Permit No. R13-2332H.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Modification Permit No. R13-2332H:
- Condition 5.1 - Mold Fabrication/Repair, and Research & Development Limitations and Standards

✓ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Modification Permit No. R13-2332H:
- Condition 5.2 - Mold Fabrication/Repair, and Research & Development Monitoring Requirements
- Condition 5.3 - Mold Fabrication/Repair, and Research & Development Testing Requirements
- Condition 5.4 - Mold Fabrication/Repair, and Research & Development Recordkeeping Requirements
- Condition 5.5 - Mold Fabrication/Repair, and Research & Development Reporting Requirements
- Condition 6.2 - 40 CFR 63 Subpart WWWW-Specific Monitoring Requirements
- Condition 6.3 - 40 CFR 63 Subpart WWWW-Specific Testing Requirements
- Condition 6.4 - 40 CFR 63 Subpart WWWW-Specific Recordkeeping Requirements
- Condition 6.5 - 40 CFR 63 Subpart WWWW-Specific Reporting Requirements

Are you in compliance with all applicable requirements for this emission unit? ✓ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.** N/A

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EU-1B	Pool Manufacturing	CD-02, CD-05, CD-06

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Open molding of fiberglass reinforced composites.

Manufacturer:	**Model number:**	**Serial number:**
N/A	N/A	N/A
Construction date: (MM/DD/YYYY) / /	**Installation date:** (MM/DD/YYYY) / /	**Modification date(s):** (MM/DD/YYYY) / / ; / / 2021 / / ; / /

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

N/A

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
N/A	N/A	8,760 hr/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes ✓ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: N/A	**Type and Btu/hr rating of burners:** N/A

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	--	0.37
Nitrogen Oxides (NO_X)	--	0.43
Lead (Pb)	--	--
Particulate Matter ($PM_{2.5}$)	--	--
Particulate Matter (PM_{10})	--	--
Total Particulate Matter (TSP)	--	4.24
Sulfur Dioxide (SO_2)	--	0.01
Volatile Organic Compounds (VOC)	--	177.4
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Included in VOC		> 10 (Single HAP)
Included in VOC		> 25 (All HAPs)
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
N/A		

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Modification Permit No. R13-2332H.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Modification Permit No. R13-2332H: Condition 4.1 - Source-Specific Limitations and Standards

✓ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Modification Permit No. R13-2332H:
- Condition 4.2 - Source-Specific Monitoring Requirements
- Condition 4.3 - Source-Specific Testing Requirements
- Condition 4.4 - Source-Specific Recordkeeping Requirements
- Condition 4.5 - Source-Specific Reporting Requirements
- Condition 6.2 - 40 CFR 63 Subpart WWWW-Specific Monitoring Requirements
- Condition 6.3 - 40 CFR 63 Subpart WWWW-Specific Testing Requirements
- Condition 6.4 - 40 CFR 63 Subpart WWWW-Specific Recordkeeping Requirements
- Condition 6.5 - 40 CFR 63 Subpart WWWW-Specific Reporting Requirements

Are you in compliance with all applicable requirements for this emission unit? ✓ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.** N/A

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EU-02	Finishing/Outfitting Area	

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Finishing and outfitting of pools and spas.

Manufacturer:	**Model number:**	**Serial number:**
N/A	N/A	N/A
Construction date: (MM/DD/YYYY) / /	**Installation date:** (MM/DD/YYYY) / /	**Modification date(s):** (MM/DD/YYYY) / / ; / / 2021 / / ; / /

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

N/A

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
N/A	N/A	8,760 hr/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes ✓ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: N/A	**Type and Btu/hr rating of burners:** N/A

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	--	--
Nitrogen Oxides (NO_X)	--	--
Lead (Pb)	--	--
Particulate Matter ($PM_{2.5}$)	--	--
Particulate Matter (PM_{10})	--	--
Total Particulate Matter (TSP)	--	2.0 (from insignificant activity)
Sulfur Dioxide (SO_2)	--	--
Volatile Organic Compounds (VOC)	--	0.7
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Single HAP	--	included in VOC (above)
All HAPs	--	included in VOC (above)
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
N/A		

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Table N-4 from Application for Modification Permit No. R13-2332H.
PM is generated by hend-held equipment for buffing plastic (insignificant activity).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

None.

✓ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? ✓ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**. N/A

Attachment G
Air Pollution Control Device Forms

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number:	List all emission units associated with this control device.	
CD-01 (Overspray Filters)	EU-1A (Mold Shop)	
Manufacturer:	**Model number:**	**Installation date:** MM/DD/YYYY
N/A	N/A	N/A

Type of Air Pollution Control Device:

✓ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Absorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	✓ Other (describe) Roll media
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	~98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Overspray filter to protect ventilation system fan/bearings.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes ✓ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** Integral to the process (not control device).

Describe the parameters monitored and/or methods used to indicate performance of this control device.

