



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor
John H. Tippets, Director

March 22, 2018

Tim Cheeseman
Plant Manager
Spunstrand Inc
620 North Post St.
Post Falls, ID 83854

RE: Facility ID No. 079-00038, Spunstrand Inc, Wallace
Final Tier I Operating Permit Letter

Dear Mr. Cheeseman:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. T1-2017.0040 to Spunstrand Inc located at Wallace in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. T-2012.0023, issued January 8, 2013. The enclosed operating permit is based on the information contained in your permit application received on July 7, 2017. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst at 208-769-1422 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Tom Burnham at 208-373-0502 or tom.burnham@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/tb Permit No. T1-2017.0040 PROJ 61916

Enclosure

Air Quality

TIER I OPERATING PERMIT

Permittee Spunstrand Inc
Permit Number T1-2017.0040
Project ID 61916
Facility ID 079-00038
Facility Location 60662 Northside Frontage Road
Wallace, Idaho 83873

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules) (IDAPA 58.01.01.300–386) (b) incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210 and the permittee elects not to incorporate those terms and conditions into this operating permit.

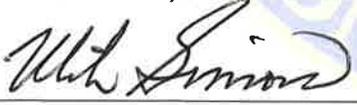
The permittee shall comply with the terms and conditions of this permit. The effective date of this permit is the date of signature by DEQ on this cover page.

Date Issued March 22, 2018

Date Expires March 22, 2023



Tom Burnham, Permit Writer



Mike Simon, Stationary Source Manager

Contents

1	Acronyms, Units, and Chemical Nomenclature	3
2	Permit Scope.....	4
3	Facility-Wide Conditions	5
4	NESHAP 40 CFR 63, Subpart WWWW	16
5	Fabrication.....	32
6	Insignificant Activities	34
7	Permit Shield	35
8	General Provisions.....	36
	Appendix – Table 1 to Subpart WWWW.....	41

1 Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
O&M	operation and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIP	State Implementation Plan
T1	Tier I operating permit
U.S.C.	United States Code

2 Permit Scope

Purpose

- 2.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules. This permit action is a permit renewal.
- 2.2 This Tier I operating permit incorporates the following permit:
- Permit to Construct No. P-2012.0050, issued September 7, 2012.
- 2.3 This Tier I operating permit replaces the following permit:
- Tier I Operating Permit No. T1-2012.0023, issued January 8, 2013.

Regulated Sources

Table 2.1 lists all sources of regulated emissions in this permit.

Table 2.1 Regulated Sources

Permit Section	Source	Control Equipment
4	Plastic Reinforced Composites	None
5	Fabrication	Baghouse, or equivalent, on trimming and cutting, all other uncontrolled

3 Facility-Wide Conditions

Table 3.1 contains a summary of requirements that apply generally to emissions units at the facility.

Table 3.1 Applicable Requirements Summary

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1-3.4	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651	3.2–3.4, 3.21, 3.26
3.5, 3.6	Odors	Reasonable control	IDAPA 58.01.01.775–776	3.6, 3.21, 3.26
3.7-3.9	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.8, 3.9, 3.21, 3.26
3.10-3.14	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136	3.10-3.14, 3.21, 3.26
3.15	PM	Natural gas only 0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.676–677	3.21, 3.26
3.16	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–623	3.17, 3.21, 3.26
3.17	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	3.17, 3.21, 3.26
3.18	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	3.18, 3.21, 3.26
3.19	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	3.19, 3.21, 3.26
3.20	NESHAP General Provisions	Compliance with 40 CFR 63, Subpart A	IDAPA 58.01.01.107.03	3.20, 3.21, 3.26
3.21	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06	3.21, 3.26
3.22-3.25	Testing	Compliance testing	IDAPA 58.01.01.157	3.21–3.26
3.26	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	3.26
3.27	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	3.27

Fugitive Dust

- 3.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.
[IDAPA 58.01.01.650–651, 4/11/15]
- 3.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive emissions.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 3.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 3.4 The permittee shall conduct a quarterly facility wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

Odors

- 3.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
[IDAPA 58.01.01.775–776 (state only), 5/1/94]
- 3.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07 (state only), 5/1/94]

Visible Emissions

- 3.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
[IDAPA 58.01.01.625, 4/5/00]

3.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[IDAPA 58.01.01.322.06, 5/1/94]

3.9 The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.07, 5/1/94]

Excess Emissions

Excess Emissions-General

3.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions. The provisions of IDAPA 58.01.01.130–136 shall govern in the event of conflicts between the excess emissions facility wide conditions (Permit Conditions 3.10 through 3.14) and the regulations of IDAPA 58.01.01.130–136.

During an excess emissions event, the permittee shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

Excess Emissions-Startup, Shutdown, and Scheduled Maintenance

3.11 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133, 4/11/06]

Excess Emissions-Upset, Breakdown, or Safety Measures

3.12 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility wide conditions (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134, 4/11/06]

Excess Emissions-Reporting and Recordkeeping

3.13 The permittee shall submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135, 4/11/06]

3.14 The permittee shall maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136, 4/5/00]

Fuel-Burning Equipment

3.15 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

[IDAPA 58.01.01.676-677, 5/1/94]

Open Burning

3.16 The permittee shall comply with the "Rules for Control of Open Burning" (IDAPA 58.01.01.600-623).

[IDAPA 58.01.01.600-623, 5/08/09]

Asbestos

3.17 NESHAP 40 CFR 61, Subpart M—National Emission Standard for Asbestos

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—"National Emission Standard for Asbestos."

[40 CFR 61, Subpart M]

Accidental Release Prevention

3.18 A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the "Chemical Accident Prevention Provisions" at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10(a)]

Recycling and Emissions Reductions

3.19 40 CFR Part 82—Protection of Stratospheric Ozone

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, “Recycling and Emissions Reduction.”

