Statement of Basis

Permit to Construct No. P-2020.0005
Project ID 62385

Fiber Care Baths
Jerome, Idaho

Facility ID 053-00051

Final

June 21, 2021
Christina Boulay CB
Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
GACT	Generally Available Control Technology
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
NSPS	New Source Performance Standards

O&M	operation and maintenance
O_2	oxygen
PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
PERF	Portable Equipment Relocation Form
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
PW	process weight rate
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
RICE	reciprocating internal combustion engines
Rules	*Rules for the Control of Air Pollution in Idaho*
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds
yd^3	cubic yards
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

Fiber Care Baths, is a fiber glass manufacturer of sanitary ware products, including tub/shower enclosures, shower pans, walk-in tubs, handicap units, and whirlpool baths. The facility location is 446 East Frontage Road North, Jerome, ID 83338. The manufacturing facility will consist of a production facility and a two floor office complex. The emission sources at this facility are three spray guns, four spray booths, and three natural gas-fired heaters.

The three spray guns are a gelcoat spray gun Magnum Venus I IMG-CM-PAT-30, 1st laminate spray gun Magnum Venus FIT-C-WMB-PAT-15746-GFC-30, and 2nd laminate spray gun Magnum Venus FIT-C-WMB-DAT-15746-GFC-30.

The four spray booths are a gelcoat spray booth size 35'x12'x10' with a 10 horsepower fan, a trim station booth size 35'x12'x10' with a 10 horsepower fan, a 1st lamination spray booth size 20'x6'x10' with a 10 horsepower fan, and a 2nd lamination spray booth size 20'x6'x10' with a 10 horsepower fan.

Two of the natural gas-fired heaters are office units and are manufactured by Trane, one with a maximum capacity of 120,000 Btu/hr and the other with a maximum capacity of 80,000 Btu/hr. The third natural gas-fired heater is in the production area and is manufactured by Reznor with a maximum capacity of 400,000 Btu/hr.

Permitting History

This is the initial PTC for a new facility thus there is no permitting history.

Application Scope

This permit is the initial PTC for this facility.

The applicant has proposed to:

- Install and operate four spray booths with three spray guns and three natural gas-fired heaters.

Application Chronology

February 6, 2020	DEQ received an application.
February 10, 2020	DEQ received an application fee.
February 17 – March 3, 2020	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
March 10, 2020	DEQ determined that the application was incomplete.
July 13, 2020	DEQ received the permit processing fee.
August 21, 2020	DEQ received supplemental information from the applicant.
September 25, 2020	DEQ determined that the application was incomplete.
February 2, 2021	DEQ received supplemental information from the applicant.
March 4, 2021	DEQ determined that the application was complete.
May 10, 2021	DEQ made available the draft permit and statement of basis for peer and regional office review.
May 10, 2021	DEQ made available the draft permit and statement of basis for applicant review.
June 21, 2021	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Sources	Control Equipment
Gelcoat Paint spray booth(s) and/or preparation station: Manufacturer(s): United Air or equivalent Model(s): MCB-09-10-X or equivalent Note: The number of booths installed at the facility is not limited by this permit.	Gelcoat Paint spray booth(s) and/or preparation station filter system: Booth Type(s): Side draft Particulate filtration method: Dry Filters Manufacturer(s): Parker & Freudenberg or equivalent Model(s): NF20000 & Series 400 or equivalent PM/PM_{10} Control Efficiency: 98.0% or greater Gelcoat Coating spray gun(s): Manufacturer(s): Magnum Venus I or equivalent Model(s): IMG-CM-PAT-30 or equivalent Type: HVLP or equivalent Transfer Efficiency: 65% or greater
Trim booth(s) and/or preparation station: Manufacturer(s): United Air or equivalent Model(s): MCB-09-10-X or equivalent Note: The number of booths installed at the facility is not limited by this permit.	Trim booth(s) and/or preparation station filter system: Booth Type(s): Side draft Particulate filtration method: Dry Filters Manufacturer(s): Parker & Freudenberg or equivalent Model(s): NF2000 & Series 400 or equivalent PM/PM_{10} Control Efficiency: 98.0% or greater
1st Laminate Paint spray booth(s) and/or preparation station: Manufacturer(s): United Air or equivalent Model(s): MCB-09-10-X or equivalent Note: The number of booths installed at the facility is not limited by this permit.	1st Laminate Paint spray booth(s) and/or preparation station filter system: Booth Type(s): Side draft Particulate filtration method: Dry Filters Manufacturer(s): Parker & Freudenberg or equivalent Model(s): NF20000 & Series 400 or equivalent PM/PM_{10} Control Efficiency: 98.0% or greater 1st Laminate Coating spray gun(s): Manufacturer(s): Magnum Venus or equivalent Model(s): FIT-C-WMB-PAT-15746-GFC-30 or equivalent Type: Airless or equivalent Transfer Efficiency: 95% or greater
2nd Laminate Paint spray booth(s) and/or preparation station: Manufacturer(s): United Air or equivalent Model(s): MCB-09-10-X or equivalent Note: The number of booths installed at the facility is not limited by this permit.	2nd Laminate Paint spray booth(s) and/or preparation station filter system: Booth Type(s): Side draft Particulate filtration method: Dry Filters Manufacturer(s): Parker & Freudenberg or equivalent Model(s): NF20000 & Series 400 or equivalent PM/PM_{10} Control Efficiency: 98.0% or greater 2nd Laminate Coating spray gun(s): Manufacturer(s): Magnum Venus or equivalent Model(s): FIT-C-WMB-PAT-15746-GFC-30 or equivalent Type: Airless or equivalent Transfer Efficiency: 95% or greater
Office Heater 1: Manufacturer: Trane Model: Gudda-12.0-A Manufacture Date: July 2020 Heat input rating: 0.12 MMBtu/hr Fuel: Natural Gas	None

Sources	Control Equipment
Office Heater 2: Manufacturer: Trane Model: Gudda-08-A Manufacture Date: June 2020 Heat input rating: 0.08 MMBtu/hr Fuel: Natural Gas	None
Production Heater: Manufacturer: Reznor Model: PV40 Manufacture Date: March 20,2020 Heat input rating: 0.40 MMBtu/hr Fuel: Natural Gas	None

Emissions Inventories

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the three spray guns, four spray booths, and three natural gas-fired heater operations at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, HAP PTE were based on emission factors from AP-42 Chapter 1 Section 1.4, material safety data sheets specific to the coatings in this project, operation of 3,120 hours per year for coatings, 8,760 hours per year at a 50% duty cycle for the natural gas-fired heaters, and process information specific to the facility for this proposed project.

The maximum operating hours on all emission sources are 8-10 hours per day, 6 days per week. The spray equipment outperforms detail, re-work, and shipping; thus the limiting factor is shipping which directly affects the spray coating production. Thus, the calculations for all emissions except the natural gas-fired heaters were based on 10 hours per day, 6 days per week. The natural gas-fired heaters were based off of a 50 % duty cycle of 8,760 hours per year.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a "Synthetic Minor" source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this fiber glass manufacture operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8,760 hr/yr (24 hr/day x 365 day/yr).

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$	SO_2	NO_X	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources					
Natural Gas-Fired Heaters	0.02	0.001	0.24	0.11	0.1
Gel-Coating	-	-	-	-	19.53
1st Lamination					
2nd Lamination					
Trim Station	4.32	-	-	-	-
Total, Point Sources	**4.32**	**0.001**	**0.24**	**0.11**	**19.63**

The following table presents the uncontrolled Potential to Emit for HAP pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this fiber glass manufacture operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8,760 hr/yr (24 hr/day x 365 day/yr). Then, the worst-case maximum HAP Potential to Emit was determined for this fiber glass manufacture operation.

Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Total PAH (POM)	3.86E-04
Benzene	5.00E-06
Formaldehyde	1.93E-04
Hexane	4.64E-03
Naphthalene	2.00E-06
Toluene	9.00E-06
Arsenic	5.16E-06
Beryllium	3.09E-08
Cadmium	3.00E-06
Chromium	4.00E-06
Cobalt	2.16E-07
Manganese	9.79E-07
Mercury	6.70E-07
Nickel	5.00E-06
Selenium	6.18E-08
Styrene Monomer	19.5367
Total	**19.54**

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

This is a new facility. Therefore, pre-project emissions are set to zero for all criteria pollutants.

Table 4 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC	
	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]
Natural Gas-Fired Heaters	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gel-Coating	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1st Lamination	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2nd Lamination	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Trim Station	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pre-Project Totals	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 5 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC	
	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]
Natural Gas-Fired Heaters	4.46E-03	3.48E-03	3.53E-04	2.75E-04	5.52E-03	4.31E-02	2.35E-02	1.83E-02	3.21E-03	2.52E-03
Gel-Coating	-	-	-	-	-	-	-	-	1.365	2.13
1st Lamination	-	-	-	-	-	-	-	-	4.295	6.70
2nd Lamination	-	-	-	-	-	-	-	-	6.609	10.31
Trim Station	4.63E-03	7.22E-03	-	-	-	-	-	-	-	-
Post Project Totals	**0.01**	**0.01**	**0.0004**	**0.000275**	**0.01**	**0.04**	**0.02**	**0.02**	**12.27**	**19.14**

a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 6 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Post Project Potential to Emit	0.01	0.01	0.0004	0.000275	0.01	0.04	0.02	0.02	12.27	19.14
Changes in Potential to Emit	**0.01**	**0.01**	**0.0004**	**0.000275**	**0.01**	**0.04**	**0.02**	**0.02**	**12.27**	**19.14**

Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of non-carcinogenic toxic air pollutants (TAP) is provided in the following table.

Pre- and post-project, as well as the change in, non-carcinogenic TAP emissions are presented in the following table:

Table 2 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Acetone	0.00E-03	4.95	4.95	119.00	No
Barium	0.00E-03	4.61E-07	4.61E-07	3.30E-02	No
Chromium	0.00E-03	1.47E-07	1.47E-07	3.30E-02	No
Cobalt	0.00E-03	8.80E-09	8.80E-09	3.30E-03	No
Dichlorobenzene	0.00E-03	1.26E-07	1.26E-07	20.00	No
Hexane	0.00E-03	8.26E-04	8.26E-04	12.00	No
Manganese	0.00E-03	1.74E-07	1.74E-07	6.70E-02	No
Naphthalene	0.00E-03	2.80E-07	2.80E-07	3.33	No
Pentane	0.00E-03	1.19E-04	1.19E-04	118.00	No
Toluene	0.00E-03	2.00E-06	2.00E-06	25.00	No
Vanadium	0.00E-03	1.00E-06	1.00E-06	3.00E-03	No
Zinc	0.00E-03	1.30E-05	1.30E-05	6.67E-01	No
Styrene	0.00E-03	4.45	4.45	6.67	No

All changes in emissions rates for non-carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average non-carcinogenic screening ELs identified in IDAPA 58.01.01.585 were exceeded.

There were 24-hour TAPs in the curing agent and filler/pigment material as well as the gel coat. The following scientific explanations, explain why those 24-hour TAPs are not listed in Table 7.

Chemical Decomposition of Methyl Ethyl Ketone Peroxide (MEKP) in reference to VOC emissions:

Fiber Care Baths will be using a relatively small amount of liquid organic peroxide solution (1.0 to 1.5% based on weight of resin only) referred to as “catalyst”. Common chemical name is Methyl Ethyl Ketone Peroxide (MEKP). MEKP is a highly reactive, colorless liquid organic oxidizer. The MEKP is immediately consumed by both the unsaturated polyester resin and the metal salts contained in the resin. Because the MEKP is a highly reactive oxidizer it immediately reacts in this case with Cobalt and is immediately consumed in the initial reaction. If a trace amount of MEKP does not fully react from over catalyzation (operator error) a small amount of acetic acid droplets may be formed due to the reaction with moisture present in the air, but not MEKP. Acetic acid droplets are neither a HAP or VOC. Therefore, the normal usage of MEKP at this facility will not result in any unmeasurable VOC or HAP emission. Published references written by Dr. Long at Norac Pharme, Azusa Ca. and Brice Milleville, another authority on MEKP catalyst from Akzo Nobel, Amsterdam, Netherlands.

Chemical decomposition of gel coat and the specific breakdown of Cobalt salt in the polymerization reaction:

Gel coat is a pigmented surface coating which gels against a mold surface and cures with the structural laminate. It reproduces the mold surface. In this case, a tub/shower enclosure. The specific chemical name is a thermoset unsaturated isophthalic neopentyl glycol resin mixed with pigments, initiators, surfactants and fillers to produce a chemical resistant surface coating. The Cobalt listed in the SDS is completely broken down and consumed in the reaction to promote free radicals to initiate cross-linking of the unsaturated polymer. MEKP previously discussed is essential in the oxidation/decomposition of the Cobalt. The specific decomposition produces free radicals which are critical in polymerization of the unsaturated polyester. If an analytical test was conducted on the gel coat utilizing a high pressure liquid chromatography (HPLC) there would no longer be any detectable amounts of Cobalt contained in the cured coating.

Chemical decomposition of resin solution and the specific breakdown of Cobalt salt in the polymerization reaction:

The resin used at this facility is unsaturated orthophthalic polyester resin (part# AOC-C949-FPF). The liquid resin is converted to a solid by cross-linking chains. This is done by creating free radicals at the unsaturated bonds which promote a chain reaction to the other unsaturated bonds in the adjacent molecules, thus linking them in the process. To initiate free radicals, MEKP is introduced. The MEKP decomposes the Cobalt salts contained in the resin and is commonly referred to as free radical initiators. Cobalt, like the gelcoat resin is completely consumed in the free radical reaction with MEKP.

Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic toxic air pollutants (TAP) is provided in the following table.

