

United States Environmental Protection Agency  
Region 10, Office of Air, Waste and Toxics  
AWT-107  
1200 Sixth Avenue  
Seattle, Washington 98101

Permit Number: R10T5030000  
Issued: June 22, 2007  
Effective: June 22, 2007  
Expiration: June 22, 2012  
AFS Plant I.D. Number: 53-077-00076

## Title V Air Quality Operating Permit

In accordance with the provisions of Title V of the Clean Air Act and 40 CFR Part 71 and applicable rules and regulations,

### Amtech Corporation


is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the conditions listed in this permit. This source is authorized to operate in the following location:

Yakama Reservation  
180 East Jones Road  
Wapato Industrial Park  
Wapato, WA 98951  
Latitude: 46° 16' N Longitude: 120° 15' W

Responsible Official: Ronald D. Savage  
President  
Amtech Corporation  
406 Railroad Street  
Yelm, WA 98597  
Phone: 360-458-3999, fax: 360-458-4550

Company Contact: Eleanor Hargrave  
Environmental Manager  
Amtech Corporation  
406 Railroad Street  
Yelm, WA 98597  
Phone: 509-877-5957, fax: 509-877-2421  
E-mail: Eleanor@amtechcorp.com

This permit constitutes the initial Title V operating permit for this facility. EPA has also developed a statement of basis that describes the bases for conditions contained in this permit.

  
Richard Albright, Director  
Office of Air, Waste and Toxics  
U.S. EPA, Region 10

June 22, 2007  
Date

# Table of Contents

Cover Page .....	1
Abbreviations and Acronyms .....	3
1. Source Information .....	4
2. Standard Terms and Conditions .....	5
3. Generally Applicable Requirements .....	7
4. Facility-Specific Requirements .....	18
5. Emission Unit WWWW – Fiberglass Operations .....	21
6. Emission Unit PPPP – Fiberglass Coating Operations .....	30
7. Emission Unit MMMM – Metal Coating Operations .....	41
8. Emission Unit BLDG – Building .....	41
9. Emission Unit BOOTH – Spray Booth .....	41
10. Emission Unit COMB – Combustion Devices .....	42

## Abbreviations and Acronyms

ASTM	American Society for Testing and Materials
BMC	bulk molding compound
Btu	British thermal units
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CFR	Code of Federal Regulations
CO	Carbon monoxide
EPA	United States Environmental Protection Agency (also U.S. EPA)
FARR	Federal Air Rules for Reservations
HAP	Hazardous air pollutant
hr	Hour
kg	Kilogram
lb	Pound
MM	One million
MSDS	Material safety data sheet
MVAC	Motor vehicle air conditioner
NO <sub>x</sub>	Nitrogen oxides
OSHA	Occupational Safety and Health Administration
PM	Particulate matter
PM <sub>2.5</sub>	Particulate matter less than or equal to 2.5 microns in aerodynamic diameter
PM <sub>10</sub>	Particulate matter less than or equal to 10 microns in aerodynamic diameter
SMC	Sheet molding compound
SO <sub>2</sub>	Sulfur dioxide
SO <sub>x</sub>	Oxides of sulfur
tpy	Tons per year
TSDf	Treatment, storage and disposal facility
VOC	Volatile organic compound

# 1. Source Information

1.1 Facility description: Manufacture of custom fiberglass products.

**Table 1: Emission Units (EU) & Control Devices**

EU ID #	Emission Unit Description	Control Device
WWWW	Fiberglass Operations: activities subject to 40 CFR Part 63, Subpart WWWW. This includes open molding operations, resin mixing, cleaning of equipment used in open molding and resin mixing operations, resin storage tank, material storage (storage of resin and other materials in open or partially-open containers), repair operations on manufactured parts, and on molds and closed mold operations (resin transfer molding);	None
PPPP	Fiberglass Coating Operations: activities subject to 40 CFR Part 63, Subpart PPPP. This consists of coating of fiberglass or plastic parts and products, surface preparation, cleaning, mixing and storage.	None
MMMM	Metal Coating Operations: activities subject to 40 CFR Part 63, Subpart MMMM. This consists of coating of miscellaneous metal parts and products, surface preparation, cleaning, mixing and storage.	None
BLDG	Building: this emission unit comprises all air pollutant-emitting activities that are located inside the building. This includes, but is not limited to open molding operations, resin mixing, cleaning of equipment used in open molding and resin mixing operations, material storage (storage of resin and other materials in open or partially-open containers), repair operations on manufactured parts, closed mold operations (resin transfer molding, vacuum infusion molding), vacuum forming, application of spa foam, and support activities (grinding and sanding of manufactured parts, woodshop, painting of fiberglass, plastic and metal parts outside a spray booth, and maintenance activities). Combustion devices and activities conducted inside the spray booth are not included in this emission unit.	Inside building
BOOTH	Spray Booth: this emission unit comprises all air pollutant-emitting activities conducted inside the spray booth. Combustion devices are not included in this emission unit.	Particulate filter
COMB	Combustion devices, as listed below. All units combust only natural gas, except as noted. 1. Heater, for paint booth, 1.5 MMBtu/hr; 2. Make-up air unit, lamination area, 2.527 MMBtu/hr; 3. Make-up air unit, lamination area, 1.775 MMBtu/hr; 4. Make-up air unit, lamination, 1.5552 MMBtu/hr. 5. Make-up air unit, gelcoat area, 1.5552 MMBtu/hr; and 6. 5 space heaters, general plant, 230,000 Btu/hr each; 7. 3 space heaters, general plant, 300,000 Btu/hr each; 8. 2 space heaters, lunch room, 140,000 Btu/hr each; and 9. 2 space heaters, offices, 100,000 Btu/hr each.	None
TNK	Resin storage tank.	None
PT	Plant traffic	None

## 2. Standard Terms and Conditions

- 2.1. Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. The language of the cited regulation takes precedence over paraphrasing except the text of terms specified pursuant to any of the following sections is directly enforceable: section 304(f)(4) of the Federal Clean Air Act, 40 CFR §§ 71.6(a)(i)(3)(B and C), 71.6(a)(3)(ii), and 71.6(b), or any other term specifically identified as directly enforceable.

### Compliance with the Permit

- 2.2. The permittee must comply with all conditions of this Part 71 permit. All terms and conditions of this permit are enforceable by EPA and citizens under the Clean Air Act. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.  
[40 CFR § 71.6(a)(6)(i)]
- 2.3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.  
[40 CFR § 71.6(a)(6)(ii)]

### Permit Shield

- 2.4. Compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements specifically listed in this permit as of the date of permit issuance.  
[40 CFR § 71.6(f)(1)]
- 2.5. Nothing in this permit shall alter or affect the following:
- 2.5.1. The provisions of section 303 of the Clean Air Act (emergency orders), including the authority of EPA under that section;
  - 2.5.2. The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - 2.5.3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Clean Air Act; or
  - 2.5.4. The ability of EPA to obtain information under section 114 of the Clean Air Act.  
[40 CFR § 71.6(f)(3)]

### Other Credible Evidence

- 2.6. For the purpose of submitting compliance certifications in accordance with Conditions 3.4 and 3.5 of this permit, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.  
[section 113(a) and 113(e)(1) of the CAA, 40 CFR §§ 51.212, 52.12, 52.33, 60.11(g), and 61.12]

### Severability

- 2.7. The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.  
[40 CFR §71.6(a)(5)]

### Property Rights

- 2.8. This permit does not convey any property rights of any sort, or any exclusive privilege.  
[40 CFR §71.6(a)(6)(iv)]

## Inspection and Entry

- 2.9. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow EPA or an authorized representative to perform the following:
- 2.9.1. Enter upon the permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
  - 2.9.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
  - 2.9.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - 2.9.4. As authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

[40 CFR § 71.6(c)(2)]

## Emergency Provisions

- 2.10. In addition to any emergency or upset provision contained in any applicable requirement, the permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:
- 2.10.1. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - 2.10.2. The permitted facility was at the time being properly operated;
  - 2.10.3. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and
  - 2.10.4. The permittee submitted notice of the emergency to EPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirements of Conditions 3.55 through 3.57 of this permit, concerning prompt notification of deviations.

[40 CFR §§ 71.6(g)(2), (3) and (5)]

- 2.11. In any enforcement proceeding, the permittee attempting to establish the occurrence of an emergency has the burden of proof. [40 CFR § 71.6(g)(4)]
- 2.12. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [40 CFR § 71.6(g)(1)]

## Certification Requirement

- 2.13. Any document required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [40 CFR §§ 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

## **Permit Actions**

- 2.14. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
[40 CFR § 71.6(a)(6)(iii)]

## **Reopening for Cause**

- 2.15. The permit may be reopened by EPA and the permit revised prior to expiration under any of the circumstances described in 40 CFR § 71.7(f).  
[40 CFR § 71.7(f)]

## **Permit Expiration and Renewal**

- 2.16. This permit shall expire on the expiration date on page one of this permit or on an earlier date if the source is issued a Part 70 or Part 71 permit by a permitting authority under an EPA approved or delegated permit program.  
[40 CFR § 71.6(a)(11)]
- 2.17. Expiration of this permit terminates the permittee's right to operate unless a timely and complete permit renewal application has been submitted at least six months, but not more than 18 months, prior to the date of expiration of this permit.  
[40 CFR §§ 71.5(a)(1)(iii), 71.7.b and 71.7.c.1.ii]
- 2.18. If the permittee submits a timely and complete permit application for renewal, consistent with 40 CFR § 71.5(a)(2), but EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR § 71.6(f) shall remain in effect until the renewal permit has been issued or denied. This permit shield shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by EPA any additional information identified as being needed to process the application.  
[40 CFR §§ 71.7(c)(3) and 71.7(b)]
- 2.19. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected State, and tribal review.  
[40 CFR § 71.7(c)(1)]
- 2.20. The application to EPA for renewal shall include the current permit number, a description of permit revisions and off-permit changes that occurred during the permit term and were not incorporated into the permit during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.  
[40 CFR §§ 71.5(a)(2) and 71.5(c)(5)]

# **3. Generally Applicable Requirements**

## **Duty to Provide and Supplement Information**

- 3.1. The permittee shall furnish to EPA, within a reasonable time, any information that EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B.  
[40 CFR §§ 71.6(a)(6)(v) and 71.5(a)(3)]
- 3.2. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information.  
[40 CFR § 71.5(b)]

- 3.3. Unless otherwise specified in this permit, any documents required to be submitted under this permit, including reports, test data, monitoring data, notifications, compliance certifications, fee calculation worksheets, and applications for renewals and permit modifications shall be submitted to:

Part 71 Air Quality Permits  
U.S. EPA - Region 10, AWT-107  
1200 Sixth Avenue  
Seattle, WA 98101

[40 CFR §§ 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

### **Annual Compliance Certification**

- 3.4. The permittee shall submit to EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by February 28 of each year and covering the previous calendar year except that the first certification shall cover the period from the effective date of this permit through December 31. The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with Condition 2.13 of this permit. [40 CFR § 71.6(c)(5)]

- 3.5. The certification shall include the following:

- 3.5.1. The identification of each permit term or condition that is the basis of the certification;
- 3.5.2. The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information; and
- 3.5.3. The status of compliance with each term and condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred.