[40 CFR 82, Subpart F]

NESHAP General Provisions

3.20 NESHAP 40 CFR 63, Subpart A—General Provisions

The permittee shall comply with the requirements of 40 CFR 63, Subpart A—“General Provisions.” A summary of applicable requirements for affected sources is provided in Table 3.2.

Table 3.2 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources

Section	Subject	Summary of Section Requirements		
63.13	Address	<ul style="list-style-type: none"> All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to: <table style="margin-left: 40px; border: none;"> <tr> <td style="padding-right: 40px;">Director Air and Waste US EPA 1200 Sixth Ave. Seattle, WA 98101</td> <td>Coeur d’Alene Regional Office 2110 Ironwood Parkway Coeur d’Alene, ID 83814</td> </tr> </table> 	Director Air and Waste US EPA 1200 Sixth Ave. Seattle, WA 98101	Coeur d’Alene Regional Office 2110 Ironwood Parkway Coeur d’Alene, ID 83814
Director Air and Waste US EPA 1200 Sixth Ave. Seattle, WA 98101	Coeur d’Alene Regional Office 2110 Ironwood Parkway Coeur d’Alene, ID 83814			
63.4(a)	Prohibited Activities	<ul style="list-style-type: none"> No permittee must operate any affected source in violation of the requirements of 40 CFR 63 in accordance with 40 CFR 63.4(a). No permittee subject to the provisions of this part shall fail to keep records, notify, report, or revise reports as required under this part. 		
63.4(b)	Circumvention/ Fragmentation	<ul style="list-style-type: none"> No permittee shall build, erect, install or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability in accordance with 40 CFR 63.4(c). 		
63.6(b) and (c)	Compliance Dates	<ul style="list-style-type: none"> The permittee of any new or reconstructed source must comply with the relevant standard as specified in 40 CFR 63.6(b). <ul style="list-style-type: none"> The permittee of a source that has an initial startup before the effective date of a relevant standard must comply not later than the standard's effective date in accordance with 40 CFR 63.6(b)(1). The permittee of a source that has an initial startup after the effective date of a relevant standard must comply upon startup of the source in accordance with 40 CFR 63.6(b)(2). The permittee of any existing sources must comply with the relevant standard by the compliance date established in the applicable subpart or as specified in 40 CFR 63.6(c). <ul style="list-style-type: none"> The permittee of an area source that increases its emissions of hazardous air pollutants such that the source becomes a major source shall be subject to relevant standards for existing sources in accordance with 40 CFR 63.6(c)(5). 		
63.6(e) and (f)	Compliance with Standards and Maintenance Requirements (Non-Opacity)	<ul style="list-style-type: none"> At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions in accordance with 40 CFR 63.6(e). The permittee of an affected source must develop a written startup, shutdown, and malfunction plan and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard in accordance with 40 CFR 63.6(e). The permittee must maintain the current plan at the affected source and must make the plan available upon request. If the plan fails to address or inadequately addresses a malfunction, the permittee must revise the plan within 45 days after the event. The permittee must record and report actions taken during a startup, shutdown, or malfunction in accordance with the requirements in 40 CFR 63.6(e). The permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the plan in the semiannual startup, shutdown, and malfunction report. Non-opacity emission standards shall apply at all times except during periods of startup, shutdown, and malfunction, and as otherwise specified, in accordance with 40 CFR 63.6(f). 		

Table 3.2 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)

Section	Subject	Summary of Section Requirements
63.7	Performance Testing Requirements	<ul style="list-style-type: none"> • If required to do performance testing, the permittee must perform such tests within 180 days of the compliance date in accordance with 40 CFR 63.7(a). • The permittee must notify in writing of the intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow review of the site-specific test plan and to have an observer present during the test in accordance with 40 CFR 63.7(b). • Before conducting a required performance test, the permittee shall develop and, if requested, shall submit a site-specific test plan for approval in accordance with 40 CFR 63.7(c). The test plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program. • If required to do performance testing, the permittee shall provide performance testing facilities in accordance with 40 CFR 63.7(d): <ul style="list-style-type: none"> Sampling ports adequate for test methods applicable to such source. Safe sampling platform(s); Safe access to sampling platform(s); Utilities for sampling and testing equipment; and Any other facilities deemed necessary for safe and adequate testing of a source. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 63.7(e) and (f). • The permittee shall report the results of the performance test before the close of business on the 60th day following the completion of the test, unless specified or approved otherwise in accordance with 40 CFR 63.7(g).
63.9	Notification Requirements	<ul style="list-style-type: none"> • The permittee of an affected source that has an initial startup before the effective date of a relevant standard shall notify in writing that the source is subject to the relevant standard, in accordance with 40 CFR 63.9(b)(2). The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information: <ul style="list-style-type: none"> The name and address of the permittee; The address (i.e., physical location) of the affected source; An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date; A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and A statement of whether the affected source is a major source or an area source. • The permittee of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required must provide the following information in writing in accordance with 40 CFR 63.9(b)(4): <ul style="list-style-type: none"> A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-emitting affected source; A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date. • The permittee of a new or reconstructed affected source for which an application for approval of construction or reconstruction is not required must provide the following information in writing in accordance with 40 CFR 63.9(b)(5): <ul style="list-style-type: none"> A notification of intention to construct a new affected source, reconstruct an affected source, or reconstruct a source such that the source becomes an affected source, and A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date. <p>Unless the permittee has requested and received prior permission, the notification must include the information required in the application for approval of construction or reconstruction as specified in 40 CFR 63.5(d)(1).</p>

Table 3.2 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)