Table 8 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
3-Methylcholanthrene	0.00E-03	1.05E-10	1.05E-10	2.50E-06	No
7-PAH Group	0.00E-03	1.19E-09	1.19E-09	9.10E-05	No
Arsenic	0.00E-03	2.10E-08	2.10E-08	1.50E-06	No
Benzene	0.00E-03	2.20E-07	2.20E-07	8.00E-04	No
Cadmium	0.00E-03	1.15E-07	1.15E-07	3.70E-06	No
Formaldehyde	0.00E-03	8.00E-06	8.00E-06	5.10E-04	No
Other-PAH (Exclude 7-PAH)	0.00E-03	1.01E-08	1.01E-08	9.10E-05	No

All changes in emissions rates for carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any carcinogenic TAP because none of the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 9 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (lb/hr)	PTE (T/yr)
Total PAH (POM)	1.022E-08	7.97E-09
Benzene	1.236E-06	9.64E-07
Formaldehyde	4.410E-05	3.44E-05
Hexane	1.059E-03	8.26E-04
Naphthalene	3.590E-07	2.80E-07
Toluene	2E-06	1.56E-06
Arsenic	1.177E-07	9.18E-08
Beryllium	7.064E-09	5.51E-09
Cadmium	6.474E-07	5.05E-07
Chromium	8.230E-07	6.42E-07
Cobalt	4.936E-08	3.85E-08
Manganese	2.231E-07	1.74E-07
Mercury	1.526E-07	1.19E-07
Nickel	9.64E-07	1.93E-03
Selenium	1.410E-09	1.10E-08
Styrene Monomer	12.53	19.54
Totals	**12.53**	**19.54**

Ambient Air Quality Impact Analyses

NAAQS compliance demonstration was not required for permit issuance because non-fugitive emissions of all criteria pollutants were below levels identified as BRC and TAP emissions were below applicable ELs.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Jerome County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.

SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.

SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.

UNK = Class is unknown.

For All Other Pollutants:

A = Use when permitted emissions of a pollutant are > 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.

UNK = Class is unknown.

Table 30 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	4.32	0.01	**100**	B
PM_{10}	4.32	0.01	**100**	B
$PM_{2.5}$	4.32	0.01	**100**	B
SO_2	0.001	0.000275	**100**	B
NO_X	0.24	0.04	**100**	B
CO	0.11	0.02	**100**	B
VOC	19.63	19.14	**100**	B
HAP (single)	19.54	19.54	**10**	A
Total HAPs	19.54	19.54	**25**	SM

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 ..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the proposed new emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 ..... Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 ..... Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.4 and 3.4.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 ..... Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility have a potential to emit greater than 10 tons per year for any one HAP or 25 tons per year for all HAP combined (styrene monomer) as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10. Therefore, in accordance with IDAPA 58.01.01.313.01.b, the permittee must submit a complete application to DEQ for an initial Tier I operating permit within 12 months of becoming a Tier I source or commencing operation. This requirement is assured by Permit Conditions 2.18 and 3.9.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 ..... Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements 40 CFR Part 60.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

GACT Applicability (40 CFR 63)

The facility has proposed to operate as a major source of hazardous air pollutant (HAP) emissions, and is subject to the requirements of 40 CFR 63, Subpart WWWW–National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

Idaho Department of Environmental Quality is delegated this subpart.

40 CFR 63, Subpart WWWW ..... National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

§ 63.5780 ..... What is the purpose of this subpart?

This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production. This subpart also establishes requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards.

This subpart applies because Fiber Care Baths utilizes reinforced plastic composites production using resins and gel coats. This facility is also a major source of HAP emissions.

§ 63.5785 ..... Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a reinforced plastic composites production facility that is located at a major source of HAP emissions. Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

(b) You are not subject to this subpart if your facility only repairs reinforced plastic composites. Repair includes the non-routine manufacture of individual components or parts intended to repair a larger item as defined in §63.5935

(c) You are not subject to this subpart if your facility is a research and development facility as defined in section 112(c)(7) of the Clean Air Act (CAA).

(d) You are not subject to this subpart if your reinforced plastic composites operations use less than 1.2 tons per year (tpy) of thermoset resins and gel coats that contain styrene combined.

This subpart applies because Fiber Care Baths utilizes reinforced plastic composites production using resins and gel coats. This facility is also a major source of HAP emissions. B, C, and D, relate to repair, R&D and small users <102 tons per year of resin and gel coat. Fiber Care Baths is not involved in any mention items.

§ 63.5787 ..... What if I also manufacture fiberglass boats or boat parts?

(a) If your source meets the applicability criteria in §63.5785, and is not subject to the Boat Manufacturing NESHAP (40 CFR part 63, subpart VVVV), you are subject to this subpart regardless of the final use of the parts you manufacture.

(b) If your source is subject to 40 CFR part 63, subpart VVVV, and all the reinforced plastic composites you manufacture are used in manufacturing your boats, you are not subject to this subpart.

(c) If you are subject to 40 CFR part 63, subpart VVVV, and meet the applicability criteria in §63.5785, and produce reinforced plastic composites that are not used in fiberglass boat manufacture at your facility, all operations associated with the manufacture of the reinforced plastic composites parts that are not used in fiberglass boat manufacture at your facility are subject to this subpart, except as noted in paragraph (d) of this section.

(d) Facilities potentially subject to both this subpart and 40 CFR part 63, subpart VVVV may elect to have the operations in paragraph (c) of this section covered by 40 CFR part 63, subpart VVVV, in lieu of this subpart, if they can demonstrate that this will not result in any organic HAP emissions increase compared to complying with this subpart.

This subpart does not apply. Fiber Care Baths is not involved in this type of production.

§ 63.5790 ..... What parts of my plant does this subpart cover?

(a) This subpart applies to each new or existing affected source at reinforced plastic composites production facilities.

(b) The affected source consists of all parts of your facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.

(c) The following operations are specifically excluded from any requirements in this subpart: application of mold sealing and release agents; mold stripping and cleaning; repair of parts that you did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations (such as hobby shops on military bases); prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply.

(d) Production resins that must meet military specifications are allowed to meet the organic HAP limit contained in that specification. In order for this exemption to be used, you must supply to the permitting authority the specifications certified as accurate by the military procurement officer, and those specifications must state a requirement for a specific resin, or a specific resin HAP content. Production resins for which this exemption is used must be applied with nonatomizing resin application equipment unless you can demonstrate this is infeasible. You must keep a record of the resins for which you are using this exemption.

This subpart does not apply. Fiber Care Baths is not involved in activities outlined in this section.

§ 63.5795 ..... How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

(a) A reinforced plastic composites production facility is a new affected source if it meets all the criteria in paragraphs (a)(1) and (2) of this section.

(1) You commence construction of the source after August 2, 2001.

(2) You commence construction, and no other reinforced plastic composites production source exists at that site.

(b) For the purposes of this subpart, an existing affected source is any affected source that is not a new affected source.

This subpart applies. Fiber Care Baths will commence construction after August 2, 2001.

§ 63.5796 ..... What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?

Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in Tables 3 and 5 to this subpart. You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting 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 you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions.

This subpart applies to Fiber Care Baths. Fiber Care Baths conforms to this section of operational type, "open molding – non CR/HS" and use mechanical resin application" with a limit of 88 lb/ton.

§ 63.5797 ..... How do I determine the organic HAP content of my resins and gel coats?

In order to determine the organic HAP content of resins and gel coats, you 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, you 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 you must use the measured organic HAP content to determine compliance.

(c) If the organic HAP content is provided as a single value, you 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 you 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 you must use the measured organic HAP content to determine compliance.

This subpart applies to Fiber Care Baths. The calculations and equations are clear and outlined in Table 1. HAP contents are obtained from the manufacturers of resins and gel coats used at the facility. The appropriate SDS's have been retained at the facility and submitted to IDEQ for verification. Tech America Corporation has been contracted by Fiber Care Baths for the past 28 years to provide engineering services for local, State and Federal compliance including 40 CFR 63 WWWW and required IDEQ regulatory compliance.

§ 63.5798 ..... What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?

If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to this subpart, you may use the procedures in paragraphs (a) or (b) of this section to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this subpart, and to calculate facility organic HAP emissions.

(a) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850.

(b) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to this subpart.

This subpart does not apply to Fiber Care Baths because all equations listed in Table 1 to this subpart are suited for all HAP calculations used in HAP/VOC reporting.

§ 63.5799 ..... How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?

To calculate your facility's organic HAP emissions in tpy for purposes of determining which paragraphs in §63.5805 apply to you, you must use the procedures in either paragraph (a) of this section for new facilities prior to startup, or paragraph (b) of this section for existing facilities and new facilities after startup. You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations, or a new facility that does not have any of the following operations: Open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing. Emissions calculation and emission reporting procedures in other sections of this subpart still apply. Calculate organic HAP emissions prior to any add-on control device, and do not include organic HAP emissions from any resin or gel coat used in operations subject to the Boat Manufacturing NESHAP, 40 CFR part 63, subpart VVVV, or from the manufacture of large parts as defined in §63.5805(d)(2). For centrifugal casting operations at existing facilities, do not include any organic HAP emissions where resin or gel coat is applied to an open centrifugal mold using open molding application techniques. Table 1 and the Table 1 footnotes to this subpart present more information on calculating centrifugal casting organic HAP emissions. The timing and reporting of these calculations is discussed in paragraph (c) of this section.

(a) For new facilities prior to startup, calculate a weighted average organic HAP emissions factor for the operations specified in §63.5805(c) and (d) on a lbs/ton of resin and gel coat basis. Base the weighted average on your projected operation for the 12 months subsequent to facility startup. Multiply the weighted average organic HAP emissions factor by projected resin use over the same period. You may calculate your organic HAP emissions factor based on the factors in Table 1 to this subpart, or you may use any HAP emissions factor approved by us, such as factors from the "Compilation of Air Pollutant Emissions Factors, Volume I: Stationary Point and Area Sources (AP-42)," or organic HAP emissions test data from similar facilities.

(b) For existing facilities and new facilities after startup, you may use the procedures in either paragraph (b)(1) or (2) of this section. If the emission factors for an existing facility have changed over the period of time prior to their initial compliance date due to incorporation of pollution-prevention control techniques, existing facilities may base the average emission factor on their operations as they exist on the compliance date. If an existing facility has accepted an enforceable permit limit that would result in less than 100 tpy of HAP measured prior to any add-on controls, and can demonstrate that they will operate at that level subsequent to the compliance date, they can be deemed to be below the 100 tpy threshold.

(1) *Use a calculated emission factor.* Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. You may calculate this organic HAP emissions factor based on the equations in Table 1 to this subpart, or you may use any organic HAP emissions factor approved by us, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.

(2) *Conduct performance testing.* Conduct performance testing using the test procedures in §63.5850 to determine a site-specific organic HAP emissions factor in units of lbs/ton of resin and gel coat used. Conduct the test under conditions expected to result in the highest possible organic HAP emissions. Multiply this factor by annual resin and gel coat use to determine annual organic HAP emissions. This calculation must be repeated and reported annually.

(c) Existing facilities must initially perform this calculation based on their 12 months of operation prior to April 21, 2003, and include this information with their initial notification report. Existing facilities must repeat the calculation based on their resin and gel coat use in the 12 months prior to their initial compliance date, and submit this information with their initial compliance report. After their initial compliance date, existing and new facilities must recalculate organic HAP emissions over the 12-month period ending June 30 or December 31, whichever date is the first date following their compliance date specified in §63.5800. Subsequent calculations should cover the periods in the semiannual compliance reports.

This subpart does not apply to Fiber Care Baths because Fiber Care Baths does not utilize any operational methods. Fiber Care Baths utilizes standard equations and standard listed application methods.

§ 63.5800 ..... When do I have to comply with this subpart?

You must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. Facilities meeting an organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

This subpart does apply to Fiber Care Baths. Fiber Care Baths has compliant rolling averages and conforming dates specified in Table 2.

§ 63.5805 ..... What standards must I meet to comply with this subpart?

You must meet the requirements of paragraphs (a) through (h) of this section that apply to you. You may elect to comply using any options to meet the standards described in §§63.5810 through 63.5830. Use the procedures in §63.5799 to determine if you meet or exceed the 100 tpy threshold.

(a) If you have an existing facility that has any centrifugal casting or continuous casting/lamination operations, you must meet the requirements of paragraph (a)(1) or (2) of this section:

(1) If the combination of all centrifugal casting and continuous lamination/casting operations emit 100 tpy or more of HAP, you must reduce the total organic HAP emissions from centrifugal casting and continuous lamination/casting operations by at least 95 percent by weight. As an alternative to meeting the 95 percent by weight requirement, centrifugal casting operations may meet the applicable organic HAP emissions limits in Table 5 to this subpart and continuous lamination/casting operations may meet an organic HAP emissions limit of 1.47 lbs/ton of neat resin plus and neat gel coat plus applied. For centrifugal casting, the percent reduction requirement does not apply to organic HAP emissions that occur during resin application onto an open centrifugal casting mold using open molding application techniques.

(2) If the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, then centrifugal casting and continuous lamination/casting operations must meet the appropriate requirements in Table 3 to this subpart.

(b) All operations at existing facilities not listed in paragraph (a) of this section 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.

(c) If you have a new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you 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 to you.

(d)(1) Except as provided in paragraph (d)(2) of this section, if you have a new facility that emits 100 tpy or more of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must reduce the total organic HAP emissions from these operations by at least 95 percent by weight and meet any applicable work practice standards in Table 4 to this subpart that apply to you. As an alternative to meeting 95 percent by weight, you may meet the organic HAP emissions limits in Table 5 to this subpart. If you have a continuous lamination/casting operation, that operation may alternatively meet an organic HAP emissions limit of 1.47 lbs/ton of neat resin plus and neat gel coat plus applied.

(2)(i) If your new facility manufactures large reinforced plastic composites parts using open molding or pultrusion operations, the specific open molding and pultrusion operations used to produce large parts are not required to reduce HAP emissions by 95 weight percent, but must meet the emission limits in Table 3 to this subpart.

(ii) A large open molding part is defined as a part that, when the final finished part is enclosed in the smallest rectangular six-sided box into which the part can fit, the total interior volume of the box exceeds 250 cubic feet, or any interior sides of the box exceed 50 square feet.

(iii) A large pultruded part is a part that exceeds an outside perimeter of 24 inches or has more than 350 reinforcements.

(e) If you have a new or existing facility subject to paragraph (a)(2) or (c) of this section at its initial compliance date that subsequently meets or exceeds the 100 tpy threshold in any calendar year, you must notify your permitting authority in your compliance report. You may at the same time request a one-time exemption from the requirements of paragraph (a)(1) or (d) of this section in your compliance report if you can demonstrate all of the following:

(1) The exceedance of the threshold was due to circumstances that will not be repeated.

(2) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.

(3) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in §63.5799.

(f) If you apply for an exemption in paragraph (e) of this section and subsequently exceed the HAP emission thresholds specified in paragraph (a)(2) or (c) of this section over the next 12-month period, you must notify the permitting authority in your semiannual report, the exemption is removed, and your facility must comply with paragraph (a)(1) or (d) of this section within 3 years from the time your organic HAP emissions first exceeded the threshold.

(g) If you have repair operations subject to this subpart as defined in §63.5785, these repair operations must meet the requirements in Tables 3 and 4 to this subpart and are not required to meet the 95 percent organic HAP emissions reduction requirements in paragraph (a)(1) or (d) of this section.

