

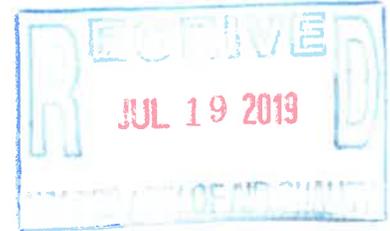


The Chemours Company
Washington Works
8480 DuPont Road
PO Box 1217
Washington, WV 26181

304-863-4000
chemours.com

July 16, 2019

CERTIFIED MAIL – 7017-1450-0002-3249-6425 - RETURN RECEIPT REQUESTED



Ms. Laura M Crowder, Acting Director
Division of Air Quality
West Virginia Department of Environmental Protection
601-57th Street, SE
Charleston, WV 25304

45 CSR 30 Permit 10700182-2015 Renewal Application – Chemours Washington Works,
Segment 12 of 14 – Facilities, Construction & Support (FC&S)

Dear Ms. Crowder:

Accompanying this letter is the required renewal application for the Facilities, Construction & Support (FC&S) Segment of the Chemours Washington Works Title V operating permit. The renewal application is based on the existing 45 CSR 30 Permit.

The application documents contain the required single paper copy and the two additional electronic copies of the application on compact disk (CD). There is a supplemental section of the permit renewal application that contains support information needed for the engineering document used by the permit writers; specifically, the last air emissions inventory data as compared to the potential to emit.

Should you have any questions about the documents, please contact the preparer of the package, Mr. John Mentink, at (304) 863-4033 or at john.j.mentink@chemours.com.

Very truly yours,

Alison A. Crane
Site Environmental Lead
Chemours Washington Works

AAC:jjm/jm

Enclosure

CC: (Letter only)
Ms. C. McCumbers, T5 Program supervisor
Division of Air Quality
WV Dept. of Environmental Protection
Charleston, WV 25304

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Facilities, construction & Support Title V Renewal Application

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11. Mailing Address		
Street or P.O. Box: Building 1 – 8480 duPont Road		
City: Washington	State: WV	Zip: 26181-1217
Telephone Number: (304) 863-4240 (Main Gate)	Fax Number: (304) 863-4862	

12. Facility Location		
Street: 8480 DuPont Road	City: Washington	County: Wood
UTM Easting: 442.368 km	UTM Northing: 4346.679 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
<p>Directions: From I-77 take the Route 50 bypass around Parkersburg towards Ohio. At the last exit prior to the bridge exit from the route 50 Bypass on to DuPont Road. At the light turn left on DuPont road. Approximately ½ mile from the turn you will see the Site on your right and be approaching the exit from the road for the main gate to the facility.</p>		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). Ohio	
Is facility located within 100 km of a Class I Area ¹ ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the area(s).	
If no, do emissions impact a Class I Area ¹ ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<p>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.</p>		

13. Contact Information			
Responsible Official: Timothy L. Byrd		Title: Plant Manager	
Street or P.O. Box: Building 1 - 8480 DuPont Road			
City: Washington	State: WV	Zip: 26181-1217	
Telephone Number: (304) 863-4305		Fax Number: (304) 362-9703	
E-mail address: Timothy.L.Byrd-1@chemours.com			
Environmental Contact: Alison A. Crane		Title: Environmental Leader	
Street or P.O. Box: Building 1 - 8480 DuPont Road			
City: Washington	State: WV	Zip: 26181-1217	
Telephone Number: (304) 863-4448		Fax Number:	
E-mail address: Alison.A.Crane@chemours.com			
Application Preparer: John J. Mentink		Title: Sr. Environ. Consultant	
Company: Chemours			
Street or P.O. Box: Building 1 - 8480 DuPont Road			
City: Washington	State: WV	Zip: 26181-1217	
Telephone Number: (304) 863-4033		Fax Number:	
E-mail address: john.j.mentink@chemours.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
Plastics and resins	Compounded Plastics and resins	325211	2821
Industrial Gas Manufacturing	Industrial Gases (monomers)	325120	2813
Inorganic Chemicals	Inorganic Chemical Manufacture	325188	2819

Provide a general description of operations.

Raw materials in the form of plastics resins, modifiers, fillers and colorants are collected and processed on plastic compounding machines. The base resin is heated and, meted and the modifiers, fillers and colorants are added to the melted resin. The mass is flow blended continuously and extruded through a die plate. As the melted polymer leaves the die plate, it is cut and cooled in a water bath to produce the final pellet product form. The pellets are then dried, blended and packaged for shipment to final consumers.

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.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS	<input type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26)
<input checked="" type="checkbox"/> 45 CSR 7 Particulate State Only Rule	<input type="checkbox"/>

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.

- a. 40 C.F.R. 60, Subpart K - "Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978." There are no petroleum liquid storage tanks of applicable size in FC&S.
- b. 40 C.F.R. 60, Subpart Ka - "Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984." There are no petroleum liquid storage tanks of applicable size in FC&S.
- c. 40 C.F.R. 60, Subpart Kb - "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." There are no volatile organic liquid storage tanks of applicable size in FC&S.
- d. 40 C.F.R. 60, Subpart VV - "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry." The FC&S Area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
- e. 40 C.F.R. 60, Subpart DDD - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry." The FC&S Area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- f. 40 C.F.R. 60, Subpart RRR - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes." The FC&S Area does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate.
- g. 40 C.F.R. 61, Subpart V - "National Emission Standards for Equipment Leaks (Fugitive Emissions Sources)." Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the FC&S Area.
- h. 40 C.F.R. 63, Subpart F - "National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry." 40 C.F.R. 63 Subparts F, G, and H do not apply to process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- i. 40 C.F.R. 63, Subpart G - "National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater." 40 C.F.R. 63 Subparts F, G, and H do not apply to process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).

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.

- j. 40 C.F.R. 63, Subpart H - "National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks." 40 C.F.R. 63 Subparts F, G, and H do not apply to process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- k. 40 C.F.R. 63, Subpart DD - "National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations." The FC&S Area does not receive off-site materials as specified in paragraph 40 C.F.R. §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §§63.680(a)(2)(i) through (a)(2)(vi).
- l. 40 C.F.R. 63, Subpart YY - "National Emission Standards for Hazardous Air Pollutant for Source Categories: Generic Maximum Achievable Control Technology Standards." The FC&S Area is not one of the source categories and affected sources specified in 40 C.F.R. §§63.1103(a) through (h).
- m. 40 C.F.R. 63, Subpart JJJ - "National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins." The FC&S Area does not produce the materials listed in 40 C.F.R. §63.1310.
- n. 40 C.F.R. 63, Subpart EEEE - "National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline)." The FC&S Area does not operate an organic liquids distribution (OLD) operation or does not handle material organic liquids as defined in §63.2406.
- o. 40 C.F.R. 63, Subpart PPPP - "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products." The FC&S Area does not produce an intermediate or final product that meets the definition of a "surface coated" plastic part.
- p. 40 C.F.R. 63, Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." The FC&S Area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- q. 40 C.F.R. 63, Subpart ZZZZ - "National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines." The FC&S Area does not have a stationary Reciprocating Internal Combustion Engine (RICE) as defined by 40 C.F.R. §63.6675.
- r. 40 C.F.R. 63, Subpart GGGGG - "National Emission Standards for Hazardous Air Pollutants: Site Remediation." The FC&S Area does not conduct site remediation as defined by 40 C.F.R. §63.7957 that meets all three of the conditions specified in 40 C.F.R. §§63.7881(a)(1) through (a)(3).

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.