Section	Subject	Summary of Section Requirements
63.9	Notification Requirements (continued)	<ul style="list-style-type: none"> • The permittee shall notify in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the opportunity to review and approve the site-specific test plan required by 40 CFR 63.7(c), and to have an observer present during the test. • The permittee of an affected source shall notify in writing of the anticipated date for conducting the opacity or visible emission observations in accordance with 40 CFR 63.9(f), if such observations are required. • Each time a notification of compliance status is required under this part, the permittee of such source shall submit a notification of compliance status in accordance with 40 CFR 63.9(h)(2)(i). The notification shall list: <ul style="list-style-type: none"> The methods that were used to determine compliance; The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted; The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods; The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard; If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification); A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and A statement by the permittee of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements. • The notification must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard unless otherwise specified in accordance with 40 CFR 63.9(h)(2)(ii). If no performance test is required but opacity or visible emission observations are required to demonstrate compliance with a standard, the notification shall be sent before close of business on the 30th day following the completion of the observations. • Each time a notification of compliance status is required under this part, the permittee of such source shall submit the notification of compliance status following completion of the relevant compliance demonstration activity specified. • If a permittee submits estimates or preliminary information in an application in place of the actual emissions data or control efficiencies, 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 this section in accordance with 40 CFR 63.9(h)(5). • Any change in the information already provided under this section shall be provided in writing within 15 calendar days after the change in accordance with 40 CFR 63.9(j).

Table 3.2 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)

Section	Subject	Summary of Section Requirements
63.10	Recordkeeping and Reporting Requirements	<ul style="list-style-type: none"> • The permittee shall maintain files of all required information recorded in a form suitable and readily available for expeditious inspection and review in accordance with 40 CFR 63.10(b)(1). The files 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 permittee shall maintain relevant records of the following in accordance with 40 CFR 63.10(b)(2); <ul style="list-style-type: none"> The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards; The occurrence and duration of each malfunction of operation or the required air pollution control and monitoring equipment; All required maintenance performed on the air pollution control and monitoring equipment; Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; or Actions taken during periods of malfunction when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan (see 40 CFR 63.6(e)(3)) when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events); Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods); All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report); All results of performance tests, CMS performance evaluations, and opacity and visible emission observations; All measurements as may be necessary to determine the conditions of performance tests and performance evaluations; All CMS calibration checks; All adjustments and maintenance performed on CMS; All emission levels relative to the criterion for obtaining permission to use an alternative to the relative accuracy test, if the source has been granted such permission under 40 CFR 63.8(f)(6); and All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9. • If an permittee determines that his or her stationary source that emits one or more HAP, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to a relevant standard because of limitations on the source's potential to emit or an exclusion, the permittee must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first in accordance with 40 CFR 63.10(b).

[40 CFR 63, Subpart A]

Monitoring and Recordkeeping

3.21 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Performance Testing

3.22 If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

3.23 All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used.
- Any extenuating or unusual circumstances regarding the proposed test.
- The proposed schedule for conducting and reporting the test.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

3.24 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

3.25 The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the "Reports and Certifications" facility wide condition (Permit Condition 3.26).

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Reports and Certifications

- 3.26** All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130–136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

Phone: (208) 769-1422

Fax: (208) 769-1404

The periodic compliance certification required in the general provisions (General Provision 7.22) shall also be submitted within 30 days of the end of the specified reporting period to:

Part 70 Operating Permit Program
U.S. EPA Region 10, Mail Stop: OAW-150
1200 Sixth Ave., Suite 900
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/00]

Incorporation of Federal Requirements by Reference

- 3.27** Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[IDAPA 58.01.01.107, 3/25/16]

4 NESHAP 40 CFR 63, Subpart WWWW

Summary Description

Table 4.1 describes the devices used to control emissions from reinforced plastic composite production.

The purpose of Section 4 of the permit is to incorporate the requirements of 40 CFR 63 Subpart WWWW. Should there be a conflict between 40 CFR 63 Subpart WWWW and Section 4 of the permit, 40 CFR 63 Subpart WWWW shall govern including any amendments to that regulation. Affected sources include open molding, mixing, cleaning of equipment used in reinforced plastic composite manufacture, HAP containing materials storage, and repair operations on parts the facility manufactures.

Table 4.1 REINFORCED PLASTIC COMPOSITE PRODUCTION CONTROL DESCRIPTION

Emissions Units / Processes	Control Devices
Reinforced Plastic Composite Production	None

NESHAP 40 CFR 63, Subpart WWWW

4.1 40 CFR 63.5796 Emissions Factors

In accordance with 40 CFR 63.5796 emissions factors are used in this subpart to determine compliance with organic HAP emissions limits in Table 3 to this subpart. The permittee may use the equations in Table 1 to this subpart to calculate emissions factors. Equations are available for each open molding operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for the permittee to demonstrate compliance without the need to conduct a HAP emissions test. Table 1 is included as an appendix to this permit.

Summary of Table 3 to Subpart WWWW of Part 63-Organic HAP Emissions Limits

If your operation type is . . .	And you use . . .	Your organic HAP emissions limit is . . .
open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
open molding—gel coat	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

[40 CFR 63. 5796; PTC No. P-2012.0050, 9/7/12]

4.2 40 CFR 63.5797 Determining Organic HAP Content

In accordance with 40 CFR 63.5797 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 specified in paragraphs (a) through (c) of this section, as applicable.

(a) 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.

(b) If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee must 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 must use the measured organic HAP content to determine compliance.

(c) 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 still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee must use the measured organic HAP content to determine compliance.

[40 CFR 63. 5797; PTC No. P-2012.0050, 9/7/12]

4.3 40 CFR 63.5805 Work Practice Standards

In accordance with 40 CFR 63.5805(b) and 40 CFR 63.5805(g) all existing open molding, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts that the permittee also manufactures must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.

Summary of Table 4 to Subpart WWWW of Part 63—Work Practice Standards

For ...	You must ...
a new or existing cleaning operation	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.
a new or existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
all mixing or bulk molding compound (BMC) manufacturing operations ¹	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..
all mixing or BMC manufacturing operations ¹	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
all mixing or BMC manufacturing operations ¹	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

¹Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

[40 CFR 63. 5805; PTC No. P-2012.0050, 9/7/12]

4.4 40 CFR 63.5810 HAP Content Calculation

In accordance with 40 CFR 63.5810 the permittee must use one of the following methods (a) through (d) for open molding to meet the applicable standards of Table 3 of this subpart.