(h) If you use an add-on control device to comply with this subpart, you must meet all requirements contained in 40 CFR part 63, subpart SS.

This subpart does not apply to Fiber Care Baths. Fiber Care Baths does not engage in centrifugal casting or continuous casting/lamination operations, large open molding parts, pultrusion or any combination thereof.

§ 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart. (1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\%\ \text{Control Efficiency}}{100} \qquad \text{(Eq. 1)}$$

Where:

Percent Control Efficiency = a value calculated from organic HAP emissions test measurements made according to the requirements of §63.5850 to this subpart.

(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) Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type. Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.

(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 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

(c) *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this 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, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

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

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

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 and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) 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 (centrifugal casting) 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 (centrifugal casting) operations as shown in Equation 4 of this section.

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

Where:

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

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

n = number of operations.

(3) Compare the values calculated in 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) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

(1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in 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.

(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.

This subpart does not currently apply. This subpart relates to options for meeting standards outlined in Table 3 and 5. Fiber Care Baths meets the requirements of Table 3, "open molding" "Non/HS mechanical resin application" and is less than 88 lb/ton". Gel coat is "open molding" – "Gel Coat White/Off White Pigmented" at "267 lb/ton". Because Fiber Care Baths meets the requirements of Table 3, they do not need the alternative organic HAP emissions limits for open molding outlined in Table 5.

§ 63.5820 ..... What are my options for meeting the standards for continuous laminating operations?

You must use one or more of the options in paragraphs (a) through (d) of this section to meet the standards in §63.5805. Use the calculation procedures in §§63.5865 through 63.5890.

(a) *Compliant line option.* Demonstrate that each continuous lamination line and each continuous casting line complies with the applicable standard.

(b) *Averaging option.* Demonstrate that all continuous lamination and continuous casting lines combined, comply with the applicable standard.

(c) *Add-on control device option.* If your operation must meet the 58.5 weight percent organic HAP emissions reduction limit in Table 3 to this subpart, you have the option of demonstrating that you achieve 95 percent reduction of all wet-out area organic HAP emissions.

(d) *Combination option.* Use any combination of options in paragraphs (a) and (b) of this section or, for affected sources at existing facilities, any combination of options in paragraphs (a), (b), and (c) of this section (in which one or more lines meet the standards on their own, two or more lines averaged together meet the standards, and one or more lines have their wet-out areas controlled to a level of 95 percent).

This subpart does not apply as Fiber Care Baths does not engage in continuous lamination casting operations.

§ 63.5830 ..... What are my options for meeting the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement?

You must use one or more of the options in paragraphs (a) through (e) of this section to meet the 60 weight percent organic HAP emissions limit in Table 3 to this subpart, as required in §63.5805.

(a) Achieve an overall reduction in organic HAP emissions of 60 weight percent by capturing the organic HAP emissions and venting them to a control device or any combination of control devices. Conduct capture and destruction efficiency testing as specified in 63.5850 to this subpart to determine the percent organic HAP emissions reduction.

(b) Design, install, and operate wet area enclosures and resin drip collection systems on pultrusion machines that meet the criteria in paragraphs (b)(1) through (10) of this section.

(1) The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die(s). The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.

(2) For open bath pultrusion machines with a radio frequency pre-heat unit, the enclosure must extend from the beginning of the resin bath to within 12.5 inches or less of the entrance of the radio frequency pre-heat unit. If the stock that is within 12.5 inches or less of the entrance to the radio frequency pre-heat unit has any drip, it must be enclosed. The stock exiting the radio frequency pre-heat unit is not required to be in an enclosure if the stock has no drip between the exit of the radio frequency pre-heat unit to within 0.5 inches of the entrance of the die.

(3) For open bath pultrusion machines without a radio frequency pre-heat unit, the enclosure must extend from the beginning of the resin bath to within 0.5 inches or less of the die entrance.

(4) For pultrusion lines with pre-wet area(s) prior to direct die injection, no more than 12.5 inches of open wet stock is permitted between the entrance of the first pre-wet area and the entrance to the die. If the pre-wet stock has any drip, it must be enclosed.

(5) The total open area of the enclosure must not exceed two times the cross sectional area of the puller window(s) and must comply with the requirements in paragraphs (b)(5)(i) through (iii) of this section.

(i) All areas that are open need to be included in the total open area calculation with the exception of access panels, doors, and/or hatches that are part of the enclosure.

(ii) The area that is displaced by entering reinforcement or exiting product is considered open.

(iii) Areas that are covered by brush covers are considered closed.

(6) Open areas for level control devices, monitoring devices, agitation shafts, and fill hoses must have no more than 1.0 inch clearance.

(7) The access panels, doors, and/or hatches that are part of the enclosure must close tightly. Damaged access panels, doors, and/or hatches that do not close tightly must be replaced.

(8) The enclosure may not be removed from the pultrusion line, and access panels, doors, and/or hatches that are part of the enclosure must remain closed whenever resin is in the bath, except for the time period discussed in paragraph (b)(9) of this section.

(9) The maximum length of time the enclosure may be removed from the pultrusion line or the access panels, doors, and/or hatches and may be open, is 30 minutes per 8 hour shift, 45 minutes per 12 hour shift, or 90 minutes per day if the machine is operated for 24 hours in a day. The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded. Facilities may average the times that access panels, doors, and/or hatches are open across all operating lines. In that case the average must not exceed the times shown in this paragraph (b)(9). All lines included in the average must have operated the entire time period being averaged.

(10) No fans, blowers, and/or air lines may be allowed within the enclosure. The enclosure must not be ventilated.

(c) Use direct die injection pultrusion machines with resin drip collection systems that meet all the criteria specified in paragraphs (c)(1) through (3) of this section.

(1) All the resin that is applied to the reinforcement is delivered directly to the die.

(2) No exposed resin is present, except at the face of the die.

(3) Resin drip is captured in a closed system and recycled back to the process.

(d) Use a preform injection system that meets the definition in §63.5935

(e) Use any combination of options in paragraphs (a) through (d) of this section in which different pultrusion lines comply with different options described in paragraphs (a) through (d) of this section, and

(1) Each individual pultrusion machine meets the 60 percent reduction requirement, or

(2) The weighted average reduction based on resin throughput of all machines combined is 60 percent. For purposes of the average percent reduction calculation, wet area enclosures reduce organic HAP emissions by 60 percent, and direct die injection and preform injection reduce organic HAP emissions by 90 percent.

This subpart does not apply as Fiber Care Baths does not engage in Pultrusion operations.

§ 63.5835 ..... What are my general requirements for complying with this subpart?

(a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls.

(b) You must be in compliance with all organic HAP emissions limits in this subpart that you meet using add-on controls at all times.

(c) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

This subpart does apply to Fiber Care Baths. Fiber Care Baths will show compliance through using Tables 3 and 4 and show compliance to the HAP content limit in Table 7. Fiber Care Baths does not have add-on controls or monitoring equipment and is not required to have these.

§ 63.5840 ..... By what date must I conduct a performance test or other initial compliance demonstration?

You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date. New sources that use add-on controls to initially meet compliance must demonstrate compliance within 180 days after their compliance date.

This subpart does not apply to Fiber Care Baths because Fiber Care Baths does not have add on controls.

§ 63.5845 ..... When must I conduct subsequent performance tests?

You must conduct a performance test every 5 years following the initial performance test for any standard you meet with an add-on control device.

This subpart does not apply because Fiber Care Baths is not required to performance test. Fiber Care Baths shows compliance through using Tables 1 and 3.

§ 63.5850 ..... How do I conduct performance tests, performance evaluations, and design evaluations?

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

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

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

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

(e) You must conduct the control device performance test using the emission measurement methods specified in paragraphs (e)(1) through (5) of this section.

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

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

(3) Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If you use Method 25A, you must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If you use Method 18 and the number of organic HAP in the exhaust stream exceeds five, you must take into account the use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. Do not use Method 18 to measure organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.

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

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

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

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

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

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

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

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

This subpart does not apply because Fiber Care Baths does not have any add on controls. Fiber Care Baths shows compliance through Tables in this subpart.

§ 63.5855 ..... What are my monitor installation and operation requirements?

You must monitor and operate all add-on control devices according to the procedures in 40 CFR part 63, subpart SS.

This subpart does not apply because Fiber Care Baths does not have any add on controls. Fiber Care Baths shows compliance through Tables in this subpart.

§ 63.5860 ..... How do I demonstrate initial compliance with the standards?

(a) You demonstrate initial compliance with each organic HAP emissions standard in paragraphs (a) through (h) of §63.5805 that applies to you by using the procedures shown in Tables 8 and 9 to this subpart.

(b) If using an add-on control device to demonstrate compliance, you must also establish each control device operating limit in 40 CFR part 63, subpart SS, that applies to you.

Emission Factor, Percent Reduction, and Capture Efficiency Calculation Procedures for Continuous Lamination/Casting Operations.

This subpart does not apply because Fiber Care Baths does not have any add on controls.

§ 63.5865 ..... What data must I generate to demonstrate compliance with the standards for continuous lamination/casting operations?

(a) For continuous lamination/casting affected sources complying with a percent reduction requirement, you must generate the data identified in Tables 10 and 11 to this subpart for each data requirement that applies to your facility.

(b) For continuous lamination/casting affected sources complying with a lbs/ton limit, you must generate the data identified in Tables 11 and 12 to this subpart for each data requirement that applies to your facility.

This subpart does not apply because Fiber Care Baths does not engage in continuous lamination/casting operations. Fiber Care Baths utilizes open molding operations.

§ 63.5870 ..... How do I calculate annual uncontrolled and controlled organic HAP emissions from my wet-out area(s) and from my oven(s) for continuous lamination/casting operations?

To calculate your annual uncontrolled and controlled organic HAP emissions from your wet-out areas and from your ovens, you must develop uncontrolled and controlled wet-out area and uncontrolled and controlled oven organic HAP emissions estimation equations or factors to apply to each formula applied on each line, determine how much of each formula for each end product is applied each year on each line, and assign uncontrolled and controlled wet-out area and uncontrolled and controlled oven organic HAP emissions estimation equations or factors to each formula. You must determine the overall capture efficiency using the procedures in §63.5850 to this subpart.

(a) To develop uncontrolled and controlled organic HAP emissions estimation equations and factors, you must, at a minimum, do the following, as specified in paragraphs (a)(1) through (6) of this section:

(1) Identify each end product and the thickness of each end product produced on the line. Separate end products into the following end product groupings, as applicable: corrosion-resistant gel coated end products, noncorrosion-resistant gel coated end products, corrosion-resistant nongel coated end products, and noncorrosion-resistant nongel coated end products. This step creates end product/thickness combinations.

(2) Identify each formula used on the line to produce each end product/thickness combination. Identify the amount of each such formula applied per year. Rank each formula used to produce each end product/thickness combination according to usage within each end product/thickness combination.

(3) For each end product/thickness combination being produced, select the formula with the highest usage rate for testing.

(4) If not already selected, also select the worst-case formula (likely to be associated with the formula with the highest organic HAP content, type of HAP, application of gel coat, thin product, low line speed, higher resin table temperature) amongst all formulae. (You may use the results of the worst-case formula test for all formulae if desired to limit the amount of testing required.)

(5) For each formula selected for testing, conduct at least one test (consisting of three runs). During the test, track information on organic HAP content and type of HAP, end product thickness, line speed, and resin temperature on the wet-out area table.

(6) Using the test results, develop uncontrolled and controlled organic HAP emissions estimation equations (or factors) or series of equations (or factors) that best fit the results for estimating uncontrolled and controlled organic HAP emissions, taking into account the organic HAP content and type of HAP, end product thickness, line speed, and resin temperature on the wet-out area table.

(b) In lieu of using the method specified in paragraph (a) of this section for developing uncontrolled and controlled organic HAP emissions estimation equations and factors, you may either method specified in paragraphs (b)(1) and (2) of this section, as applicable.

(1) For either uncontrolled or controlled organic HAP emissions estimates, you may use previously established, facility-specific organic HAP emissions equations or factors, provided they allow estimation of both wet-out area and oven organic HAP emissions, where necessary, and have been approved by your permitting authority. If a previously established equation or factor is specific to the wet-out area only, or to the oven only, then you must develop the corresponding uncontrolled or controlled equation or factor for the other organic HAP emissions source.

(2) For uncontrolled (controlled) organic HAP emissions estimates, you may use controlled (uncontrolled) organic HAP emissions estimates and control device destruction efficiency to calculate your uncontrolled (controlled) organic HAP emissions provided the control device destruction efficiency was calculated at the same time you collected the data to develop your facility's controlled (uncontrolled) organic HAP emissions estimation equations and factors.

(c) Assign to each formula an uncontrolled organic HAP emissions estimation equation or factor based on the end product/thickness combination for which that formula is used.

(d)(1) To calculate your annual uncontrolled organic HAP emissions from wet-out areas that do not have any capture and control and from wet-out areas that are captured by an enclosure but are vented to the atmosphere and not to a control device, multiply each formula's annual usage by its appropriate organic HAP emissions estimation equation or factor and sum the individual results.

(2) To calculate your annual uncontrolled organic HAP emissions that escape from the enclosure on the wet-out area, multiply each formula's annual usage by its appropriate uncontrolled organic HAP emissions estimation equation or factor, sum the individual results, and multiply the summation by 1 minus the percent capture (expressed as a fraction).

(3) To calculate your annual uncontrolled oven organic HAP emissions, multiply each formula's annual usage by its appropriate uncontrolled organic HAP emissions estimation equation or factor and sum the individual results.

(4) To calculate your annual controlled organic HAP emissions, multiply each formula's annual usage by its appropriate organic HAP emissions estimation equation or factor and sum the individual results to obtain total annual controlled organic HAP emissions.

(e) Where a facility is calculating both uncontrolled and controlled organic HAP emissions estimation equations and factors, you must test the same formulae. In addition, you must develop both sets of equations and factors from the same tests.

This subpart does not apply to Fiber Care Baths as Fiber Care baths does not engage in the operations outlined in this subpart.

§ 63.5875 ..... How do I determine the capture efficiency of the enclosure in my wet-out area and the capture efficiency of my oven(s) for continuous lamination/casting operations?

(a) The capture efficiency of a wet-out area enclosure is assumed to be 100 percent if it meets the design and operation requirements for a permanent total enclosure (PTE) specified in EPA Method 204 of appendix M to 40 CFR part 51. If a PTE does not exist, then a temporary total enclosure must be constructed and verified using EPA Method 204, and capture efficiency testing must be determined using EPA Methods 204B through E of appendix M to 40 CFR part 51.