- s. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” The FC&S Area does not produce, blend, or manufacture coatings as part of the manufacturing process.
- t. 40 C.F.R. 63, Subpart NNNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” The FC&S Area is not an HCl production facility as defined by 40 C.F.R. §63.9075.
- u. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. The FC&S Area does not conduct motor vehicle maintenance involving CFCs on site.
- v. 40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.” Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The FC&S Area does not use, manufacture, nor distribute these materials.
- w. 45CSR2 – “To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.” The FC&S Area does not contain any fuel burning units.
- x. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The Specialty Compounding Area does not contain any fuel burning units subject to the sulfur dioxide weight emission standards of 45CSR§10-3. Also, per 45CSR§10-4.1.e, manufacturing process source operations in the FC&S Area are exempt from the sulfur dioxide concentration limits of 45CSR§10-4.1 because the potential to emit of sulfur dioxide is less than 500 pounds per year.
- y. 45CSR15 – “Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. 61.” The FC&S Area is not subject to any requirements under 40 C.F.R. 61.
- z. 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The FC&S Area is not subject to any requirements under 40 C.F.R. 60.
- aa. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, the FC&S Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.

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.

- bb. 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in FC&S have maximum theoretical emissions of 6 pounds per hour or more and are not subject to the requirements of this section.
- cc. 45CSR§27-4.1 – “To Prevent and Control the Emissions of Toxic Air Pollutants: Fugitive Emissions of Toxic Air Pollutants.” The equipment in the FC&S Area is not in “toxic air pollutant service” as defined by 45CSR§27-2.11 is not subject to the requirements of 45CSR§27-4.1.
- dd. 40 C.F.R.63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Facilities, Construction, and Support does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).
- ee. 40 C.F.R. 63, Subpart MMMM – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” There are no surface coating activities conducted in Facilities, Construction, and Support subject to the requirements of this rule.
- ff. 40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.” Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. Facilities, Construction, and Support does not use, manufacture, nor distribute these materials.
- gg. 45CSR27 – “To Prevent and Control the Emission of Toxic Air Pollutants.” Facilities, Construction, and Support does not have emission sources of toxic air pollutants as listed in 45CSR27.
- hh. 45CSR§21-19 – “Other Facilities that Emit Volatile Organic Compound (VOC).” The operations of Facilities, Construction, and Support are outside of the SIC grouping to which this section of 45CSR21 applies.
- ii.

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).

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee 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). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health. [40 C.F.R. 61 and 45CSR15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shut down, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shut down. [45CSR§13-10.5]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2]
- 3.1.7. **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)]
- 3.1.8. **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:

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.

- 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]**
- 3.1.9. **Risk Management Plan.** This stationary source, as defined in 40 C.F.R. § 68.3, is subject to Part 68. This stationary source shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. Part 68.10. This stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71. **[40 C.F.R. 68]**
- 3.1.10. **Fugitives.** The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. [45CSR§7-5.2] 3.1.10.
- 3.1.11. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. [45CSR§7-4.12.]
- 3.1.12. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. [45CSR§7-9.1.]

Permit Shield

20. Facility-Wide Applicable Requirements

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.)

3.2. Monitoring Requirements

3.2.1. Not applicable

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

20. Facility-Wide Applicable Requirements

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

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. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit will be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 as applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit will be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 as applicable.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15) and 45CSR13]

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

20. Facility-Wide Applicable Requirements

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.)

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-1533, 4.1.1; 45CSR13, R13-2617, 4.4.1]

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. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken. [45CSR§30-5.1.c. State-Enforceable only.]

3.4.4. **Fugitives.** The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures as required by 3.1.9. applied at the facility. These records shall be maintained on site. [45CSR§30-5.1.c.J]

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

20. Facility-Wide Applicable Requirements

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.)

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 certification to the USEPA as required in 3.5.5 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, mailed first class, or by private carrier with postage prepaid to the addressees) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

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

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
**Office of Enforcement and Permits Review
(3AP12)**
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

20. Facility-Wide Applicable Requirements

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance

3.5 Reporting Requirements

- 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. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative. [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 annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by email to the following address: R3 _APD _Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. [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 15th for the reporting period January 1 – June 30 and on, or before, March 15th for the reporting period July 1 – December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official consistent with 45CSR§30-4.4. The semiannual monitoring reports shall be submitted in electronic format by emailing to the following address: For the WV-DAQ DEPAirQualityReports@wv.gov.

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

20. Facility-Wide Applicable Requirements

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.)

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.]

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

20. Facility-Wide Applicable Requirements

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.)

- 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.]

- c. Every report submitted under this subsection shall be certified by a responsible official.

[45CSR§30.5.1.c.3.D.]

- 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.]

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit <i>(if any)</i>
None	None	None
	/ /	
	/ /	
	/ /	

22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance	Permit Condition Number
None	MM/DD/YYYY	None
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	0.035
Nitrogen Oxides (NO _x)	0.084
Lead (Pb)	0
Particulate Matter (PM _{2.5}) ¹	0.08
Particulate Matter (PM ₁₀) ¹	0.1637
Total Particulate Matter (TSP)	13.33
Sulfur Dioxide (SO ₂)	0.0007
Volatile Organic Compounds (VOC)	45.7
Hazardous Air Pollutants ²	Potential Emissions
Cumen	0.018
Ethylene Glycol	0.062
Glycol Ethers	0.22
Toluene	0.212
Ethyl Benzene	0.1
Xylenes	0.4
Methyl Isobutyl Ketone	0.004
Methyl Ethyl Ketone	0.589
Methylene Chloride	0.018
Methyl Methacrylate	0.004
Chromium	0.006
Chromium VI	0.0005
Cobalt	0.0009
Manganese	0.003
Nickel	0.002
Benzene	0.0043
n-Hexane	0.007
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Ozone Depleting Compounds (ODC)	0
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.	

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	7. Blacksmith forges.
<input type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input checked="" type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	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: _____ _____ _____
<input type="checkbox"/>	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: _____

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	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.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input checked="" type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input checked="" type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input checked="" type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.
<input checked="" type="checkbox"/>	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.)
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input checked="" type="checkbox"/>	51. Steam cleaning operations.
<input checked="" type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	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.
<input type="checkbox"/>	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.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input checked="" type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	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 .
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: Timothy L. Byrd

Title: Plant Manager

Responsible official's signature:

Signature: 

Signature Date: 07/10/2019

(Must be signed and dated in blue ink)

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)
- 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.wvdep.org/dag, requested by phone (304) 926-0475, and/or obtained through the mail.



ATTACHMENT A – MAP TO FACILITY

DIRECTIONS:

FROM AIRPORT:

1. Exit Airport Rd to Rte 31 S (right)
2. Rte 31 S to Rte 2 S (right)
3. Rte 2 S to Rte 68 S (Emerson Ave)

A) Washington Works

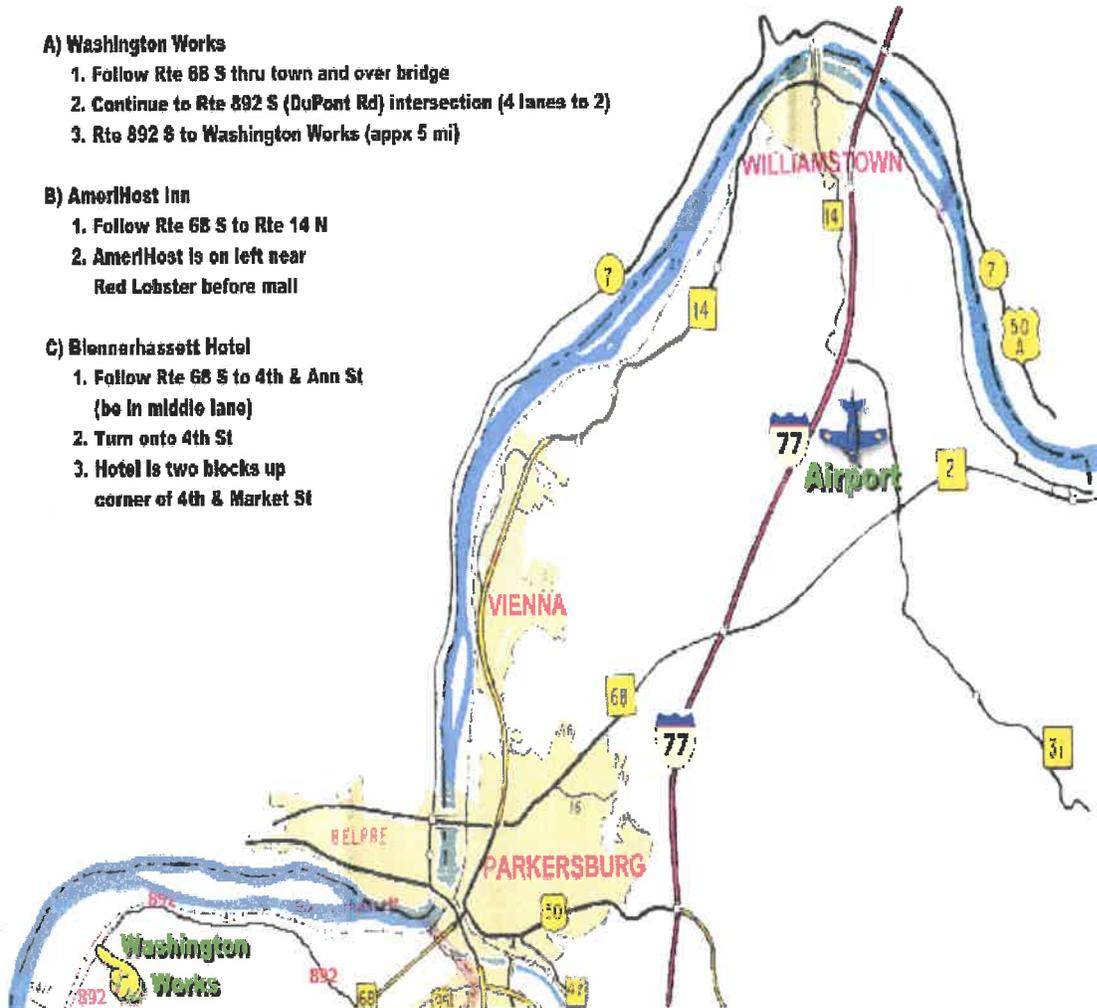
1. Follow Rte 68 S thru town and over bridge
2. Continue to Rte 892 S (DuPont Rd) intersection (4 lanes to 2)
3. Rte 892 S to Washington Works (appx 5 mi)

B) AmeriHost Inn

1. Follow Rte 68 S to Rte 14 N
2. AmeriHost is on left near Red Lobster before mall

C) Biennarhassett Hotel

1. Follow Rte 68 S to 4th & Ann St (be in middle lane)
2. Turn onto 4th St
3. Hotel is two blocks up corner of 4th & Market St

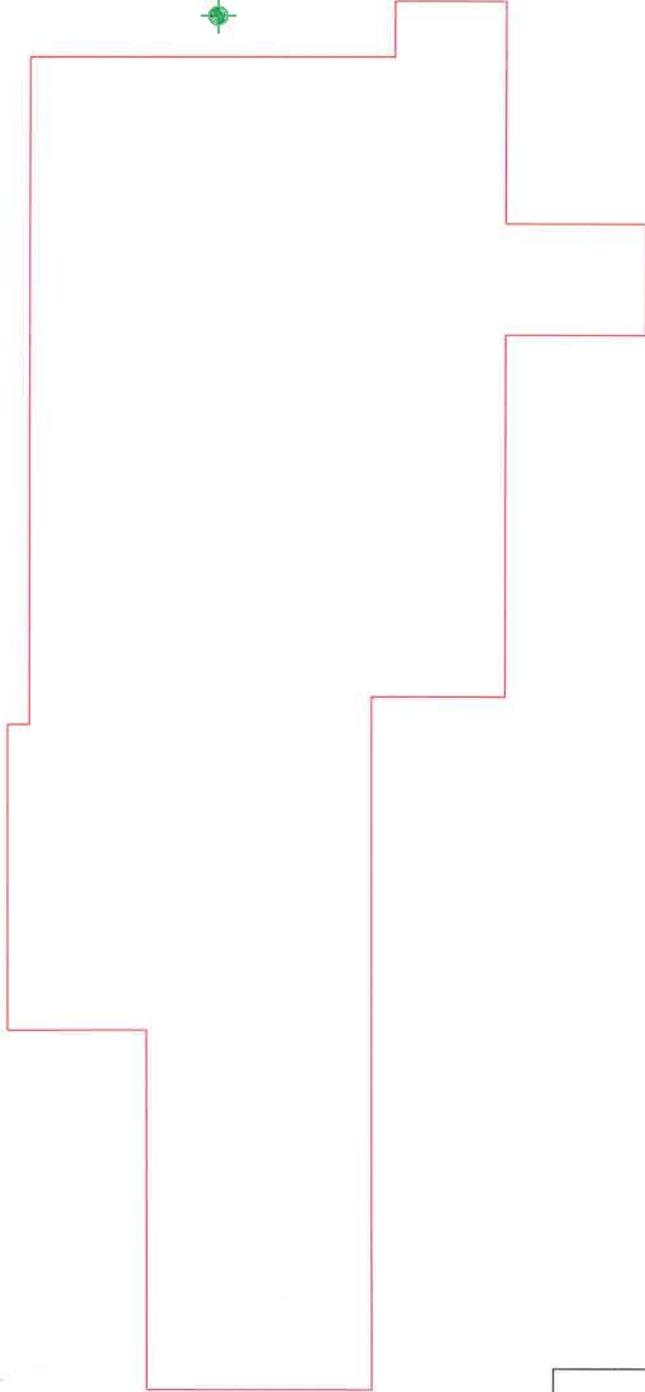


ATTACHMENT B – Plot Plan of Permitted Facility

Plot Plan for the FC&S facilities shows the entire plant as the facilities are spread over many areas.



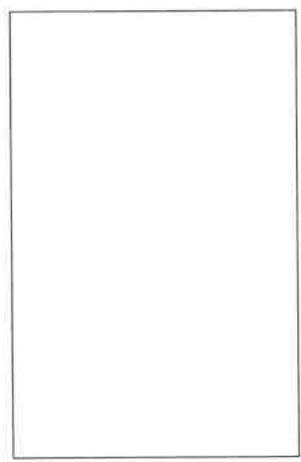
VP005E



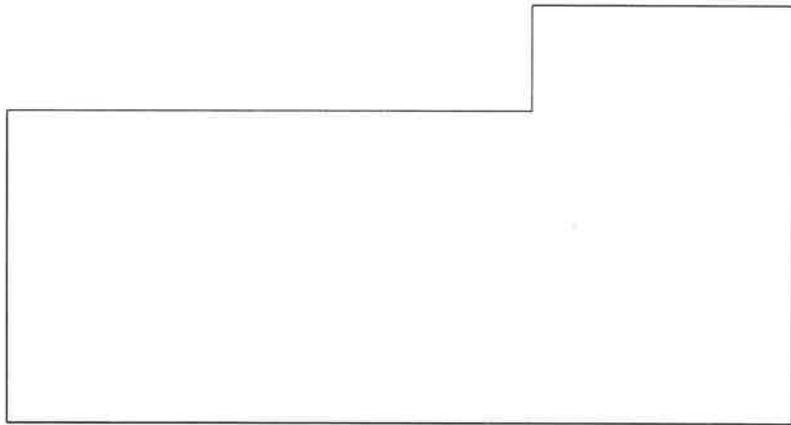
PERMIT APPLICATION	
TITLE 5	
45CSR30	
DAVE DRENNEN 1-29-09	WWM666
SCALE: 1"=300'	-96



VCS01E



PERMIT APPLICATION	
TITLE 5	
45CSR30	
DAVE DRENNEN 1-29-09	WWM666
SCALE: 1"=300'	-101

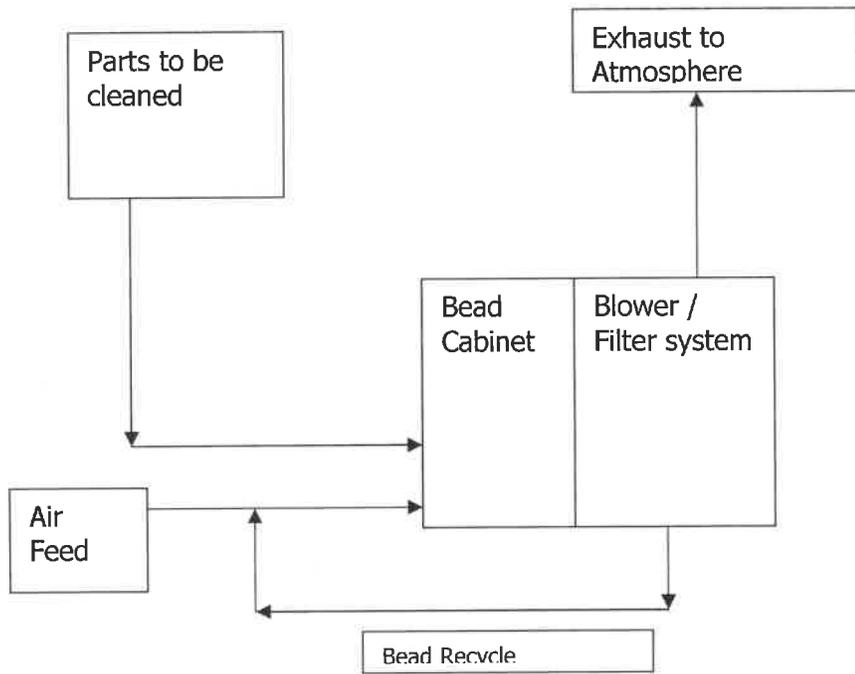


VTIS01E

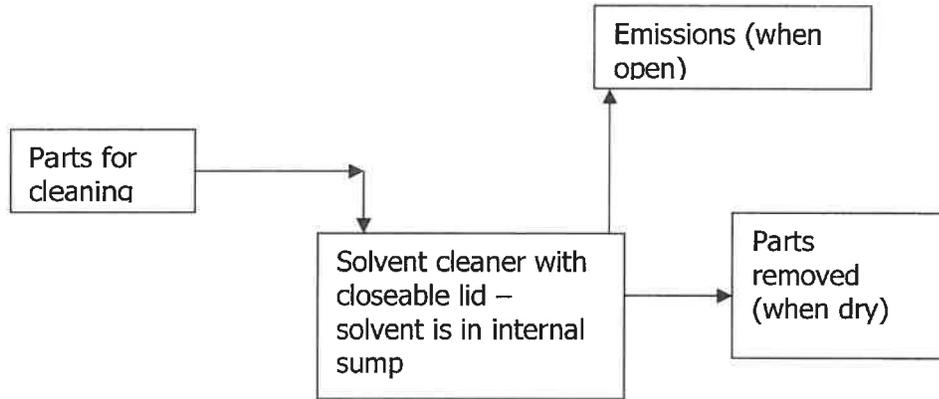
PERMIT APPLICATION		
TITLE 5		
45CSR30		
DAVE DRENNEN	1-29-09	WWM666
SCALE: 1"=150'		-166

ATTACHMENT C – Process Flow Diagrams

Process Flow Diagram – Bead Blast Unit
(General)



Process Flow Diagram – General Unit – Solvent Cleaner (Safety-Kleen)



Attachment D – Emission Units Table

ATTACHMENT D - Emission Units Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID ¹	Emission Point ID ¹	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device ¹
V238G01	V238G01E	Mineral Spirits Parts Cleaner (B-238)	1991	44 gallons	No
VBOS08	VBOS08E	Mineral Spirits Parts Cleaner (B-301B)	1991	44 gallons	No
VP005	VP005E	Bead Blast Unit (B-96)	2004	275 lb/hr	External bag filter
VTIS01	VTIS01E	Band Saw Insulation Shop (B-166)	1991	15"	Yes
VCS03	VCS01E	Radial Arm Saw (B-101)	1968	2 HP	Yes
VCS04	VCS01E	Band Saw (B-101)	1968	15"	Yes
VCS05	VCS01E	Table Saw (B-101)	2000	7.5 HP	Yes
VCFT01	VCFT01E	Diesel Fuel Tank	2014	200 Gallons	No
VCFT02	VCFT02E	Gasoline Tank	2014	200 Gallons	No
V238G03	V238G03E	Hotsy Hot Water Cleaner	1991	360 GPH/.4	No
VTEMP-WORK	VTEMP-WORKE	Temporary Work Areas at Task Sites	NA	NA	NA

¹For 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			
<i>Emission Unit Description</i>			
Emission unit ID number: V238G01	Emission unit name: Building 238 Parts Cleaner	List any control devices associated with this emission unit: None	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Parts cleaner bath consisting of Safety-Kleen Solvent			
Manufacturer:	Model number:	Serial number:	
Construction date:	Installation date: 1991	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 44 gal			
Maximum Hourly Throughput: 1 Batch	Maximum Annual Throughput: 8760 batches	Maximum Operating Schedule: 8760 hours	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? ___ Yes [X] No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
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)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	1.12	5.65
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>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.).</p> <p>Emission factors were determined by assuming a vent moving in a 4" duct – 149ft³ / min over the opened solvent enclosure. It was determined that 6.69 lbs / hour are lost through evaporation. Examination of a typical parts cleaning cycle found that the enclosure was open for a total of 10 minute per cycle maximum. Thus a total of 1.12 pph was determined as the maximum emissions.</p>		

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.

Mineral spirits parts cleaners are subject to the cold cleaning provisions of 45CSR§21-30.

- 45 CSR 21-30.3.a.4. Provide a permanent, legible, conspicuous label, summarizing the operating requirements;
- 45 CSR 21-30.3.a.5. Store waste solvent in covered containers;
- 45 CSR 21-30.3.a.6. Close the cover whenever parts are not being handled in the cleaner;
- 45 CSR 21-30.3.a.7. Drain the cleaned parts until dripping ceases;
- 45 CSR 21-30.3.a.8. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge (psig); and
- 45 CSR 21-30.3.a.9. Degrease only materials that are neither porous nor absorbent.
- 45 CSR 21-30.6.b. Comply with the requirements of section 5.2. regarding reports of excess emissions;

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.)

All applicable testing, recordkeeping, and reporting are the same as required by 45CSR§21, Section 30 with the exception that records shall be maintained for a period of 5 years instead of two.

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.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: V238G03	Emission unit name: Hotsy® Hot Water Cleaner	List any control devices associated with this emission unit:	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Unit heats water for the purpose of cleaning equipment with the application of a pressure washer.			
Manufacturer: Hotsy	Model number: 5832A	Serial number: H28915	
Construction date:	Installation date: 1991	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 360 gallons per hour			
Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule:	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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. Natural gas propane			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.016	0.035
Nitrogen Oxides (NO _x)	0.038	0.084
Lead (Pb)	N/A	N/A
Particulate Matter (PM _{2.5})	0.003	0.007
Particulate Matter (PM ₁₀)	0.003	0.007
Total Particulate Matter (TSP)	0.003	0.007
Sulfur Dioxide (SO ₂)	0.0003	0.0007
Volatile Organic Compounds (VOC)	0.003	0.007
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>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.).</p> <p>“Hotsy” washer is rated at 0.4 MM BTU/Hour. With Natural gas at 1000 BTU/SCF this is 400 SCFH use rate for a maximum of 4380 hours per year. Using AP-42 factors for gas combustion in a residential furnace (to compensate for lower efficiency and no controls) we have the following:</p> <p>NO_x = 400SCFH X 94 pounds NO_x per million SCF X 4380 hours/year)/(2000 pounds/ton) = 0.084 tons/year CO = 400SCFH X 40 pounds CO per million SCF X 4380 hours/year)/(2000 pounds/ton) = 0.035 tons/year PM_{2.5}= 400SCFH X 5.7 pounds PM_{2.5} per million SCF X 4380 hours/year)/(2000 pounds/ton) = 0.007 tons/year PM₁₀= 400SCFH X 5.7 pounds PM₁₀ per million SCF X 4380 hours/year)/(2000 pounds/ton) = 0.007 tons/year TSP= 400SCFH X 7.6 pounds TSP per million SCF X 4380 hours/year)/(2000 pounds/ton) = 0.007 tons/year SO₂= 400SCFH X 0.6 pounds SO₂ per million SCF X 4380 hours/year)/(2000 pounds/ton) = 0.0007 tons/year VOC= 400SCFH X 5.5 pounds VOC per million SCF X 4380 hours/year)/(2000 pounds/ton) = 0.007 tons/year</p>		

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.

No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. [45CSR§2-3.1]

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.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VBOS08	Emission unit name: Building 301B Parts Cleaner	List any control devices associated with this emission unit: None	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Parts cleaner bath consisting of Safety-Kleen Solvent			
Manufacturer:	Model number:	Serial number:	
Construction date:	Installation date: 1991	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 44 gal			
Maximum Hourly Throughput: 1 Batch	Maximum Annual Throughput: 8760 batches	Maximum Operating Schedule: 8760 hours	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes [X] No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
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)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	1.12	5.65
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.).

Emission factors were determined by assuming a vent moving in a 4" duct – 149ft³ / min over the opened solvent enclosure. It was determined that 6.69 lbs / hour are lost through evaporation. Examination of a typical parts cleaning cycle found that the enclosure was open for a total of 10 minute per cycle maximum. Thus a total of 1.12 pph was determined as the maximum emissions.

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.

Mineral spirits parts cleaners are subject to the cold cleaning provisions of 45CSR§21-30.

- 45 CSR 21-30.3.a.4. Provide a permanent, legible, conspicuous label, summarizing the operating requirements;
- 45 CSR 21-30.3.a.5. Store waste solvent in covered containers;
- 45 CSR 21-30.3.a.6. Close the cover whenever parts are not being handled in the cleaner;
- 45 CSR 21-30.3.a.7. Drain the cleaned parts until dripping ceases;
- 45 CSR 21-30.3.a.8. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge (psig); and
- 45 CSR 21-30.3.a.9. Degrease only materials that are neither porous nor absorbent.
- 45 CSR 21-30.6.b. Comply with the requirements of section 5.2. regarding reports of excess emissions;

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.)

All applicable testing, recordkeeping, and reporting are the same as required by 45CSR§21, Section 30 with the exception that records shall be maintained for a period of 5 years instead of two.

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**.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VCFT01	Emission unit name: Diesel Fuel Tank	List any control devices associated with this emission unit:	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Tank that is stored in a containment shed that can be taken around the plant if need be by fork truck to fill mobile equipment.			
Manufacturer:	Model number:	Serial number:	
Construction date:	Installation date: 2014	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 200 gallons			
Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule: 8760 hours/year	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <u>X</u> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
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)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	0.006	0.019
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Total HAP	0.005	0.0006
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
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.).		

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.

Gasoline Fuel Tank Requirements**5.1. Limitations and Standards**

- 5.1.1. All gasoline storage vessels at gasoline dispensing facilities shall be loaded by submerged fill. [45CSR§21-23.2.a.1]

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.*)

5.2. Monitoring Requirements

- 5.2.1. Compliance with the requirement to equip with the tank with a fill tube for submerged fill shall be verified upon inspection. [45CSR§30-5.1.c.]

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.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VCFT02	Emission unit name: Gasoline Fuel Tank	List any control devices associated with this emission unit:	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Tank that is stored in a containment shed that can be taken around the plant if need be by fork truck to fill mobile equipment.			
Manufacturer:	Model number:	Serial number:	
Construction date:	Installation date: 2014	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 200 gallons			
Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule: 8760 hours/year	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes ___ <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

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)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	3.57	0.86
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Total HAP	0.32	0.01
Benzene	0.04	0.001
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>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.).</p> <p>Engineering estimates based on General gasoline composition and use rate.</p>		

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.

Gasoline Fuel Tank Requirements**5.1. Limitations and Standards**

- 5.1.1. All gasoline storage vessels at gasoline dispensing facilities shall be loaded by submerged fill. [45CSR§21-23.2.a.1]

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.*)

5.2. Monitoring Requirements

- 5.2.1. Compliance with the requirement to equip with the tank with a fill tube for submerged fill shall be verified upon inspection. [45CSR§30-5.1.c.]

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.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VCS03	Emission unit name: Radial Arm Saw	List any control devices associated with this emission unit: Dust Collector with fabric filter	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Radial arm saw used to cut wood			
Manufacturer: DeWalt	Model number: 542021-00	Serial number:	
Construction date:	Installation date: 05/01/2000	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 7.5 Hp electric drive 3425 RPM			
Maximum Hourly Throughput: 360 linear ft./hr.	Maximum Annual Throughput:	Maximum Operating Schedule: 8760	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
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)	4.54	19.89
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.).

A board 2 in. thick by 12 in. wide would be maximum size you could cut. Cutting at 12 ft. per min., with an 1/8" kerf you would produce .021 ft.3 of dust. You could only be sawing about 1/2 an hour per hour, so with the density of wood being 7.2 lbs/ft.3, you would produce 4.54 lbs. of sawdust per hour.

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.

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

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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks

Ensure integrity of Flexible Fittings

Operate Filter Shaker

Ensure that filters are engaged

Empty collector tray/drum

Post-Operation Checks

Check area around collector/recovery device for indications of leaks. (If leaks are noted take corrective action)

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**.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VCS04	Emission unit name: Band Saw	List any control devices associated with this emission unit: Dust Collector with fabric filter	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Band saw used to cut wood			
Manufacturer: Rockwell	Model number:	Serial number: 4801A	
Construction date:	Installation date: 01/01/1968	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 15" throat			
Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule:	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

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)	4.54	19.89
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.).

A board 2 in. thick by 12 in. wide would be maximum size you could cut. Cutting at 12 ft. per min., with an 1/8" kerf you would produce .021 ft.3 of dust. You could only be sawing about 1/2 an hour per hour, so with the density of wood being 7.2 lbs/ft.3, you would produce 4.54 lbs. of sawdust per hour.

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.

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

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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks

Ensure integrity of Flexible Fittings

Operate Filter Shaker

Ensure that filters are engaged

Empty collector tray/drum

Post-Operation Checks

Check area around collector/recovery device for indications of leaks. (If leaks are noted take corrective action)

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.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VCS05	Emission unit name: Table Saw	List any control devices associated with this emission unit: Dust Collector with fabric filter	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Table saw used to cut wood			
Manufacturer: Mobile	Model number:	Serial number:	
Construction date:	Installation date: 2000	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 7.5 Hp			
Maximum Hourly Throughput: 360 linear ft./hr.	Maximum Annual Throughput:	Maximum Operating Schedule: 8760	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
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)	4.54	19.89
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.).
 A board 2 in. thick by 12 in. wide would be maximum size you could cut. Cutting at 12 ft. per min., with an 1/8" kerf you would produce .021 ft.3 of dust. You could only be sawing about 1/2 an hour per hour, so with the density of wood being 7.2 lbs/ft.3, you would produce 4.54 lbs. of sawdust per hour.

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.

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

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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks

Ensure integrity of Flexible Fittings

Operate Filter Shaker

Ensure that filters are engaged

Empty collector tray/drum

Post-Operation Checks

Check area around collector/recovery device for indications of leaks. (If leaks are noted take corrective action)

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.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VDIS02	Emission unit name: Band Saw	List any control devices associated with this emission unit: Dust Collector with fabric filters	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Band saw that is used to cut insulation			
Manufacturer: Forrest	Model number: 230	Serial number: 6236	
Construction date:	Installation date: 1984	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 3450 rpm			
Maximum Hourly Throughput: 360 linear ft/hr	Maximum Annual Throughput:	Maximum Operating Schedule: 8760	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___Yes ___X___ No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

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)	8.19	35.87
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.).

The maximum throughput is 12 ft. per min. Maximum amount of dust that can be produced from a 1/8" kerf is 0.021 ft.³/minute. 0.021 ft.³/minute X 60 minutes/hour X .5 hours operated/hour day X 13 lbs/ft.³ (bulk density of insulation being cut) = 8.19 lbs per hour particulate produced.

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.

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

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.*)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks

Ensure integrity of Flexible Fittings

Operate Filter Shaker

Ensure that filters are engaged

Empty collector tray/drum

Post-Operation Checks

Check area around collector/recovery device for indications of leaks. (If leaks are noted take corrective action)

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.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VP005	Emission unit name: Building 96 Bead Blast Unit	List any control devices associated with this emission unit: Integral	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Bead Blast unit located in building 96 with integral recovery / collection device			
Manufacturer:	Model number:	Serial number:	
Construction date:	Installation date: 1992	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 4 ft ³			
Maximum Hourly Throughput: 665 pph	Maximum Annual Throughput: 831 tpy	Maximum Operating Schedule: 2500 hours / yr	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? ___ Yes [X] No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

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)	0.8	0.83
Total Particulate Matter (TSP)	0.8	0.83
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.).

The maximum hourly process weight rate was calculated to be 665 pph and was based on the volume of material capable of being placed into the unit (4ft³), its weight (assumed the metal was carbon steel with an 80% void space in the metal part), and a 275 pph grit rate through the blast nozzle.

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.

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

[X] 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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks

Ensure integrity of Flexible Fittings

Operate Filter Shaker

Ensure that filters are engaged

Empty collector tray/drum

Post-Operation Checks

Check area around collector/recovery device for indications of leaks. (If leaks are noted take corrective action)

Are you in compliance with all applicable requirements for this emission unit? [X]Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VTEMPWORK	Emission unit name: Temporary Work Facilities	List any control devices associated with this emission unit: As Described in work plan	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Dependent of task – refer to work plan			
Manufacturer: Variable dependent on task	Model number: Variable dependent on task	Serial number: Variable dependent on task	
Construction date:	Installation date: As needed	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 3450 rpm			
Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule: Defined by Work Plan	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes ___X___ No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
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)	Dependent of task – refer to work plan May include blasting and painting of structures	Dependent of task – refer to work plan May include blasting and painting of structures
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	Dependent of task – refer to work plan –	Dependent of task – refer to work plan for painting est. 33.4
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Cumene	0.0125	0.018
Ethylene Glycol	0.043	0.062
Glycol Ethers	0.153	0.22
Toluene	0.15	0.212
Ethyl Benzene	0.07	0.1
Xylenes	0.305	0.4
Methyl Isobutyl Ketone	0.0031	0.004
Methyl Ethyl Ketone	0.45	0.589
Methylene Chloride	0.014	0.018
Methyl Methacrylate	0.0031	0.004
Chromium	0.0005	0.0006
Chromium VI	0.0001	0.00005
Cobalt	0.0008	0.0009
Manganese	0.0003	0.0003
Nickel	0.00017	0.0002
Benzene	0.0004	0.0043
n-Hexane	0.001	0.007

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.).

Compliance will be judged against a work plan developed prior to the start of activities at the VTEMPWORK location. Activities and associated emissions will be specified in the work plan and emission control measure will also be specified in the work plan. Compliance is judged against conformance to the work plan. The Basis work plan for the PTE was for the maintenance of building steel which involved cutting, welding and painting of building steel to repair or replace structure elements.

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.

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

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.)

Work practices and equipment used to control emissions will be defined in the work plan associated with the VTEMPWORK location and prepared prior to the start of the activities at the location. Estimated emissions for the planned work will be part of the work plan.

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.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: VTIS01	Emission unit name: Band Saw	List any control devices associated with this emission unit: Dust Collector with fabric filters	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Band saw that is used to cut insulation			
Manufacturer: Forrest	Model number: 204	Serial number: 204-45	
Construction date:	Installation date: 1984	Modification date(s):	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 3450 rpm			
Maximum Hourly Throughput: 360 linear ft./hr.	Maximum Annual Throughput:	Maximum Operating Schedule: 8760	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes ___X___ No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

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)	8.19	35.87
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.).

The maximum throughput is 12 ft. per min. Maximum amount of dust that can be produced from a 1/8" kerf is 0.021 ft.3/minute. 0.021 ft.3/minute X 60 minutes/hour X .5 hours operated/hour day X 13 lbs/ft.3 (bulk density of insulation being cut) = 8.19 lbs per hour particulate produced.

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.

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

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.*)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks

Ensure integrity of Flexible Fittings

Operate Filter Shaker

Ensure that filters are engaged

Empty collector tray/drum

Post-Operation Checks

Check area around collector/recovery device for indications of leaks. (If leaks are noted take corrective action)

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.

ATTACHMENT F – COMPLIANCE PLAN

**Attachment F is not required for the Title V renewal Application for
FC&S (Segment 12 of 14) of the Chemours Washington Works**

ATTACHMENT G- Control Devices

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: VCS01C	List all emission units associated with this control device. Band Saw, Table Saw, and Radial Arm Saw	
Manufacturer:	Model number:	Installation date:
Type of Air Pollution Control Device:		
<input checked="" type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Absorber	<input type="checkbox"/> Packed Tower Scrubber	<input checked="" type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe)
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> 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
Particulate	95%	
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).		
This is a dust collection system for the carpenter shop tools in B-101.		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.		
This equipment is monitored by weekly inspections of equipment in its entirety. All fittings and associated ductwork are inspected. Engagement of fabric filters and any emptying of collection trays or drums are also included.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: VDIS02C	List all emission units associated with this control device. Band Saw	
Manufacturer: Tornado	Model number: 98900 HAK107649	Installation date: 1995
Type of Air Pollution Control Device:		
<input checked="" type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Absorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) Drum mounted blower with filter
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> 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
Particulate	95%	
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).		
This is a dust collection system for the insulation cutting table in B-224.		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.		
This equipment is monitored by weekly inspections of equipment in its entirety. All fittings and associated ductwork are inspected. Engagement of fabric filters and any emptying of collection trays or drums are also included.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: VMIS01C	List all emission units associated with this control device. Band Saw	
Manufacturer: Tornado	Model number: 98900 HAK107649	Installation date:
Type of Air Pollution Control Device:		
<input checked="" type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Absorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) Drum mounted blower with filter
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> 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
Particulate	95%	
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).		
This is a dust collection system for the insulation cutting table in B-101.		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.		
This equipment is monitored by weekly inspections of equipment in its entirety. All fittings and associated ductwork are inspected. Engagement of fabric filters and any emptying of collection trays or drums are also included.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: VTIS01C	List all emission units associated with this control device. Band Saw	
Manufacturer: Torit	Model number: 19-FR	Installation date: 1990
Type of Air Pollution Control Device:		
<input checked="" type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Absorber	<input type="checkbox"/> Packed Tower Scrubber	<input checked="" type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe)
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> 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
Particulate	95%	
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). This is a dust collection system for the insulation cutting table in B-166.		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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. This equipment is monitored by weekly inspections of equipment in its entirety. All fittings and associated ductwork are inspected. Engagement of fabric filters and any emptying of collection trays or drums are also included.		

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 <u>all</u> 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
<u>EXAMPLE</u> 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:	4b) Pollutant:	4c) ^aIndicator No. 1:	4d) ^aIndicator No. 2:
5a) GENERAL CRITERIA Describe the <u>MONITORING APPROACH</u> used to measure the indicators:			
^b Establish the appropriate <u>INDICATOR RANGE</u> or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:			
5b) PERFORMANCE CRITERIA Provide the <u>SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA</u> , such as detector location, installation specifications, and minimum acceptable accuracy:			
^c For new or modified monitoring equipment, provide <u>VERIFICATION PROCEDURES</u> , including manufacturer's recommendations, <u>TO CONFIRM THE OPERATIONAL STATUS</u> of the monitoring:			
Provide <u>QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES</u> that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):			
^d Provide the <u>MONITORING FREQUENCY</u> :			
Provide the <u>DATA COLLECTION PROCEDURES</u> that will be used:			
Provide the <u>DATA AVERAGING PERIOD</u> for the purpose of determining whether an excursion or exceedance has occurred:			

^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:

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):

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:

ATTACHMENT I – SUPPLIMENTAL INFORMATION

Facility-Wide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2018 Actual Emissions
Carbon Monoxide (CO)	0.035	0
Nitrogen Oxides (NO _x)	0.084	0
Lead (Pb)	0	0
Particulate Matter (PM _{2.5}) ¹	0.08	0.2701626
Particulate Matter (PM ₁₀) ¹	0.1637	0.3077426
Total Particulate Matter (TSP)	13.33	0.3267026
Sulfur Dioxide (SO ₂)	0.0007	0
Volatile Organic Compounds (VOC)	45.7	0.797052
Hazardous Air Pollutants ²	Potential Emissions	
Cumen	0.018	0.01148
Ethylene Glycol	0.062	0.013
Glycol Ethers	0.22	0
Toluene	0.212	0.155
Ethyl Benzene	0.1	0.070196
Xylenes	0.4	0.286
Methyl Isobutyl Ketone	0.004	0
Methyl Ethyl Ketone	0.589	0
Methylene Chloride	0.018	0
Methyl Methacrylate	0.004	0
Chromium	0.006	0.0000534
Chromium VI	0.0005	0
Cobalt	0.0009	0
Manganese	0.003	0.000225
Nickel	0.002	0.0000354
Benzene	0.0043	0
n-Hexane	0.007	0
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
Ozone Depleting Compounds (ODC)	0	0

APPLICABLE REQUIREMENTS – FC&S Segment 12 of 14

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

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

Federal and State:	45CSR2	Particulate matter and opacity limits for indirect heat exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR10	Sulfur dioxide limits.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR21, Section 23	Control of VOC emissions from gasoline dispensing facility.
	45CSR21, Section 30	Control of VOC emissions from cold and solvent metal cleaning.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances.
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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, 45CSR15, 45CSR34 and 45CSR30.

45CSR7 Requirements

45CSR§§7-3.1 and 3.2

Emission points VP005E, VTIS01E, VCS01E and VTEMPWORK are subject to the opacity limits of 45CSR§§7-3.1 and 3.2. In order to demonstrate compliance with the opacity limits for VTEMPWORK, visible emission observations are required to be conducted monthly using methods based on 40 C.F.R. 60, Appendix A, Method 22. Records of the visible emission observations must be maintained on site for a period of five years. Compliance with the opacity limits for the emission points VCDMDCS34, VP005E, VZIS01E, VTIS01E, and VCS01E will be demonstrated through monitoring and record keeping of the control devices as described below. VTEMPWORK visible emissions will be controlled and monitored according to the work practices plan generated at the establishment of the temporary source.

45CSR§7-4.1

The Bead Blast Unit (emission point VP005E) consists of an enclosed chamber with both an integral filter and external filter. The unit is designed for use on small parts and is used intermittently. The maximum allowable emission limits, calculated from 45CSR§7-4.1, for the blast unit is 0.8 pounds per hour.

The insulation band saw (emission point VTIS01E) use filters to control particulate emissions. The band saw unit is used to cut insulation. The maximum hourly process weight rates were based on the maximum amount of insulation that can be either cut. The 45CSR§7-4.1 maximum allowable hourly emission limit for VTIS01E (Insulation Band Saw VTIS02) is 0.368 pounds.

Since the Bead Blast Unit and Insulation Units are rather small, used in a batch mode, and there are filters in place for control of particulate emissions, Chemours proposed work practice standards to demonstrate compliance with both the opacity and the hourly particulate matter emission limitations of 45CSR§§7-3.1 and 4.1. These work practices consist of the following:

- 1) Pre-Operation Checks
 - a. Ensure integrity of flexible fittings.
 - b. Operate Filter Shaker.
 - c. Ensure that filters are engaged.
 - d. Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.
- 2) Post-Operation Checks
 - a. Check area around collector/recovery device for indications of leaks.
 - b. If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

Records to demonstrate performance of the work practices must be maintained on site for a period of no less than five (5) years. These records shall be in the form of a log for each unit and shall document that the first operator to use the unit in the calendar day performed the necessary pre-operation/post-operation checks. These records shall also be used to document any problems that were discovered during inspection and the measures taken to correct the problem(s) and prevent the reoccurrence.

The Radial Arm Saw (emission point VCS01E) has a cyclone separator with a particulate collection drum to control particulate emissions. The 45CSR§7-4.1 allowable particulate emission limit of 0.435 pounds per hour was calculated based on the maximum amount of lumber that can be cut in an hour. In order to demonstrate compliance with both the opacity and emission limitations of 45CSR§§7-3.1 and 4.1, the permittee will be required to monitor and implement work practice standards similar to those for the filter units. These work practice standards shall consist of the following:

- 1) Pre-Operation Checks
 - a. Ensure integrity of flexible fittings.
 - b. Operate Cyclone Separator.
 - c. Ensure that Cyclone Separator is engaged.
 - d. Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.
- 2) Post-Operation Checks
 - a. Check area around collector/recovery device for indications of leaks.
 - b. If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

Records to demonstrate performance of the work practices must be maintained on site for a period of no less than five (5) years. These records shall be in the form of a log for each unit and shall document that the first operator to use the unit in the calendar day performed the necessary pre-operation/post-operation checks. These records shall also be used to document any problems that were discovered during inspection and the measures taken to correct the problem(s) and prevent the reoccurrence.

45CSR§7-5.1

45CSR§7-5.1 requires the emission units to be equipped with a system which may include, but not be limited to, process equipment design, control equipment design, or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. In order to demonstrate compliance with this requirement, the permittee will be required to maintain records of the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems. Chemours maintains that for equipment not listed in the Title V permit that is used solely under the insignificant listings found as items 41 and 44 in the application form there is a general duty to operate these systems in a manner to minimize fugitive particulate emissions to the environment and that individual listing of the affected equipment is unnecessary. At the same time the applicable requirement to all maintenance activities may be found in 45 CSR 7-10.3 as referenced below.

45CSR§7-10.3

VTEMPWORK is the emission unit and emission point ID for temporary field-erected facilities for construction and maintenance activities and has also been classified by Chemours as maintenance operations.

In accordance with 45CSR§7-10.3, maintenance operations are exempt from the provisions of 45CSR§7-4 provided that at all times the owner or operator conducts these maintenance operations in a manner consistent with good air pollution control practices for minimizing emissions. In order to demonstrate compliance, the permittee will be required to maintain records of the types of particulate capture and/or suppression systems used to minimize emissions, the times these systems were inoperable, and the corrective actions taken to repair these systems. In addition, the monthly visible emission observations required to be conducted to demonstrate compliance with 45CSR§7-3.1 will also be used to verify that these emission units are being operating in accordance with good air pollution control practices.

45CSR21 Requirements

45CSR§21-23

The Diesel and Gasoline Fuel Tanks (VCFT01 and VCFT02) are subject to the requirements of 45CSR§21-23 for gasoline dispensing facilities. Since the Diesel and Gasoline Fuel Tanks (VCFT01 and VCFT02) are stationary storage tanks with capacities less than 250 gallons and were constructed after December 31, 1978, the only applicable requirement is that the tanks be loaded by submerged fill. Compliance with this requirement can be verified upon inspection.

45CSR§21-30

The Mineral Spirits Parts Cleaners (V238G01 and VBOS08) are subject to the cold cleaning provisions of 45CSR§21-30. All applicable testing, record keeping, and reporting are the same as required by Section 30 with the exception that records shall be maintained for a period of five (5) years instead of two (2).

45CSR2 and 45CSR10 Requirements

45CSR2

45CSR§2-3.1 requires that opacity of the "Hotsy" Propane Hot Water Cleaner (V238G03) be maintained at or below ten percent. Because of the type of fuel used, compliance with the ten percent opacity limit is not expected to be a problem and visible emission observations were not required.

45CSR§2-11.1 exempts fuel burning units with a maximum design heat input under 10 MMBTU/hr from the emission limitations and testing, monitoring, record keeping, and reporting requirements of 45CSR2. Since the "Hotsy" Propane Hot Water Cleaner (V238G03) has a maximum design heat input of less than 10 MMBTU/hr, they are exempt from these requirements.

45CSR10

45CSR§10-10.1 exempts fuel burning units with a maximum design heat input under 10 MMBTU/hr from emission limitations and testing, monitoring, record keeping, and reporting requirements of 45CSR10. Since the “Hotsy” Propane Hot Water Cleaner (V238G03) has a maximum design heat input less than 10 MMBTU/hr, they are exempt from these requirements.

Suggested text for applicable requirements has been attached.

4.0. 45CSR7 Requirements**4.1. Limitations and Standards**

- 4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. These provisions shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (*VP005E, VTIS01E, VCS01E, and VTEMPWORK*) [45CSR§§7-3.1. and 3.2]
- 4.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7.

Emission Points	45CSR7 Hourly Particulate Emission Limit pph
VP005E	0.8
VTIS01E	0.368
VCS01E	0.435

(*VP005E, VTIS01E, VCS01E*) [45CSR§7-4.1.]

- 4.1.3. Maintenance operations shall be exempt from the provisions of 45CSR§7-4 provided that at all times the owner or operator shall conduct maintenance operations in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. (*VTEMPWORK*) [45CSR§7-10.3]

4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2, the permittee shall conduct opacity monitoring and record keeping for all emission points and equipment subject to an opacity limit under 45CSR7. Monitoring shall be conducted at least once per month. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within twenty-four (24) hours of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within twenty-four (24) hours after the visible emission and the sources are operating at normal conditions. (*VTEMPWORK*) [45CSR§30-5.1.c.]

4.2.2. The following work practices shall be employed for VP005E, and VTIS01E to minimize the potential of fugitive particulate matter and demonstrate compliance with the opacity limits of 4.1.1 and the hourly emission limits of 4.1.2.

1. Pre-Operation Checks

- (a) Ensure integrity of flexible fittings.
- (b) Operate Filter Shaker.
- (c) Ensure that filters are engaged.
- (d) Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

2. Post-Operation Checks

- (a) Check area around collector/recovery device for indications of leaks.
- (b) If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

(VP005E, and VTIS01E) [45CSR§30-5.1.c.]

4.2.3. The following work practices shall be employed for VCS01E to minimize the potential of fugitive particulate matter and demonstrate compliance with the opacity limits of 4.1.1 and the hourly emission limit of 4.1.2.

1. Pre-Operation Checks

- (a) Ensure integrity of flexible fittings.
- (b) Operate Cylcone Separator.
- (c) Ensure that Cyclone Separator is engaged.
- (d) Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

2. Post-Operation Checks

- (a) Check area around collector/recovery device for indications of leaks.
- (b) If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

(VCS01E) [45CSR§30-5.1.c.]

4.3. Testing Requirements

4.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling

ports to be located in such manner as the Director 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. [45CSR§7-8.1]

4.4. Recordkeeping Requirements

- 4.4.1. Records of the visible emission observations required by 4.2.1 shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. These records shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request. [45CSR§30-5.1.c.]
- 4.4.2. Records of the work practices performed for each emission unit and its associated control device, conducted in accordance with 4.2.2 and 4.2.3 shall be maintained on site for a period of no less than five (5) years. These records shall be in the form of a log for each unit and shall document that the first operator to use the unit in the calendar day performed the necessary inspections outlined in 4.2.2 and 4.2.3. These records shall also be used to document any problems which were discovered during inspection and the measures which were taken to correct the problem(s) and prevent the reoccurrence. [45CSR§30-5.1.c.]
- 4.4.3. The permittee shall monitor all fugitive particulate emission sources as required by 4.1.3. to ensure that a system to minimize fugitive emissions has been installed or implemented. Records shall be maintained on site for a period of no less than five (5) years stating the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems. [45CSR§30-5.1.c.]
- 4.4.4. The permittee shall monitor all maintenance operations as required by 4.1.4. to ensure that a system to minimize particulate emissions has been installed or implemented. Records shall be maintained on site for a period of no less than five (5) years stating the types of particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems. [45CSR§30-5.1.c.]

5.0. Diesel and Gasoline Fuel Tank (VCFT01 and VCFT02) Requirements**5.1. Limitations and Standards**

- 5.1.1. All gasoline storage vessels at gasoline dispensing facilities shall be loaded by submerged fill. [45CSR§21-23.2.a.1]

5.2. Monitoring Requirements

- 5.2.1. Compliance with the requirement to equip with the tank with a fill tube for submerged fill shall be verified upon inspection. [45CSR§30-5.1.c.]

6.0. Mineral Spirits Parts Cleaners (V238G01 and VBOS08) Requirements

6.1. Limitations and Standards

- 6.1.1. The owner or operator of a cold cleaning facility shall:
- a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge (psig).
 - f. Degrease only materials that are neither porous nor absorbent.

[45CSR§§21-30.3.a.4, 30.3.a.5, 30.3.a.6, 30.3.a.7, 30.3.a.8, 30.3.a.9]

6.2. Testing Requirements

- 6.2.1. Test Method ASTM D323-72 shall be used for measuring the solvent true vapor pressure.
[45CSR§21-30.4.e.]

6.3. Recordkeeping Requirements

- 6.3.1. Each owner or operator of a solvent metal cleaning source subject to this 45CSR§21-30 shall maintain the following records in a readily accessible location for at least 5 years and shall make these records available to the Director upon verbal or written request:
- a. A record of central equipment maintenance, such as replacement of the carbon in a carbon adsorption unit.
 - b. The results of all tests conducted in accordance with the requirements in section 45CSR§21-30.4 (6.2.1.).

[45CSR§21-30.5. and 45CSR§30-5.1.c.]

6.4. Reporting Requirements

- 6.4.1. Except as provided in section 45CSR§21-9.3, the owner or operator of any facility containing sources subject to 45CSR§21-5 shall, for each occurrence of excess emissions expected to last more than 7 days, within 1 business day of becoming aware of such occurrence, supply the Director by letter with the following information.
- (1) The name and location of the facility;
 - (2) The subject sources that caused the excess emissions;
 - (3) The time and date of first observation of the excess emissions; and

- (4) The cause and expected duration of the excess emissions.
- (5) For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
- (6) The proposed corrective actions and schedule to correct the conditions causing the excess emissions.

[45CSR§21-5.2]

7.0. "Hotsy" Propane Water Cleaners (V238G03) Requirements

7.1. Limitations and Standards

7.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. [45CSR§2-3.1]

Emission Points	45CSR7 Hourly Particulate Emission Limit(pph)
VP005E	0.8
VTIS01E	0.368
VCS01E	0.435