- a) In accordance with 40 CFR 63.810(a) demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3.
 - 1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, and application technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding.
 - 2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.
- b) In accordance with 40 CFR 63.810(b) demonstrate that, on average, the individual HAP limits for each combination of operation type and resin application method or gel coat type is met.
 - 1) (i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

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

Where:

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

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

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

- (ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.
- 2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.
- c) In accordance with 40 CFR 63.810(c) demonstrate compliance with a weighted average emission limit. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations.
- 1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table to this subpart for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding the last 12 months as shown in Equation 3 of this section.

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

Where:

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

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

n =number of operations.

- 2) Each month calculate your weighted average organic HAP emissions factor for open molding. To do this, multiply your actual open molding operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4 of this section.

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

Where:

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

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

n=number of operations.

- 3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.
- d) In accordance with 40 CFR 63.810(d) meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.
 - (1) For any combination of manual resin application, mechanical resin application, filament application you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

Table 7 to Subpart WWWW of Part 63—Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type

If your facility has the following resin type and application method . . .	The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .	is . . .
1. Corrosion resistant/high strength (CR/HS) resins, centrifugal casting ^{1,2}	a. CR/HS mechanical	³ 48.0
	b. CR/HS filament application	48.0
	c. CR/HS manual	48.0
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.4
	b. CR/HS manual	46.4
3. CR/HS resins, filament application	CR/HS manual	42.0
4. non-CR/HS resins, filament application	a. non-CR/HS mechanical	³ 45.0
	b. non-CR/HS manual	45.0
	c. non-CR/HS centrifugal casting ^{1,2}	45.0
5. non-CR/HS resins, nonatomized mechanical	a. non-CR/HS manual	38.5
	b. non-CR/HS centrifugal casting ^{1,2}	38.5
6. non-CR/HS resins, centrifugal casting ^{1,2}	non-CR/HS manual	37.5
7. tooling resins, nonatomized mechanical	tooling manual	91.4
8. tooling resins, manual	tooling atomized mechanical	45.9

¹If the centrifugal casting operation blows heated air through the molds, then 95 percent capture and control must be used if the facility wishes to use this compliance option.

²If the centrifugal casting molds are not vented, the facility may treat the centrifugal casting operations as if they were vented if they wish to use this compliance option.

³Nonatomized mechanical application must be used.

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

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

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

[40 CFR 63. 5810; PTC No. P-2012.0050, 9/7/12]

4.5 40 CFR 63.5835(a) Table 3 and Table 4 Compliance

In accordance with 40 CFR 63.5835(a) the permittee must be in compliance at all times with the work practice standards in Table 4 of this subpart as well as the applicable organic HAP emissions limit in Table 3 of this subpart.

[40 CFR 63. 5835(a); PTC No. P-2012.0050, 9/7/12]

4.6 40 CFR 63.5895(b) Data Monitoring

In accordance with 40 CFR 63.5895(b) the permittee must monitor and collect data as specified in paragraphs (1) through (4) of this section.

(1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.

(2) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system (at the time of permit issuance the permittee is not using a control device to comply).

(3) At all times, the permittee must maintain necessary parts for routine repairs of the monitoring equipment.

(4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 63. 5895(b); PTC No. P-2012.0050, 9/7/12]

4.7 40 CFR 63.5895(c) HAP Content Recordkeeping

In accordance with 40 CFR 63.5895(c) the permittee must 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 Tables 3 to this subpart. The permittee must 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 content limits in Table 7 to this subpart 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 MSDS or on resin specifications supplied by the resin supplier.

[40 CFR 63. 5895(c); PTC No. P-2012.0050, 9/7/12]

4.8 40 CFR 63.5895(d) Records Retention

In accordance with 40 CFR 63.5895(d) resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, the permittee must retain the records of resin and gel coat organic HAP content, and the permittee must include the list of these resins and gel coats and identify their application methods in the permittee's semiannual compliance reports. If after the permittee has initially demonstrated 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 content increases, or the permittee changes the application method or controls, then the permittee again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 of this subpart, the permittee must 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(d); PTC No. P-2012.0050, 9/7/12]

4.9 40 CFR 63.5900 Continuous Compliance

In accordance with 40 CFR 63.5900 the permittee must demonstrate continuous compliance with each standard in §63.5805 that applies according to the following methods:

- In accordance with §63.5900(a)(2) compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).
- In accordance with §63.5900(a)(3) compliance with the optional organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as discussed in §63.5895(d).
- In accordance with §63.5900(a)(4) compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the permittee's operation.
- In accordance with §63.5900(b) the permittee must report each deviation from each standard in §63.5805 that applies to the permittee. The deviations must be reported according to the requirements in §63.5910.
- In accordance with §63.5900(c) during periods of startup, shutdown or malfunction, the permittee must meet the organic HAP emissions limits and work practice standards that apply to the permittee.

[40 CFR 63. 5900; PTC No. P-2012.0050, 9/7/12]

4.10 40 CFR 63.5910(a) Table 14 Reporting

In accordance with 40 CFR 63.5910(a) the permittee must submit each report in Table 14 to this subpart that applies to the permittee.

Summary of Table 14 to Subpart WWW of Part 63—Requirements for Reports

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report	A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period	Semiannually according to the requirements in §63.5910(b).
	The information in §63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan	Semiannually according to the requirements in §63.5910(b).
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	b. The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§63.10(d)(5)(ii)).