(b) The capture efficiency of an oven is to be considered 100 percent, provided the oven is operated under negative pressure.

This subpart does not apply as Fiber Care Baths does not have wet-out area(s) or ovens.

§ 63.5880 ..... How do I determine how much neat resin plus is applied to the line and how much neat gel coat plus is applied to the line for continuous lamination/casting operations?

Use the following procedures to determine how much neat resin plus and neat gel coat plus is applied to the line each year.

(a) Track formula usage by end product/thickness combinations.

(b) Use in-house records to show usage. This may be either from automated systems or manual records.

(c) Record daily the usage of each formula/end product combination on each line. This is to be recorded at the end of each run (*i.e.,* when a changeover in formula or product is made) and at the end of each shift.

(d) Sum the amounts from the daily records to calculate annual usage of each formula/end product combination by line.

This subpart does not apply to Fiber Care Baths because Fiber Care Baths uses resins and gel coats that are filled materials and not neat resins for continuous lamination/casting operations.

§ 63.5885 ..... How do I calculate percent reduction to demonstrate compliance for continuous lamination/casting operations?

You may calculate percent reduction using any of the methods in paragraphs (a) through (d) of this section.

(a) *Compliant line option.* If all of your wet-out areas have PTE that meet the requirements of EPA Method 204 of appendix M of 40 CFR part 51, and all of your wet-out area organic HAP emissions and oven organic HAP emissions are vented to an add-on control device, use Equation 1 of this section to demonstrate compliance. In all other situations, use Equation 2 of this section to demonstrate compliance.

$$PR = \frac{(\text{Inlet}) - (\text{Outlet})}{(\text{Inlet})} \times 100 \qquad \text{(Eq. 1)}$$

Where:

PR = percent reduction;

Inlet + HAP emissions entering the control device, lbs per year;

Outlet = HAP emissions existing the control device to the atmosphere, lbs per year.

$$PR = \frac{(WAE_{ci} + O_{ci}) - (WAE_{co} + O_{co})}{(WAE_{ci} + WAE_{u} + O_{ci} + O_{u})} \times 100 \qquad \text{(Eq. 2)}$$

Where:

PR = percent reduction;

$WAEi_{ci}$ = wet-out area organic HAP emissions, lbs per year, vented to a control device;

$WAEi_{u}$ = wet-out area organic HAP emissions, lbs per year, not vented to a control device;

Oj_{u} = oven organic HAP emissions, lbs per year, not vented to a control device;

Oj_{ci} = oven organic HAP emissions, lbs per year, vented to a control device;

$WAEi_{co}$ = wet-out area organic HAP emissions, lbs per year, from the control device outlet;

Oj_{co} = oven organic HAP emissions, lbs per year, from the control device outlet.

(b) *Averaging option.* Use Equation 3 of this section to calculate percent reduction.

$$PR = \frac{\left(\sum_{i=1}^{m} WAEi_{ci} + \sum_{j=1}^{n} Oj_{ci}\right) - \left(\sum_{i=1}^{m} WAEi_{co} + \sum_{j=1}^{n} Oj_{co}\right)}{\left(\sum_{i=1}^{m} WAEi_{ci} + \sum_{j=1}^{n} Oj_{ci} + \sum_{i=1}^{m} WAEi_{u} + \sum_{j=1}^{n} Oj_{u}\right)} \times 100 \qquad \text{(Eq. 3)}$$

Where:

PR = percent reduction;

$WAEi_{ci}$ = wet-out area organic HAP emissions from wet-out area i, lbs per year, sent to a control device;

$WAEi_{u}$ = wet-out area organic HAP emissions from wet-out area i, lbs per year, not sent to a control device;

$WAEi_{co}$ = wet-out area organic HAP emissions from wet-out area i, lbs per year, at the outlet of a control device;

Oj_{u} = organic HAP emissions from oven j, lbs per year, not sent to a control device;

Oj_{ci} = organic HAP emissions from oven j, lbs per year, sent to a control device;

Oj_{co} = organic HAP emissions from oven j, lbs per year, at the outlet of the control device;

m = number of wet-out areas;

n = number of ovens.

(c) *Add-on control device option.* Use Equation 1 of this section to calculate percent reduction.

(d) *Combination option.* Use Equations 1 through 3 of this section, as applicable, to calculate percent reduction.

This subpart does not apply to Fiber Care Baths as this facility does not use this mode of production.

§ 63.5890 ..... How do I calculate an organic HAP emission factor to demonstrate compliance for continuous lamination/casting operations?

(a) Compliant line option. Use Equation 1 of this section to calculate an organic HAP emissions factor in lbs/ton.

$$E = \frac{WAE_u + WAE_c + O_u + O_c}{(R+G)} \quad (Eq.\ 1)$$

Where:

E = HAP emissions factor in lbs/ton of resin and gel coat

WAE_u = uncontrolled wet-out area organic HAP emissions, lbs per year

WAE_c = controlled wet-out area organic HAP emissions, lbs per year

O_u = uncontrolled oven organic HAP emissions, lbs per year

O_c = controlled oven organic HAP emissions, lbs per year

R = total usage of neat resin plus, tpy

G = total usage of neat gel coat plus, tpy

(b) *Averaging option.* Use Equation 2 of this section to demonstrate compliance.

$$E = \frac{\sum_{i=1}^{m} WAE_{ui} + \sum_{i=1}^{o} WAE_{ci} + \sum_{j=1}^{n} O_{uj} + \sum_{j=1}^{p} O_{cj}}{(R+G)} \quad (Eq.\ 2)$$

Where:

E = HAP emissions factor in lbs/ton of resin and gel coat

WAE_{ui} = uncontrolled organic HAP emissions from wet-out area i, lbs per year

WAE_{ci} = controlled organic HAP emissions from wet-out area i, lbs per year

O_{uj} = uncontrolled organic HAP emissions from oven j, lbs per year

O_{cj} = controlled organic HAP emissions from oven j, lbs per year

i = number of wet-out areas

j = number of ovens

m = number of wet-out areas uncontrolled

n = number of ovens uncontrolled

o = number of wet-out areas controlled

p = number of ovens controlled

R = total usage of neat resin plus, tpy

G = total usage of neat gel coat plus, tpy

(c) *Combination option.* Use Equations 1 and 2 of this section, as applicable, to demonstrate compliance.

This subpart does not apply to Fiber Care Baths as this facility does not use this mode of production.

§ 63.5895 ..... How do I monitor and collect data to demonstrate continuous compliance?

(a) During production, you must collect and keep a record of data as indicated in 40 CFR part 63, subpart SS, if you are using an add-on control device.

(b) You must monitor and collect data as specified in paragraphs (b)(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), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.

(2) You 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. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

(3) At all times, you 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.

(c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

(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, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have 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 you change the application method or controls, then you 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 or 5 of this subpart, you must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

(e) For each of your pultrusion machines, you must record all times that wet area enclosures doors or covers are open and there is resin present in the resin bath.

This subpart does not apply to Fiber Care Baths as this facility does not use this mode of production.

§ 63.5900 ..... How do I demonstrate continuous compliance with the standards?

(a) You must demonstrate continuous compliance with each standard in §63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.

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

(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 or 5 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).

(3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to 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).

(4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.

(b) You must report each deviation from each standard in §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910.

(c) You must meet the organic HAP emissions limits and work practice standards that apply to you at all times.

This subpart does not apply to Fiber Care Baths as Fiber Care Baths does not employ add-on devices. This facility uses Tables 1 and 3 to show compliance.

§ 63.5905 ..... What notifications must I submit and when?

(a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

This subpart does not apply to Fiber Care Baths because Fiber Care Baths does not utilize any notifications listed in Table 13.

§ 63.5910 ..... What reports must I submit and when?

(a) You must submit each report in Table 14 to this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800.

(2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800.

(3) Each subsequent 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.

(4) Each subsequent 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.

(5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain the information in paragraphs (c)(1) through (6) 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) [Reserved]

(5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, 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.

(6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

(d) For each deviation from an organic HAP emissions limitation or operating limit and for each deviation from the requirements for work practice standards that occurs at an affected source where you are 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 (3) of this section and in paragraphs (d)(1) and (2) of this section.

(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.

(e) For each deviation from an organic HAP emissions limitation (*i.e.,* emissions limit and operating limit) occurring at an affected source where you are using a CMS to comply with the organic HAP emissions limitation in this subpart, you must include the information in paragraphs (c)(1) through (3) of this section and in paragraphs (e)(1) through (6) of this section.

(1) The date and time that each malfunction started and stopped.

(2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

(3) The date, time, and duration that each CMS was out of control, including the information in §63.8(c)(8).

(4) The date and time that each deviation started and stopped.

(5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(6) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.

(f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to §63.5805(a)(1) or (d). Include with this report any request for an exemption under §63.5805(e). If you receive an exemption under §63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in §63.5805(f).

(g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). 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 §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), 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.

(h) Submit compliance reports based on the requirements in §§63.5910 and 63.5912 and table 14 to this subpart, and not based on the requirements in §63.999.

(i) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

This subpart applies to Fiber Care Baths. Sections (a), (b), (c) (1-5), (d)(1 and 2) all apply.

Semi-Annually Monitoring Reports *January 31st and July 31st.*

Semi-Annual Compliance 40 CFR 63 Subpart WWWW *January 1st through June 30th – Due July 31st, and July 1st thorugh December 31st – Due January 31st.*

§ 63.5912 ..... How do I submit my reports?

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

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

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

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

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

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

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

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

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

(d) If you are required to submit reports following the procedure specified in this paragraph (d), beginning on September 17, 2020, you must submit all subsequent reports to the EPA via CEDRI, which can be accessed through the EPA's CDX (*https://cdx.epa.gov/*). You must use the appropriate electronic report template on the CEDRI website (*https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri*) for this subpart. The report must be submitted by the deadline specified in this subpart, regardless of the method in which the report is submitted. If you claim some of the information required to be submitted via CEDRI is CBI, submit a complete report, including information claimed to be CBI, to the EPA. The report must be generated using the appropriate form on the CEDRI website or an alternate electronic file consistent with the XML schema listed on the CEDRI website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph (d).

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

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

(2) The outage must have occurred within the period of time beginning five business days prior to the date that the submission is due.

(3) The outage may be planned or unplanned.

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

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

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

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

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

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

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

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

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

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

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

(3) You must provide to the Administrator:

(i) A written description of the force majeure event;

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

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

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

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

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

This subpart does not apply to Fiber Care Baths because this facility is not required to conduct performance testing.

§ 63.5915 ..... What records must I keep?

(a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.

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

(2) [Reserved]

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

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

(c) You 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, 5, and 7 to this subpart.

(d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

(e) For a new or existing continuous lamination/ casting operation, you must keep the records listed in paragraphs (e)(1) through (4) of this section, when complying with the percent reduction and/or lbs/ton requirements specified in paragraphs (a) and (c) through (d) of §63.5805.

(1) You must keep all data, assumptions, and calculations used to determine percent reduction and/or lbs/ton as applicable;

(2) You must keep a brief description of the rationale for the assignment of an equation or factor to each formula;

(3) When using facility-specific organic HAP emissions estimation equations or factors, you must keep all data, assumptions, and calculations used to derive the organic HAP emissions estimation equations and factors and identification and rationale for the worst-case formula; and

(4) For all organic HAP emissions estimation equations and organic HAP emissions factors, you must keep documentation that the appropriate permitting authority has approved them.

This subpart applies to Fiber Care Baths. Sections (a)(1), (c), and (d).

§ 63.5920 ..... In what form and how long must I keep my records?

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

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

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

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

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

This subpart applies to Fiber Care Baths.

§ 63.5925 ..... What parts of the General Provisions apply to me?

This supart applies to Fiber Care Baths. The applicable sections in Table 15 are highlighted in yellow.

Table 15 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

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

As specified in §63.5925, the parts of the General Provisions which apply to you are shown in the following table:

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§63.1(a)(1)	General applicability of the general	Yes	Additional terms defined in subpart

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
	provisions		WWWW of part 63, when overlap between subparts A and WWWW of this part, subpart WWWW of part 63 takes precedence.
§63.1(a)(2) through (4)	General applicability of the general provisions	Yes	
§63.1(a)(5)	Reserved	No	
§63.1(a)(6)	General applicability of the general provisions	Yes	
§63.1(a)(7) through (9)	Reserved	No	
§63.1(a)(10) through (14)	General applicability of the general provisions	Yes	
§63.1(b)(1)	Initial applicability determination	Yes	Subpart WWWW of part 63 clarifies the applicability in §§63.5780 and 63.5785.
§63.1(b)(2)	Reserved	No	
§63.1(b)(3)	Record of the applicability determination	Yes	
§63.1(c)(1)	Applicability of this part after a relevant standard has been set under this part	Yes	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	Yes	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)(3) and (4)	Reserved	No	
§63.1(c)(5)	Notification requirements for an area source that increases HAP emissions to major source levels	Yes	
§63.1(c)(6)	Reclassification	Yes	
§63.1(d)	Reserved	No	
§63.1(e)	Applicability of permit program before a relevant standard has been set under this part	Yes	
§63.2	Definitions	Yes	Subpart WWWW of part 63 defines terms in §63.5935. When overlap