[40 CFR § 71.6(c)(5)(iii)]

### **Compliance Schedule**

- 3.6. For applicable requirements with which the source is in compliance, the permittee will continue to comply with such requirements. [40 CFR §§ 71.6(c)(3) and 71.5(c)(8)(iii)(A)]
- 3.7. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. [40 CFR §§ 71.6(c)(3) and 71.5(c)(8)(iii)(B)]

### **Off Permit Changes**

- 3.8. The permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met:
- 3.8.1. Each change is not addressed or prohibited by this permit;
- 3.8.2. Each change shall meet all applicable requirements and shall not violate any existing permit term or condition;
- 3.8.3. Changes under this provision may not include changes subject to any requirement of 40 CFR Parts 72 through 78 or modifications under any provision of Title I of the Clean Air Act;



- 3.8.4. The permittee shall provide contemporaneous written notice to EPA of each change, except for changes that qualify as insignificant activities under 40 CFR § 71.5(c)(11). The written notice shall describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;
- 3.8.5. The permit shield does not apply to changes made under this provision; and
- 3.8.6. The permittee shall keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes.

[40 CFR §71.6(a)(12)]

### **Emissions Trading and Operational Flexibility**

- 3.9. The permittee is allowed to make a limited class of changes under section 502(b)(10) of the Clean Air Act within this permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions) and are not Title I modifications. This class of changes does not include:

- 3.9.1. Changes that would violate applicable requirements; or
- 3.9.2. Changes that would contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[40 CFR § 71.6(a)(13)(i)]

- 3.10. The permittee is required to send a notice to EPA at least 7 days in advance of any change made under this provision. The notice must describe the change, when it will occur and any change in emissions, and identify any permit terms or conditions made inapplicable as a result of the change. The permittee shall attach each notice to its copy this permit.

[40 CFR § 71.6(a)(13)(i)(A)]

- 3.11. Any permit shield provided under 40 CFR § 71.6(f) and Conditions 2.4 and 2.5 of this permit does not apply to changes made under this provision.

[40 CFR § 71.6(a)(13)(i)(B)]

- 3.12. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

[40 CFR § 71.6(a)(8)]

### **Payment of Fees**

- 3.13. No later than December 31 of each year, the permittee shall submit the following to EPA:

- 3.13.1. Full payment of the annual permit fee, as specified in Conditions 3.14 through 3.23;
- 3.13.2. An updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid), as specified in Conditions 3.16 through 3.20; and
- 3.13.3. An annual emissions report of actual emissions, as specified in Condition 3.18, for the preceding calendar year.

[40 CFR §§ 71.9(a) and 71.9(h)]

- 3.14. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.

[40 CFR § 71.9(k)(1)]

- 3.15. The permittee shall send fee payment and a completed fee filing form to:  
U.S.EPA – Region X Mellon Client Service Center  
P. O. Box 360903M  
500 Ross Street  
Pittsburgh, PA 15251-6903  
[40 CFR § 71.9(k)(2)]
- 3.16. The permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid), submitted annually by the date specified in Condition 3.13, to the address listed in Condition 3.3 of this permit. [40 CFR § 71.9(h)(1)]
- 3.17. The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all “regulated pollutants (for fee calculation),” emitted from the source by the presumptive emission fee (in dollars/ton) in effect at the time of calculation. The presumptive emission fee is revised each calendar year and is available from EPA prior to the start of each calendar year. [40 CFR § 71.9(c)(1)]
- 3.17.1. “Actual emissions” means the actual rate of emissions in tpy of any “regulated pollutant (for fee calculation),” as defined in 40 CFR § 71.2, emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit’s actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. [40 CFR § 71.9(c)(6)]
- 3.17.2. Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data. [40 CFR § 71.9(h)(3)]
- 3.17.3. If actual emissions cannot be determined using the compliance methods in the permit, the permittee shall use other federally recognized procedures. [40 CFR § 71.9(e)(2)]
- 3.17.4. The permittee shall exclude the following emissions from the calculation of fees:
- 3.17.4.1. The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tons per year; [40 CFR § 71.9(c)(5)(i)]
- 3.17.4.2. Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and [40 CFR § 71.9(c)(5)(ii)]
- 3.17.4.3. The insignificant quantities of actual emissions not required to be listed or calculated in a permit application pursuant to 40 CFR 71.5(c)(11). [40 CFR § 71.9(c)(5)(iii)]
- 3.18. The permittee shall submit an annual emissions report of its actual emissions for the preceding calendar year. The annual emissions report shall be certified by a responsible official and shall be submitted each year to EPA by the date specified in Condition 3.13. The annual emissions report shall be submitted to EPA at the address listed in Condition 3.3 of this permit.<sup>1</sup> [40 CFR §§ 71.9(h)(1) and (2)]
- 3.19. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official in accordance with Condition 2.13 of this permit. [40 CFR § 71.9(h)(2)]
- 3.20. The permittee shall retain in accordance with the provisions of Conditions 3.52 and 3.53 of this permit, all work sheets and other materials used to determine fee payments. Records shall be retained for five years following the year in which the emissions data is submitted. [40 CFR § 71.9(i)]
- 3.21. Failure of the permittee to pay fees in a timely manner shall subject the permittee to assessment of penalties and interest in accordance with 40 CFR § 71.9(l). [40 CFR § 71.9(l)]
- 3.22. The permittee, when notified by EPA of additional amounts due, shall remit full payment within 30 days of receipt of an invoice from EPA. [40 CFR § 71.9(j)(2)]

---

<sup>1</sup>The permittee should note that an annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR § 71.9(h), has been incorporated into the fee calculation worksheet.

- 3.23. If the permittee thinks an EPA assessed fee is in error and wishes to challenge such fee, the permittee shall provide a written explanation of the alleged error to EPA along with full payment of the EPA assessed fee. [40 CFR § 71.9(j)(3)]

#### **FARR Reporting of Emissions.**

- 3.24. The permittee shall submit an annual registration report that consists of estimates of the total actual emissions from the air pollution source for the following air pollutants: PM, PM10, PM2.5, SO<sub>x</sub>, NO<sub>x</sub>, CO, VOC, lead and lead compounds, ammonia, fluorides (gaseous and particulate), sulfuric acid mist, hydrogen sulfide, total reduced sulfur (TRS), and reduced sulfur compounds, including all calculations for the estimates. Emissions shall be calculated using the actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. [40 CFR §§ 49.138(e)(3)(xii), (e)(4) and (f)]
- 3.25. The emission estimates required by Condition 3.24 shall be based upon actual test data or, in the absence of such data, upon procedures acceptable to the Regional Administrator. Any emission estimates submitted to the Regional Administrator shall be verifiable using currently accepted engineering criteria. The following procedures are generally acceptable for estimating emissions from air pollution sources:
- 3.25.1. Source-specific emission tests;
  - 3.25.2. Mass balance calculations;
  - 3.25.3. Published, verifiable emission factors that are applicable to the source;
  - 3.25.4. Other engineering calculations; or
  - 3.25.5. Other procedures to estimate emissions specifically approved by the Regional Administrator.
- [40 CFR §§ 49.138(e)(4) and (f)]
- 3.26. The annual registration report shall be submitted with the annual emission report and fee calculation worksheet required by Conditions 3.18 and 3.16 of this permit. The permittee may submit a single combined report provided that the combined report clearly identifies which emissions are the basis for the annual registration report, the part 71 annual emission report, and the part 71 fee calculation worksheet.
- 3.26.1. The first annual registration report shall be submitted in 2007, for calendar year 2006.
  - 3.26.2. All registration information and reports shall be submitted on forms provided by the Regional Administrator.
- [40 CFR §§ 49.138(d) and (f)]

#### **Open Burning**

- 3.27. Except as exempted in 40 CFR § 49.131(c), the permittee shall not openly burn, or allow the open burning of, the following materials:
- 3.27.1. Garbage;
  - 3.27.2. Dead animals or parts of dead animals;
  - 3.27.3. Junked motor vehicles or any materials resulting from a salvage operation;
  - 3.27.4. Tires or rubber materials or products;
  - 3.27.5. Plastics, plastic products, or styrofoam;
  - 3.27.6. Asphalt or composition roofing, or any other asphaltic material or product;
  - 3.27.7. Tar, tarpaper, petroleum products, or paints;
  - 3.27.8. Paper, paper products, or cardboard other than what is necessary to start a fire or that is generated at single-family residences or residential buildings with four or fewer dwelling units and is burned at the residential site;
  - 3.27.9. Lumber or timbers treated with preservatives;
  - 3.27.10. Construction debris or demolition waste;
  - 3.27.11. Pesticides, herbicides, fertilizers, or other chemicals;

- 3.27.12. Insulated wire;
- 3.27.13. Batteries;
- 3.27.14. Light bulbs;
- 3.27.15. Materials containing mercury (e.g., thermometers);
- 3.27.16. Asbestos or asbestos-containing materials;
- 3.27.17. Pathogenic wastes;
- 3.27.18. Hazardous wastes; or
- 3.27.19. Any material other than natural vegetation that normally emits dense smoke or noxious fumes when burned.

[40 CFR §§ 49.131(c) and (d)(1)]

3.28. Open burning shall be conducted as follows:

- 3.28.1. All materials to be openly burned shall be kept as dry as possible through the use of a cover or dry storage;
- 3.28.2. Before igniting a burn, noncombustibles shall be separated from the materials to be openly burned to the greatest extent practicable;
- 3.28.3. Natural or artificially induced draft shall be present, including the use of blowers or air curtain incinerators where practicable;
- 3.28.4. To the greatest extent practicable, materials to be openly burned shall be separated from the grass or peat layer; and
- 3.28.5. A fire shall not be allowed to smolder.

[40 CFR § 49.131(e)(1)]

3.29. Except for exempted fires set for cultural or traditional purposes, a person shall not initiate any open burning when:

- 3.29.1. The Regional Administrator has declared a burn ban; or
- 3.29.2. An air stagnation advisory has been issued or an air pollution alert, warning, or emergency has been declared by the Regional Administrator.

[40 CFR §§ 49.131(d)(2), (d)(3) and (e)(2), and 49.137(c)(4)(i)]

3.30. Except for exempted fires set for cultural or traditional purposes, any person conducting open burning when such an advisory is issued or declaration is made shall either immediately extinguish the fire, or immediately withhold additional material such that the fire burns down.

[40 CFR §§ 49.131(e)(3) and 49.137(c)(4)(ii)]

3.31. Nothing in this section exempts or excuses any person from complying with applicable laws and ordinances of local fire departments and other governmental jurisdictions. [40 CFR § 49.131(d)(4)]

3.32. For each open burn, the permittee shall document the following:

- 3.32.1. The date that burning was initiated;
- 3.32.2. The duration of the burn;
- 3.32.3. The measures taken to comply with each provision of Condition 3.28; and
- 3.32.4. The measures taken to ensure that materials prohibited in Condition 3.27 were not burned.

[40 CFR § 71.6(a)(3)(B)]

### **Limits on Visible Emissions.**

3.33. Except as provided for in Conditions 3.34 and 3.35, the visible emissions from any air pollution source that emits, or could emit, particulate matter or other visible air pollutants shall not exceed 20% opacity, averaged over any consecutive six-minute period.

- 3.33.1. Compliance with the opacity limits in Condition 3.33 is determined using EPA Reference Method 9 (see 40 CFR part 60, Appendix A).

[40 CFR §§ 49.124(c), (d) and (e)(1)]

- 3.34. The requirements of Condition 3.33 do not apply to open burning, agricultural activities, forestry and silvicultural activities, non-commercial smoke houses, sweat houses or lodges, smudge pots, furnaces and boilers used exclusively to heat residential buildings with four or fewer dwelling units, or emissions from fuel combustion in mobile sources. [40 CFR § 49.124(c)]
- 3.35. The visible emissions from an air pollution source may exceed the 20% opacity limit if the owner or operator of the air pollution source demonstrates to the Regional Administrator's satisfaction that the presence of uncombined water, such as steam, is the only reason for the failure of an air pollution source to meet the 20% opacity limit. [40 CFR § 49.124(d)(2)]

#### **Limits on Fugitive Emissions of Particulate Matter**

- 3.36. Except as provided for in Condition 3.41, the permittee shall take all reasonable precautions to prevent fugitive particulate matter emissions and shall maintain and operate all pollutant-emitting activities to minimize fugitive particulate matter emissions. Reasonable precautions include, but are not limited to the following:
- 3.36.1. Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, grading of roads, or clearing of land;
  - 3.36.2. Application of asphalt, oil (but not used oil), water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces that can create airborne dust;
  - 3.36.3. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals is not sufficient or appropriate to prevent particulate matter from becoming airborne;
  - 3.36.4. Implementation of good housekeeping practices to avoid or minimize the accumulation of dusty materials that have the potential to become airborne, and the prompt cleanup of spilled or accumulated materials;
  - 3.36.5. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
  - 3.36.6. Adequate containment during sandblasting or other similar operations;
  - 3.36.7. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
  - 3.36.8. The prompt removal from paved streets of earth or other material that does or may become airborne.
- [40 CFR §§ 49.126(d)(1) and (2)]
- 3.37. Once each calendar year, during typical operating conditions and meteorological conditions conducive to producing fugitive dust, the permittee shall survey the facility to determine the sources of fugitive particulate matter emissions. For new sources or new operations, a survey shall be conducted within 30 days after commencing operation.
- 3.37.1. The permittee shall record the results of the survey, including the date and time of the survey and identification of any sources of fugitive particulate matter emissions found; and
  - 3.37.2. If sources of fugitive particulate matter emissions are present, the permittee shall determine the reasonable precautions that will be taken to prevent fugitive particulate matter emissions.
- [40 CFR §§ 49.126(e)(1)(i) and (ii)]
- 3.38. The permittee shall prepare, and update as necessary following each survey, a written plan that specifies the reasonable precautions that will be taken and the procedures to be followed to prevent fugitive particulate matter emissions, including appropriate monitoring and recordkeeping.
- 3.38.1. For construction or demolition activities, a written plan shall be prepared prior to commencing construction or demolition.
- [40 CFR §§ 49.126(e)(1)(iii) and (iv)]

- 3.39. The permittee shall implement the written plan, and maintain and operate all sources to minimize fugitive particulate matter emissions. [40 CFR §§ 49.126(e)(1)(iii) and (iv)]
- 3.40. Efforts to comply with this section cannot be used as a reason for not complying with other applicable laws and ordinances. [40 CFR § 49.126(e)(3)]
- 3.41. The requirements of Conditions 3.36 – 3.40 do not apply to open burning, agricultural activities, forestry and silvicultural activities, sweat houses or lodges, non-commercial smoke houses, or activities associated with single-family residences or residential buildings with four or fewer dwelling units. [40 CFR § 49.126(c)]

### General Testing Requirements

- 3.42. In addition to the specific testing requirements contained in the emission unit sections of this permit, the permittee shall comply with the generally applicable testing requirements in Conditions 3.43 through 3.51 whenever conducting a performance test required by this permit unless specifically stated otherwise in this permit. [40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]
- 3.43. The permittee shall provide EPA at least 30 days prior notice of any performance test, except as otherwise specified in this permit, to afford EPA the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay in conducting the scheduled performance test, the permittee shall notify EPA as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with EPA by mutual agreement. [40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]
- 3.44. The permittee shall submit to EPA a source test plan 30 days prior to any required testing. The source test plan shall include and address the following elements:
  - 3.44.1. Purpose and scope of testing;
  - 3.44.2. Source description, including a description of the operating scenarios and mode of operation during testing and including fuel sampling and analysis procedures;
  - 3.44.3. Schedule/dates of testing;
  - 3.44.4. Process data to be collected during the test and reported with the results, including source-specific data identified in the emission unit sections of this permit;
  - 3.44.5. Sampling and analysis procedures, specifically requesting approval for any proposed alternatives to the reference test methods, and addressing minimum test length (e.g., one hour, 8 hours, 24 hours, etc.) and minimum sample volume;
  - 3.44.6. Sampling location description and compliance with the reference test methods;
  - 3.44.7. Analysis procedures and laboratory identification;
  - 3.44.8. Quality assurance plan;
  - 3.44.9. Calibration procedures and frequency;
  - 3.44.10. Sample recovery and field documentation;
  - 3.44.11. Chain of custody procedures;
  - 3.44.12. QA/QC project flow chart;
  - 3.44.13. Data processing and reporting;
  - 3.44.14. Description of data handling and QC procedures; and
  - 3.44.15. Report content and timing.

[40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]
- 3.45. Unless EPA determines in writing that other operating conditions are representative of normal operations or unless specified in the emission unit sections of this permit, the source shall be operated at a capacity of at least 90% but no more than 100% of maximum during all tests. [40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]
- 3.46. Only regular operating staff may adjust the processes or emission control devices during or within 2 hours prior to the start of a source test. Any operating adjustments made during a source test, that are a

result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid. [40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]

- 3.47. For the duration of each test run (unless otherwise specified), the permittee shall record the following information:
- 3.47.1. All data which is required to be monitored during the test in the emission unit sections of this permit; and
  - 3.47.2. All continuous monitoring system data which is required to be routinely monitored in the emission unit sections of this permit for the emission unit being tested. [40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]
- 3.48. Each source test shall follow the reference test methods specified by this permit and consist of at least three (3) valid test runs.
- 3.48.1. If the reference test method yields measured pollutant concentration values at an oxygen concentration other than specified in the emission standard, the permittee shall correct the measured pollutant concentration to the oxygen concentration specified in the emission standard by using the following equation:  
$$PC_X = PC_m \times \frac{(21-X)}{(21-Y)}$$

Where:  
PC<sub>X</sub> = Pollutant concentration at X percent;  
PC<sub>m</sub> = Pollutant concentration as measured;  
X = The oxygen concentration specified in the standard; and  
Y = The measured average volumetric oxygen concentration. [40 CFR § 71.6(a)(3)(i)(B)]
- 3.49. Facilities for performing and observing the emission testing shall be provided that meet the requirements of 40 CFR 60.8(e) and Reference Method 1 (40 CFR Part 60, Appendix A). [40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]
- 3.50. Emission test reports shall be submitted to EPA within 45 days of completing any emission test required by this permit along with items required to be recorded in Condition 3.47 above. [40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]
- 3.51. Source test emission data shall be reported as the arithmetic average of all valid test runs and in the terms of any applicable emission limit, unless otherwise specified in the emission unit sections of this permit. [40 CFR §§ 71.6(a)(3) and 71.6(c)(1)]

### General Recordkeeping Requirements

- 3.52. In addition to the specific recordkeeping requirements contained in the emission unit sections of this permit, the permittee shall comply with the following generally applicable recordkeeping requirements:
- 3.52.1. The permittee shall keep records of required monitoring information that include the following:
    - 3.52.1.1. The date, place, and time of sampling or measurements;
    - 3.52.1.2. The date(s) analyses were performed;
    - 3.52.1.3. The company or entity that performed the analyses;
    - 3.52.1.4. The analytical techniques or methods used;
    - 3.52.1.5. The results of such analyses; and,
    - 3.52.1.6. The operating conditions as existing at the time of sampling or measurement. [40 CFR § 71.6(a)(3)(ii)(A)]

- 3.53. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.  
[40 CFR §§ 71.6(a)(3)(ii)(B), 49.126(e)(1)(v) and 49.130(f)(2)]

### General Reporting Requirements

- 3.54. The permittee shall submit to EPA reports of any required monitoring for each six month reporting period from July 1 to December 31 and from January 1 to June 30, except that the first reporting period shall begin on the effective date of this permit and end on either June 30 or December 31, whichever occurs first. All reports shall be submitted to EPA and shall be postmarked by the 30th day following the end of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Condition 2.13.  
[40 CFR § 71.6(a)(3)(iii)(A)]
- 3.55. The permittee shall promptly report to EPA, by telephone or facsimile, deviations from permit conditions, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. The report shall be made using the following numbers:  
Telephone: (206) 553-4273  
Facsimile: (206) 553-0110  
Attn: Part 71 Deviation Report  
[40 CFR § 71.6(a)(3)(iii)(B)]
- 3.56. For the purposes of Conditions 3.54 through 3.58 of the permit, prompt is defined as follow:
- 3.56.1. Any definition of prompt or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.
- 3.56.2. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
- 3.56.2.1. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence;
- 3.56.2.2. For emissions of any regulated pollutant excluding those listed in Condition 3.56.2.1 above, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours of the occurrence; or
- 3.56.2.3. For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report required in Condition 3.54.  
[40 CFR § 71.6(a)(3)(iii)(B)]
- 3.57. Within 10 working days of the occurrence of a deviation as provided in Condition 3.56.2.1 or 3.56.2.2 above, the permittee shall also submit a written notice, which shall include a narrative description of the deviation and updated information as listed in Condition 3.55, to EPA, certified consistent with Condition 2.13 of this permit.  
[40 CFR §§ 71.6(a)(3)(i)(B) and (iii)(B)]
- 3.58. For the purposes of Conditions 3.54 through 3.58, deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or record keeping required by this permit. For a situation lasting more than 24 hours, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:
- 3.58.1. A situation where emissions exceed an emission limitation or standard;
- 3.58.2. A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met;



- 3.58.3. A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit (including indicators of compliance revealed through parameter monitoring);
  - 3.58.4. A situation in which any testing, monitoring, recordkeeping or reporting required by this permit is not performed or not performed as required;
  - 3.58.5. A situation in which an exceedance or an excursion, as defined in 40 CFR Part 64, occurs; and
  - 3.58.6. Failure to comply with a permit term that requires submittal of a report.
- [40 CFR § 71.6(a)(3)(iii)(C)]

### **Other Limits and Work Practice Requirements**

- 3.59. Chemical Accident Prevention Program. The permittee shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68 no later than the latest of the following dates:
  - 3.59.1. Three years after the date on which a regulated substance, present above the threshold quantity in a process, is first listed under 40 CFR § 68.130; or
  - 3.59.2. The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR § 68.10]
- 3.60. Stratospheric Ozone and Climate Protection. Except as provided for motor vehicle air conditioners (MVACs) in 40 CFR Part 82, Subpart B, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
  - 3.60.1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR § 82.156.
  - 3.60.2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR § 82.158.
  - 3.60.3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR § 82.161.
  - 3.60.4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR § 82.166. ("MVAC-like appliance" is defined at 40 CFR § 82.152.)
  - 3.60.5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR § 82.156.
  - 3.60.6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR § 82.166.

[40 CFR Part 82, Subpart F]
- 3.61. Stratospheric Ozone and Climate Protection – Motor Vehicles. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the permittee must comply with all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
 

[40 CFR Part 82, Subpart B]
- 3.62. Asbestos Removal and Disposal. The permittee shall comply with 40 CFR Part 61, Subpart M when conducting any renovation or demolition at the facility.
 