[40 CFR 63. 5910(a); PTC No. P-2012.0050, 9/7/12]

4.11 40 CFR 63.5910(b)(3) Compliance Semiannual Reporting

In accordance with 40 CFR 63.5910(b)(3) the compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

[40 CFR 63. 5910(b)(3); PTC No. P-2012.0050, 9/7/12]

4.12 40 CFR 63.5910(b)(4) Compliance Semiannual Reporting Period

In accordance with 40 CFR 63.5910(b)(4) the compliance report must 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. 5910(b)(4); PTC No. P-2012.0050, 9/7/12]

4.13 40 CFR 63.5910(c) Compliance Semiannual Report Content

In accordance with 40 CFR 63.5910(c) the compliance report must contain the information in paragraphs (1) through (5) of this section:

- (1) Company name and address.

(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.

(3) Date of the report and beginning and ending dates of the reporting period.

(4) If the permittee had a startup, shutdown, or malfunction during the reporting period and the permittee took actions consistent with the permittee's startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).

(5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to the permittee, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

[40 CFR 63. 5910(c); PTC No. P-2012.0050, 9/7/12]

4.14 40 CFR 63.5910(d) Organic HAP Emissions Deviation

In accordance with 40 CFR 63.5910(d) 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 that occurs at an affected source where the permittee is not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of the previous permit condition and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.

(1) The total operating time of each affected source during the reporting period.

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

[40 CFR 63. 5910(d); PTC No. P-2012.0050, 9/7/12]

4.15 40 CFR 63.5910(g) Organic HAP Emissions Deviation Reporting

In accordance with 40 CFR 63.5910(g) the permittee must report all deviations as defined in this subpart in the semiannual monitoring report required by this permit. If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by this permit, 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 subpart, 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 the permitting authority.

[40 CFR 63. 5910(g); PTC No. P-2012.0050, 9/7/12]

4.16 40 CFR 63.5910(h) Compliance Report Submission

In accordance with 40 CFR 63.5910(h) submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in table 14 to this subpart.

[40 CFR 63. 5910(h)]

4.17 40 CFR 63.5910(i) Multiple Compliance Options

In accordance with 40 CFR 63.5910(i) where multiple compliance options are available, the permittee must state in the next compliance report if the permittee has changed compliance options since the last compliance report.

[40 CFR 63. 5910(i); PTC No. P-2012.0050, 9/7/12]

4.18 40 CFR 63.5915(a) Notification Recordkeeping Requirement

In accordance with 40 CFR 63.5915(a) the permittee must keep the records listed in paragraphs (1) through (3) of this section.

(1) A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv).

(2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).

[40 CFR 63. 5915(a); PTC No. P-2012.0050, 9/7/12]

4.19 40 CFR 63.5915 (c) Data, Assumptions, and Calculation Retention

In accordance with 40 CFR 63.5915 (c) the permittee must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in tables 3, and 7 to this subpart.

[40 CFR 63. 5915(c); PTC No. P-2012.0050, 9/7/12]

4.20 40 CFR 63.5915 (d) Certified Statement

In accordance with 40 CFR 63.5915 (d) the permittee must keep a certified statement that it is in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

[40 CFR 63. 5915(d); PTC No. P-2012.0050, 9/7/12]

4.21 40 CFR 63.5920 Organic HAP Records Retention

In accordance with 40 CFR 63.5920 the permittee:

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

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

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

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

[40 CFR 63. 5920; PTC No. P-2012.0050, 9/7/12]

4.22 Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

In accordance with 63.5925, the parts of the General Provisions which apply are shown in the Table 15. Should there be any discrepancy between the federal requirements and the permit conditions, the federal requirements shall govern.

Table 15 Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

The general provisions reference	That addresses . . .	Subject to the following additional information
§63.1(a)(1)	General applicability of the general provisions	Additional terms defined in subpart WWWW of Part 63, when overlap between subparts A and WWWW of Part 63 of this part, subpart WWWW of Part 63 takes precedence.
§63.1(a)(2) through (4)	General applicability of the general provisions	
§63.1(a)(6)	General applicability of the general provisions	
§63.1(a)(10) through (14)	General applicability of the general provisions	
§63.1(b)(1)	Initial applicability determination	Subpart WWWW of Part 63 clarifies the applicability in §§63.5780 and 63.5785.
§63.1(b)(3)	Record of the applicability determination	
§63.1(c)(1)	Applicability of this part after a relevant standard has been set under this part	Subpart WWWW of Part 63 clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
§63.1(c)(2)	Title V operating permit requirement	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
§63.1(c)(5)	Notification requirements for an area source that increases HAP emissions to major source levels	
§63.1(e)	Applicability of permit program before a relevant standard has been set under this part	
§63.2	Definitions	Subpart WWWW of Part 63 defines terms in §63.5935. When overlap between subparts A and WWWW of Part 63 occurs, you must comply with the subpart WWWW of Part 63 definitions, which take precedence over the subpart A definitions.
§63.3	Units and abbreviations	Other units and abbreviations used in subpart WWWW of Part 63 are defined in subpart WWWW of Part 63.
§63.4	Prohibited activities and circumvention	§63.4(a)(3) through (5) is reserved and does not apply.
§63.5(a)(1) and (2)	Applicability of construction and reconstruction	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(1)	Relevant standards for new sources upon construction	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(3)	New construction/reconstruction	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(4)	Construction/reconstruction notification	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(6)	Equipment addition or process change	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(d)(1)	General application for approval of construction or reconstruction	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(d)(2)	Application for approval of construction	

Table 15 Applicability of General Provisions (Subpart A) to Subpart WWW of Part 63 (continued)