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
			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	Yes	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	Yes	§63.4(a)(3) through (5) is reserved and does not apply.
§63.5(a)(1) and (2)	Applicability of construction and reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of part 63.
§63.5(b)(1)	Relevant standards for new sources upon construction	Yes	Existing facilities do not become reconstructed under subpart WWWW of part 63.
§63.5(b)(2)	Reserved	No	
§63.5(b)(3)	New construction/reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of part 63.
§63.5(b)(4)	Construction/reconstruction notification	Yes	Existing facilities do not become reconstructed under subpart WWWW of part 63.
§63.5(b)(5)	Reserved	No	
§63.5(b)(6)	Equipment addition or process change	Yes	Existing facilities do not become reconstructed under subpart WWWW of part 63.
§63.5(c)	Reserved	No	
§63.5(d)(1)	General application for approval of construction or reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of part 63.
§63.5(d)(2)	Application for approval of construction	Yes	
§63.5(d)(3)	Application for approval of reconstruction	No	
§63.5(d)(4)	Additional information	Yes	
§63.5(e)(1) through (5)	Approval of construction or reconstruction	Yes	
§63.5(f)(1) and (2)	Approval of construction or reconstruction based on prior State preconstruction	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
	review		
§63.6(a)(1)	Applicability of compliance with standards and maintenance requirements	Yes	
§63.6(a)(2)	Applicability of area sources that increase HAP emissions to become major sources	Yes	
§63.6(b)(1) through (5)	Compliance dates for new and reconstructed sources	Yes	Subpart WWWW of part 63 clarifies compliance dates in §63.5800.
§63.6(b)(6)	Reserved	No	
§63.6(b)(7)	Compliance dates for new operations or equipment that cause an area source to become a major source	Yes	New operations at an existing facility are not subject to new source standards.
§63.6(c)(1) and (2)	Compliance dates for existing sources	Yes	Subpart WWWW of part 63 clarifies compliance dates in §63.5800.
§63.6(c)(3) and (4)	Reserved	No	
§63.6(c)(5)	Compliance dates for existing area sources that become major	Yes	Subpart WWWW of part 63 clarifies compliance dates in §63.5800.
§63.6(d)	Reserved	No	
§63.6(e)(1)	Operation and maintenance requirements	Yes	Except portions of §63.6(e)(1)(i) and (ii) specific to conditions during startup, shutdown, or malfunction.
§63.6(e)(3)	SSM plan and recordkeeping	No	
§63.6(f)(1)	Compliance except during periods of startup, shutdown, and malfunction	No	Subpart WWWW of part 63 requires compliance at all times.
§63.6(f)(2) and (3)	Methods for determining compliance	Yes	
§63.6(g)(1) through (3)	Alternative standard	Yes	
§63.6(h)	Opacity and visible emission Standards	No	Subpart WWWW of part 63 does not contain opacity or visible emission standards.
§63.6(i)(1) through (14)	Compliance extensions	Yes	
§63.6(i)(15)	Reserved	No	
§63.6(i)(16)	Compliance extensions	Yes	
§63.6(j)	Presidential compliance exemption	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§63.7(a)(1)	Applicability of performance testing requirements	Yes	
§63.7(a)(2)	Performance test dates	No	Subpart WWWW of part 63 initial compliance requirements are in §63.5840.
§63.7(a)(3)	CAA Section 114 authority	Yes	
§63.7(b)(1)	Notification of performance test	Yes	
§63.7(b)(2)	Notification rescheduled performance test	Yes	
§63.7(c)	Quality assurance program, including test plan	Yes	Except that the test plan must be submitted with the notification of the performance test.
§63.7(d)	Performance testing facilities	Yes	
§63.7(e)	Conditions for conducting performance tests	Yes	Performance test requirements are contained in §63.5850. Additional requirements for conducting performance tests for continuous lamination/casting are included in §63.5870. Conditions specific to operations during periods of startup, shutdown, and malfunction in §63.7(e)(1) do not apply.
§63.7(f)	Use of alternative test method	Yes	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes	
§63.7(h)	Waiver of performance tests	Yes	
§63.8(a)(1) and (2)	Applicability of monitoring requirements	Yes	
§63.8(a)(3)	Reserved	No	
§63.8(a)(4)	Monitoring requirements when using flares	Yes	
§63.8(b)(1)	Conduct of monitoring exceptions	Yes	
§63.8(b)(2) and (3)	Multiple effluents and multiple monitoring systems	Yes	
§63.8(c)(1)	Compliance with CMS operation and maintenance requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit. Except references to SSM plans in

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
			§63.8(c)(1)(i) and (iii).
§63.8(c)(2) and (3)	Monitoring system installation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(4)	CMS requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(5)	Continuous Opacity Monitoring System (COMS) minimum procedures	No	Subpart WWWW of part 63 does not contain opacity standards.
§63.8(c)(6) through (8)	CMS calibration and periods CMS is out of control	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(d)(1)-(2)	CMS quality control program, including test plan and all previous versions	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(d)(3)	CMS quality control program, including test plan and all previous versions	Yes	Except references to SSM plans in §63.8(d)(3).
§63.8(e)(1)	Performance evaluation of CMS	Yes	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	Yes	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	Yes	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	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(5)(ii)	Results of COMS performance evaluation	No	Subpart WWWW of part 63 does not contain opacity standards.
§63.8(f)(1) through (3)	Use of an alternative monitoring method	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§63.8(f)(4)	Request to use an alternative monitoring method	Yes	
§63.8(f)(5)	Approval of request to use an alternative monitoring method	Yes	
§63.8(f)(6)	Request for alternative to relative accuracy test and associated records	Yes	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	Yes	
§63.9(a)(1) through (4)	Notification requirements and general information	Yes	
§63.9(b)(1)	Initial notification applicability	Yes	
§63.9(b)(2)	Notification for affected source with initial startup before effective date of standard	Yes	
§63.9(b)(3)	Reserved	No	
§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	Yes	
§63.9(b)(4)(ii) through (iv)	Reserved	No	
§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	Yes	Existing facilities do not become reconstructed under subpart WWWW of part 63.
§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	Yes	Existing facilities do not become reconstructed under subpart WWWW of part 63.
§63.9(c)	Request for compliance extension	Yes	
§63.9(d)	Notification of special compliance requirements for new source	Yes	
§63.9(e)	Notification of performance test	Yes	
§63.9(f)	Notification of opacity and visible emissions observations	No	Subpart WWWW of part 63 does not contain opacity or visible

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
			emission standards.
§63.9(g)(1)	Additional notification requirements for sources using CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(g)(2)	Notification of compliance with opacity emission standard	No	Subpart WWWW of part 63 does not contain opacity emission standards.
§63.9(g)(3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded	Yes	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	Yes	
§63.9(h)(4)	Reserved	No	
§63.9(h)(5) and (6)	Notification of compliance status	Yes	
§63.9(i)	Adjustment of submittal deadlines	Yes	
§63.9(j)	Change in information provided	Yes	
§63.9(k)	Electronic reporting procedures	Yes	Only as specified in §63.9(j).
§63.10(a)	Applicability of recordkeeping and reporting	Yes	
§63.10(b)(1)	Records retention	Yes	
§63.10(b)(2)(i) through (v)	Records related to startup, shutdown, and malfunction	No	
§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	Yes	
§63.10(b)(2)(xii)	Record of waiver of recordkeeping and reporting	Yes	
§63.10(b)(2)(xiii)	Record for alternative to the relative accuracy test	Yes	
§63.10(b)(2)(xiv)	Records supporting initial notification and notification of compliance status	Yes	
§63.10(b)(3)	Records for applicability determinations	Yes	
§63.10(c)(1)	CMS records	Yes	This section applies if you elect to

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
			use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(2) through (4)	Reserved	No	
§63.10(c)(5) through (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(9)	Reserved	No	
§63.10(c)(10) through (14)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(15)	CMS records	No	
§63.10(d)(1)	General reporting requirements	Yes	
§63.10(d)(2)	Report of performance test results	Yes	
§63.10(d)(3)	Reporting results of opacity or visible emission observations	No	Subpart WWWW of part 63 does not contain opacity or visible emission standards.
§63.10(d)(4)	Progress reports as part of extension of compliance	Yes	
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No	
§63.10(e)(1) through (3)	Additional reporting requirements for CMS	Yes	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(e)(4)	Reporting COMS data	No	Subpart WWWW of part 63 does not contain opacity standards.
§63.10(f)	Waiver for recordkeeping or reporting	Yes	
§63.11	Control device requirements	Yes	Only applies if you elect to use a flare as a control device.
§63.12	State authority and delegations	Yes	
§63.13	Addresses of state air pollution control agencies and EPA Regional offices	Yes	
§63.14	Incorporations by reference	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§63.15	Availability of information and confidentiality	Yes	

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Initial Permit Condition 1.1

States this is an initial permit to construct for a new fiberglass manufacturer. The facility is not constructed yet.

Initial Permit Condition 2.1

Describes the processes at the facility from prep work, to coating, 1st lamination, 2nd lamination, trim and repair work, to the final product and shipping.

Initial Permit Condition 2.2

Lists the emission units for the gel coat, 1st lamination, 2nd lamination process and each control device for each emission unit in this section.

Initial Permit Condition 2.3

Lists the emission limits for each process in this section. These emission limits are protected by the following permit conditions 2.5, 2.6, 2.9, and 2.10. However, the facility also uses a curing agent CADOXL-50A and a filler/pigment 9810700 OMYACARB BP-LU. These two materials are added in a closed system and transferred to the gel coat and lamination material in a closed system. These materials are catalysts and the emissions are accounted for in the gel coat, 1st lamination, and 2nd lamination emission limits.

Therefore there will be no material throughput limits on the curing agent or filler/pigment. However there will be permit conditions stating only this curing agent and filler/pigment shall be used or equivalent. The equivalent curing agent and filler/pigment shall contain the same TAPs and HAPs, have the same chemical reaction and be added in the same manner.

Initial Permit Condition 2.4

Sets the opacity limit for the facility

Initial Permit Condition 2.5

Sets the material throughput limit for the gel coat to protect the VOC emissions listed in the emission limit permit condition.

Initial Permit Condition 2.6

Sets the material throughput limit for the polyester resin solution to protect the VOC emissions listed in the emission limit permit condition.

Initial Permit Condition 2.7

Sets the type of material that can be used as a curing agent to protect the VOC emissions listed in the emission limit permit condition. This material is transferred in a closed system to be mixed with the gel coat and lamination process as a catalyst. The emissions from the curing agent are accounted for in the gel coat and lamination emission limits.

Initial Permit Condition 2.8

Sets the type of material that can be used as a filler/pigment to protect the VOC emissions listed in the emission limit permit condition. This material is transferred in a closed system to be mixed with the gel coat and lamination process as a catalyst. The emissions from the curing agent are accounted for in the gel coat and lamination emission limits.

Initial Permit Condition 2.9

This permit condition establishes the daily acetone material throughput. Acetone is a 24 hour TAP. The facility submitted emissions based on an annual average. Therefore the daily limit of 18 gallons per day multiplied to the 6.6 density factor for acetone and divided by 24 hours was used to ensure the 24 hour emission limit was not exceeded. Thus leaving a daily limit of 18 gallons per day as the daily material throughput to protect the 585 TAP EL in IDAPA 58.01.01.

Initial Permit Condition 2.10

$PM_{2.5}$ is assumed to be the same as PM_{10} and PM in the emission inventory for this facility. This permit condition lists the daily parts that are to be trimmed and sets the limit at 150 parts per day in order to protect the $PM_{2.5}/PM_{10}$ emissions listed in the emission limit permit condition.

Initial Permit Condition 2.11

This facility is only major for the HAP, Styrene Monomer. Over 10 T/yr of Styrene Monomer is emitted. However, the combination of all HAPS are below 25 T/yr and all criteria pollutants are below 100 T/yr. Therefore the facility is required to apply for a Tier 1 Operating Permit. This permit condition establishes that.

Initial Permit Condition 2.12

Establishes the monitoring and recordkeeping requirements to demonstrate compliance with the gel coat material throughput limit permit condition.

Initial Permit Condition 2.13

Establishes the monitoring and recordkeeping requirements to demonstrate compliance with the polyester resin solution throughput limit permit condition.

Initial Permit Condition 2.14

Establishes the monitoring and recordkeeping requirements to demonstrate compliance with the curing agent CADOXL-50A permit condition.

Initial Permit Condition 2.15

Establishes the monitoring and recordkeeping requirements to demonstrate compliance with the filler/pigment 9810700 OMYACARB BP-LU permit condition.

Initial Permit Condition 2.16

Establishes the monitoring and recordkeeping requirements to demonstrate compliance with the acetone material throughput limit permit condition.

Initial Permit Condition 2.17

Establishes the monitoring and recordkeeping requirements to demonstrate compliance with the $PM_{2.5}/PM_{10}$ material throughput limit permit condition.

Initial Permit Condition 2.18

This facility is only major for the HAP, Styrene Monomer. Over 10 T/yr of Styrene Monomer is emitted. However, the combination of all HAPS are below 25 T/yr and all criteria pollutants are below 100 T/yr. Therefore the facility is required to apply for a Tier 1 Operating Permit. This permit condition establishes that.

Initial Permit Condition 2.19

This permit condition establishes that the facility is subject to 40 CFR 63 Subpart WWWW. However this permit condition was left as a high level permit condition because the facility is required to apply for a Tier 1 Operating Permit. The requirements of 40 CFR 63 Subpart WWWW will be listed as permit conditions in the Tier 1 Operating Permit. In the meantime the facility must comply with 40 CFR 63 Subpart WWWW upon issuance of this PTC.

Initial Permit Condition 3.1

Describes the process for the three natural gas fired heaters for the facility.

Initial Permit Condition 3.2

Lists the three natural gas fired heaters, and the associated control devices.

Initial Permit Condition 3.3

Sets the emission limits for the facility for the three natural gas fired heaters. The emissions for all three units were combined because the facility shall have one natural gas annual material throughput limit for all three heaters combined.

Initial Permit Condition 3.4

Establishes the opacity permit limit for the facility.

Initial Permit Condition 3.5

Establishes the type of fuel to be burned by the three heaters at the facility to be natural gas exclusively.

Initial Permit Condition 3.6

Establishes the material throughput limit for the natural gas. The emissions for the three heaters were calculated on a 50% duty cycle. Therefore the material throughput for the natural gas was reduced and based on the 50% duty cycle theory. This permit condition protects the emissions listed in the emission limit permit condition.

Initial Permit Condition 3.7

This facility is only major for the HAP, Styrene Monomer. Over 10 T/yr of Styrene Monomer is emitted. However, the combination of all HAPS are below 25 T/yr and all criteria pollutants are below 100 T/yr. Therefore the facility is required to apply for a Tier 1 Operating Permit. This permit condition establishes that.

Initial Permit Condition 3.8

Establishes the monitoring and recordkeeping requirements to protect the emission limit permit condition and the natural gas throughput permit condition. Each monthly bill for the previous month shall be retained and used to calculate the 12-consecutive month natural gas usage.

Initial Permit Condition 3.9

This facility is only major for the HAP, Styrene Monomer. Over 10 T/yr of Styrene Monomer is emitted. However, the combination of all HAPS are below 25 T/yr and all criteria pollutants are below 100 T/yr. Therefore the facility is required to apply for a Tier 1 Operating Permit. This permit condition establishes that.

Initial Permit Condition 4.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Initial Permit Condition 4.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 4.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Initial Permit Condition 4.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Initial Permit Condition 4.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Initial Permit Condition 4.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.01 and 211.03.