PM removal efficiency based on roll media manufacturer's documentation.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number:	**List all emission units associated with this control device.**	
CD-02 (Overspray Filters)	EU-1B (Pool Manufacturing: GC & VE)	
Manufacturer:	**Model number:**	**Installation date:** MM/DD/YYYY
N/A	N/A	N/A

Type of Air Pollution Control Device:

✓ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Absorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	✓ Other (describe) Rcll media
Wet Plate Electrostatic Precipitator		Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	~98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Overspray filter to protect ventilation system fan/bearings.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes ✓ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** Integral to the process (not control device).

Describe the parameters monitored and/or methods used to indicate performance of this control device.

PM removal efficiency based on roll media manufacturer's documentation.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number:	List all emission units associated with this control device.	
CD-03 (Dust Collector1)	EU-1A (Mold Shop)	
Manufacturer:	**Model number:**	**Installation date:** MM/DD/YYYY
N/A	N/A	N/A

Type of Air Pollution Control Device:

✓ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Absorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	✓ Other (describe) Controls hand-held equip.
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	~99%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Designed to control hand-held buffers/sanders (insignificant activities).

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes ✓ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** Hand-held buffers/sanders are not subject to an emission limit.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

PM removal efficiency based on roll media manufacturer's documentation.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number:	**List all emission units associated with this control device.**	
CD-04 (Dust Collector2)	EU-1A (Mold Shop)	
Manufacturer:	**Model number:**	**Installation date:** MM/DD/YYYY
N/A	N/A	N/A

Type of Air Pollution Control Device:

✓ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Absorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	✓ Other (describe) Controls hand-held equip.
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	~99%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Designed to control hand-held buffers/sanders (insignificant activities).

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes ✓ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** Hand-held buffers/sanders are not subject to an emission limit.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

PM removal efficiency based on manufacturer's documentation.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number:	List all emission units associated with this control device.	
CD-05 (Overspray Filters)	EU-1B (Pool Manufacturing - GP)	
Manufacturer: N/A	**Model number:** N/A	**Installation date:** MM/DD/YYYY N/A

Type of Air Pollution Control Device:

✓ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Absorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	✓ Other (describe) Roll media
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	~98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Overspray filter to protect ventilation system fan/bearings.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes ✓ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** Integral to the process (not a control device).

Describe the parameters monitored and/or methods used to indicate performance of this control device.

PM removal efficiency based on roll media manufacturer's documentation.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number:	List all emission units associated with this control device.	
CD-06 (RC/RTO)	EU-1A (Pool Manufacturing: GC & VE)	
Manufacturer:	**Model number:**	**Installation date:** MM/DD/YYYY
Adwest	55.0 ZRC	2021

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Absorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
✓ Thermal Incinerator	___ Flare	✓ Other (describe) Rotary Concentrator>RTO
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	~90% (overall)

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Designed to reduce VOC emissions from gelcoat (GC) and vinyl ester (VE) resin usage for pool manufacturing by 90% overall.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ✓ Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See Attachment H.

Attachment H
Compliance Assurance Monitoring Plan Form

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☑ YES ☐ NO

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☑ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☐ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

3) [a] BACKGROUND DATA AND INFORMATION					
Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU In order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.					
PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	[b] EMISSION LIMITATION or STANDARD	[c] MONITORING REQUIREMENT
EU-1B	Pool Manufacturing (GC & VE)	VOC	RC/RTO	177.4 tpy VOC (R13-2332H Condition)	RTO combustion chamber shall be monitored and recorded on at least an
					hourly basis anytime the RTO is in operation.
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

[b] Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

[c] Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA			
Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation: EU-1B (GC & VE)	**4b) Pollutant:** VOC	**4c) [a] Indicator No. 1:** RTO Comb. Chamber Temp	**4d) [a] Indicator No. 2:** TBD after start-up testing
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		Thermal couple	TBD after start-up testing
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		>/= 1,500 F	TBD after start-up testing
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		Thermal couple is in combustion chamber; minimum accuracy is 1 F.	TBD after start-up testing
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:		Per mfr recommendations	TBD after start-up testing
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		Periodic testing of thermal couple	TBD after start-up testing
[d] Provide the MONITORING FREQUENCY:		Continuous (while RTO is operating)	TBD after start-up testing
Provide the DATA COLLECTION PROCEDURES that will be used:		Recorded every hour	TBD after start-up testing
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:		1-hour average	TBD after start-up testing

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:	6b) Regulated Air Pollutant:
EU-1B (Pool Manufacturing: GC & VE)	VOC

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

RTO combustion chamber temperature is continuously monitored with a thermocouple; readings communicated to the RTO control panel, and periodically averaged and recorded.

8) **INDICATOR RANGES**: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.

- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.

- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

1,500 F is the manufacturer's default recommended minimum RTO combustion chamber temperature; to be validated upon startup with emissions testing.