The general provisions reference	That addresses . . .	Subject to the following additional information
§63.5(d)(4)	Additional information	
§63.5(e)(1) through (5)	Approval of construction or reconstruction	
§63.5(f)(1) and (2)	Approval of construction or reconstruction based on prior State preconstruction review	
§63.6(a)(1)	Applicability of compliance with standards and maintenance requirements	
§63.6(a)(2)	Applicability of area sources that increase HAP emissions to become major sources	
§63.6(b)(1) through (5)	Compliance dates for new and reconstructed sources	Subpart WWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(b)(7)	Compliance dates for new operations or equipment that cause an area source to become a major source	New operations at an existing facility are not subject to new source standards.
§63.6(c)(1) and (2)	Compliance dates for existing sources	Subpart WWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(c)(5)	Compliance dates for existing area sources that become major	Subpart WWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(e)(1) and (2)	Operation & maintenance requirements	
§63.6(e)(3)	Startup, shutdown, and malfunction plan and recordkeeping	Subpart WWW of Part 63 requires a startup, shutdown, and malfunction plan only for sources using add-on controls.
§63.6(f)(2) and (3)	Methods for determining compliance	
§63.6(g)(1) through (3)	Alternative standard	
§63.6(i)(1) through (14)	Compliance extensions	
§63.6(i)(16)	Compliance extensions	
§63.6(j)	Presidential compliance exemption	
§63.7(a)(1)	Applicability of performance testing requirements	
§63.7(a)(3)	CAA Section 114 authority	
§63.7(b)(1)	Notification of performance test	
§63.7(b)(2)	Notification rescheduled performance test	
§63.7(c)	Quality assurance program, including test plan	Except that the test plan must be submitted with the notification of the performance test.
§63.7(d)	Performance testing facilities	
§63.7(e)	Conditions for conducting performance tests	Performance test requirements are contained in §63.5850. Additional requirements for conducting performance tests for continuous lamination/casting are included in §63.5870.
§63.7(f)	Use of alternative test method	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	
§63.7(h)	Waiver of performance tests	
§63.8(a)(1) and (2)	Applicability of monitoring requirements	
§63.8(a)(4)	Monitoring requirements when using flares	
§63.8(b)(1)	Conduct of monitoring exceptions	
§63.8(b)(2) and (3)	Multiple effluents and multiple monitoring systems	

Table 15 Applicability of General Provisions (Subpart A) to Subpart WWW of Part 63 (continued)

The general provisions reference	That addresses . . .	Subject to the following additional information
§63.8(c)(1)	Compliance with CMS operation and maintenance requirements	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(2) and (3)	Monitoring system installation	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(4)	CMS requirements	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(6) through (8)	CMS calibration and periods CMS is out of control	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(d)	CMS quality control program, including test plan and all previous versions	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(1)	Performance evaluation of CMS	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(2)	Notification of performance evaluation	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(3) and (4)	CMS requirements/alternatives	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(5)(i)	Reporting performance evaluation results	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(f)(1) through (3)	Use of an alternative monitoring method	
§63.8(f)(4)	Request to use an alternative monitoring method	
§63.8(f)(5)	Approval of request to use an alternative monitoring method	
§63.8(f)(6)	Request for alternative to relative accuracy test and associated records	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(g)(1) through (5)	Data reduction	
§63.9(a)(1) through (4)	Notification requirements and general information	
§63.9(b)(1)	Initial notification applicability	
§63.9(b)(2)	Notification for affected source with initial startup before effective date of standard	
§63.9(b)(4)(i)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	
§63.9(b)(4)(v)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Existing facilities do not become reconstructed under subpart WWW of Part 63.

Table 15 Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 (continued)

The general provisions reference	That addresses . . .	Subject to the following additional information
§63.9(b)(5)	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is not required	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.9(c)	Request for compliance extension	
§63.9(d)	Notification of special compliance requirements for new source	
§63.9(e)	Notification of performance test	
§63.9(g)(1)	Additional notification requirements for sources using CMS	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(g)(3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(h)(1) through (3)	Notification of compliance status	
§63.9(h)(5) and (6)	Notification of compliance status	
§63.9(i)	Adjustment of submittal deadlines	
§63.9(j)	Change in information provided	
§63.10(a)	Applicability of recordkeeping and reporting	
§63.10(b)(1)	Records retention	
§63.10(b)(2)(i) through (v)	Records related to startup, shutdown, and malfunction	Only applies to facilities that use an add-on control device.
§63.10(b)(2)(vi) through (xi)	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations	
§63.10(b)(2)(xii)	Record of waiver of recordkeeping and reporting	
§63.10(b)(2)(xiii)	Record for alternative to the relative accuracy test	
§63.10(b)(2)(xiv)	Records supporting initial notification and notification of compliance status	
§63.10(b)(3)	Records for applicability determinations	
§63.10(c)(1)	CMS records	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(5) through (8)	CMS records	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(10) through (15)	CMS records	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(d)(1)	General reporting requirements	
§63.10(d)(2)	Report of performance test results	
§63.10(d)(4)	Progress reports as part of extension of compliance	
§63.10(d)(5)	Startup, shutdown, and malfunction reports	Only applies if you use an add-on control device.

Table 15 Applicability of General Provisions (Subpart A) to Subpart WWW of Part 63 (continued)

The general provisions reference	That addresses . . .	Subject to the following additional information
§63.10(e)(1) through (3)	Additional reporting requirements for CMS	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
§63.10(f)	Waiver for recordkeeping or reporting	
§63.11	Control device requirements	Only applies if you elect to use a flare as a control device.
§63.12	State authority and delegations	
§63.14	Incorporations by reference	
§63.15	Availability of information and confidentiality	

[40 CFR 63, Subpart A]

5 Fabrication

Summary Description

Fabrication of fiberglass reinforced duct work, pipes, tubing, and tanks using a filament winding process. The facility consists of three work areas: Main Building, Blue Building, and Warehouse. The Main Building contains three winding machines, a pulling station, a cutting station, and a chopper station. The Blue Building is used for small scale hand lay-up fabrication, gel coat application and painting. The Warehouse is used for storage and packaging.

Table 5.1 describes the devices used to control emissions from Fabrication.

Table 5.1 FABRICATION DESCRIPTION

Emissions Units / Processes	Control Devices
Cutting and Trimming	Baghouse
Fabrication of Fiberglass Reinforced Composites	None

Emission Limits

5.1 PM₁₀ Emission Limits

Emissions of PM₁₀ from the dust collection baghouse or equivalent device shall not exceed any corresponding emission limit listed in Table 5.2.