Initial Permit Condition 4.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Initial Permit Condition 4.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Initial Permit Condition 4.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 60 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Initial Permit Condition 4.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 4.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Initial Permit Condition 4.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Initial Permit Condition 4.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Initial Permit Condition 4.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Initial Permit Condition 4.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Initial Permit Condition 4.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – EMISSIONS INVENTORIES

SECTION 5

Uncontrolled and controlled emission units are different

DEQ: 1/18/2021

Response: Tables 1 through 6 are the following. I don't believe you received all the tables included in previous attachments.

Table 1 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM10/PM2.5	SO^2	NO_x	CO	VOC	Lead
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Natural	.0196	.0016	.24	.103	.014	1.2882E-06
Gelcoat/Laminations Repair					19.536	
Total, Point Sources	.0044	.0016	.24	.103	19.55	1.2882E-06

Table 2 provides a summary of uncontrolled Hazardous Air Pollutant (HAP) emissions for the facility also based upon a worst-case for operations of the facility of 8760 hr/yr (24 hr/day x 365 day/yr).

Table 2 UNCONTROLLED POTENTIAL TO EMIT HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Total PAH (POM)	3.864E-04
Benzene	5.0E-06
Formaldehyde	1.93E-04
Hexane	4.638E-03
Naphthalene	2.0E-06
Toluene	9.0E-06
Arsenic	5.155E-06
Beryllium	3.091E-08
Cadmium	3.0E-06
Chromium	4.0E-06
Cobalt	2.16E-07
Manganese	9.79E-07
Mercury	6.698E-07
Nickel	5.0E-06
Selenium	6.183E-08
Total	5.252E-03

Table 1

Calculations based on AP-42 Natural Gas Combustion Data and 4W- National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

Gas Fired Heaters:

Office Heater #1 - 80,000 ÷ 1020 = 78.4314 scf/hr

Office Heater #2 - 120,000 ÷ 1020 = 117.6471 scf/hr

Production Heater - 400,000 ÷ 1020 = 392.1569 scf/hr

Total **588.2354 scf/hr**

588.2354 x 8760 (hours/yr) = 5,152,942.00 scf

Factor used for Calculations 5.1529

PM total: 5.1529 x 7.6 (EF AP-42) = 39.16204 ÷ 2000 (ton conversion) = .0196 T/yr

SO^3: 5,1529 x 0.6 (EF AP-42) = 3.0917 ÷ 2000 (ton conversion) = .0016

NOX: 5,1529 x 94.0 (EF AP-42) = 484.3726 ÷ 2000 (ton conversion) = .2421

CO: 5.1529 x 40.0 (EF-AP-42) = 206.116 ÷ 2000 (ton conversion) = .103

VOC Heaters: 5.1529 x 5.5 (EF-AP-42) = 28.340 ÷ 2000 (ton conversion) = 28.340÷ 2000 (ton conversion) = .014

VOC Fiberglass Operations:

Gel coat 2.128 tns/yr

1st lamination 6.704 tns/yr

2nd lamination 10.314 tns/yr

Repair .39 tns/yrd

Total VOC's (Fiberglass Operations) 19.536 tns/yr

Lead: 5.1529 x .0005 (EF-AP-42) = .002576 ÷ 2000 (ton conversion) = 1.2882E-06

PM Trim Operations: .0239 lbs (per day of PM) x 365 = 8.7235 ÷ 2000 (ton conversion) = .004361

Table 1 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM10/PM2.5	SO^2	NO_x	CO	VOC	Lead
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
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Gelcoat/Laminations Repair					19.536	
Total, Point Sources	.0044	.0016	.24	.103	19.55	1.2882E-06

Table 2 provides a summary of uncontrolled Hazardous Air Pollutant (HAP) emissions for the facility also based upon a worst-case for operations of the facility of 8760 hr/yr (24 hr/day x 365 day/yr).

Table 2 UNCONTROLLED POTENTIAL TO EMIT HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Total PAH (POM)	3.864E-04
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Naphthalene	2.0E-06
Toluene	9.0E-06
Arsenic	5.155E-06
Beryllium	3.091E-08
Cadmium	3.0E-06
Chromium	4.0E-06
Cobalt	2.16E-07
Manganese	9.79E-07
Mercury	6.698E-07
Nickel	5.0E-06
Selenium	6.183E-08
Total	5.252E-03

Table 2 Calculations

Total PAH (POM): Calculations are based on 5,152,942 scf yearly useage 8760 hours of operation (Uncontrolled)

5,152.942 (uncontrolled useage) ÷ 1,000,000 = 5.1529

5,1529 factor used for the following:

1) 2 - Methylnaphthalene: .000024 (EF-AR42 2.4E-05.) x 5.1529 = 1.2366 E-04= .0001236

2) 7,12 Dimethylbenze (a) anthracene: .000016 (EF-AP-42 1.6E-05) x 5.1529= 8.2446E-05 = .00008244

3) Acenaphthene: .0000018 (EF-AP-42 1.8E-06) x 5.1529 = 9.2752E-06= .000009275

4) Acenaphthylene: .0000018 (EF-AP-42 1.8E-06) x 5.1529 = 9.2752E-06 = .000009275

5) Anthracene: .0000024 (EF-AP-42 2.4E-06) x 5.1529 = 1.2366E-05 = .00001236

6) Benzo (g,h,I) perylene: .0000012 (EF-AP-42- 1.2E-06) x 5.1529 = 6.1834E-06 = .000006183

7) Fluoranthene: .000003 (EF-AP-42 3.0E-06) x 5.1529 = 1.5458E-05 = .00001545

8) Fluorene: .0000028 (EF-AP-42 2.8E - 06) x 5.1529 = 1.4428E-05 = .00001442

9) Phenanathrene: .000017 (EF-AP-42 1.7E-05) x 5.1529 = 8.7599E-05 = .00008759

10) Pyrene: .000005 (EF-AP-42 5.0E-06) x 5.1529 = 2.5764E-05 = .00002576

Total PAH (POM) 3.8635E-04

Table -2 Uncontrolled Potential to emit for Hazardous Air pollutants

Benzene: .0021 x 5.1529= .010821
÷ 2000 = 000005 = 5.0 E - 6 tns/yr

Formaldehyde: .075 x5.1529= 9.27522
÷ 2000 = .000193 = 1.93 E - 04 tns/yr

Hexane: 1.8 x 5.1529 = 9.27522
÷2000 = .004638 = 4.638 E - 03 tns/yr

Naphthalene: .00061 x 5.1529= .01452
÷ 2000 = .000002 = 2.0 E - 06 tns/yr

Toluene: .0034 x 5.1529 = .01752
÷ 2000 = .000009 = 9.0 E - 06 tns/yr

Arsenic: .0002 x 5.1529= .001031
÷2000 = 0000005155 = 5.155 E - 06 tns/yr

Beryllium : .000012 x 5.1529 = .000062
÷ 2000 = .00000003091 = 3.091 E - 08 tns/yr

Cadmium: .0011 x 5.1529 = .005668
÷2000 = .000003 = 3.0 E - 06 tns/yr

Chromium: .0014 x 5.1529 = .007214
÷2000 = .000004 = 4.0 E - 06 tns/yr

Cobalt: .000084x 51.1529 = .000433
÷2000 = 000000216 = 2.16 E - 07 tns/yr

Manganese: .00038 x 5.1529 = .001958
÷2000 = .000000979 = 9.79 E - 07 tns/yr

Mercury: .00026 x 5.1529= .00134
÷2000 = 0000006698 + 6.698 E - 07 tns/yr

Nickel: .0021 x 5.1529 = .010821
÷2000 = .000005 = 5.0 E - 06 tns/yr

Selenium : .000024 x 5.1529 = .000124
÷2000 = 00000006183 = 6.183 E - 08 tns/yr

Controlled Potential to Emit

Controlled Criteria Emissions

Table 3 provides a summary of controlled PTE criteria pollutant emissions for the facility based upon the facility's operations detailed in the Emissions Overview.

Table 3 CONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM10/PM2.5	SO2	NOx	CO	VOC	Lead
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Natural Gas Heaters	3.48E-03	2.75E-04	4.31E-02	1.83E-02	2.52E-03	2.29E-07
Gel-Coat Application					2.128	
Barrier Coat Application						
First Lamination					6.704	
Second Lamination					10.314	
Trim Station	3.740E-03				.39	
Total	7.22E-03	2.75E-04	4.31E-02	1.83E-02	19.540	2.29E-06

Table 3 – Calculations for controlled potential to emit for regulated air pollutants

Natural Gas Heaters:

588.2354 scf per hr. (calculated in table 6 for table 1)

588.2354 x 3120 (hours of operations = 1,835,294.45
Yearly consumption of natural gas in SCF

1,835,294.45 x 50% duty cycle 12 months a year = 917,647.23 SCF

PM Total: Gas Fired Heaters
917,647.23 ÷ 1,000,000 = .91764 (conversion factor for pounds of pollutant per million SCF of natural gas fired)
.91764 x 7.6 (total pm per million SCF of natural gas fired) = 6.974064 pounds ÷ 2000 = .003487 = 3.48E - 03

PM Total, Fiberglass Operations: Calculations outlined in section 3 for daily emissions of .0239 lbs daily (10 hours).

.0239 x 313 (Production days) = 7.4807 lbs per year

7.4807 ÷ 2000 = .003740 or 3,740E - 03

S02: .91764 x .6 (per million SCF fired) = .550584 ÷ 2000 = 000275 = 2.75E-04

NOx:
.91764 x 94 (pounds per millions SCF fired) = 86.25716 ÷ 2000 = .0431= 4.31E-02

CO:
.91764 x 40 (pounds per million scf fired) = 36.7056 ÷ 2000 = .018353 = 1.83E-02

VOC:
.91764 x 5.5 (pounds per million SCF fired)=5.04702 ÷ 2000 = .0025427 = 4.31E-02

Lead: .91764 x .0005 (per million SCF fired)= .000459 ÷ 2000 = .000000229410 = 2.29E-07

Controlled Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of non-carcinogenic toxic air pollutants (TAP) is provided in Table 4.

Table 4 CONTROLLED POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR

Non-Carcinogenic Toxic Air Pollutants	Heaters (1b/hr)	Gel-Coat Laminations Repair (1b/hr)	24-hour Average Emissions Rates for Units at the Facility (1b/Hr)	Non-Carcinogenic Screening Emissions Level (1b/Hr)	Exceeds Screening Level (Modeling Required)? (Y/N)
Acetone		4.25	4.25	119.0	NO
Barium	4.609E-07		4.609E-07	.033	NO
Chromium	1.466E-07		1.466E-07	.033	NO
Cobalt	8.799E-09		8.799E-09	.0033	NO
Copper	3.900E-70		3.900E-07	.013	NO
Dichlorobenzene	1.257E-07		1.257E-07	20	NO
Hexan	8.26E-04		8.26E-04	12	NO
Manganese	1.743E-07		1.743E-07	.067	NO
Naphthalene	2.798E-07		2.798E-07	3.33	NO
Pentane	1.193E-04		1.193E-04	118	NO
Toluene	2.00E-06		2.00E-06	25	NO
Vanadium	1.0E-06		1.0E-06	.003	NO
Zinc	1.3E-05		1.3E-05	.667	NO
Styrene		4.446	4.446	6.67	NO

Table 4
Calculations for controlled non-carcinogenic TAP Emissions

Acetone: Calculations

Assumption: Verified by Edger Carrillo, Maintenance Supervisor, Fiber Care Baths Adelanto Facility.

Consumptions: (3) Venus internal mix spray guns

(1) Gel-coat Gun Part #IMG-CM-PAT-30. Useage (Acetone Per day/gallons 10 hour day): 3 gallons

(2) Chopper Guns, Part #FIT-C-WMB-PAT-15-746-GFC-30 Useage (Acetone per day/gallons, 10 hour day): 3 gallons per gun

Roller stations: (2) 4 gallons per day, per station

Acetone Sub Totals:

(3) Internal Mix Guns	9 gal/day
(2) Roller stations	8 gal/day
Misc. Useage	1 gal/day
Total Acetone Usage	18 gal/day

Yearly Consumptions:

313 (work days per year) x 18 gallons useage per day = 5,634 gallons per year or 37,184.4 lbs per year. (Bulk density Acetone = 6.6)

Hourly Acetone Useage:

37,184.4 lbs ÷ 8,760 hrs = 4.25 lbs per 24 hour period EL=119.0 lbs per hour

Calculations for heaters are based on an 80,000 Btu, 120,000 Btu and a 400,000 Btu heater requiring 588.2354 SCF per/hr. x 3120 (hours of operations) x 50% duty cycle 12 months a per/yr.

Yearly consumption of natural gas is as follows:

588.2354 x 3120 = 1,835,294.45 SCF x .50 = 917,647.23 SCF per year
Conversion factor for calculations is 1,000,000 ÷ 917,647.23 = .917647

Barium: .0044 x .917647 = .004035÷ 8760 = 0000004609 (or 4.60919-07)

Chromium: .0014 x .917647 = .001285 ÷ 8760 = .000000146656 (or 1.466E-07)

Cobalt: .000084 x .917647 = .0000771 ÷ 8760 = .0000000087935 or (8.799E-09)

Copper: .00085 x .917647 = .00078 ÷ 2000 = .0000039 or (3.900E-07)

Dichlorobenzene: .0012 x .917647= .001101 ÷ 2000 = .0000001257 or (1.257E-07)

Hexane: 1.8 x .916747 = 1.6517 ÷ 2000 = 000826 or (8.26E-04)

Manganese: .00038 x .917647 = .000349 ÷ 2000 = .0000001743 or (1.743E-07)

Naphthalene: .00061 x .917647 = .00056 ÷ 2000 = .0000002798 or (2.798 E-07)

Pentane: 2.6 x .917647 = 2.38588 ÷ 2000 = .0001193 or (1.193E – 04)

Toluene: .0034 x .917647 = .00312 ÷2000 = .000002 or (2.00E-06)

Vunadium: .0023 x 917647 = .00211 ÷ 2000 = .000001 or (1.0E-06)

Zinc: .029 x .917647 = .0256612 ÷ 2000 = .000013 or (1.3E-05)

Styrene: Calculation for yearly styrene emissions were done in section 1
The summation numbers are as follows:

Gel-coat	2.128 tns/yr. or 4,256 lbs.
1st, Lamination	6.704 tns/yr. or 13,407.41 lbs.
2nd, Lamination	10.3147 tns/yr. or 20,629.4 lbs.
Repair	.39 tns/yr. or 780.0 lbs.
Total	19.5367 tns/yr or 39,073.4 lbs.

39,073.4 ÷ 8760 = 4.446 lbs. per hour.

Controlled Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic toxic air pollutants (TAP) is provided in Table 5.