[40 CFR Part 61, Subpart M]

## 4. Facility-Specific Requirements

### Limits on Sulfur in Fuels

- 4.1. Except for gasoline and diesel fuel, such as automotive and marine diesel fuel regulated under 40 CFR part 80, the permittee shall not sell, distribute, use, or make available for use any fuel oil, coal, solid fuel, liquid fuel, or gaseous fuel that contains more than the following amounts of sulfur:
- 4.1.1. For distillate fuel oil, 0.3 percent by weight for ASTM Grade 1 fuel oil;
  - 4.1.2. For distillate fuel oil, 0.5 percent by weight for ASTM Grade 2 fuel oil;
  - 4.1.3. For residual fuel oil, 1.75 percent sulfur by weight for ASTM Grades 4, 5, or 6 fuel oil;
  - 4.1.4. For used oil, 2.0 percent sulfur by weight;
  - 4.1.5. For any liquid fuel not listed in Conditions 4.1.1 through 4.1.4, 2.0 percent sulfur by weight;
  - 4.1.6. For coal, 1.0 percent sulfur by weight;
  - 4.1.7. For solid fuels, 2.0 percent sulfur by weight;
  - 4.1.8. For gaseous fuels, 1.1 grams of sulfur per dry standard cubic meter of gaseous fuel (400 parts per million at standard conditions).
- [40 CFR §§ 49.130(c) and (d)]
- 4.2. Compliance with the fuel-sulfur limits in Condition 4.1 are determined as follow:
- 4.2.1. Sulfur content in fuel oil or liquid fuels: ASTM methods D2880-03, D4294-03, and D6021-96(Reapproved 2001);
  - 4.2.2. Sulfur content in coal: ASTM methods D3177-02, D4239-04a, and D2492-02;
  - 4.2.3. Sulfur content in solid fuels: ASTM method E775-87(Reapproved 2004);
  - 4.2.4. Sulfur content in gaseous fuels: ASTM methods D1072-90(Reapproved 1999), D3246-96, D4084-94(Reapproved 1999), D5504-01, D4468-85(Reapproved 2000), D2622-03, and D6228-98(Reapproved 2003).
- [40 CFR § 49.130(e)]
- 4.3. For each fuel oil or liquid fuel, the permittee shall either:
- 4.3.1. Obtain, record, and keep records of the percent sulfur by weight from the vendor for each purchase of fuel; or
  - 4.3.2. If the vendor is unable to provide this information, obtain a representative grab sample for each purchase and test the sample using the reference method.
- [40 CFR § 49.130(f)(1)(i)]
- 4.4. For each gaseous fuel, the permittee shall conduct the following, as appropriate:
- 4.4.1. Obtain, record, and keep records of the sulfur content from the vendor for each delivery of gaseous fuel;
  - 4.4.2. Continuously monitor the sulfur content of the fuel gas line using a method that meets the requirements of Performance Specification 5, 7, 9, or 15 (as applicable for the sulfur compounds in the gaseous fuel) of appendix B and appendix F of 40 CFR part 60; or
  - 4.4.3. If only purchased natural gas is used, keep records showing that the gaseous fuel meets the definition of natural gas in 40 CFR 72.2.
- [40 CFR §§ 49.130(f)(1)(ii) and 71.6(a)(3)(i)(B)]
- 4.5. For each coal or solid fuel, the permittee shall conduct one of the following as appropriate:
- 4.5.1. Obtain, record, and keep records of the percent sulfur by weight from the vendor for each purchase of coal or solid fuel;
  - 4.5.2. Obtain a representative grab sample for each day of operation and test the sample using the reference method;
  - 4.5.3. If only wood is used, then keep records showing that only wood was used; or

- 4.5.4. The owner or operator of a coal- or solid fuel-fired source may apply to the Regional Administrator for a waiver of this provision or for approval of an alternative fuel sampling program.

[40 CFR § 49.130(f)(1)(iii)]

### **Plant Walkthrough**

- 4.6. Once each calendar quarter, the permittee shall visually survey each building stack, spray booth stack, combustion unit stack and any other pollutant emitting activity for the presence of visible emissions or fugitive emissions of particulate matter.
- 4.6.1. The observer conducting the visual survey must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting and wind, and the presence of uncombined water on the visibility of emissions (see 40 CFR part 60 appendix A, Method 22);
- 4.6.2. For the surveys, the observer shall select a position that enables a clear view of the emission point to be surveyed, that is at least 15 feet from the emission point, and where the sunlight is not shining directly in the observer's eyes.
- 4.6.3. The observer shall observe emissions from each potential emission point for at least 15 seconds.
- 4.6.4. Any visible emissions or fugitive emissions of particulate matter other than uncombined water shall be recorded as a positive reading associated with the emission unit or pollutant emitting activity;
- 4.6.5. Surveys shall be conducted while the facility is operating, and during daylight hours.  
[40 CFR § 71.6(a)(3)(i)(B)]
- 4.7. If the observation conducted under Condition 4.6 identifies any visible emissions or fugitive emissions of particulate matter, the permittee shall:
- 4.7.1. Immediately upon conclusion of the visual observation in Condition 4.6, investigate the source and reason for the presence of visible emissions or fugitive emissions; and
- 4.7.2. As soon as practicable, take appropriate corrective action.  
[40 CFR § 71.6(a)(3)(i)(B)]
- 4.8. If the corrective actions undertaken pursuant to Condition 4.7.2 do not eliminate the visible or fugitive emissions, the permittee shall within 24 hours of the initial survey conduct a visible emissions observation of the emission point in question, for thirty minutes, using the procedures specified in Condition 3.33.1.  
[40 CFR § 71.6(a)(3)(i)(B)]
- 4.9. If any of the visible emissions observations required in Condition 4.8 or 4.10 indicate visible emissions greater than 20% opacity, the permittee shall conduct daily visible emissions observations, for thirty minutes, of the emission point in question until two consecutive daily observations indicate visible emissions of 20% opacity or less.  
[40 CFR § 71.6(a)(3)(i)(B)]
- 4.10. If the Method 9 visible emissions observation required in Condition 4.8, or if two consecutive daily observations required by Condition 4.9, indicate visible emissions of 20% opacity or less, the permittee shall conduct weekly visible emissions observations of the emission point for three additional weeks.  
[40 CFR § 71.6(a)(3)(i)(B)]
- 4.11. The permittee shall maintain records of the following:
- 4.11.1. Details of each visual survey or visible emissions observation, including date, time, observer and results for each emission unit and any other pollutant emitting activity;
- 4.11.2. Date, time and type of any investigation conducted pursuant to Condition 4.7.1;
- 4.11.3. Findings of the investigation, including the reasons for the presence of visible emissions or fugitive emissions of particulate matter;

- 4.11.4. Date, time and type of corrective actions taken pursuant to Condition 4.7.2;
- 4.11.5. Results of any Method 9 visible emissions observations conducted on the source of visible or fugitive emissions, and pursuant to Conditions 4.8 through 4.10. [40 CFR § 71.6(a)(3)(i)(B)]

4.12. Any observation of visible emissions in excess of Condition 3.33 is a deviation and subject to the provisions of Conditions 3.55 through 3.58. [40 CFR § 71.6(a)(3)(i)(B)]

4.13. For the purposes of Conditions 4.6 through 4.12, the meaning of “stack” shall be as defined in 40 CFR § 49.123. [40 CFR § 49.123]

#### **Facility-Wide VOC Emission Limit**

4.14. At such time as this source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in Condition 4.15, then the requirements of 40 CFR 52.21(j) through (s) shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Non Title V Operating Permit R10NT500100]

4.15. Volatile organic compound (VOC) emissions from this facility shall not exceed 249 tons per year as determined on a rolling, 12-month basis, which shall be determined by calculating the emissions (tons) for each month and adding the emissions (tons) for the previous eleven months. Monthly VOC emissions (tons) shall be determined by multiplying appropriate emission factors (lb/unit) by the recorded monthly operating rates (units/month) and dividing by 2000 (lb/ton). For emission sources, such as tanks, that rely on computer programs to calculate emissions, monthly VOC emissions can be determined by use of the computer program. [Non Title V Operating Permit R10NT500100]

4.16. Each month, the permittee shall calculate and record facility-wide monthly and rolling 12-month total emissions (tons) for all emission units that emit VOC. [Non Title V Operating Permit R10NT500100]

4.17. The permittee shall track and record the operations and production for each emission unit that emits VOC at the facility, such that facility-wide VOC emissions can be calculated on a monthly and 12-month basis. Records shall include, but not be limited to:

- 4.17.1. Material purchase records;
- 4.17.2. Monthly gelcoat usage;
- 4.17.3. Monthly resin usage in open molding operations;
- 4.17.4. Monthly quantity of resin or gelcoat mixed;
- 4.17.5. Number of batches mixed each month;
- 4.17.6. Monthly solvent usage to clean equipment used in open molding and mixing operations;
- 4.17.7. Quantity of material stored in open or partially-open containers each month;
- 4.17.8. Monthly resin usage in repair operations;
- 4.17.9. Monthly resin usage in closed mold operations;
- 4.17.10. Monthly usage of components of spa foam;
- 4.17.11. Monthly usage of each coating or solvent used in the spray booth;
- 4.17.12. Monthly usage of each material used in support activities;
- 4.17.13. Monthly natural gas usage;
- 4.17.14. Material Safety Data Sheets;
- 4.17.15. Emission factors used;
- 4.17.16. Vapor pressure of materials stored in the tank;
- 4.17.17. Parameters used to determine emission factors; and
- 4.17.18. Any other information used to determine monthly facility emissions of VOC. [Non Title V Operating Permit R10NT500100]

- 4.18. Once each year, on or before December 31, the permittee shall, along with the annual registration required by 40 CFR § 49.138(e)(2), submit to EPA a report containing the twelve monthly rolling 12-month emissions calculations for the previous calendar year.  
[Non Title V Operating Permit R10NT500100]
- 4.19. The report required under Condition 4.18 shall contain a description of all emissions estimating methods used, including emission factors and their sources, a summary of materials usage and VOC content, assumptions made and production data.  
[Non Title V Operating Permit R10NT500100]

## 5. Emission Unit WWWW – Fiberglass Operations

### WWWW Emission Limits and Work Practice Requirements

- 5.1. Conditions 5.2 through 5.35 apply to all reinforced plastic composites production facilities, including open molding, closed molding, cleaning of equipment used in reinforced plastic composites manufacture, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.  
[40 CFR §§ 63.5785(a) and 63.5790(b)]
- 5.2. The following operations are specifically excluded from any requirements in this section of the permit:
- 5.2.1. Application of mold sealing and release agents;
  - 5.2.2. Mold stripping and cleaning;
  - 5.2.3. Repair of parts manufactured off-site, including non-routine manufacturing of parts;
  - 5.2.4. Personal activities that are not part of the manufacturing operations;
  - 5.2.5. Prepreg materials as defined in 40 CFR § 63.5935;
  - 5.2.6. Non-gel coat surface coatings;
  - 5.2.7. Application of putties, polyputties and adhesives;
  - 5.2.8. Repair or production materials that do not contain resin or gel coat;
  - 5.2.9. Research and development operations as defined in section 112(c)(7) of the CAA;
  - 5.2.10. Polymer casting; and
  - 5.2.11. Closed molding operations (except for compression/injection molding).  
[40 CFR § 63.5790(c)]
- 5.3. Production resins that must meet military specifications are allowed to meet the organic HAP limit contained in that specification if the permittee supplies to EPA the specifications certified as accurate by the military procurement officer, and those specifications must state a requirement for a specific resin HAP content. Production resins for which this exemption is used must be applied with nonatomizing resin application equipment unless the permittee can demonstrate this is infeasible.  
[40 CFR § 63.5790(d)]
- 5.4. Emissions factors are used to determine compliance with the HAP emissions limits in Condition 5.9. The permittee may use the organic HAP emissions factors calculated using the equations in Table 1 to Subpart WWWW of Subpart 63, combined with resin and gel coat use data to calculate organic HAP emissions.  
[40 CFR § 63.5796]
- 5.5. In lieu of the of the equations in Table 1 to Subpart WWWW of Subpart 63, the permittee may elect to use site-specific organic HAP emissions factors to demonstrate compliance provided the site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data.  
[40 CFR § 63.5796]
- 5.6. In order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures below, as applicable:
- 5.6.1. Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified

in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds;

5.6.2. If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of Appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee shall use the measured organic HAP content to determine compliance;

5.6.3. If the organic HAP content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may still use the provided value to determine compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee shall use the measured organic HAP content to determine compliance.

[40 CFR § 63.5797]

5.7. If the permittee wishes to use a resin or gel coat application technology (new or existing) whose emission characteristics are not represented by the equations in Table 1 to Subpart WWWW of Subpart 63, the permittee may use the procedures in Conditions 5.7.1 or 5.7.2 below to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in 40 CFR Part 63, Subpart WWWW, and to calculate facility organic HAP emissions.

5.7.1. Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in 40 CFR § 63.5850;

5.7.2. Submit a petition to the Administrator for administrative review of 40 CFR Part 63, Subpart WWWW. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites.

[40 CFR § 63.5798]

5.8. In order to calculate the facility organic HAP emissions on a tons-per-year basis, the permittee may use the procedures in either of Condition 5.8.1 or 5.8.2, below:

5.8.1. The permittee shall calculate a weighted average organic HAP emissions factor on a lbs/ton of resin or gel coat basis, based on the prior 12 months of operation. The permittee shall multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. The permittee may calculate this organic HAP emissions factor based on the equations in Table 1 to 40 CFR Part 63, Subpart WWWW, or may use any organic HAP emissions factor approved by the EPA, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data;

5.8.2. The permittee shall conduct performance testing using the test procedures in 40 CFR § 63.5850 to determine a site-specific organic HAP emissions factor in units of lbs/ton of resin and gel coat used. The test must be conducted under conditions expected to result in the highest possible organic HAP emissions. The permittee shall multiply this factor by annual resin and gel coat use to determine annual organic HAP emissions; and

5.8.3. The permittee shall perform these calculations to cover the periods in the semiannual compliance reports.

[40 CFR §§ 63.5799(b) and (c)]

- 5.9. The permittee shall meet the following organic HAP emissions limits for open molding operations, including repair operations, on a 12-month rolling average:

**Table 2: Organic HAP Emissions Limits for Open Molding Operations**

Operation Type	Use	Organic HAP Emissions Limit, lb/ton
Open-molding - corrosion-resistant and/or high strength resin (CR/HS)	Mechanical resin application	113
	Manual resin application	123
Open-molding - non-CR/HS resin	Mechanical resin application	88
	Manual resin application	87
Open-molding - tooling resin	Mechanical resin application	254
	Manual resin application	157
Open-molding - low-flame spread/low-smoke products	Mechanical resin application	497
	Manual resin application	238
Open-molding - shrinkage controlled production and tooling resins	Mechanical resin application	354
	Manual resin application	180
Open molding – gel coat <sup>1</sup>	Tooling gel coating	440
	White/off white pigmented gel coating	267
	All other pigmented gel coating	377
	CR/HS or high performance gel coating	605
	Fire retardant gel coating	854
	Clear production gel coating	522

<sup>1</sup> If gel coat is only applied with manual application, for compliance purposes, treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If multiple application methods are used and any portion of a specific gel coat is applied using nonatomized spray, the nonatomized spray gel coat equation may be used to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

[40 CFR §§ 63.5800, 63.5805(c) and (g)]

- 5.10. If the permittee elects to conduct filament-application open molding, centrifugal casting, pultrusion or continuous lamination/casting operations, the permittee shall first submit an application to modify this permit, and shall receive a modified permit prior to conducting such operations.

[40 CFR §§ 63.5800, 63.5805(c), 71.6(a)(1) and 71.7(f)(1)(iv)]

- 5.11. If the permittee determines, using the procedures in Condition 5.8, that the facility emits 100 tpy or more of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing the permittee shall notify EPA in the compliance report. In addition, the permittee shall at the same time either:

- 5.11.1. Request a one-time exemption from the requirements of 40 CFR § 63.5805(d) if the permittee can demonstrate the following:
  - 5.11.1.1. The exceedance of the 100 tpy threshold was due to circumstances that will not be repeated;
  - 5.11.1.2. The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy; and
  - 5.11.1.3. Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emissions factors calculated according to the procedures in Condition 5.8; or

5.11.2. Immediately comply with the provisions of 40 CFR § 63.5805(d) and shall within 30 days, submit a permit application to modify this permit to incorporate the additional applicable requirements as necessary.

[40 CFR §§ 63.5800, 63.5805(d) and (e), 71.6(a)(1) and 71.7(f)(1)(iv)]

5.12. If the permittee applies for the exemption in Condition 5.11 and subsequently exceeds the 100 tpy organic HAP emissions threshold over the next 12-month period, the permittee shall notify EPA in the semiannual report, the exemption is removed and the permittee shall comply with 40 CFR § 63.5805(d) within 3 years from the time facility organic HAP emissions first exceeded the threshold.

[40 CFR § 63.5805(f)]

5.13. The permittee shall comply with the following work practice standards:

5.13.1. For closed molding operations using compression/injection molding, the permittee shall uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting;

5.13.2. For cleaning operations, the permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP-containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin;

5.13.3. For HAP-containing materials storage operations, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety;

5.13.4. For all mixing operations, the permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;

5.13.5. For all mixing operations, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;

5.13.6. For all mixing operations, the permittee shall keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels; and

5.13.7. Notwithstanding Conditions 5.13.4 through 5.13.6, containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e. they are actually being used to apply resin).

[40 CFR §§ 63.5800, 63.5805(c) and (g)]

5.14. The permittee shall use one of the following methods in Conditions 5.14.1 through 5.14.4 to meet the standards for open molding in Condition 5.9. The permittee may use any control method that reduces organic HAP emissions, and may use different compliance options for the different operations listed in Condition 5.9. The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options below. When changing to an option based on a 12-month rolling average, the average must be based on the previous 12 months of data calculated using the compliance option the permittee is changing to, unless the permittee was previously using an option that did not require maintaining records of resin and gel coat use. In this case, the permittee shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.



- 5.14.1. The permittee shall:
  - 5.14.1.1. Calculate an actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, the control technique. The permittee shall calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to 40 CFR, Part 63, Subpart WWWW, or site-specific organic emission factors. The emission factor calculation should include any and all emission reduction techniques used. If vapor suppressants are being used to reduce HAP emissions, the permittee shall determine the vapor suppressant effectiveness by conducting testing according to the procedures specified in Appendix A to 40 CFR, Part 63, Subpart WWWW.
  - 5.14.1.2. Have demonstrated that this process stream complies with the emission limit in Condition 5.9 if the calculated emission factor is less than or equal to the appropriate emission limit. It is not necessary that all process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat used, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in Conditions 5.14.2 through 5.14.4, then all process streams using that individual resin or gel coat must be included in the averaging calculations.
- 5.14.2. The permittee shall demonstrate that, on average, the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type in Condition 5.9 that apply to the permittee's operations have been met by conducting the following:
  - 5.14.2.1. The permittee shall group the process streams described in Condition 5.14.1 by operation type and resin application method or gel coat type listed in Condition 5.9 and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in Condition 5.14.1.1 and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 1:

$$\begin{array}{l}
 \text{Average organic} \\
 \text{HAP Emissions} \\
 \text{Factor}
 \end{array}
 = \frac{\sum_{i=1}^n (\text{Actual Process Stream } EF_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}
 \qquad \text{Equation 1}$$

Where

- Actual Process Stream  $EF_i$  = actual organic HAP emissions factor for process stream  $i$ , lbs/ton;
- $\text{Material}_i$  = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream  $i$ , tons;
- $n$  = number of process streams where an organic HAP emissions factor was calculated.

- 5.14.2.2. The permittee may, but is not required to, include process streams where compliance has been demonstrated as described in Condition 5.14.1, subject to the limitations described in Condition 5.14.1.2.

5.14.2.3. The permittee shall compare each organic HAP emissions factor calculated in Conditions 5.14.2.1 and 5.14.2.2 with its corresponding organic HAP emissions limit in Condition 5.9. If all emissions factors are equal to or less than their corresponding emission limits, then the permittee is in compliance.

5.14.3. The permittee shall:

5.14.3.1. Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the facility for the last 12-month period to determine the organic HAP emissions limit. To do this, the permittee shall multiply the individual organic HAP emissions limits in Condition 5.9 for each operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations over the last 12 months as shown in Equation 2:

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad \text{Equation 2}$$

Where

EL<sub>i</sub> = organic HAP emissions limit for operation type i, lbs/ton from Condition 5.9;  
 Material<sub>i</sub> = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n = number of operations.

5.14.3.2. Each month calculate the weighted average organic HAP emissions factor for open molding. To do this, the permittee shall multiply actual open molding operation organic HAP emissions factors calculated in Condition 5.14.2.1 and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 3:

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation EF}_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad \text{Equation 3}$$

Where

Actual Process Stream EF<sub>i</sub> = actual organic HAP emissions factor for operation type i, lbs/ton;

Material<sub>i</sub> = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n = number of operations.

5.14.3.3. Compare the values calculated in Conditions 5.14.3.1 and 5.14.3.2. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the permittee is in compliance.

5.14.4. The permittee may meet the organic HAP emissions limit for one application method and

use the same resin(s) for all application method(s). This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

- 5.14.4.1. For any combination of manual or mechanical resin application, the permittee may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this Condition. Table 7 to 40 CFR Part 63, Subpart WWWW presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to 40 CFR Part 63, Subpart WWWW, the resin is in compliance.
- 5.14.4.2. The permittee may also use a weighted average organic HAP content for each application method described in Condition 5.14.4.1. The permittee shall calculate the weighted average organic HAP content monthly. The permittee shall use Equation 1 in Condition 5.14.2.1 except substitute organic HAP content for organic HAP emissions factor. The permittee is in compliance if the weighted average organic HAP content based on the last 12 months or resin use is less than or equal to the applicable organic HAP contents in Table 7 to 40 CFR Part 63, Subpart WWWW.
- 5.14.4.3. The permittee may simultaneously use the averaging provisions in Conditions 5.14.2 or 5.14.3 to demonstrate compliance for any operations and/or resins not included in the compliance demonstrations in Conditions 5.14.4.1 and 5.14.4.2. However, any resins for which compliance is claimed under the option in Conditions 5.14.4.1 and 5.14.4.2 may not be included in any of the averaging calculations described in Conditions 5.14.2 or 5.14.3.
- 5.14.4.4. The permittee does not have to keep records of resin use for any of the individual resins where compliance is demonstrated under the option in Condition 5.14.4.1 unless the permittee elects to include that resin in the averaging calculations described in Condition 5.14.4.2.

[40 CFR § 63.5810]

- 5.15. The permittee shall be in compliance at all times with the work practice standards in Condition 5.13, as well as the organic HAP emissions limits in Condition 5.9 or the organic HAP content limits in Table 7 to 40 CFR Part 63, Subpart WWWW, as applicable, that the permittee is meeting without the use of add-on controls. [40 CFR §§ 63.6(f)(1) and 63.5835(a)]
- 5.16. At all times, the permittee shall operate and maintain any equipment used in reinforced plastic composites production, including monitoring equipment, in a manner consistent with safety and good air pollution practices for minimizing emissions. These operations and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section of the permit. [40 CFR §§ 63.5835(c) and 63.6(e)(1)(i)]
- 5.17. The permittee shall demonstrate continuous compliance with each standard in Conditions 5.9 through 5.12 according to the methods below:
  - 5.17.1. Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit in Condition 5.9, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in Condition 5.24.2.
  - 5.17.2. Compliance with organic HAP content limits in Table 7 to 40 CFR Part 63, Subpart WWWW is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to 40 CFR Part 63, Subpart WWWW on a rolling 12-month basis, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP

content limits in Table 7 to 40 CFR Part 63, Subpart WWWW, as discussed in Condition 5.24.2.

[40 CFR § 63.5900(a)]

- 5.18. The permittee shall demonstrate compliance with the work practice standards in Condition 5.13 by performing the work practice required for the permittee's operation. [40 CFR § 63.5900(a)(4)]
- 5.19. During periods of startup, shutdown or malfunction, the permittee shall meet the organic HAP emissions limits and work practice standards that apply to the permittee. [40 CFR § 63.5900(c)]
- 5.20. The permittee shall obtain written approval in advance from EPA in accordance with the procedures in 40 CFR §§ 63.5(d) and (e) before reconstructing any reinforced plastic composites production operations. [40 CFR § 63.5(b)(3)(ii)]
- 5.21. Equipment added (or a process change) to the existing reinforced plastic composites production operations that is within the scope specified in Condition 5.1 shall be considered part of the reinforced plastic composites production operations and are subject to the provisions of this section of the permit. [40 CFR § 63.5(b)(6)]
- 5.22. At all times, the permittee shall operate and maintain any equipment used in reinforced plastic composites production operations, including monitoring equipment, in a manner consistent with safety and good air pollution practices for minimizing emissions. These operations and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section of the permit. [40 CFR § 63.6(e)(1)(i)]

#### **WWWW Monitoring and Recordkeeping Requirements**

- 5.23. For any resins for which the exemption in Condition 5.3 is used, the permittee shall keep records of the resins for which this exemption is used. [40 CFR § 63.5790(d)]
- 5.24. The permittee shall monitor and collect data as specified below:
- 5.24.1. Collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the permittee is meeting any organic HAP emissions limits based on an organic HAP emissions limit in Condition 5.9, or Table 7 to 40 CFR Part 63, Subpart WWWW if the permittee is averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on resin specifications supplied by the resin supplier.
- 5.24.2. Resin and gel coat records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in Condition 5.14.1. However, the permittee must retain the records of resin and gel coat organic HAP content, and must include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports.
- 5.24.2.1. If, after an initial demonstration that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP increases, or the application method or controls are changed, the permittee shall once again demonstrate that the individual resin or gel coat meets its emission limit as specified in Condition 5.14.1.
- 5.24.2.2. If any of the changes described in Condition 5.24.2.1 results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Condition 5.9, the permittee shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average. [40 CFR §§ 63.5895 (c) and (d)]
- 5.25. The permittee shall keep the following records:

- 5.25.1. A copy of each notification and report submitted by the permittee to comply with the requirements of Section 5 of this permit, including all documentation supporting any initial notification or notification of compliance;
- 5.25.2. All data, assumptions and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Condition 5.9 or Table 7 to 40 CFR Part 63, Subpart WWWW;
- 5.25.3. A certified statement that the permittee is in compliance with the work practice requirements of Condition 5.13.

[40 CFR §§ 63.10(b)(2)(xiv), 63.5915(a)(1), (c) and (d)]

- 5.26. The permittee shall maintain all applicable records and files of all information (including all reports and notifications) required by this section of the permit in a form suitable and readily available for expeditious inspection and review. [40 CFR §§ 63.10(b)(1) and 63.5920(a)]
- 5.27. The information specified in Conditions 5.23 through 5.26 and 5.28 through 5.35 shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained as hard copy or on a computer, or computer readable form including, but not limited to paper, microfilm, computer floppy disks, magnetic tape disks, or microfiche. [40 CFR §§ 63.10(b)(1), 63.5920(b) and (c)]
- 5.28. The permittee shall maintain relevant records for all required maintenance performed on the monitoring equipment. [40 CFR § 63.10(b)(2)(iii)]

#### **WWWW Reporting Requirements**

- 5.29. The permittee shall submit the following notifications, in writing, as specified below:
  - 5.29.1. A notification of intent to reconstruct the reinforced plastic composites production operations; and
  - 5.29.2. A notification of the actual date of startup of the reconstructed reinforced plastic composites production operations, delivered or postmarked within 15 calendar days after that date.
  - 5.29.3. If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to EPA within 15 days after the change. [40 CFR §§ 63.9(b)(4), 63.10(d)(1) and 63.5905]
- 5.30. The permittee shall submit to EPA semiannual compliance reports on the following schedule:
  - 5.30.1. Each compliance report shall cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31; and
  - 5.30.2. Each compliance report shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [40 CFR §§ 63.9(h)(3), 63.10(d)(1), 63.5910(a), (b) and (h)]
- 5.31. The compliance report must contain the following information:
  - 5.31.1. Company name and address;
  - 5.31.2. Statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report;
  - 5.31.3. Date of the report and beginning and ending dates of the reporting period;
  - 5.31.4. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) and there are no deviations from the requirements for work practice standards in Condition 5.13, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period;

- 5.31.5. For each deviation from an organic HAP emissions limitation (i.e. emissions limit and operating limit) and for each deviation from the requirements for work practice standards:
  - 5.31.5.1. The total operating time of each affected source during the reporting period; and
  - 5.31.5.2. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken;
  - 5.31.6. If multiple compliance options are available, an indication that compliance options have changed since the last compliance report  
[40 CFR §§ 63.10(d)(1), 63.5900(b), 63.5910(a), (c), (d) (h) and (i)]
- 5.32. The permittee shall report if the 100 tpy organic HAP emissions threshold has been exceeded if that exceedance would make the facility subject to the requirements of 40 CFR § 63.5805(d). The permittee shall include with this report any request for an exemption under Condition 5.11. If the permittee has received an exemption under Condition 5.11 and subsequently exceeds the 100 tpy organic HAP emissions threshold, the permittee shall report this exceedance as required in Condition 5.12.  
[40 CFR §§ 63.10(d)(1) and 63.5910(f)]
- 5.33. The permittee shall report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by Condition 3.54. If the permittee submits a compliance report pursuant to Conditions 5.30 and 5.31, along with, or as part of, the semiannual monitoring report required by Condition 3.54, and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this section of the permit, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to EPA.  
[40 CFR §§ 63.10(d)(1) and 63.5910(g)]
- 5.34. If, as part of the application for approval of construction of the reinforced plastic composites production operations, the permittee submitted estimates or preliminary information instead of the actual emissions data, the permittee shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in Condition 5.29.  
[40 CFR §§ 63.9(h)(5) and 63.10(d)(1)]
- 5.35. Any change in the information already provided under Conditions 5.29, 5.30 5.34 shall be provided to the EPA in writing within 15 calendar days after the change.  
[40 CFR §§ 63.9(j)]

## **6. Emission Unit PPPP – Fiberglass Coating Operations**

### **PPPP Emission Limits and Work Practice Requirements**

- 6.1. Conditions 6.2 through 6.26 apply to all surface coating of plastic parts and products, including the following:
  - 6.1.1. All coating operations as defined in 40 CFR § 63.4581;
  - 6.1.2. All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - 6.1.3. All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - 6.1.4. All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.  
[40 CFR §§ 63.4481(a) and (b), 63.4482(a) and (b)]
- 6.2. The requirements of this section of the permit do not apply to the operations covered under Section 5 of this permit.  
[40 CFR § 63.4481(c)(6)]
- 6.3. The permittee shall at all times limit organic hazardous air pollutant (HAP) emissions to the atmosphere

from the surface coating of plastic parts and products (as specified in Condition 6.1), to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period, as specified in Conditions 6.13 and 6.14.

[40 CFR §§ 63.6(f)(1), 63.4490(a)(1), 63.4500(a), 63.4541(d) and 63.4551(h)]

- 6.4. The permittee shall include all coatings (as defined in 40 CFR § 63.4581), thinners, and/or other additives, and cleaning materials used when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Condition 6.3. [40 CFR § 63.4491]
- 6.5. To determine whether the organic HAP emission rate is equal to or less than the emission limit in Condition 6.3, the permittee shall use at least one of the compliance options in Conditions 6.6 and 6.7. Either of the compliance options may be applied to an individual coating operation, or to multiple coating operations as a group, or to the entire surface coating of plastic parts operation. Different compliance options may be used for different coating operations, or at different times on the same coating operation. Different compliance options may be used when different coatings are applied to the same part, or when the same coating is applied to different parts. However, different compliance options may not be used at the same time on the same coating operation.  
[40 CFR §§ 63.4491, 63.4540, 63.4541, 63.4550 and 63.4551]
- 6.6. *Compliant material option.* In order to use the compliant material option, the permittee shall demonstrate that the organic HAP content of each coating used in the coating operation is less than or equal to the emission limit in Condition 6.3, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. In addition, to demonstrate compliance with the emission limit using this compliance option, the permittee must also meet all of the following requirements:
- 6.6.1. *Demonstrate initial compliance using the compliant material option.* To demonstrate initial compliance, during the initial compliance period, the permittee must use no coating with an organic HAP content that exceeds the emission limit in Condition 6.3, and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined below:
- 6.6.1.1. The permittee shall determine the mass fraction of organic HAP for each coating, thinner, and/or other additive, and cleaning material used during the compliance period by using one of the options below:
- 6.6.1.1.1. The permittee may use Method 311 (Appendix A to 40 CFR Part 63) for determining the mass fraction of organic HAP. Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. Express the mass fraction of each organic HAP as a value truncated to four places after the decimal point. Then, calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating to three places after the decimal point;
- 6.6.1.1.2. For coatings, the permittee may use Method 24 (Appendix A to 40 CFR Part 60) to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP;
- 6.6.1.1.3. The permittee may use an alternative method for determining the mass fraction of organic HAP once it has been approved by the EPA. The procedure in 40 CFR 63.7(f) must be followed to submit an alternative test method for approval;
- 6.6.1.1.4. The permittee may rely on information other than that generated by the test methods in Conditions 6.6.1.1.1 through 6.6.1.1.3, such as manufacturer's

formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. If there is a disagreement between such information and results of a test conducted according to Conditions 6.6.1.1.1 through 6.6.1.1.3, then the test method results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of EPA Region 10's Office of Compliance and Enforcement that the formulation data are correct; or

6.6.1.1.5. When test data and manufacturer's data for solvent blends are not available, the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to 40 CFR Part 63, Subpart PPPP may be used. If the tables are used, the permittee must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3. Table 4 may only be used if the solvent blends in the materials used do not match any of the solvent blends in Table 3 and the permittee knows only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 test indicate higher values than those listed on Table 3 or 4, the Method 311 results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of EPA Region 10's Office of Compliance and Enforcement that the formulation data are correct.

6.6.1.2. The permittee shall determine the mass fraction of coating solids (kg (lb) per kg (lb) of coating) for each coating used during the compliance period by using one of the options below:

- 6.6.1.2.1. For coatings, the permittee shall use Method 24 (Appendix A to 40 CFR Part 60) to determine the mass fraction of coating solids;
- 6.6.1.2.2. The permittee may use an alternative test method for determining the solids content each coating once it has been approved by the EPA. The procedure in 40 CFR 63.7(f) must be followed to submit an alternative test method for approval; or
- 6.6.1.2.3. The permittee may obtain the mass fraction of coating solids for each coating from the supplier or manufacturer. If there is a disagreement between such information and the test method results, then the test method results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of EPA Region 10's Office of Compliance and Enforcement that the formulation data are correct.

6.6.1.3. The permittee shall calculate the organic HAP content, kg(lb) organic HAP emitted per kg(lb) coating solids used, of each coating used during the compliance period using the equation below:

$$H_c = (W_c)/(S_c) \quad \text{Equation 4}$$

Where:

- H<sub>c</sub> = Organic HAP content of the coating, kg (lb) of organic HAP emitted per kg (lb) coating solids used.
- W<sub>c</sub> = Mass fraction of organic HAP in the coating, kg (lb) organic HAP per kg (lb) coating, determined according to Condition 6.6.1.1.
- S<sub>c</sub> = Mass fraction of coating solids, kg (lb) coating solids per kg (lb) coating, determined according to Condition 6.6.1.2.



6.6.2. *Demonstrate continuous compliance using the compliant material option.* For each compliance period, to demonstrate continuous compliance, the permittee shall use no coating for which the organic HAP content (determined using Equation 4 in Condition 6.6.1.3) exceeds the emission limit in Condition 6.3, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to Condition 6.6.1.1.

6.6.2.1. If the permittee chooses to comply with the emission limitation by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in Condition 6.6.2 is a deviation from the emission limitations that must be reported as specified in Conditions 6.23.6 and 6.26.6.7.

[40 CFR §§ 63.4491(a), 63.4540, 63.4541 and 63.4542]

6.7. *Emission rate without add-on controls option.* In order to use the emission rate without add-on controls option, the permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the emission limit in Condition 6.3, calculated as a rolling 12-month emission rate and determined on a monthly basis. In addition, to demonstrate compliance with the emission limit using this compliance option, the permittee must also meet all of the following requirements:

6.7.1. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements of Condition 6.6.1.1;

6.7.2. Determine the mass fraction of coating solids (kg(lb) of coating solids per kg(lb) of coating) for each coating used during each month according to the requirements in Condition 6.6.1.2;

6.7.3. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from:

6.7.3.1.1. Test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks and Related Products;"

6.7.3.1.2. Information from the supplier or manufacturer of the material; or

6.7.3.1.3. Reference sources providing density or specific gravity data for pure materials;

6.7.4. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records;

6.7.5. Calculate the mass of organic HAP emissions using Equation 5 below:

$$He = A + B + C - Rw \quad \text{Equation 5}$$

Where:

He = Total mass of organic HAP emissions during the month, kg;

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 6 in Condition 6.7.5.1;

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 7 in Condition 6.7.5.2;

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 8 in Condition 6.7.5.3;

Rw = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to Condition 6.7.5.4.

6.7.5.1. Calculate the kg organic HAP in the coatings used during the month using Equation 6:

$$A = \sum_{i=1}^m (\text{Vol}_{c,i}) (D_{c,i}) (W_{c,i}) \quad \text{Equation 6}$$

Where:

- A = Total mass of organic HAP in the coatings used during the month, kg.
- Vol<sub>c,i</sub> = Total volume of coating, i, used during the month, liters.
- D<sub>c,i</sub> = Density of coating, i, kg coating per liter coating.
- W<sub>c,i</sub> = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating.
- m = Number of different coatings used during the month.

6.7.5.2. Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 7:

$$B = \sum_{j=1}^n (\text{Vol}_{t,j}) (D_{t,j}) (W_{t,j}) \quad \text{Equation 7}$$

Where:

- B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.
- Vol<sub>t,j</sub> = Total volume of thinner and/or other additive, j, used during the month, liters.
- D<sub>t,j</sub> = Density of thinner and/or other additive, j, kg per liter.
- W<sub>t,j</sub> = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg coating.
- n = Number of different thinners and/or other additives used during the month.

6.7.5.3. Calculate the kg of organic HAP in the cleaning materials used during the month using Equation 8:

$$C = \sum_{k=1}^p (\text{Vol}_{s,k}) (D_{s,k}) (W_{s,k}) \quad \text{Equation 8}$$

Where:

- C = Total mass of organic HAP in the cleaning materials used during the month, kg.
- Vol<sub>s,k</sub> = Total volume of cleaning material, k, used during the month, liters.
- D<sub>s,k</sub> = Density of cleaning material, k, kg per liter.
- W<sub>s,k</sub> = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg coating.
- p = Number of different cleaning materials used during the month.

6.7.5.4. The permittee may account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 5 of this section of the permit. The permittee shall determine the mass as follows:

- 6.7.5.4.1. The permittee may only include waste materials in the determination that are generated by coating operations for which Equation 5 is used, and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR Part 262, 264, 265 or 266. The TSDF may be either off-site or on-

site;

- 6.7.5.4.2. The permittee may not include organic HAP contained in wastewater;
- 6.7.5.4.3. The permittee must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. The permittee shall not include in the determination any waste materials sent to a TSDF during a month if they have already been included in the amount collected and stored during that month or a previous month;
- 6.7.5.4.4. The permittee shall determine the total mass of organic HAP contained in the waste materials specified in Condition 6.7.5.4.3;
- 6.7.5.4.5. The permittee shall document the methodology used to determine the amount of waste materials and the total mass of organic HAP they contain, as required in Condition 6.16.7. If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

- 6.7.5.5. Determine the total mass of coating solids used, kg, which is the combined mass of coating solids for all the coatings used during each month, using Equation 9:

$$M_{st} = \sum_{i=1}^m (\text{Vol}_{c,i}) (D_{c,i}) (M_{s,i}) \quad \text{Equation 9}$$

Where:

$M_{st}$  = Total mass of coating solids used during the month, kg.

$\text{Vol}_{c,i}$  = Total volume of coating, i, used during the month, liters.

$D_{c,i}$  = Density of coating, i, kg per liter coating, determined according to Condition 6.7.3.

$M_{s,i}$  = Mass fraction of coating solids for coating, i, kg solids per kg coating, determined according to Condition 6.6.1.2.

$m$  = Number of coatings used during the month.

- 6.7.5.6. Calculate the organic HAP emission rate for the compliance period, kg(lb) organic HAP emitted per kg(lb) coating solids used, using Equation 10:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n M_{st}} \quad \text{Equation 10}$$

Where:

$H_{yr}$  = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per kg coating solids used.

$H_e$  = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 5 in Condition 6.7.5.

$M_{st}$  = Total mass of coating solids used during the month, y, kg as calculated by Equation 9 in Condition 6.7.5.5.

$y$  = Identifier for months.

$n$  = Number of full or partial months in the compliance period.

- 6.7.6. *Demonstrate continuous compliance using the emission rate without add-on controls.* To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to Conditions 6.7.1 through 6.7.5.6, must be less than or equal to the emission limit in Condition 6.3.

6.7.6.1. If the permittee chooses to comply with the emission limitation by using the emission rate without add-on controls option, and the organic HAP emission rate for any 12-month compliance period exceeded the emission limit in Condition 6.3, this is a deviation from the emission limitation for that compliance period and must be reported as specified in Conditions 6.23.6 and 6.26.6.8.

[40 CFR §§ 63.4491(b), 63.4550, 63.4551 and 63.4552]

6.8. At all times, the permittee shall operate and maintain any equipment used in surface coating of plastic parts and products, including monitoring equipment, in a manner consistent with safety and good air pollution practices for minimizing emissions. These operations and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section of the permit.

[40 CFR §§ 63.4500(b) and 63.6(e)(1)(i)]

6.9. The permittee may not conduct surface coating of plastic parts and products in violation of the requirements of this section of the permit.

[40 CFR § 63.4(a)(1)]

6.10. The permittee shall obtain written approval in advance from EPA in accordance with the procedures in 40 CFR §§ 63.5(d) and (e) before reconstructing any surface coating of plastic parts and products operations.

[40 CFR § 63.5(b)(3)(ii)]

6.11. Equipment added (or a process change) to the existing surface coating of plastic parts and products operations that is within the scope specified in Condition 6.1 shall be considered part of the surface coating of plastic parts and products operations and are subject to the provisions of this section of the permit.

[40 CFR § 63.5(b)(6)]

6.12. The permittee shall complete the initial compliance demonstration for the initial compliance period according to the requirements in Condition 6.6 and/or 6.7.

[40 CFR §§ 63.4540 and 63.4550]

6.13. *Initial compliance period.* The initial compliance period begins on the date of initial startup of surface coating of plastic parts and products operations and ends on the last day of the 12<sup>th</sup> month following the initial startup date. If the startup date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months.

[40 CFR §§ 63.4540 and 63.4550]

6.14. *Compliance period.* A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in Condition 6.13, is the end of a compliance period consisting of that month and the preceding 11 months.

[40 CFR §§ 63.4542(a) and 63.4552(a)]

### **PPPP Monitoring and Recordkeeping Requirements**

6.15. The permittee shall maintain a log for the surface coating of plastic parts and products. In the log, the permittee shall, at a minimum, contemporaneously record the date, time, identification of part coated, identification of coating applied, quantity of coating applied, identification of other thinners and/or additives or cleaning materials used, quantity of other thinners and/or additives or cleaning materials used, and compliance option selected.

[40 CFR §§ 63.4491 and 63.4530(c)(1)-(3)]

6.16. The permittee shall collect and keep records of the data and information listed below:

6.16.1. A copy of each notification and report submitted by the permittee to comply with the requirements of Section 6 of this permit, and the documentation supporting each notification and report;

6.16.2. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or coating solids, the permittee shall keep

a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee shall keep the summary sheet of results provided by the manufacturer or supplier.

- 6.16.3. For each compliance period, the records specified below:
  - 6.16.3.1. A record of the coating operations on which each compliance option was used, and the time periods (beginning and ending dates and times) for each option used;
  - 6.16.3.2. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 4 in Condition 6.6.1.3;
  - 6.16.3.3. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 2 through 6 of Condition 6.7.5 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition 6.7.5.4; the calculation of the total mass of coating solids used each month using Equation 9 of Condition 6.7.5.5; and the calculation of each 12-month organic HAP emission rate using Equation 10 of Condition 6.7.5.6;
- 6.16.4. A record of the name and mass of each coating, thinner, and/or other additive, and cleaning material used during each compliance period. If the compliant material option is being used for all coatings at the facility, the permittee may maintain purchase records for each material used rather than a record of the mass used;
- 6.16.5. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period;
- 6.16.6. A record of the mass fraction of coating solids for each coating used during each compliance period;
- 6.16.7. If the permittee uses an allowance in Equation 5 in Condition 6.7.5 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage and disposal facility (TSDF) according to Condition 6.7.5.4, the permittee shall keep records of the information specified below:
  - 6.16.7.1. The name and address of each TSDF to which the permittee sent materials for which an allowance in Equation 5 in Condition 6.7.5 was used, a statement of which subparts under 40 CFR 262, 264, 265, and 266 apply to the facility, and the date of each shipment;
  - 6.16.7.2. Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 5 of Condition 6.7.5; and
  - 6.16.7.3. The methodology used in accordance with Condition 6.7.5.4 to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This shall include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
- 6.16.8. Records of the date, time and duration of each deviation.

[40 CFR §§ 63.4530, 63.4541(d), 63.4542(d), 63.4551(h) and 63.4552(d)]

- 6.17. Failure to collect and keep the records specified in Condition 6.16 is a deviation from the requirements of 40 CFR Part 63, Subpart PPPP. [40 CFR § 63.4530]
- 6.18. The permittee shall maintain files of all information (including all reports and notifications) required by this section of the permit in a form suitable and readily available for expeditious inspection and review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [40 CFR §§ 63.10(b)(1), 63.4531(a), 63.4541(d), 63.4542(c), 63.4551(h) and 63.4552(d)]

- 6.19. The files specified in Conditions 6.15 through 6.21 shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche  
[40 CFR §§ 63.10(b)(1), 63.4531(b) and (c), 63.4541(d), 63.4542(d), 63.4551(h) and 63.4552(d)]
- 6.20. The permittee shall maintain all documentation supporting initial notifications and notifications of compliance status under Conditions 6.22 through 6.25. [40 CFR § 63.10(b)(2)(xiv)]
- 6.21. *Request to use alternative monitoring procedure.* If the permittee wishes to use an alternative monitoring procedure, the permittee shall submit an application to the EPA as described in 40 CFR § 63.8(f)(4)(ii). [40 CFR § 63.8(f)(4)]

### PPPP Reporting Requirements

- 6.22. *Initial notification.* No later than 120 calendar days after initial start up of the surface coating of plastic parts and products at this facility, the permittee shall notify EPA in writing of the actual date of startup of the source. [40 CFR §§ 63.9(b)(4), 63.10(d)(1) and 63.4510(a) and (b)]
- 6.23. *Notification of compliance status.* No later than 30 calendar days following the end of the initial compliance period specified in Condition 6.13, the permittee shall notify EPA of compliance status. The notification of compliance status shall contain the following information:
- 6.23.1. Company name and address;
  - 6.23.2. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
  - 6.23.3. Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period specified in Condition 6.13;
  - 6.23.4. Identification of the compliance option or options that the permittee used on each coating operation during the initial compliance period;
  - 6.23.5. Statement of whether or not the surface coating of plastic parts and products achieved the emission limitations for the initial compliance period;
  - 6.23.6. If a deviation occurred, include:
    - 6.23.6.1. A description and statement of the cause of the deviation; and
    - 6.23.6.2. If the permittee failed to meet the emission limit, all calculations used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used.
  - 6.23.7. The following data items. For each data item, include an example of how the value was determined including calculations and supporting data.
    - 6.23.7.1. Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material;
    - 6.23.7.2. Mass fraction of coating solids for one coating;
    - 6.23.7.3. Density for one coating, one thinner and/or other additive, and one cleaning material, except that if the compliant material option is being used, only the example coating density is required;
    - 6.23.7.4. The amount of waste materials and the mass of organic HAP contained in the waste materials for which an allowance is claimed in Condition 6.7.5;
    - 6.23.7.5. For the compliant material option, the calculation of kg (lb) organic HAP emitted per kg (lb) coating solids, with an example calculation of the organic HAP content for one coating, using the equation in Condition 6.6.1.3;
    - 6.23.7.6. For the compliant material option, a statement that the coating operations were in compliance with the emission limitations during the initial compliance period because no coatings for which the organic HAP content exceeded the applicable emission limit in

Condition 6.3 were used and that no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in Condition 6.6.1.1 were used.

6.23.7.7. For the emission rate without add-on controls option, the calculation of kg (lb) organic HAP emitted per kg (lb) coating solids, and also:

6.23.7.7.1. The calculation of the total mass of organic HAP emissions for each month;

6.23.7.7.2. The calculation of the 12-month organic HAP emission rate using Equations 2 through 7, respectively of Condition 6.7;

6.23.7.8. For the emission rate without add-on controls option, submit a statement that the coating operations were in compliance with the emission limit during the initial compliance period because the organic HAP emission rate was less than or equal to the emission limit in Condition 6.3, determined according to the procedures in Condition 6.7.

[40 CFR §§ 63.9(h)(3), 63.10(d)(1), 63.4510(a) and (c), 63.4541(d) and 63.4551(h)]

6.24. If, as part of the application for approval of construction of the surface coating of plastic parts operations, the permittee submitted estimates or preliminary information instead of the actual emissions data, the permittee shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in Condition 6.23.

[40 CFR §§ 63.9(h)(5), 63.10(d)(1) and 63.4510(a)]

6.25. Any change in the information already provided under Conditions 6.22 through 6.24 shall be provided to the EPA in writing within 15 calendar days after the change. [40 CFR §§ 63.9(j)]

6.26. *Semiannual compliance reports.* The permittee shall submit semiannual compliance reports for the surface coating of plastic parts according to the following requirements:

6.26.1. The first semiannual compliance report shall cover the first semiannual reporting period which begins the day after the end of the initial compliance period specified in Condition 6.13 and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period;

6.26.2. Each subsequent semiannual compliance report shall cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual period from July 1 through December 31;

6.26.3. Each semiannual compliance report shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period;

6.26.4. The information reported for each of the months in the reporting period shall be based on the last 12 months of data prior to the date of each monthly calculation;

6.26.5. The permittee shall report all deviations as defined in 40 CFR § 63.4581 in the semiannual monitoring report required by Condition 3.54. If the permittee submits a semiannual compliance report along with, or as part of, the semiannual monitoring report required by Condition 3.54, and the semiannual compliance report includes all required information concerning deviations from any limitation in Section 6 of this permit, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However submission of a semiannual compliance report shall not otherwise affect any obligation the permittee may have to report deviations from the permit requirements to EPA;

6.26.6. The semiannual compliance report shall contain the following information:

6.26.6.1. Company name and address;

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

- 6.26.6.3. Date of the report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31;
- 6.26.6.4. Identification of the compliance option or options that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option that was used;
- 6.26.6.5. For the emission rate without add-on controls option, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period;
- 6.26.6.6. If there were no deviations from the emission limitation in Condition 6.3, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period:
  - 6.26.6.6.1. If the compliant material option was used, the permittee shall submit a statement that the coating operation was in compliance with the emission limitation during the reporting period because no coatings for which the organic HAP content exceeded the emission limit in Condition 6.3 were used, and no thinner and/or additive, or cleaning material that contained organic HAP, determined according to Condition 6.6.1.1 were used;
  - 6.26.6.6.2. If the emission rate without add-on controls was used, the permittee shall submit a statement that the coating operation was in compliance with the emission limitation during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the emission limit in Condition 6.3, determined according to Condition 6.7.5.
- 6.26.6.7. If the compliant material option was used, and there was a deviation from the organic HAP content requirements in Condition 6.3, the semiannual compliance report shall contain the following information:
  - 6.26.6.7.1. Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and times periods each was used;
  - 6.26.6.7.2. The calculation of the organic HAP content, using Equation 4 in Condition 6.6.1.3, for each coating identified in Condition 6.26.6.7.1;
  - 6.26.6.7.3. The determination of mass fraction of organic HAP for each thinner and/or additive, and cleaning material identified in Condition 6.26.6.7.1; and
  - 6.26.6.7.4. A statement of the cause of each deviation.
- 6.26.6.8. If the emission rate without add-on controls option was used, and there was a deviation from the emission limit in Condition 6.3, the semiannual compliance report shall contain the following information:
  - 6.26.6.8.1. The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit in Condition 6.3;
  - 6.26.6.8.2. The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee shall submit the calculations for Equations 2 through 7 of Condition 6.7.5, and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition 6.7.5.4; and
  - 6.26.6.8.3. A statement of the cause of each deviation.
    - [40 CFR §§ 63.10(d)(1), 63.4491, 63.4520, 63.4542(c) and 63.4552(c)]



## **7. Emission Unit MMMM – Metal Coating Operations**

### **MMMM Emission Limits and Work Practice Requirements**

- 7.1. If during any consecutive 12-month period, the permittee uses 946 liters (250 gallons) or more of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts as defined in 40 CFR § 63.3881(a), the permittee shall:
- 7.1.1. Comply with the requirements of 40 CFR Part 63, Subpart MMMM; and
  - 7.1.2. Within 90 days of determining that coating usage has exceeded 946 liters, and if at least three years remain prior to expiration of this permit, submit a permit modification application to EPA to incorporate the requirements of 40 CFR Part 63, Subpart MMMM into this Title V permit.

[40 CFR Part 63, Subpart MMMM]

### **MMMM Monitoring and Recordkeeping Requirements**

- 7.2. Each month, the permittee shall record the monthly and rolling 12-month total quantity (in liters) of coatings that contain HAPs used in the surface coating of miscellaneous metal parts as defined in 40 CFR § 63.3881(a). [40 CFR §§ 71.6(a)(3)(i)(B), 71.6(a)(3)(ii) and 71.6(c)(1)]

## **8. Emission Unit BLDG – Building**

### **BLDG Emission Limits and Work Practice Requirements**

- 8.1. Particulate matter emissions from each stack of this emission unit shall not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) during any three-hour period.
- 8.1.1. Compliance with the particulate matter limit in Condition 8.1 is determined using EPA Reference Method 5 (see 40 CFR part 60, appendix A).

[40 CFR §§ 49.125(d)(3) and (e)]

- 8.2. By August 31, 2007, the permittee shall submit to EPA a scale drawing of the facility building with the location and description of each stack (except combustion device stack) identified on the drawing. The meaning of stack shall be as defined in 40 CFR 49.123. [40 CFR § 71.6(a)(3)(i)(B)]

## **9. Emission Unit BOOTH – Spray Booth**

### **BOOTH Emission Limits and Work Practice Requirements**

- 9.1. Particulate matter emissions from each stack of this emission unit shall not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) during any three-hour period.
- 9.1.1. Compliance with the particulate matter limit in Condition 9.1 is determined using EPA Reference Method 5 (see 40 CFR part 60, appendix A).

[40 CFR §§ 49.125(d)(3) and (e)]

- 9.2. The spray booth shall not be operated unless all exhaust air passes through a dual-layer exhaust filter. The first filter layer shall have a control efficiency of at least 93%, per manufacturer's specifications. The second filter layer shall have a control efficiency of at least 98%, per manufacturer's specifications. [40 CFR §§ 49.124(d)(1), 49.125(d)(3) and 71.6(a)(1)]

- 9.3. The pressure differential across the exhaust filters shall not exceed 1.0 inches of water. [40 CFR §§ 49.124(d)(1), 49.125(d)(3) and 71.6(a)(1)]

- 9.4. The exhaust filters shall be maintained in good operating condition, and such that the filters:
- 9.4.1. Are not over-loaded with accumulated material to the point of being blinded;
  - 9.4.2. Shall be properly aligned and seated; and
  - 9.4.3. Shall not have visible rips, tears or holes.
- [40 CFR §§ 49.124(d)(1), 49.125(d)(3) and 71.6(a)(1)]

### **BOOTH Monitoring and Recordkeeping Requirements**

- 9.5. The permittee shall install, calibrate, operate and maintain a gauge to indicate, in inches of water, the static pressure differential across the exhaust filters.
- [40 CFR §§ 71.6(a)(3)(i)(B) and (C), and 71.6(c)(1)]
- 9.6. The permittee shall monitor and record the static pressure differential across the exhaust filters at least once per operational shift. The records shall include the date and time that the static pressure differential reading was taken.
- [40 CFR §§ 71.6(a)(3)(i)(B), 71.6(a)(3)(ii) and 71.6(c)(1)]
- 9.7. The monitoring equipment required under Condition 9.5 shall be operated in accordance with manufacturers specifications.
- [40 CFR §§ 71.6(a)(3)(ii) and 71.6(c)(1)]

## **10. Emission Unit COMB – Combustion Devices**

### **COMB Emission Limits and Work Practice Requirements**

- 10.1. Particulate matter emissions from each stack of this emission unit shall not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot), corrected to seven percent oxygen, during any three-hour period.
- 10.1.1. Compliance with the particulate matter limit in Condition 10.1 is determined using EPA Reference Method 5 (see 40 CFR part 60, appendix A).
- [40 CFR §§ 49.125(d)(1) and (e)]
- 10.2. Sulfur dioxide emissions from each stack of this emission unit shall not exceed an average of 500 parts per million by volume, on a dry basis and corrected to seven percent oxygen, during any three-hour period.
- 10.2.1. Compliance with the SO<sub>2</sub> limit in Condition 10.2 is determined using EPA Reference Methods 6, 6A, 6B, and 6C as specified in the applicability section of each method (see 40 CFR part 60, appendix A).
- [40 CFR §§ 49.129(d)(1) and (e)(1)]

### **COMB Reporting Requirements**

- 10.3. By August 31, 2007, the permittee shall submit to EPA a scale drawing of the facility building and spray booth with the location and description of each combustion device stack identified on the drawing. The meaning of stack shall be as defined in 40 CFR 49.123. [40 CFR § 71.6(a)(3)(i)(B)]

Filename: AMTECH Title V Permit 062207 FINAL