Table 5.2 EMISSIONS LIMITS

Source	PM ₁₀ lb/day
Dust Collection Baghouse	14.4

[PTC No. P-2012.0050, 9/7/12]

Operating Requirements

5.2 Dust Collection Baghouse/Control Device

- The permittee shall not trim and/or cut products unless the dust collection baghouse or equivalent control device with a manufacturer guaranteed PM₁₀ control efficiency of 90% or greater is in operation.
- Baghouse/Control Device Procedures

The permittee shall have developed a Baghouse or Equivalent Control Device Procedures document for the inspection and operation of the control device. The Baghouse or Equivalent Control Device Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse or Equivalent Control Device Procedures document shall describe the procedures that will be followed to comply with the General Provision requirement to maintain the baghouse or equivalent control device in good working order and operate it as efficiently as practicable, and shall contain requirements for weekly see-no-see visible emissions inspections of the control device. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse or Equivalent Control Device Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse or equivalent control device at anytime. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of each control device inspections in accordance with the General Provisions. The records shall include , but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse or Equivalent Control Device Procedures document shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. Any changes to the procedures document shall be submitted within 15 days of the change.

The procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the procedures document are incorporated by reference to this permit and are enforceable permit conditions.

{PTC No. P-2012.0050, 9/7/12}

5.3 Odor Management Plan

The permittee shall have developed an Odor Management Plan for the facility. The plan shall describe procedures that will be followed to comply with Permit Condition 3.5. The plan shall include, but not be limited to, the following provisions:

- Maintain negative air pressure inside the buildings.
- Keep all storage containers and vessels closed when not in use.

{PTC No. P-2012.0050, 9/7/12 – State Only}

6 Insignificant Activities

- 6.1 Table 6.1 lists the units or activities that are insignificant on the basis of size or production rate as provided by the permittee. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b. There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions (see Section 3).

Table 6.1 Insignificant Activities

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Five (5) Monitor hot water heaters in main/warehouse	IDAPA 58.01.01.317.01(b)(i)(5)
Two (2) Reznor heaters in warehouse	IDAPA 58.01.01.317.01(b)(i)(5)
Carrier heater in main/warehouse	IDAPA 58.01.01.317.01(b)(i)(5)
Three (3) heaters in blue building	IDAPA 58.01.01.317.01(b)(i)(5)
Office heater	IDAPA 58.01.01.317.01(b)(i)(5)

[IDAPA 58.01.01.317.01(b)(i), 5/3/03]

7 Permit Shield

The permittee has requested a permit shield for non-applicable requirements in accordance with IDAPA 58.01.01.325 .01.b. In order to qualify for a permit shield the non-applicable requirements must be listed in the permit. Table 7.1 includes the non-applicable requirements qualifying for a permit shield.

Table 7.1 Non-applicable Requirements

Citation	Summary of Rule
	P-2012.0050 (PTC)
PC 3.5-3.6	Construction and Operation Notification
IDAPA 58.01.01 Rules for the Control of Air Pollution in Idaho	
517 - 527	Motor Vehicle Inspection and Maintenance
563 - 574	Transportation Conformity
590	New Source Performance Standards
592 - 598	Stage I Vapor Collection
599	Gasoline Cargo Tanks
610	Industrial Flares
611	Residential Solid Waste Disposal Fires
612	Landfill Disposal Site Fires
613	Orchard Fires
614	Prescribed Burning
626	Visible Emissions from Wigwam Burners
676	Standards for New Sources
750 - 751	Rules for the Control of Flouride
760 - 764	Rules for the Control of Ammonia From Dairy Farms
785 - 787	Rules for the Control of Incinerators
790 - 799	Rules for the Control of Nonmetallic Mineral Processing Plants
800 - 802	Registration Fee for Permit by Rule
805 - 808	Rules for the control of Hotmix Asphalt Plants
815 - 818	Rules for the Control of Kraft Pulp Mill
835 - 839	Rules for the Control of Rendering Plants
845 - 848	Rules for Sulfuric Acid Plants
855 - 858	Combined Zinc and Lead Smelters
859 - 860	Standards for MSW Landfills
Federal Regulations	
40 CFR 60	New Source Performance Standards
40 CFR 61, Except Subpart M	NESHAPs
40 CFR 63, Except Subparts WWWW	NESHAPs
40 CFR 64	Compliance Assurance Monitoring

[IDAPA 58.01.01.325.01.b, 07, 5/1/94]

8 General Provisions

General Compliance

- 8.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
- 8.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
- 8.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

- 8.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]
- 8.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

- 8.6 This permit does not convey any property rights of any sort or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

- 8.7 The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ 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.
[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]
- 8.8 Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

- 8.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

- 8.10** The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.
[IDAPA 58.01.01.200–223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380–386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15); 40 CFR 70.7(d), (e)]
- 8.11** Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the Clean Air Act (CAA), 42 United States Code (U.S.C.) Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.
[IDAPA 58.01.01.381–385, 4/5/00; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14), (15)]

Federal and State Enforceability

- 8.12** Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.
[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1), (2)]
- 8.13** Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.
[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

- 8.14** Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where a Tier I source is located, or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

New Applicable Requirements

- 8.15** The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

- 8.16 The permittee shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

- 8.17 All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 8.18 The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the permittee is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- 8.19 If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit, including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325, shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

- 8.20 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
 - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 5/1/94; IDAPA 58.01.01.325, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

8.21 The permittee shall comply with the following:

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

8.22 The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - 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 under Subsections 322.06, 322.07, and 322.08;
 - The status of compliance with the terms and conditions of the Tier I operating 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 in Subsection 322.11.c.ii 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; and
 - Such information as DEQ may require to determine the compliance status of the emissions unit.

8.23 All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

False Statements

- 8.24 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

- 8.25 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

- 8.26 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

- 8.27 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130–136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

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

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

- 8.29 In accordance with IDAPA 58.01.01.332, an “emergency”, as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

Appendix – Table 1 to Subpart WWWW

Table 1 to Subpart WWWW of Part 63—Equations To Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

Table 1 to Subpart WWWW of Part 63—Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

As specified in §63.59(c), use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams.

If your operation And you use... With...

Type is a new or existing...

	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat)	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat)
i. open molding operation		
a. manual resin application		
i. nonvapor-suppressed resin	$EF = 0.126 \times \text{HMAP} \times 2000$	$EF = 110.286 \times \text{HMAP} \times 0.05251 \times 2000$
ii. vapor-suppressed resin	$EF = 0.126 \times \text{HMAP} \times 2000 \times (1 - 10.5 \times \text{VSE factor})$	$EF = 110.286 \times \text{HMAP} \times 0.05251 \times 2000 \times (1 - 10.5 \times \text{VSE factor})$
iii. vacuum bagging/closed-mold curing with roll-out	$EF = 0.126 \times \text{HMAP} \times 2000 \times 0.8$	$EF = 110.286 \times \text{HMAP} \times 0.05251 \times 2000 \times 0.8$
iv. vacuum bagging/closed-mold curing without roll-out	$EF = 0.126 \times \text{HMAP} \times 2000 \times 0.5$	$EF = 110.286 \times \text{HMAP} \times 0.05251 \times 2000 \times 0.5$
b. automated mechanical resin application		
i. nonvapor-suppressed resin	$EF = 0.169 \times \text{HMAP} \times 2000$	$EF = 140.714 \times \text{HMAP} \times 0.181 \times 2000$
ii. vapor-suppressed resin	$EF = 0.169 \times \text{HMAP} \times 2000 \times (1 - 10.45 \times \text{VSE factor})$	$EF = 140.714 \times \text{HMAP} \times 0.181 \times 2000 \times (1 - 10.45 \times \text{VSE factor})$
iii. vacuum bagging/closed-mold curing with roll-out	$EF = 0.169 \times \text{HMAP} \times 2000 \times 0.85$	$EF = 140.714 \times \text{HMAP} \times 0.181 \times 2000 \times 0.85$
iv. vacuum bagging/closed-mold curing without roll-out	$EF = 0.169 \times \text{HMAP} \times 2000 \times 0.55$	$EF = 140.714 \times \text{HMAP} \times 0.181 \times 2000 \times 0.55$
v. nonvapor-suppressed resin	$EF = 0.107 \times \text{HMAP} \times 2000$	$EF = 110.157 \times \text{HMAP} \times 0.01551 \times 2000$
vi. vapor-suppressed resin	$EF = 0.107 \times \text{HMAP} \times 2000 \times (1 - 10.45 \times \text{VSE factor})$	$EF = 110.157 \times \text{HMAP} \times 0.01551 \times 2000 \times (1 - 10.45 \times \text{VSE factor})$
iii. closed-mold curing with roll-out	$EF = 0.107 \times \text{HMAP} \times 2000 \times 0.65$	$EF = 110.157 \times \text{HMAP} \times 0.01551 \times 2000 \times 0.65$
iv. vacuum bagging/closed-mold curing without roll-out	$EF = 0.107 \times \text{HMAP} \times 2000 \times 0.55$	$EF = 110.157 \times \text{HMAP} \times 0.01551 \times 2000 \times 0.55$
d. atomized mechanical resin application with robotic or automated spray control	$EF = 0.169 \times \text{HMAP} \times 2000 \times 2.77$	$EF = 0.07 \times 140.714 \times \text{HMAP} \times 0.181 \times 2000$
e. filament application		
i. nonvapor-suppressed resin	$EF = 0.184 \times \text{HMAP} \times 2000$	$EF = 140.204 \times \text{HMAP} \times 0.02381 \times 2000$
ii. vapor-suppressed resin	$EF = 0.184 \times \text{HMAP} \times 2000 \times 0.55$	$EF = 140.204 \times \text{HMAP} \times 0.02381 \times 2000 \times 0.55$
f. atomized spray gel coat application	$EF = 0.445 \times \text{HMAP} \times 2000$	$EF = 110.03546 \times \text{HMAP} \times 0.192 \times 2000$

9. nonatomized spray gel coat application	EF = $(0.4566 \times \text{VHAP} \times 2000)$	EF = $(0.4566 \times \text{VHAP} \times 2000)$
	EF = $(11.01646 \times \text{VHAP} \times 0.197) \times 2000$	EF = $(11.01646 \times \text{VHAP} \times 0.197) \times 2000$
10. atomized spray gel coat application using robotic or automated spray	EF = $0.445 \times \text{VHAP} \times 2000 \times 0.71$	EF = $0.445 \times \text{VHAP} \times 2000 \times 0.71$
	EF = $0.026 \times \text{VHAP} \times 2000$	EF = $0.026 \times \text{VHAP} \times 2000$
11. beated air blown through molds	EF = $0.558 \times \text{VHAP} \times 2000$	EF = $0.558 \times \text{VHAP} \times 2000$
	EF = $0.026 \times \text{VHAP} \times 2000$	EF = $0.026 \times \text{VHAP} \times 2000$
12. vented molds, but air is not heated	EF = $0.026 \times \text{VHAP} \times 2000$	EF = $0.026 \times \text{VHAP} \times 2000$
	EF = $0.026 \times \text{VHAP} \times 2000$	EF = $0.026 \times \text{VHAP} \times 2000$

Footnotes to Table 1

- The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart MMW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.
- To obtain the organic HAP emissions factor value for an operator with an SDS on control device multiply the EF above by the add on control factor calculated using Equation 1 of 303.6010. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.
- Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.
- The VSK factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSK test method of appendix A to this subpart.
- This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.
- Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.
- These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.
- If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no roller to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no roller to determine emission factors.