Table 5 CONTROLLED POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Heaters (1b/hr)	Annual Average Emissions Rates for Units at the Facility (1b/hr)	Carcinogenic Screening Emissions Level (1b/hr)	Exceeds Screening Level (Modeling Required)? (Y/N)
3-Methylcholanthrene	1.047E-10	1.047E-10	2.5E-06	No
7-PAH Group	1.1939E-09	1.1939E-09	9.1E-05	No
Arsenic	2.095E-08	2.095E-08	1.5E-06	No
Benzene	2.1998E-07	2.1998E-07	8.0E-04	No
Cadmium	1.152E-07	1.152E-07	3.7E-06	No
Formaldehyde	8.0E-06	8.0E-06	5.1E-04	No
Other-PAH (exclude 7-PAH)	1.012E-08	1.012E-08	9.1E-05	No

* TAPs that are HAPs do not require modeling because this facility is subjected to a NESHAP, 40 CFR XXXXXX. See application Form FRA for details.

Table 5
Calculations for controlled potential to emit for carcinogenic toxic air pollutants

Calculations are based on 917,647 SCF of usage per year, conversion
To 917,647 ÷ 1,000,000 = .917647

3- Methylcholanthrene:
.0000018 x .917647 =.0000009176 ÷ 8760 = .0000000001047 or (1.047E-10)

7- PAH group:

1) Benzo (a) anthracene: .0000018x .917647 = .0000017 ÷ 8760= .0000000001885 or (1.885E-10)
2) Benzo (a) pyrene: .0000012 x .917647= .0000011 ÷ 8760 = .0000000001257 or (1,257E-10)
3) Benzo (b) fluoranthene: .0000018 x .917647 = .0000017 ÷ 8760 = .0000000001885 or (1.885E-10)
4) Benzo (k) fluoranthene: .0000018 x .917647 = .0000017 ÷ 8760 = .0000000001885 or (11.885E-10)
5) Chrysens: .0000018 x .917647 = .0000017 ÷ 8760 = .00000000001885 or (1.885E-10)
6) Dibenzo (a,h) anthracene: .0000012 x .917647 = .0000011 ÷ 8760 = .0000000001257 or (1,257E-10)
7) Indeno (1,2,3,-cd) pyrene: .0000018 x .917647 = .0000017 ÷ 8760 = .0000000001885 or (1.885 E-10)

Total 7-PAH group = .0000000011939 or (1.1939E-09)

Arsenic : .0002 x .917647 = .000184÷ 8760 = .00000002095 or (2.095E-08)

Benzene: .0021 x .917647= .001927 ÷ 8720 = .0000002199 or (2.1998E-07)

Cadmium: .0011 X .917647 = .001009 ÷ 8760 = .0000001152 or (1.152E-07)

Formaldehyde: .075 x .917647 = .068824 ÷ 8760 = .000008 or (8.0E-06)

Other – PAH (Exclude 7-PAH)

1) 2-Methylnaphthalene: .000024 x .917647 = .000022÷ 8760 = .000000002514 or 2.514 E-09
2) 7,12 Dimethylbenze (a) anthracene: .000016 x .917647 =.000015 ÷ 8760 = .000000001676 or (1.676 E-09)
3) Acenaphthene: .0000018 x .917647 = .0000017 ÷ 8760 .0000000001885 or (1.885E-10)
4) Aceenaphthlene: .0000018 x .917647 = .0000017 ÷ 8760 .0000000001885 or (1.885E-10)
5) Anthracene: .0000024x .917647 = .000022 ÷ 8760 = .0000000002514 or (2.514E-09)
6) Benzo (g,h,I,) perylene .0000012 x .917647 = 0000011 ÷ 8760 = 0000000001257 or (1.257E-10)
7) Fluoranthene: .000003 x .917647= .0000028 ÷ 8760 = .0000000003142 or (3.142E-10)
8) Fluorene: .0000028 x .917647 = .0000026 ÷ 8760 = .0000000002933 or (2.933 E-10)
9) Phenanathrene: .000017 x .917647 = .000016 ÷ 8760 = .000000001780 or (1.78082E-0)
10) Pyrene: .000005 x .917647 = .0000046 ÷ 8760 = .0000000005237 or (5.237E-10)

Total : 1.01189 E-8

Controlled HAP Emissions

Table 6 presents the potential to emit for HAP pollutants from all emissions units at the facility. See the emission inventory file that was submitted with this application for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 6 CONTROLLED HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (T/yr)
Total PAH (POM)	7.9747E-09
Benzene	9.6352E-07
Formaldehyde	3.4411E-05
Hexane	8.2588E-04
Naphthalene	2.7988E-07
Toluene	1.5599E-06
Arsenic	9.1764E-08
Beryllium	5.5058E-09
Cadmium	5.0470E-07
Chromium	6.4235E-07
Cobalt	3.8541E-08
Manganese	1.7435E-07
Mercury	1.1929E-07
Selenium	1.1011E-08
Sub Total (Heaters)	8.6468E-04
Styrene Monomer	19.536
Total	19.537

Table 6

Calculations for Natural Gas heaters based on:

Heater office 1st floor	120,000 Btu's
Heater office 2nd floor	80,000 But's
Heater production	400,000 But's
Total Btu's	600,000 But's

600,000 ÷ 1020 = 588.2353 SCF per hour

588.2353 SCF per hour x 3120 (hours of operations yearly)= 1,835,294.118 SCF yearly usage

1,835,294.118 x .50 (heaters on 50% duty cycle 12 months out of the year) = 917,647.0588 SCF per year.

917,647.118 ÷ 1,000,000 = .917647118 (conversion factor for pounds of pollutant per million SCF of natural gas fired)

Total PAN (POM)

7-PAH Group calculated in table 5 calculations @ 1.04E-10 per hours x 3120 (hours of operation) = 3.2448E-07 x .5 (50%) heater duty cycle 12 months per year)

Other PAH (exclude 7-PAH) calculated in Table 5 calculations @ 1.012 E-8 per hour x 3120 (hours of operation) = 3.15744e-05 x .5 (50% heater duty cycle 12 months per year) 1.57872 E-05

1.6224E-07 + 1.57872 E-05 1.594944E-05 = Total PAH ÷ 2000 = 7.97472E-09

Benzene:
.0021 x .917647 = .00192705 ÷ 2000 = 9.6352 E-07

Formaldehyde: .075 x .917647 = .6882 ÷ 2000 = 3.4411 E-05

Hexane: 1.8 x .917647 = 1.6517 ÷ 2000 = 8.2588 E-04

Naphthalene: .00061 x .917647 = 5.5976 E-04 ÷ 2000= 2.7988 E-07

Toluene: .0034 x .917647 = .0031199 ÷ 2000= 1.5599 E-06

Arsenic: .002 x .917647 = 1.8352 E-04 ÷ 2000 = 9.1764 E-08

Bergllium: .000012 x .917647 = 1.1011 E -05 ÷ 2000 = 5.5058 E-09

Cadmium: .0011 x .917647 = .001009 ÷ 2000 = 5.0470 E-07

Chromium: .0014 x 917647 = .001284 ÷2000 = 6.4235E-07

Cobalt: 000084 x .917647 = 7.7082 E-05 ÷ 2000 = 3.8541 E-08

Maganese: .00038 x .917647 = 3,4870 E-04 ÷ 2000 = 1.77435 E -07

Mercury: .00026 x .917647 = 2.3858 E-04 ÷ 2000 = 1.1929 E-07

Selenium: .00024 x .917647 = 2.2023 ÷ 2000 = 1.1011 E-08

Question 5: Please describe how emissions are controlled and vented to the atmosphere for each emission unit.

Answer: There are (4) emission units in the facility. The gel coat application, 1st lamination spray booth, 2nd lamination spray booth and trim operations. The technical specifications of each emission unit/booths are discussed in section 3 to great detail along with the technical performance efficiencies of both first and second stage filtration media. Viledon fiberglass filters part# 400-020 are used in the 1st stage. They have an efficiency rating of 98% and meet NESHAP requirements. Second stage filtration systems have a Merv rating of 15. The gel coat booth utilizes two MCB-09-10-X Crossflo Dust Collectors. Each having 10 hp and producing 13,500 cfm. Both units are combined to one exhaust stack. 1st lamination utilizes one Crossflo system having (1) 10 hp electric motor producing 13,500 cfm exhausting to one stack, 2nd lamination is identical to 1st lamination, again exhausting to one stack. Trim station utilizes (2) Crossflo dust collectors part # MCB-09-10-X having (2) 10 hp electric motors producing 13,500 cfm each. Both Crossflo dust collectors are combined into one exhaust stack. The combustion sources, (natural gas heaters(3)) are exhausted directly from there burners to exhaust ducting, then through the roof and into the atmosphere.

Question 6, Submit a National Ambient Air Quality Standard (NAAQS) compliance demonstration.

Answer: Contained in this section table 4 indicates all non-carcinogenic Toxics are well below Emission Levels established by IDAPA58- Department of Environmental Quality 58.01.01- Rules for the Control of Air Pollution in Idaho, Section 585 for screening emission levels (EL) Table 5, indicates all carcinogenic Toxics are well below Emission Levels established by IDAPA 58- Department of Environmental Quality 58.01.01 - Rules for the Control of Air Pollution in Idaho, Section 586 for screening emission levels (EL) Additional Fiberglass and trim operations are well below EL's established for styrene found in section 585.

Controlled Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of non-carcinogenic toxic air pollutants (TAP) is provided in Table 4.

Table 4 CONTROLLED POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR

Non-Carcinogenic Toxic Air Pollutants	Heaters (1b/hr)	Gel-Coat Laminations Repair (1b/hr)	24-hour Average Emissions Rates for Units at the Facility (1b/Hr)	Non-Carcinogenic Screening Emissions Level (1b/Hr)	Exceeds Screening Level (Modeling Required)? (Y/N)
Acetone		4.25	4.25	119.0	NO
Barium	4.609E-07		4.609E-07	.033	NO
Chromium	1.466E-07		1.466E-07	.033	NO
Cobalt	8.799E-09		8.799E-09	.0033	NO
Copper	3.900E-70		3.900E-07	.013	NO
Dichlorobenzene	1.257E-07		1.257E-07	20	NO
Hexan	8.26E-04		8.26E-04	12	NO
Manganese	1.743E-07		1.743E-07	.067	NO
Naphthalene	2.798E-07		2.798E-07	3.33	NO
Pentane	1.193E-04		1.193E-04	118	NO
Toluene	2.00E-06		2.00E-06	25	NO
Vanadium	1.0E-06		1.0E-06	.003	NO
Zinc	1.3E-05		1.3E-05	.667	NO
Styrene		4.446	4.446	6.67	NO

Table 4
Calculations for controlled non-carcinogenic TAP Emissions

Acetone: Calculations

Assumption: Verified by Edger Carrillo, Maintenance Supervisor, Fiber Care Baths Adelanto Facility.

Consumptions: (3) Venus internal mix spray guns

(1) Gel-coat Gun Part #IMG-CM-PAT-30. Useage (Acetone Per day/gallons 10 hour day): 3 gallons

(2) Chopper Guns, Part #FIT-C-WMB-PAT-15-746-GFC-30 Useage (Acetone per day/gallons, 10 hour day): 3 gallons per gun

Roller stations: (2) 4 gallons per day, per station

Acetone Sub Totals:

(3) Internal Mix Guns	9 gal/day
(2) Roller stations	8 gal/day
Misc. Useage	1 gal/day
Total Acetone Usage	18 gal/day

Yearly Consumptions:

313 (work days per year) x 18 gallons useage per day = 5,634 gallons per year or 37,184.4 lbs per year. (Bulk density Acetone = 6.6)

Hourly Acetone Useage:

37,184.4 lbs ÷ 8,760 hrs = 4.25 lbs per 24 hour period EL=119.0 lbs per hour

Calculations for heaters are based on an 80,000 Btu, 120,000 Btu and a 400,000 Btu heater requiring 588.2354 SCF per/hr. x 3120 (hours of operations) x 50% duty cycle 12 months a per/yr.

Yearly consumption of natural gas is as follows:

588.2354 x 3120 = 1,835,294.45 SCF x .50 = 917,647.23 SCF per year
Conversion factor for calculations is 1,000,000 + 917,647.23 = .917647

Barium: .0044 x .917647 = .004035+ 8760 = 0000004609 (or 4.60919-07)

Chromium: .0014 x .917647 = .001285 + 8760 = .000000146656 (or 1.466E-07)

Cobalt: .000084 x .917647 = .0000771 ÷ 8760 = .0000000087935 or (8.799E-09)

Copper: .00085 x .917647 = .00078 ÷ 2000 = .0000039 or (3.900E-07)

Dichlorobenzene: .0012 x .917647= .001101 ÷ 2000 = .0000001257 or (1.257E-07)

Hexane: 1.8 x .916747 = 1.6517 ÷ 2000 = 000826 or (8.26E-04)

Manganese: .00038 x .917647 = .000349 ÷ 2000 = .0000001743 or (1.743E-07)

Naphthalene: .00061 x .917647 = .00056 ÷ 2000 = .0000002798 or (2.798 E-07)

Pentane: 2.6 x .917647 = 2.38588 ÷ 2000 = .0001193 or (1.193E – 04)

Toluene: .0034 x .917647 = .00312 ÷2000 = .000002 or (2.00E-06)

Vunadium: .0023 x 917647 = .00211 ÷ 2000 = .000001 or (1.0E-06)

Zinc: .029 x .917647 = .0256612 ÷ 2000 = .000013 or (1.3E-05)

Styrene: Calculation for yearly styrene emissions were done in section 1
The summation numbers are as follows:

Gel-coat	2.128 tns/yr. or 4,256 lbs.
1st, Lamination	6.704 tns/yr. or 13,407.41 lbs.
2nd, Lamination	10.3147 tns/yr. or 20,629.4 lbs.
Repair	.39 tns/yr. or 780.0 lbs.
Total	19.5367 tns/yr or 39,073.4 lbs.

39,073.4 ÷ 8760 = 4.446 lbs. per hour.

Controlled Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic toxic air pollutants (TAP) is provided in Table 5.

Table 5 CONTROLLED POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Heaters (lb/hr)	Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emissions Level (lb/hr)	Exceeds Screening Level (Modeling Required)? (Y/N)
3-Methylcholanthrene	1.047E-10	1.047E-10	2.5E-06	No
7-PAH Group	1.1939E-09	1.1939E-09	9.1E-05	No
Arsenic	2.095E-08	2.095E-08	1.5E-06	No
Benzene	2.1998E-07	2.1998E-07	8.0E-04	No
Cadmium	1.152E-07	1.152E-07	3.7E-06	No
Formaldehyde	8.0E-06	8.0E-06	5.1E-04	No
Other-PAH (exclude 7-PAH)	1.012E-08	1.012E-08	9.1E-05	No

* TAPs that are HAPs do not require modeling because this facility is subjected to a NESHAP, 40 CFR XXXXXX. See application Form FRA for details.

Table 5
Calculations for controlled potential to emit for carcinogenic toxic air pollutants

Calculations are based on 917,647 SCF of usage per year, conversion
To 917,647 ÷ 1,000,000 = .917647

3- Methylcholanthrene:
.0000018 x .917647 =.0000009176 ÷ 8760 = .0000000001047 or (1.047E-10)

7- PAH group:

1) Benzo (a) anthracene: .0000018x .917647 = .0000017 ÷ 8760= .0000000001885 or (1.885E-10)
2) Benzo (a) pyrene: .0000012 x .917647= .0000011 ÷ 8760 = .0000000001257 or (1,257E-10)
3) Benzo (b) fluoranthene: .0000018 x .917647 = .0000017 ÷ 8760 = .0000000001885 or (1.885E-10)
4) Benzo (k) fluoranthene: .0000018 x .917647 = .0000017 ÷ 8760 = .0000000001885 or (11.885E-10)
5) Chrysens: .0000018 x .917647 = .0000017 ÷ 8760 = .00000000001885 or (1.885E-10)
6) Dibenzo (a,h) anthracene: .0000012 x .917647 = .0000011 ÷ 8760 = .0000000001257 or (1,257E-10)
7) Indeno (1,2,3,-cd) pyrene: .0000018 x .917647 = .0000017 ÷ 8760 = .0000000001885 or (1.885 E-10)

Total 7-PAH group = .0000000011939 or (1.1939E-09)

Arsenic : .0002 x .917647 = .000184÷ 8760 = .00000002095 or (2.095E-08)

Benzene: .0021 x .917647= .001927 ÷ 8720 = .0000002199 or (2.1998E-07)

Cadmium: .0011 X .917647 = .001009 ÷ 8760 = .0000001152 or (1.152E-07)

Formaldehyde: .075 x .917647 = .068824 ÷ 8760 = .000008 or (8.0E-06)

Other – PAH (Exclude 7-PAH)

1) 2-Methylnaphthalene: .000024 x .917647 = .000022+ 8760 = .000000002514 or 2.514 E-09
2) 7,12 Dimethylbenze (a) anthracene: .000016 x .917647 =.000015 + 8760 = .000000001676 or (1.676 E-09)
3) Acenaphthene: .0000018 x .917647 = .0000017 + 8760 .0000000001885 or (1.885E-10)
4) Aceenaphthlene: .0000018 x .917647 = .0000017 + 8760 .0000000001885 or (1.885E-10)
5) Anthracene: .0000024x .917647 = .000022 + 8760 = .0000000002514 or (2.514E-09)
6) Benzo (g,h,I,) perylene .0000012 x .917647 = 0000011 ÷ 8760 = 0000000001257 or (1.257E-10)
7) Fluoranthene: .000003 x .917647= .0000028 ÷ 8760 = .0000000003142 or (3.142E-10)
8) Fluorene: .0000028 x .917647 = .0000026 ÷ 8760 = .0000000002933 or (2.933 E-10)
9) Phenanathrene: .000017 x .917647 = .000016 ÷ 8760 = .000000001780 or (1.78082E-0)
10) Pyrene: .000005 x .917647 = .0000046 ÷ 8760 = .0000000005237 or (5.237E-10)

Total : 1.01189 E-8

Controlled HAP Emissions

Table 6 presents the potential to emit for HAP pollutants from all emissions units at the facility. See the emission inventory file that was submitted with this application for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 6 CONTROLLED HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (T/yr)
Total PAH (POM)	7.9747E-09
Benzene	9.6352E-07
Formaldehyde	3.4411E-05
Hexane	8.2588E-04
Naphthalene	2.7988E-07
Toluene	1.5599E-06
Arsenic	9.1764E-08
Beryllium	5.5058E-09
Cadmium	5.0470E-07
Chromium	6.4235E-07
Cobalt	3.8541E-08
Manganese	1.7435E-07
Mercury	1.1929E-07
Selenium	1.1011E-08
Sub Total (Heaters)	8.6468E-04
Styrene Monomer	19.536
Total	19.537

Table 6

Calculations for Natural Gas heaters based on:

Heater office 1st floor	120,000 Btu's
Heater office 2nd floor	80,000 But's
Heater production	400,000 But's
Total Btu's	600,000 But's

600,000 ÷ 1020 = 588.2353 SCF per hour

588.2353 SCF per hour x 3120 (hours of operations yearly)= 1,835,294.118 SCF yearly usage

1,835,294.118 x .50 (heaters on 50% duty cycle 12 months out of the year) = 917,647.0588 SCF per year.

917,647.118 ÷ 1,000,000 = .917647118 (conversion factor for pounds of pollutant per million SCF of natural gas fired)

Total PAN (POM)

7-PAH Group calculated in table 5 calculations @ 1.04E-10 per hours x 3120 (hours of operation) = 3.2448E-07 x .5 (50%) heater duty cycle 12 months per year)

Other PAH (exclude 7-PAH) calculated in Table 5 calculations @ 1.012 E-8 per hour x 3120 (hours of operation) = 3.15744e-05 x .5 (50% heater duty cycle 12 months per year) 1.57872 E-05

1.6224E-07 + 1.57872 E-05 1.594944E-05 = Total PAH ÷ 2000 = 7.97472E-09

Benzene:
.0021 x .917647 = .00192705 + 2000 = 9.6352 E-07

Formaldehyde: .075 x .917647 = .6882 + 2000 = 3.4411 E-05

Hexane: 1.8 x .917647 = 1.6517 + 2000 = 8.2588 E-04

Naphthalene: .00061 x .917647 = 5.5976 E-04 + 2000= 2.7988 E-07

Toluene: .0034 x .917647 = .0031199 + 2000= 1.5599 E-06

Arsenic: .002 x .917647 = 1.8352 E-04 + 2000 = 9.1764 E-08

Bergllium: .000012 x .917647 = 1.1011 E -05 + 2000 = 5.5058 E-09

Cadmium: .0011 x .917647 = .001009 ÷ 2000 = 5.0470 E-07

Chromium: .0014 x 917647 = .001284 ÷2000 = 6.4235E-07

Cobalt: 000084 x .917647 = 7.7082 E-05 ÷ 2000 = 3.8541 E-08

Maganese: .00038 x .917647 = 3,4870 E-04 ÷ 2000 = 1.77435 E -07

Mercury: .00026 x .917647 = 2.3858 E-04 ÷ 2000 = 1.1929 E-07

Selenium: .00024 x .917647 = 2.2023 ÷ 2000 = 1.1011 E-08

Hazardous Air Pollutants		
Pollutant	T/yr	lb/hr
Total PAH (POM)	7.97E-09	1.02E-08
Benzene	9.64E-07	1.24E-06
Formaldehyde	3.44E-05	4.41E-05
Hexane	8.26E-04	1.06E-03
Naphthalene	2.80E-07	3.59E-07
Toluene	1.56E-06	2.00E-06
Arsenic	9.18E-08	1.18E-07
Beryllium	5.51E-09	7.06E-09
Cadmium	5.05E-07	6.47E-07
Chromium	6.42E-07	8.23E-07
Cobalt	3.85E-08	4.94E-08
Manganese	1.74E-07	2.23E-07
Mercury	1.19E-07	1.53E-07
Nickel	0	0.00E+00
Selenium	1.10E-08	1.41E-08
Styrene Monomer	19.54	1.25E+01

coating	heaters
3120	1560

Source	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC	
	lb/hr[(a)]	**T/yr[(b)]**	**lb/hr[(a)]**	**T/yr[(b)]**	**lb/hr[(a)]**	**T/yr[(b)]**	**lb/hr[(a)]**	**T/yr[(b)]**	**lb/hr[(a)]**	**T/yr[(b)]**
Natural Gas-Fired Heaters	4.46E-03	3.48E-03	3.53E-04	2.75E-04	5.53E-02	4.31E-02	2.35E-02	1.83E-02	3.23E-03	2.52E-03
Gel-Coating	-	-	-	-	-	-	-	-	1.365384615	2.13
1st Lamination	-	-	-	-	-	-	-	-	4.294871795	6.7
2nd Lamination	-	-	-	-	-	-	-	-	6.608974359	10.31
Trim Station	4.63E-03	7.22E-03	-	-	-	-	-	-	0	0
Post Project Totals	**9.09E-03**	**1.07E-02**	**3.53E-04**	**2.75E-04**	**5.53E-02**	**4.31E-02**	**2.35E-02**	**1.83E-02**	**1.23E+01**	**1.91E+01**

Controlled Potential to Emit

Controlled Criteria Emissions

Table 1 provides a summary of controlled PTE criteria pollutant emissions for the facility based upon the facility's operations detailed in the Emissions Overview.

Table 1 CONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$	SO_2	NO_x	CO	VOC	Lead
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Natural Gas Heaters	0.046	0.032	5.565	4.676	0.307	0.00
Gel-Coat Application	0.00	0.00	0.00	0.00	3.680	0.00
Barrier Coat Application	0.00	0.00	0.00	0.00	0.00	0.00
First Lamination	0.00	0.00	0.00	0.00	6.477	0.00
Second Lamination	0.00	0.00	0.00	0.00	9.715	0.00
Mold Repair Construction	0.00	0.00	0.00	0.00	0.073	0.00
Total	0.046	0.032	5.565	4.676	20.252	0.00

Controlled Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of non-carcinogenic toxic air pollutants (TAP) is provided in Table 2.

Table 2 CONTROLLED POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Gel-Coat Application (lb/hr)	Barrier Application (lb/hr)	1st Lamination (lb/hr)	2nd Lamination (lb/hr)	Tooling Repair (lb/hr)	24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emissions Level (lb/hr)	Exceeds Screening Level (Modeling Required)? (Y/N)
Acetone	1.71	1.71	1.71	1.71	1.71	8.55	119	No
Styrene	0.840	0.00	1.479	2.218	0.047	4.584	6.67	No

Footnotes: Acetone Listed IDAPA 58.01.01-585 page 139
CAS number 67-64-1 Acetone
Styrene listed IDAPA 58-01-01-585 page 154
CAS number 100-42-5 Styrene Monomer

Controlled Carcinogenic TAP Emissions

The facility at 72 East Frontage Road North has no controlled carcinogenic TAP Emissions. Researched and confirmed in IDAPA 58.01.01 585 and 586.

Controlled HAP Emissions

Table 3 presents the potential to emit for HAP pollutants from all emissions units at the facility. See the emission inventory file that was submitted with this application for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 3 CONTROLLED HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (T/yr)
Styrene Monomer	19.945
Total	19.945

APPENDIX B – FACILITY DRAFT COMMENTS

The following comments were received from the facility on June 10, 2021:

Facility Comment: Please change the booth type to side draft for the trim and 1st lamination booths.

DEQ Response: The requested change has been made.

Facility Comment: Please change four spay guns to three spay guns and change the barrier booth to the trim booth.

DEQ Response: The requested change has been made.

Facility Comment: The manufacture date for the office heater 1 is July 2020, June 2020 for the office heater 2 and the model number for the production heater is PV40.

DEQ Response: The requested change has been made.

Facility Comment: Please remove the T/yr VOC emissions from the trim booth as the material does not release any VOC's during this process because all coatings have thoroughly cured and hardened at this point.

DEQ Response**:** The requested change has been made.

Facility Comment: Please update Table 9 in the S.O.B. and the permit with the following lb/hr emissions.

	$PM_{10}/PM_{2.5}$		**SO_2**		**NO_X**		**CO**		**VOC**	
	lb/hr[(a)]	**T/yr[(b)]**	**lb/hr[(a)]**	**T/yr[(b)]**	**lb/hr[(a)]**	**T/yr[(b)]**	**lb/hr[(a)]**	**T/yr[(b)]**	**lb/hr[(a)]**	**T/yr[(b)]**
Natural Gas-Fired Heaters	4.46E-03	3.48E-03	3.53E-04	2.75E-04	5.53E-02	4.31E-02	2.35E-02	1.83E-02	3.23E-03	2.52E-03
Gel-Coating	-	-	-	-	-	-	-	-	1.36538462	2.13
1st Lamination	-	-	-	-	-	-	-	-	4.29487179	6.7
2nd Lamination	-	-	-	-	-	-	-	-	6.60897436	10.31
Trim Station	4.63E-03	7.22E-03	-	-	-	-	-	-	0	0
Post Project Totals	**9.09E-03**	**1.07E-02**	**3.53E-04**	**2.75E-04**	**5.53E-02**	**4.31E-02**	**2.35E-02**	**1.83E-02**	**1.23E+01**	**1.91E+01**

DEQ Response: The requested change has been made.

Facility Comment: Please update Table 13 in the S.O.B. with the following lb/hr emissions.

Hazardous Air Pollutants		
Pollutant	T/yr	lb/hr
Total PAH (POM)	7.97E-09	1.02E-08
Benzene	9.64E-07	1.24E-06
Formaldehyde	3.44E-05	4.41E-05
Hexane	8.26E-04	1.06E-03
Naphthalene	2.80E-07	3.59E-07
Toluene	1.56E-06	2.00E-06
Arsenic	9.18E-08	1.18E-07
Beryllium	5.51E-09	7.06E-09
Cadmium	5.05E-07	6.47E-07

Hazardous Air Pollutants		
Chromium	6.42E-07	8.23E-07
Cobalt	3.85E-08	4.94E-08
Manganese	1.74E-07	2.23E-07
Mercury	1.19E-07	1.53E-07
Nickel	0	0.00E+00
Selenium	1.10E-08	1.41E-08
Styrene Monomer	19.54	1.25E+01

DEQ Response: The requested change has been made.

APPENDIX C – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

Instructions:
Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company:	**Fiber Care Baths**
Address:	**446 East Frontage Road North**
City:	**Jerome**
State:	**Idaho**
Zip Code:	**83338**
Facility Contact:	**Jay Bellasalma**
Title:	**Project Engineer**
AIRS No.:	**326191**

N	Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
Y	Did this permit require engineering analysis? Y/N
N	Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO_X	0.0	0	0.0
SO_2	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.5	0	0.5
VOC	19.5	0	19.5
Total:	20.1	0	**20.1**
Fee Due	**$ 5,000.00**		

Comments: