

Public Notice

DEQ Requests Comments on Statera Fiberglass LLC's Proposed Air Quality Permit in Aumsville

The Oregon Department of Environmental Quality invites the public to submit written comments on the conditions of Statera Fiberglass LLC's proposed air quality permit, known officially as Title V permit.

Summary

The proposed permit is a new Title V permit. The facility in Aumsville has been operating since 2018 and submitted an application for a Title V permit due to their production increase. Statera Fiberglass, also known as EverFab, currently operates under a Standard Air Contaminant Discharge Permit. As required, they submitted an application for a Title V permit within 12 months of the issuance of the current permit.

How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

DEQ
Western Region Air Quality Permit Coordinator
4026 Fairview Industrial Dr. SE
Salem, OR 97302
Fax: 503-378-4196
Email: wraqpermits@deq.state.or.us

Written comments are due by 5 p.m. Tues., Oct. 12, 2021.

About the facility

Statera Fiberglass owns and operates a shower-and-tub manufacturing facility at 9050 Porter Way SE in Aumsville. The company manufactures fiberglass in spray booths. The facility emits primarily volatile organic compounds and hazardous air pollutants. DEQ issued the current Standard Air Contaminant Discharge Permit on Oct. 30, 2019.

What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit requirements according to state and federal regulations.

What special conditions are in this permit?

The conditions in this proposed permit are the same with the existing conditions in the current permit. The classification of the permit needs to be changed to a Title V permit from an Air Contaminant Discharge Permit.

How does DEQ monitor compliance with the permit requirements?

This permit would require the facility to monitor pollutants using federally-approved monitoring practices and standards. Statera Fiberglass is required to keep track of material usages, calculate the emissions and report it to DEQ.

What happens after the public comment period ends?

DEQ will schedule a public hearing if requested by 10 or more individuals, or by an authorized person representing an organization of at least 10 people. An additional public notice will be published to advertise the public hearing.

If a public hearing is not requested, DEQ will consider and provide responses to all comments received at the close of the comment period. DEQ may modify provisions in the proposed permit, but the permit writers can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes. Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's air quality permit.

Where can I get more information?

Find out more and view the application at <https://www.oregon.gov/deq/Get-Involved/Pages/Public-Notices.aspx>, or contact Yuki Puram, DEQ Natural Resources Specialist: Phone: 503-378-8240 or 800-349-7677
Fax: 503-378-4196
Email: yuki.puram@deq.state.or.us

View the application and related documents in person at the DEQ office in Salem. For a review appointment, call Western Region Air Quality Permit Coordinator at 503-378-5305 or wraqpermits@deq.state.or.us.



State of Oregon
Department of
Environmental
Quality

Western Region
4026 Fairview Industrial
Drive SE
Salem, OR 97302
Phone: 503-378-8240
800-349-7677
Fax: 503-378-4196
Contact: Yuki Puram

www.oregon.gov/DEQ

DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

Emissions limits

Criteria Pollutants: Table 1 below presents maximum allowable emissions of criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

Table 1

Criteria Pollutant	Current Limit (tons per year)	Proposed Limit (tons per year)
Particulate matter	NA	NA
Small particulate matter	NA	NA
Nitrogen oxides)	NA	NA
Sulfur dioxide	NA	NA
Carbon monoxide	NA	NA
Volatile organic compounds	78	78

For more information about criteria pollutants, go to: www.epa.gov/criteria-air-pollutants

Hazardous air pollutants:

Statera Fiberglass is a major source of hazardous air pollutants. As a major source, it is subject to the following National Emission Standards for Hazardous Air Pollutants in 40 CFR Part 63 Subpart WWWW. Table 2 summarizes significant hazardous air pollutants which the source emits. More detailed information can be found in the review report.

Table 2

Hazardous Air Pollutants	Potential Emissions (tons per year)	Actual Emissions (tons per year)
Styrene monomer	71.66	24.76
Other HAP	Less than 1	0.63

For more information about hazardous air pollutants, go to: <https://www.epa.gov/haps/health-effects-notebook-hazardous-air-pollutants>

Alternative Formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
OREGON TITLE V OPERATING PERMIT

Western Region
 4026 Fairview Industrial Drive SE
 Salem, OR 97302

Issued in accordance with provisions of ORS 468A.040
 and based on land use compatibility findings included in the permit record.

ISSUED TO:

Statera Fiberglass LLC
 PO Box 490
 Aumsville, OR 97325

INFORMATION RELIED UPON:

Application Number: 32833
 Received: 07/27/2020

PLANT SITE LOCATION:

9050 Porter Way SE
 Aumsville, OR 97325

LAND USE COMPATIBILITY STATEMENT:

Issued by: Marion County
 Dated: 4/19/19

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

 Claudia Davis, Western Region Air Quality Manager

 Date

Nature of Business

SIC

NAICS

Fiberglass Manufacturing

Primary

3088

326191

RESPONSIBLE OFFICIAL

Title: Facility Owner

FACILITY CONTACT PERSON

Name: Daniel Bryan

Title: Owner

Phone: (503) 303-3300

TABLE OF CONTENTS

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT3

PERMITTED ACTIVITIES4

EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION4

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING
REQUIREMENTS4

 Facility-wide emission limits and standards4

 Emissions Unit FW-VOC Requirements5

EMISSION FEES20

GENERAL TESTING REQUIREMENTS20

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS.....20

REPORTING REQUIREMENTS22

General Conditions25

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit	ORS	Oregon Revised Statutes
ASTM	American Society for Testing and Materials	O&M	operation and maintenance
AQMA	Air Quality Maintenance Area	Pb	lead
calendar year	The 12-month period beginning January 1st and ending December 31 st	PCD	pollution control device
CAO	Cleaner Air Oregon	PM	particulate matter
CFR	Code of Federal Regulations	PM10	particulate matter less than 10 microns in size
CO	carbon monoxide	PM2.5	particulate matter less than 2.5 microns in size
CO ₂ e	carbon dioxide equivalent	ppm	part per million
CPMS	continuous parameter monitoring system	PSD	Prevention of Significant Deterioration
DEQ	Oregon Department of Environmental Quality	PSEL	Plant Site Emission Limit
dscf	dry standard cubic foot	PTE	Potential to Emit
EF	emission factor	RACT	Reasonably Available Control Technology
EPA	US Environmental Protection Agency	scf	standard cubic foot
FCAA	Federal Clean Air Act	SER	Significant Emission Rate
Gal	gallon(s)	SERP	source emission reduction plan
GDF	gasoline dispensing facility	SIC	Standard Industrial Code
GHG	greenhouse gas	SIP	State Implementation Plan
gr/dscf	grains per dry standard cubic foot	SO ₂	sulfur dioxide
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	Special Control Area	as defined in OAR 340-204-0070
HCFC	halogenated chloro-fluoro-carbon	ST	Source test
ID	identification number	TACT	Typically Achievable Control Technology
I&M	inspection and maintenance	VE	visible emissions
NSR	New Source Review	VOC	volatile organic compound
O ₂	oxygen	year	A period consisting of any 12-consecutive calendar months
OAR	Oregon Administrative Rules		

PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120(2)]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by DEQ, EPA, and citizens under the Clean Air Act, except Conditions 6, 7, 8, G5, and G9 (OAR 340-248-0005 through 340-248-0180) are only enforceable by the state. [OAR 340-218-0060]

EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

3. The emissions units regulated by this permit are the following [OAR 340-218-0040(3)]:

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Facility-Wide Use of VOC Containing Materials: Spray Booth 1 (Gel coat) Spray Booth 2 (Spray Core, Resin) Spray Booth 3 (Resin)	FW-VOC	None	NA
Aggregate Insignificant emissions include Resin Storage Tank (VOC), trimming and sanding (PM/PM _{10/2.5})	AI	None	NA

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING REQUIREMENTS

The following tables and conditions contain the applicable requirements along with testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

Facility-wide emission limits and standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Testing Requirement	Monitoring Condition
340-208-0210	4	Fugitive emissions	Minimize	Complaint investigation	NA	5
340-208-0300	6	Nuisance	No nuisance	Complaint investigation	NA	8
340-208-0450	7	PM >250 μ	No fallout	Complaint investigation	NA	8

4. Applicable Requirement: The permittee must not allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne.
 - 4.a. Such reasonable precautions must include, but not be limited to the following: [OAR 340-208-0210(1)]
 - 4.a.i. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

- 4.a.ii. Application of water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
- 4.a.iii. Full or partial enclosure of materials stockpiles in cases where application of water or chemicals are not sufficient to prevent particulate matter from becoming airborne;
- 4.a.iv. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- 4.a.v. Adequate containment during sandblasting or other similar operations;
- 4.a.vi. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
- 4.a.vii. Prompt removal from paved streets of earth or other material that does or may become airborne.
- 4.b. Upon request by DEQ, the permittee must develop a fugitive emission control plan for approval by DEQ if the above precautions are not adequate, and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period. [OAR 340-208-0210(3)]
5. **Monitoring Requirement:** The permittee must maintain a log of each dust, nuisance, or particle deposition complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible. This condition is enforceable only by the State. [OAR 340-218-0050(3)(a)]

Nuisance Conditions

6. **Applicable Requirement:** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300] This condition is enforceable only by the State.
7. **Applicable Requirement:** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. DEQ will verify that the deposition exists and will notify the permittee that the deposition must be controlled. [OAR 340-208-0450] This condition is enforceable only by the State.
8. **Monitoring Requirement:** The permittee must maintain a log of each dust, nuisance, or particle deposition complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible. This condition is enforceable only by the State. [OAR 340-218-0050(3)(a)]

Emissions Unit FW-VOC Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
40 CFR Part 63, NESHAP Subpart A and Subpart WWWW	9 through 30	HAPs	<ul style="list-style-type: none"> See limits listed in Condition 19 Work practice standards listed in Condition 24.a 	NA	NA	25 and 26

NESHAP: General Compliance Requirements [40 CFR Part 63 Subpart A]Prohibited Activities

9. The permittee must not operate any affected source in violation of the requirements of 40 CFR Part 63. Affected sources subject to and in compliance with either an extension of compliance or an exemption from compliance are not in violation of the requirements of 40 CFR Part 63. An extension of compliance can be granted by DEQ under 40 CFR Part 63 or by the President under section 112(i)(4) of the Clean Air Act. [40 CFR 63.4(a)(1)]
10. The permittee must not fail to keep records, notify, report, or revise reports as required under 40 CFR Part 63. [40 CFR 63.4(a)(2)]

Circumvention

11. The permittee must not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to: [40 CFR 63.4(b)]
 - 11.a. The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere.
 - 11.b. The use of a gaseous diluent to achieve compliance with a relevant standard for visible emissions.

Fragmentation

12. Fragmentation which divides ownership of an operation within the same facility among various owners where there is no real change in control will not affect applicability. The permittee must not use fragmentation or phasing of reconstruction activities (i.e., intentionally dividing reconstruction into multiple parts for purposes of avoiding new source requirements) to avoid becoming subject to new source requirements. [40 CFR 63.4(c)]

Operation and Maintenance Requirements

13. The permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6(e)(1)(i)] and [40 CFR 63.5835(c)]
14. Malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during startup, shutdown, or malfunction, the permittee must comply by minimizing emissions during such startup, shutdown, and malfunction event consistent with safety and good air pollution control practices. [40 CFR 63.6(e)(1)(ii)]
15. Operation and maintenance requirements established pursuant to section 112 of the Clean Air Act are

enforceable independent of emissions limitations or other requirements in relevant standards.
[40 CFR 63.6(e)(1)(iii)]

Compliance with Nonopacity Emission Standards

16. If a startup, shutdown, or malfunction of one portion of an affected source does not affect the ability of particular emission points within other portions of the affected source to comply with the non-opacity emission standards set forth in 40 CFR Part 63, then that emission point must still comply with the emission standards and other applicable requirements.
[40 CFR 63.6(f)(1)]

Reinforced Plastic Composite Production NESHAP: [40 CFR Part 63, Subpart WWWW]

17. **Applicability:** The permittee is subject to this subpart if they 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. The permittee is not subject to this subpart if the facility's operation described as follows:
- 17.a. The permittee is 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.
- 17.b. The permittee is not subject to this subpart if the facility is a research and development facility as defined in section 112(c)(7) of the Clean Air Act (CAA).
- 17.c. The permittee is not subject to this subpart if the facility's reinforced plastic composites operations use less than 1.2 tons per year (tpy) of thermoset resins and gel coats that contain styrene combined.
[40 CFR 63.5785]
18. **Standards:** The permittee must meet the requirements of Conditions 18.a. The permittee may elect to comply using any of the options to meet the standards described in Conditions 23.a through 23.d.
- 18.a. For 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, the permittee must meet the organic HAP emissions limits in Condition 19 and the work practice standards in Condition 30.a that apply. [40 CFR 63.5805(c)]
19. The permittee must not exceed the weighted average of the HAP emission limits shown in the table below using the weighted average of the actual emissions factors for all resin and gel coat application over a 12-month period. The permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations. [40 CFR 63.5810, 40 CFR Part 63 Subpart WWWW Table 3]

Open molding operation type	Application type	¹Organic HAP emissions limit
Corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application	113 lb/ton.
	b. filament application	171 lb/ton.
	c. manual resin application	123 lb/ton.

Non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
Tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
Low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
Shrinkage controlled resins ²	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
Gel coat ³	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

¹ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

² This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³ If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using non-atomized spray, you may use the non-atomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

20. The permittee may use the equations in the following table to calculate 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 the permittee to demonstrate compliance without the need to conduct a HAP emissions test. In lieu of these equations, the permittee can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided the site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. The permittee may also use the organic HAP emissions factors calculated using the equations in the following table, combined with resin and gel coat use data, to calculate organic HAP emissions. [40 CFR 63.5796, 40 CFR Part 63 Subpart WWWW Table 1]

Application Type	Resin	Emissions Factor (EF) Equation (if organic HAP content is less than 33 percent, or 19 percent for non-atomized gel coat) ^{a, b, c}	Emissions Factor (EF) Equation (if organic HAP content is 33 percent or more, or 19 percent for non-atomized gel coat) ^{a, b, c}
Manual resin application	Nonvapor-suppressed resin	$EF = 0.126 \times \% \text{ HAP} \times 2000$	$EF = ((0.286 \times \% \text{ HAP}) - 0.0529) \times 2000$
	Vapor-suppressed resin	$EF = 0.126 \times \% \text{ HAP} \times 2000 \times (1 - (0.5 \times \text{VSE factor}))$	$EF = ((0.286 \times \% \text{ HAP}) - 0.0529) \times 2000 \times (1 - (0.5 \times \text{VSE factor}))$
	Vacuum bagging/closed-mold curing with roll out	$EF = 0.126 \times \% \text{ HAP} \times 2000 \times 0.8$	$EF = ((0.286 \times \% \text{ HAP}) - 0.0529) \times 2000 \times 0.8$

	Vacuum bagging/ closed-mold curing without roll-out	$EF = (0.126 \times \% \text{HAP} \times 2000 \times 0.5)$	$EF = ((0.286 \times \% \text{HAP}) - 0.0529) \times 2000 \times 0.5$
Atomized mechanical resin application	Nonvapor-suppressed resin	$EF = 0.169 \times \% \text{HAP} \times 2000$	$EF = ((0.714 \times \% \text{HAP}) - 0.18) \times 2000$
	Vapor-suppressed resin	$EF = 0.169 \times \% \text{HAP} \times 2000 \times (1 - (0.45 \times \text{VSE factor}))$	$EF = ((0.714 \times \% \text{HAP}) - 0.18) \times 2000 \times (1 - (0.45 \times \text{VSE factor}))$
	Vacuum bagging/closed-mold curing with roll-out	$EF = 0.169 \times \% \text{HAP} \times 2000 \times 0.85$	$EF = ((0.714 \times \% \text{HAP}) - 0.18) \times 2000 \times 0.85$
	Vacuum bagging/closed-mold curing without roll-out	$EF = 0.169 \times \% \text{HAP} \times 2000 \times 0.55$	$EF = ((0.714 \times \% \text{HAP}) - 0.18) \times 2000 \times 0.55$
Non-atomized mechanical resin application	Nonvapor-suppressed resin	$EF = 0.107 \times \% \text{HAP} \times 2000$	$EF = ((0.157 \times \% \text{HAP}) - 0.0165) \times 2000$
	Vapor-suppressed resin	$EF = 0.107 \times \% \text{HAP} \times 2000 \times (1 - (0.45 \times \text{VSE factor}))$	$EF = ((0.157 \times \% \text{HAP}) - 0.0165) \times 2000 \times (1 - (0.45 \times \text{VSE factor}))$
	Closed-mold curing with roll-out	$EF = 0.107 \times \% \text{HAP} \times 2000 \times 0.85$	$EF = ((0.157 \times \% \text{HAP}) - 0.0165) \times 2000 \times 0.85$
	Vacuum bagging/closed-mold curing without roll-out	$EF = 0.107 \times \% \text{HAP} \times 2000 \times 0.55$	$EF = ((0.157 \times \% \text{HAP}) - 0.0165) \times 2000 \times 0.55$
Atomized mechanical resin application with robotic or automated spray control ^d	Nonvapor-suppressed resin	$EF = 0.169 \times \% \text{HAP} \times 2000 \times 0.77$	$EF = 0.77 \times ((0.714 \times \% \text{HAP}) - 0.18) \times 2000$
Filament application ^e	Nonvapor-suppressed resin	$EF = 0.184 \times \% \text{HAP} \times 2000$	$EF = ((0.2746 \times \% \text{HAP}) - 0.0298) \times 2000$
	Vapor-suppressed resin	$EF = 0.12 \times \% \text{HAP} \times 2000$	$EF = ((0.2746 \times \% \text{HAP}) - 0.0298) \times 2000 \times 0.65$
Atomized spray gel coat application	Nonvapor-suppressed gel coat	$EF = 0.446 \times \% \text{HAP} \times 2000$	$EF = ((1.03646 \times \% \text{HAP}) - 0.195) \times 2000$

Nonatomized spray gel coat application	Nonvapor-suppressed gel coat	$EF = 0.185 \times \%HAP \times 2000$	$EF = ((0.4506 \times \%HAP) - 0.0505) \times 2000$
Manual gel coat application ^f	Nonvapor-suppressed gel coat	$EF = 0.126 \times \% HAP \times 2000$ (for emissions estimation only, see footnote f)	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000$ (for emissions estimation only, see footnote f)

- a. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.
 - b. Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e. 33 percent HAP should be input as 0.33, not 33.
 - c. The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to the Reinforced Plastic Composite Production NESHAP.
 - d. This equation is based on an organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.
 - e. Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.
 - f. Do not use this equation for determining compliance with emission limits in Table 2. To determine compliance with emission limits the permittee must treat all gel coat as if were applied as part of the gel coat spray application operations. If applying gel coat by manual techniques only, the permittee must treat the gel coat as if it were applied with atomized spray and use Equation 1.f. to determine compliance with the appropriate emission limits in Table 2. To estimate emissions from manually applied gel coat, the permittee may either include the gel coat quantities applied manually with the quantities applied using spray, or use this equation to estimate emissions from the manually applied portion of gel coat.
21. Organic HAP content determination for resins and gel coats. In order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and safety data sheets (SDS), using the procedures specified in Conditions 21.a through 21.c, as applicable. [40 CFR 63.5797]
- 21.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. [40 CFR 63.5797(a)]
 - 21.b. If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance. [40 CFR 63.5797(b)]
 - 21.c. If the organic HAP content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee must use the measured organic HAP content to determine compliance. [40 CFR 63.5797(c)]
22. Application technology (new or existing) not represented by the equations in Condition 20. If the permittee wishes to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Condition 20, the permittee may use the procedures in Conditions 22.a or 22.b to establish an organic HAP emissions factor. This organic HAP emissions factor may then be

used to determine compliance with the emission limits in the Reinforced Plastic Composite Production NESHAP, and to calculate facility organic HAP emissions.

- 22.a. Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in 40 CFR §63.5850.
- 22.b. Submit a petition to the DEQ for administrative review of the Reinforced Plastic Composite Production NESHAP. 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. The EPA will review the submitted data, and, if appropriate, update the equations in Condition 20. [40 CFR 63.5798]

Reinforced Plastic Composite Production NESHAP: Options for Meeting Standards

23. Options for meeting the standards for open molding and centrifugal casting operations. The permittee must use one of the following methods to meet the standards in Condition 18 when complying with an emission limit in Condition 19.

- The permittee may use any method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, or
- Changing to nonatomized mechanical application, or
- Using covered curing techniques, or
- Routing part or all of the emissions to an add-on control device.

The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in Conditions 23.a through 23.d. When changing to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the new compliance option unless the compliant materials option in Condition 23.d is used. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. [40 CFR 63.5810]

23.a. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Condition 19. [40 CFR 63.5810(a)]

23.a.i. Calculate the 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: 1) the neat resin plus (means any organic HAP-containing materials that are added to the resin by the supplier or the facility) or neat gel coat plus (means any organic HAP-containing materials that are added to gel coat by the supplier or the facility, excluding catalysts and promoters. Neat gel coat plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters) organic HAP content; 2) the gel coat type, 3) the application technique, or 4) the control technique. The permittee must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Condition 20 for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in Condition 20. If the permittee is using vapor suppressants to reduce HAP emissions, the permittee must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified of appendix A to the Reinforced Plastic Composite Production NESHAP. [40 CFR 63.5810(a)(1)]

23.a.ii. Compare each organic HAP emissions factor for each process stream calculated in Condition 23.a.i with its corresponding organic HAP emissions limit in Condition 19. If

all process stream emissions factors are equal to or less than their corresponding emission limits, then compliance is demonstrated. It is not necessary that all process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat used, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in Conditions 23.b through 23.d, then all process streams using that individual resin or gel coat must be included in the averaging calculations. [40 CFR 63.5810(a)(2)]

23.b. Demonstrate that, on average, the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type shown in Condition 23 are met. [40 CFR 63.5810(b)]

23.b.i. Group the process streams described in Condition 23.a.i by operation type and resin application method or gel coat type listed in Condition 19 and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in Condition 23.a.i and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 1.

Average Organic HAP Emissions Factor

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

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 an organic HAP emissions factor was calculated [40 CFR 63.5810(b)(1)(i)]

23.b.ii. The permittee may, but is not required to, include process streams that have demonstrated compliance by Condition 23.a subject to the limitations described in Condition 23.a.ii, and are not required to and should not include process streams for which compliance is demonstrated using the procedures in Condition 23.d. [40 CFR 63.5810(b)(1)(ii)]

23.b.iii. Compare each organic HAP emissions factor calculated in Condition 23.b.i with the corresponding organic HAP emissions limit in Condition 19. If all emissions factors are equal to or less than their corresponding emissions limits, then compliance is demonstrated. [40 CFR 63.5810 (b)(2)]

23.c. Demonstrate compliance with a weighted average emission limit. The permittee must demonstrate each month that each weighted average organic HAP emissions limit in Condition 19 is met. The permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other. The following procedures in Conditions 23.c.i. through 23.c.iii. must be followed: [40 CFR 63.5810(c)]

23.c.i. 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 at the facility for the last 12-month period to determine the organic HAP emissions limit that must be met. To do this, multiply the individual organic HAP emissions limits in Condition 19 for each open molding (or 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 (or 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 (or centrifugal casting) over the last 12 months as shown in Equation 2 below. [40 CFR 63.5810(c)(1)]

Weighted Average Emission Limit

$$= \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 2})$$

Where:

EL_i = organic HAP emissions limit for operation type i , lbs/ton from Condition 23

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

- 23.c.ii. Each month calculate the weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply the actual open molding (or centrifugal casting) operation organic HAP emissions factors calculated in Condition 27.c.i. and the amount of neat resin plus and neat gel coat plus used in each open molding (or 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 (or centrifugal casting) operations as shown in Equation 3 below. [40 CFR 63.5810(c)(2)]

Actual Weighted Average organic HAP Emissions Factor

$$= \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

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

- 23.c.iii. Compare the values calculated in Conditions 23.c.i and 23.c.ii. 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 compliance is demonstrated. [40 CFR 63.5810(c)(3)]

- 23.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 non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. [40 CFR 63.5810(d)]

23.d.i. For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, the permittee may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed above. Condition 23.d.ii 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 Condition 23.d.ii, the resin is in compliance. [40 CFR 63.5810(d)(1)]

23.d.ii. As specified in § 63.5810(d), when electing to use the same resin(s) for multiple resin application methods, you may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

Resin Type and Application Method	Application method	Maximum Percent/ Weighted Average Percent Organic HAP Content
CR/HS resins, centrifugal casting ^{1,2}	CR/HS mechanical	³ 48.0
	CR/HS filament application	48.0
	CR/HS manual	48.0
CR/HS resins, nonatomized mechanical	CR/HS filament application	46.4
	CR/HS manual	46.4
CR/HS resins, filament application	CR/HS manual	42.0
Non-CR/HS resins, filament application	Non-CR/HS mechanical	³ 45.0
	Non-CR/HS manual	45.0
	Non-CR/HS centrifugal casting ^{1,2}	45.0
Non-CR/HS resins, nonatomized mechanical	Non-CR/HS manual	38.5
	Non-CR/HS centrifugal casting ^{1,2}	38.5
Non-CR/HS resins, centrifugal casting ^{1,2}	Non-CR/HS manual	37.5
Tooling resins, nonatomized mechanical	Tooling manual	91.4
Tooling resins, manual	Tooling atomized mechanical	45.9

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

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

³ Nonatomized mechanical application must be used.

[70 FR 50133, Aug. 25, 2005]

23.d.iii. The permittee may also use a weighted average organic HAP content for each application method described in Condition 23.d.i. Calculate the weighted average organic HAP content monthly. Use Equation 1 in Condition 23.b.i. except substitute organic HAP content for organic HAP emissions factor. Compliance is demonstrated 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 Condition 23.d.ii. [40 CFR 63.5810(d)(2)]

23.d.iv. The permittee may simultaneously use the averaging provisions in Conditions 23.b or

23.c to demonstrate compliance for any operations and/or resins not included in the compliance demonstrations in Conditions 23.d.i. and 23.d.iii. However, any resins for which the permittee claims compliance under the options in Conditions 23.d.i and 23.d.iii may not be included in any of the averaging calculations described in Conditions 23.b or 23.c. [40 CFR 63.5810(d)(3)]

23.d.v. The permittee does not have to keep records of resin use for any of the individual resins where the permittee demonstrates compliance under the option in Condition 23.d.i unless the permittee elects to include that resin in the averaging calculations described in Condition 23.d.iii. [40 CFR 63.5810(d)(4)]

Reinforced Plastic Composite Production NESHAP: General Compliance Requirements

24. General compliance requirements.

24.a. The permittee must be in compliance at all times with the work practice standards in the following table as applicable. [40 CFR 63.5835(a), 40 CFR Subpart WWWW Table 4]

Operation Type	Work Practice Standards
Closed molding operation using compression/injection molding	Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
Cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
SMC manufacturing operation	use a nylon containing film to enclose SMC.
All mixing or BMC manufacturing operations ¹	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
All mixing or BMC manufacturing operations ¹	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
All mixing or BMC manufacturing operations ¹	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

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

24.b. The permittee must always operate and maintain an affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by the relevant standards. [40 CFR 63.5835(c), 40 CFR 63.6(e)(1)(i)]

Reinforced Plastic Composite Production NESHAP: Continuous Compliance Requirements25. Monitoring and data collection for continuous compliance demonstration.

- 25.a. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Condition 19. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP content limits in of 40 CFR Part 63 Subpart WWW if averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on SDS or on resin specifications supplied by the resin supplier. [40 CFR 63.5895(c)]
- 25.b. 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 Condition 19. However, the permittee must retain the records of resin and gel coat organic HAP content, and must include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. If after the permittee has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and control meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the application method or controls change, then the permittee must again demonstrate that the individual resin or gel coat meets its emission limit as specified in Condition 19. 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 Condition 19, the permittee must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average. [40 CFR 63.5895(d)]

26. Continuous compliance demonstration

- 26.a. The permittee must demonstrate continuous compliance with each standard in Condition 18 that applies according to the methods specified in Conditions 26.a.i through 26.a.iii.
- 26.a.i. Compliance with organic HAP emissions limits is demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Condition 19, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in Condition 25.b. [40 CFR 63.5900(a)(2)]
- 26.a.ii. Compliance with organic HAP content limits in Condition 23.d.ii is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Condition 23.d.ii, 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, as discussed in Condition 25.b. [40 CFR 63.5900(a)(3)]
- 26.a.iii. Compliance with the work practice standards in Condition 24.a is demonstrated by performing the work practice required for that operation.
- 26.b. The permittee must report each deviation from each standard in Condition 18 that applies. The deviations must be reported according to the requirements in Condition 28.
- 26.c. During periods of startup, shutdown or malfunction, the permittee must meet the organic HAP emissions limits and work practice standards that apply. [40 CFR 63.5900]

Reinforced Plastic Composite Production NESHAP: Notifications, Reports, and Records27. Notifications

If changing any information submitted in any notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change. [40 CFR 63.5905]

28. Reporting

- 28.a. Unless the DEQ has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report semiannually and according to Conditions 28.a.i through 28.a.iii.
- 28.a.i. Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [40 CFR 63.5910(b)(3)]
- 28.a.ii. Each compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [40 CFR 63.5910(b)(4)]
- 28.a.iii. 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. [40 CFR 63.5910(b)(3)]
- 28.b. The compliance report must contain the information in Conditions 28.b.i through 28.b.iv:
- 28.b.i. Company name and address.
- 28.b.ii. 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.
- 28.b.iii. Date of the report and beginning and ending dates of the reporting period.
- 28.b.iv. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Condition 30.a, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [40 CFR 63.5910(c)]
- 28.c. For each deviation from a organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report must contain the information in Conditions 28.b.i through 28.b.iii and in Conditions 28.c.i and 28.c.ii. This includes periods of startup, shutdown, and malfunction.
- 28.c.i. The total operating time of each affected source during the reporting period.
- 28.c.ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [40 CFR 63.5910(d)]
- 28.d. The permittee must report all deviations as defined in the Reinforced Plastic Composite Production NESHAP. If an affected source submits a compliance report along with, or as part of, the semiannual monitoring report required in the affected source's Title V permit, and the

compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in the Reinforced Plastic Composite Production NESHAP, 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 DEQ. [40 CFR 63.5910(g)]

- 28.e. Where multiple compliance options are available, the permittee must state in the next compliance report that compliance options have changed since the last compliance report. [40 CFR 63.5910(i)]

29. Recordkeeping

- 29.a. The permittee must keep a copy of each notification and report submitted to comply with the Reinforced Plastic Composite Production NESHAP, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). [40 CFR 63.5915(a)(1)]
- 29.b. The permittee must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Condition 19 and Condition 23.d.ii. [40 CFR 63.5915(c)]
- 29.c. The permittee must keep a certified statement that the affected source(s) is in compliance with the work practice requirements in Condition 24.a, as applicable. [40 CFR 63.5915(d)]

30. Form and duration of records.

- 30.a. The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection.
- 30.b. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- 30.c. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records offsite for the remaining 3 years.
- 30.d. The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [40 CFR 63.5920]

Insignificant Activities Requirements

31. DEQ acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in OAR 340-200-0020 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 31.a. OAR 340-208-0110 (20% opacity)
- 31.b. OAR 340-228-0210 (0.14 gr/dscf corrected to 12% CO₂ or 50% excess air for fuel burning equipment)
- 31.c. OAR 340-226-0210 (0.14 gr/dscf for non-fugitive, non-fuel burning equipment)
- 31.d. OAR 340-226-0310 (process weight limit for non-fugitive, non-fuel burning process equipment)

Testing, Monitoring, and Recordkeeping Requirements: Unless otherwise specified in this permit or an applicable requirement, DEQ is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in and perform the testing in accordance with DEQ’s Source Sampling Manual.

Plant Site Emission Limits

32. The permittee must not cause or allow plant site emissions to exceed the following limits for any 12 consecutive calendar month period: [OAR 340-222-0035 through OAR 340-222-0041]

Pollutant	Plant Site Emission Limit (tons/yr)
VOC	78

33. Monitoring Requirement: [OAR 340-218-0050(3)]

The permittee must determine compliance with the Plant Site Emission Limits established in Condition 36 of this permit by conducting monitoring in accordance with the following procedures, test methods, and frequencies:

- 33.a. The permittee shall monitor and record the following on a monthly basis:

- 33.a.i. For each gelcoat resin type used for Gelcoat resin Application;
 - 33.a.i.A. lbs of resin used;
 - 33.a.i.B. percent styrene of the resin.

- 33.a.ii. For each resin type used for Mechanical (Spray) Resin Application; For resin applied using non-atomizing application;
 - 33.a.ii.A. lbs of resin used;
 - 33.a.ii.B. percent styrene of the resin.

- 33.a.iii. For each resin type used for Spray Core application;
 - 33.a.iii.A. lbs of resin used;
 - 33.a.iii.B. percent styrene of the resin.

- 33.b. For each type of resin, the permittee shall calculate facility-wide emissions by multiplying pounds of resin used by the emission factor listed in Condition 20 above for each type of resin and application type.

$$E = Q \times EF \times K$$

Where:

- E = Emissions (tons/month or tons/year)
- Q = lbs of resin used each month or year
- EF = Emission factor (pounds/month or pounds/year)
- K = conversion constant: 1ton/2000 lbs

- 33.c. Percent styrene content for each resin shall be determined based on Safety Data Sheets, Technical Data Sheets, or other information as approved by DEQ.

34. The permittee shall determine compliance with Condition 36 (Annual Plant Site Emission Limits) by summing the emissions calculated in Condition 33 for each consecutive 12 month period, and adding the Aggregate Insignificant emissions of 1 ton per year of VOC, and comparing the resulting totals to the Plant Site Emission Limits listed in Condition 32. Monthly calculations must be completed within 30 days of the end of each month.

EMISSION FEES

35. Emission fees will be based on the Plant Site Emissions Limits, unless permittee elects to report actual emissions for one or more permitted processes/pollutants. [OAR 340-220-0090]

GENERAL TESTING REQUIREMENTS

36. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ's Source Sampling Manual. [OAR 340-212-0120]
- 36.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to DEQ at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. Permittee should be aware, if significant variations are requested, it may require more than 30 days for DEQ to grant approval and may require EPA approval in addition to approval by DEQ.
- 36.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
- 36.c. Unless otherwise specified by permit condition or DEQ approved source test plan, all compliance source tests must be performed as follows:
- 36.c.i. At least 90% of the design capacity for new or modified equipment;
 - 36.c.ii. At least 90% of the maximum operating rate for existing equipment; or
 - 36.c.iii. At 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
- 36.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, DEQ may accept two (2) test runs for demonstrating compliance with the emission limit or standard.

Source test reports prepared in accordance with DEQ's Source Sampling Manual must be submitted to DEQ within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

General Monitoring Requirements:

37. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
38. The permittee must use the same methods to determine compliance as those used to determine actual emissions for fee purposes and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]
39. The permittee must comply with the monitoring requirements on the date of permit issuance unless

otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

General Recordkeeping Requirements

40. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
 - 40.a. The date, place as defined in the permit, and time of sampling or measurements;
 - 40.b. The date(s) analyses were performed;
 - 40.c. The company or entity that performed the analyses;
 - 40.d. The analytical techniques or methods used;
 - 40.e. The results of such analyses;
 - 40.f. The operating conditions as existing at the time of sampling or measurement; and
 - 40.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
 - 40.h. The permittee shall maintain the following specific records of required monitoring information:
 - 40.h.i. The complaint logs, as required by Conditions 5 and 8;
 - 40.h.ii. Monthly records of resin use and emission calculations as required by Condition 33;
 - 40.h.iii. Monthly records of Miscellaneous VOC use as required in Condition 33;
 - 40.h.iv. Monthly and annual plant-wide VOC emissions;
 - 40.h.v. Monthly PSEL compliance calculations as required by Condition 34.
 - 40.i. Monthly records shall be available for inspection on or before the 30th calendar day following the last day of each calendar month.
41. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [OAR 340-214-0110, 340-214-0114, and 340-218-0050(3)(b)]
42. The permittee must comply with the recordkeeping requirements on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
43. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report, or application. [OAR 340-218-0050(b)(B)]

REPORTING REQUIREMENTS

General Reporting Requirements

44. Excess Emissions Reporting The permittee must report all excess emissions as follows: [OAR 340-214-0300 through 340-214-0360]
- 44.a. Immediately (by 9:00 AM the next business day) notify DEQ of an excess emission event by phone, email, or facsimile; and
 - 44.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [OAR 340-214-0340(1)]
 - 44.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
 - 44.b.ii. The date and time the owner or operator notified DEQ of the event;
 - 44.b.iii. The equipment involved;
 - 44.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
 - 44.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
 - 44.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
 - 44.b.vii. The final resolution of the cause of the excess emissions; and
 - 44.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to OAR 340-214-0360.
 - 44.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify DEQ by calling the Oregon Emergency Response System (OERs). The current number is 1-800-452-0311.
 - 44.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to DEQ for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by DEQ in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
 - 44.e. The permittee must notify DEQ of planned startup/shutdown or scheduled maintenance events.
 - 44.f. The permittee must continue to maintain a log of all excess emissions in accordance with OAR 340-214-0340(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]
45. Permit Deviations Reporting: The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in OAR 340-214-0300 through 340-214-0360 must be reported in accordance with Condition 44.

46. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]
47. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

Addresses of regulatory agencies are the following, unless otherwise instructed:

DEQ – Western Region 4026 Fairview Industrial Dr. SE Salem, OR 97302 503-378-8240	DEQ – Air Quality Division 700 NE Multnomah St., Suite 600 Portland, OR 97204 503-229-5359	Air Operating Permits US Environmental Protection Agency Mail Stop OAQ-108 1200 Sixth Avenue Seattle, WA 98101
--	---	--

Semi-annual and Annual Reports

48. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by DEQ. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the EPA and two copies to the DEQ regional office. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 48.a. The first semi-annual report is be due on July 31 and must include the semi-annual compliance certification, OAR 340-218-0080.
- 48.b. The annual report is due on February 15 and must consist of the following:
- 48.b.i. the emission fee report; [OAR 340-220-0100]
 - 48.b.ii. a summary of the excess emissions upset log; [OAR 340-214-0340]
 - 48.b.iii. the second semi-annual compliance certification; [OAR 340-218-0080]
 - 48.b.iv. the second semi-annual NESHAP compliance certification; and,
 - 48.b.v. the annual emission inventory report for the prior calendar year (Form R1001).
49. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]
- 49.a. The identification of each term or condition of the permit that is the basis of the certification;
- 49.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference into the permit. When certifying compliance with new applicable requirements that are not yet in the permit, the permittee must provide the information required by this condition.* If necessary, the owner or operator must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
- 49.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The

certification must be based on the method or means designated in condition 49.b of this rule. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0020, occurred; and

- 49.d. Such other facts as DEQ may require to determine the compliance status of the source.
50. Greenhouse Gas Registration and Reporting: If the calendar year emission rate of greenhouse gases (CO₂e) is greater than or equal to 2,756 tons (2,500 metric tons), the permittee must register and report its greenhouse gas emissions with DEQ in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5).
51. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in this permit have the meaning assigned to such terms in the referenced regulation.

G2. Reference materials

Where referenced in this permit, the versions of the following materials are effective as of the dates noted unless otherwise specified in this permit:

- a. Source Sampling Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A4;
- b. Continuous Monitoring Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

G3. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the Oregon Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee must comply with all conditions of this permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance is supplemental to, and does not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G5. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400] This condition is enforceable only by the State.

G6. Credible Evidence:

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

G7. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to DEQ or EPA pursuant to this permit must contain certification by a responsible official of truth, accuracy and completeness. All certifications must state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee must promptly, upon discovery, report to DEQ a material error or omission in these records, reports, plans, or other documents.

G8. Open Burning [OAR Chapter 340, Division 264]

The permittee is prohibited from conducting open burning, except as may be allowed by OAR 340-264-0020 through 340-264-0200.

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR Chapter 340-248-0005 through 340-248-0180 (state-only enforceable) and 340-248-0205 through 340-248-0280]

The permittee must comply with OAR Chapter 340, Division 248, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

The permittee must comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G11. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit is deemed compliance with any applicable requirements as of the date of permit issuance provided that:
 - i. Such applicable requirements are included and are specifically identified in the permit, or
 - ii. DEQ, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit alters or affects the following:
 - i. The provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the national acid rain program, consistent with section 408(a) of the FCAA; or
 - iv. The ability of DEQ to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative

amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by DEQ.

G12. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee must allow DEQ, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. Enter upon the permittee's premises where an Oregon Title V Operating Permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the FCAA or state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must pay an annual base fee and an annual emission fee for particulates, sulfur dioxide, nitrogen oxides, and volatile organic compounds. The permittee must submit payment to DEQ, Financial Services 700 NE Multnomah St., Suite 600, Portland, OR 97204, within 30 days of date DEQ mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to DEQ. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee must monitor for, and record, any off-permit change to the source that:
 - i. Is not addressed or prohibited by the permit;
 - ii. Is not a Title I modification;
 - iii. Is not subject to any requirements under Title IV of the FCAA;
 - iv. Meets all applicable requirements;
 - v. Does not violate any existing permit term or condition; and
 - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to DEQ and the EPA.
- c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 does not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee must monitor for, and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:

- i. Violate an applicable requirement;
 - ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
 - iii. Be a Title I modification.
- b. A minimum 7-day advance notification must be submitted to DEQ and the EPA in accordance with OAR 340-218-0140(3)(b).
 - c. The permit shield of Condition G11 does not extend to section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

- a. Legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
- b. Sale or exchange of the activity or facility.

G17. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G18. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180

G19. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding Conditions G16 and G17, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G20. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from DEQ prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0200 through OAR 340-210-0250.

G21. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an Air Contaminant Discharge Permit (ACDP) from DEQ and having satisfied the requirements of OAR 340, Division 224.

G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and OAR 340-214-0110]

The permittee must furnish to DEQ, within a reasonable time, any information that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to DEQ copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to DEQ along with a claim of confidentiality.

G24. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by DEQ.
- b. A permit must be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
- c. Proceedings to reopen and reissue a permit must follow the same procedures as apply to initial permit issuance and affect only those parts of the permit for which cause to reopen exists.

G25. Severability Clause [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless DEQ requests an earlier submittal. If more than 12 months is required to process a permit renewal application, DEQ must provide no less than six (6) months for the owner or operator to prepare an application.
- c. Provided the permittee submits a timely and complete renewal application, this permit will remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

G28. Property Rights [OAR 340-200-0020 and 340-218-0050(6)(d)]

The permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations, except as provided in OAR 340-218-0110.

G29. Permit Availability [OAR 340-200-0020 and 340-218-0120(2)]

The permittee must have available at facility at all times a copy of the Oregon Title V Operating Permit and must provide a copy of the permit to DEQ or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

Western Region
4026 Fairview Industrial Dr. SE
Salem, OR 97302
503-378-8240

<p style="text-align: center;">Table 1</p> <p style="text-align: center;">Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories</p> <p style="text-align: center;">Subpart A – General Provisions</p>	
§63.1	Applicability.
§63.2	Definitions.
§63.3	Units and abbreviations.
§63.4	Prohibited activities and circumvention.
§63.5	Preconstruction review and notification requirements.
§63.6	Compliance with standards and maintenance requirements.
§63.7	Performance testing requirements.
§63.8	Monitoring requirements.
§63.9	Notification requirements.
§63.10	Recordkeeping and reporting requirements.
§63.11	Control device and work practice requirements.
§63.12	State authority and delegations.
§63.13	Addresses of State air pollution control agencies and EPA Regional Offices.
§63.14	Incorporations by reference.
§63.15	Availability of information and confidentiality.
§63.16	Performance Track Provisions.
Table 1 to Subpart A of Part 63	Detection Sensitivity Levels (grams per hour)



State of Oregon
 Department of
 Environmental
 Quality

TITLE V OPERATING PERMIT REVIEW REPORT

Statera Fiberglass LLC
 9050 Porter Way SE
 Aumsville, OR 97325

SIC	3088	Source Categories (Part and code)	
NAICS	326191		
EPA ICIS-Air ID			

Compliance and Emissions Monitoring Requirements:

Unassigned emissions		COMS	
Emission credits		CEMS	
Compliance schedule		PEMS	
Source test [date(s)]		Ambient monitoring	

Reporting Requirements

Annual report (due date)	Feb. 15	Quarterly report (due dates)	
Emission fee report (due date)	Feb. 15	Monthly report (due dates)	
SACC (due date)	Feb. 15/July 30	Excess emissions report	
		Other reports (type)	

Air Programs

NSPS (list subparts)		RACT	
NESHAP (list subparts)	Subpart A Subpart WWWW	TACT	
CAM		Title V	X
Regional Haze (RH)		ACDP (SIP)	
Synthetic Minor (SM)		Major HAP source	X
Part 68 Risk Management		Federal major source	
CFC		NSR (by pollutant)	
		PSD (by pollutant)	
		Acid Rain	

TABLE OF CONTENTS

INTRODUCTION4
PERMITTEE IDENTIFICATION.....4
FACILITY DESCRIPTION5
EMISSION LIMITS AND STANDARDS, TESTING, MONITORING AND
RECORDKEEPING7
PLANT SITE EMISSION LIMITS10
HAZARDOUS AIR POLLUTANTS10
CLEANER AIR OREGON.....11
TOXICS RELEASE INVENTORY11
GENERAL BACKGROUND INFORMATION.....11
COMPLIANCE HISTORY11
SOURCE TEST RESULTS11
PUBLIC NOTICE.....12
EMISSIONS DETAIL SHEETS13

LIST OF ABBREVIATIONS USED IN THIS REVIEW REPORT

AQMA	Air Quality Management Area	MM	million
ASTM	American Society of Testing and Materials	N ₂ O	nitrous oxide (greenhouse gas)
BDT	bone dry ton	NA	not applicable
CEMS	continuous emissions monitoring system	NESHAP	National Emission Standard for Hazardous Air Pollutants
CFR	Code of Federal Regulations	NO _x	oxides of nitrogen
CH ₄	methane (greenhouse gas)	NSPS	New Source Performance Standard
CMS	continuous monitoring system	NSR	New Source Review
CO	carbon monoxide	O ₂	oxygen
CO _{2e}	carbon dioxide equivalent	OAR	Oregon Administrative Rules
COMS	continuous opacity monitoring system	ORS	Oregon Revised Statutes
DEQ	Oregon Department of Environmental Quality	O&M	operation and maintenance
dscf	dry standard cubic feet	Pb	lead
EF	emission factor	PCD	pollution control device
EPA	United State Environmental Protection Agency	PEMS	predictive emissions monitoring system
EU	emissions unit	PM	particulate matter
FCAA	Federal Clean Air Act	PM ₁₀	particulate matter less than 10 microns in size
GHG	greenhouse gas	PM _{2.5}	particulate matter less than 2.5 microns in size
gr/dscf	grains per dry standard cubic feet	PSD	Prevention of Significant Deterioration
HAP	hazardous air pollutant	PSEL	Plant Site Emission Limit
ID	identification code	SO ₂	sulfur dioxide
I&M	inspection and maintenance	ST	source test
MB	material balance	VE	visible emissions
Mlb	1000 pounds	VMT	vehicle mile traveled
		VOC	volatile organic compound

INTRODUCTION

1. The proposed permit is for a new Title V permit. Statera Fiberglass LLC (also known as EverFab) began operation in March 2018. Because their projected emissions at that time was under the threshold, they were allowed to operate without an air permit. However, due to the increasing production demands, the facility projected their styrene emissions exceeding 10 tons per year in 2021, which triggered a Title V permitting requirement per NESHAP Subpart WWWW.
2. Styrene is a hazardous air pollutant (HAP) and the facility is subject to NESHAP Subpart WWWW once HAP emissions exceeds 10 tons per year. NESHAP Subpart WWWW requires them to obtain a Title V permit.
3. Prior to obtaining a Title V permit, they had to obtain an ACDP first as a part of the process. An application for a Standard ACDP was submitted on April 15, 2019, and was issued on October 30, 2020. As required in OAR 340- 218-0040(1)(a), Statera submitted a Title V permit application on July 27, 2020, within 12 months of the issuance of the Standard ACDP.
4. After the first ACDP was issued, the facility projected VOC emissions exceeding Generic PSEL of 39 tons per year near future. They submitted an application to modify the permit to increase VOC PSEL on February 25, 2021. The modified ACDP was issued on May 10, 2021 and VOC PSEL was increased to 78 tons per year.
5. Statera Fiberglass LLC (Statera) has been determined to be an existing source for the purposes of Cleaner Air Oregon in accordance with OAR 340-245-0020 because the facility was in operation prior to November 16, 2018. As an existing source the permittee is required to perform a risk assessment in accordance with OAR 340-245-0050, and demonstrate compliance with the Risk Action Levels for an “Existing Source” in OAR 340-245-8010 Table 1 when called in by DEQ. Statera has not been called in and therefore, has not performed a risk assessment.
6. In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

PERMITTEE IDENTIFICATION

7. Statera Fiberglass LLC (Statera) owns and operates a shower manufacturing facility in Aumsville, Oregon. The facility was built in March 2018 and they currently employ about 40 people.

FACILITY DESCRIPTION

8. Statera manufactures two types of shower/tub combo units: one is ADA compliant and the other is not. The showers are manufactured in spray booths at this facility with gel coat guns, spray core guns, and chop guns. The units are then taken to the other areas of the facility for trimming and quality control. Each booth is equipped with a filter with 98.81% control efficiency. The facility uses monometers to identify when to replace the filters.

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

9. The emissions units at this facility are the following:
- 9.a. Facility-Wide use of VOC Containing Materials (Emission Unit FW-VOC)
 - Resins – VOC from resin application with non-atomized mechanical, non-vapor suppressed guns is emitted from a stack.
 - Gelcoat – VOC from gelcoat mix is emitted from a stack. Gelcoat is applied with an atomized spray coat gun from a 50 gallon drum
 - Spray Core – Spray core is applied with an atomized spray coat gun. VOC from the spray core application is emitted from a common stack.
 - 9.b. Aggregate Insignificant (Emission Unit AI)
 - Resin Storage Tank – VOC emitted from the resin storage tank.
 - Fugitive Emissions – fugitive VOC emissions from finished products
10. Categorically insignificant activities include the following:
- 10.a. Constituents of a chemical mixture present at less than 1% by weight of any chemical or compound regulated under OAR Chapter 340, Divisions 200 through 268, excluding Divisions 248 and 262, or less than 0.1% by weight of any carcinogen listed in the U.S. Department of Health and Human Service's Annual Report on Carcinogens when usage of the chemical mixture is less than 100,000 pounds/year
 - 10.b. Evaporative and tail pipe emissions from on-site motor vehicle operation
 - 10.c. Distillate oil, kerosene, and gasoline fuel burning equipment rated at less than or equal to 0.4 million Btu/hr
 - 10.d. Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
 - 10.e. Office activities
 - 10.f. Food service activities
 - 10.g. Janitorial activities
 - 10.h. Personal care activities

- 10.i. Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance
- 10.j. On-site laundry activities
- 10.k. On-site recreation facilities
- 10.l. Instrument calibration
- 10.m. Maintenance and repair shop
- 10.n. Automotive repair shops or storage garages
- 10.o. Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- 10.p. Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems
- 10.q. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities
- 10.r. Temporary construction activities
- 10.s. Warehouse activities
- 10.t. Accidental fires
- 10.u. Air vents from air compressors
- 10.v. Air purification systems
- 10.w. Continuous emissions monitoring vent lines
- 10.x. Demineralized water tanks
- 10.y. Pre-treatment of municipal water, including use of deionized water purification systems
- 10.z. Electrical charging stations
- 10.aa. Fire brigade training
- 10.bb. Instrument air dryers and distribution
- 10.cc. Process raw water filtration systems
- 10.dd. Pharmaceutical packaging
- 10.ee. Fire suppression
- 10.ff. Blueprint making
- 10.gg. Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- 10.hh. Electric motors
- 10.ii. Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- 10.jj. On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- 10.kk. Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- 10.ll. Pressurized tanks containing gaseous compounds

- 10.mm. Vacuum sheet stacker vents
- 10.nn. Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
- 10.oo. Log ponds
- 10.pp. Storm water settling basins
- 10.qq. Fire suppression and training
- 10.rr. Paved roads and paved parking lots within an urban growth boundary
- 10.ss. Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils
- 10.tt. Health, safety, and emergency response activities
- 10.uu. Emergency generators and pumps used only during loss of primary equipment or utility service due to circumstances beyond the reasonable control of the owner or operator, or to address a power emergency, provided that the aggregate horsepower rating of all stationary emergency generator and pump engines is not more than 3,000 horsepower. If the aggregate horsepower rating of all stationary emergency generator and pump engines is more than 3,000 horsepower, then no emergency generators and pumps at the source may be considered categorically insignificant
- 10.vv. Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems
- 10.ww. Non-contact steam condensate flash tanks
- 10.xx. Non-contact steam vents on condensate receivers, deaerators and similar equipment
- 10.yy. Boiler blowdown tanks
- 10.zz. Industrial cooling towers that do not use chromium-based water treatment chemicals
- 10.aaa. Ash piles maintained in a wetted condition and associated handling systems and activities
- 10.bbb. Oil/water separators in effluent treatment systems
- 10.ccc. Combustion source flame safety purging on startup
- 10.ddd. Broke beaters, pulp and repulping tanks, stock chests and pulp handling equipment, excluding thickening equipment and repulpers
- 10.eee. Stock cleaning and pressurized pulp washing, excluding open stock washing systems
- 10.fff. White water storage tanks

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING AND RECORDKEEPING

11. STATE REQUIREMENTS

The following Chapter 340 Oregon Administrative Rules that have specific requirements (e.g., emissions limits or standards, monitoring, recordkeeping, or reporting requirements) have been determined to be applicable to this facility. The “Oregon Title V Monitoring and Testing Guidance” document was used to determine the frequency of inspection and maintenance schedules and testing requirements.

11.a. Division 208-0110(4) – Visible Emissions:

The 20% opacity limit applies to all emissions units and activities at the facility, including the categorically insignificant activities. The source is required to maintain a complaint log for any visible emissions complaints. The permittee shall maintain records of all complaints and corrective actions.

11.b. Division 208-0210: Fugitive Emissions

The Permittee must minimize fugitive emissions by taking preventative measures applies. Compliance will be demonstrated by maintaining a complaint log for any excess fugitive dust emission complaints.

11.c. Division 208-0300 – Nuisance Control Requirements:

The source is required to immediately investigate any air quality nuisance complaints and to respond to the complainant within 24 hours. A record is to be maintained of complaints received, investigation results, and actions taken.

11.d. Division 208-0450 – Particle Fallout Limitations:

The source is required to immediately investigate any particulate matter fallout complaint and respond back to the complainant within 24 hours. A record is to be maintained of complaints received, investigation results, and actions taken.

11.e. Division 222-0020 – Stationary Source Plant Site Emission Limits:

Plant Site Emission Limits are required. The PSEL is being established on a plant-wide basis with annual limits for all regulated pollutants above the de minimis level in accordance with DEQ rules. For more detail in establishing PSEL, see Section 10 of this review.

11.f. Insignificant activities

As identified earlier in this Review Report, this facility has insignificant emissions units (IEUs) that include categorically insignificant activities and aggregate insignificant emissions, as defined in OAR 340-200-0020. For the most part, the standards that apply to IEUs are for opacity (20% limit) and particulate matter (0.14 gr/dscf limit). The DEQ does not consider it likely that IEUs could exceed an applicable emissions limit or standard because IEUs are generally equipment or activities that do not have any emission controls do not typically have visible emissions. Since there are no controls, no visible emissions, and the emissions are less than one ton per year, the DEQ does not believe that monitoring, recordkeeping, or reporting is necessary for assuring compliance with the standards.

11.g. Cleaner Air Oregon (CAO)

Per OAR 340-245-0020(20)(a), Statera is considered as an existing source as the facility was constructed prior to 11/16/18. Therefore, no CAO action was required at this time.

FEDERAL REQUIREMENTS

12. The following federal requirements have been reviewed and those that apply, or do not apply to this source are noted as follows:

12.a. Accidental Release (40 CFR Part 68)

The facility does not have the regulated pollutants above the threshold. Therefore, this rule is not applicable.

12.b. NESHAP Standards (40 CFR Part 63, Subpart WWWW standards §63.5780-§63.5935 and OAR, Division 244-0220(bbbb))

Statera is predicting styrene emissions exceeding the 10 tp threshold due to production increase. Per §63.5785(a), the facility will be subject to NESHAP Subpart WWWW, Reinforced Plastic Composites Production. Because the source was constructed in 2018, the facility is considered as a new source for NESHAP.

This facility currently operates open molding operations with atomized spray gel coat application and nonatomized mechanical resin application only. As requested, rules for other operation types and application techniques were included in the permit to give them a flexibility. The permittee may choose one out of the three compliance options as described in the permit.

As indicated in the detail sheet, Statera's potential styrene emissions are 71.66 tons per year. Per §63.5797 (1), the facility is not required to include organic HAPs that contains less than 1 % by mass (less than 0.1% for carcinogen HAPS defined by OSHA). HAPs that are contained in their materials were verified by the manufacturers' SDS.

12.c. New Source Performance Standards (40 CFR Part 60)

New Source Performance Standards (NSPS) is not applicable to any of emission sources at this facility.

12.d. New Source Review (NSR)

This source is not currently subject to federal regulations for NSR for nonattainment areas.

12.e. Prevention of Significant Deterioration (PSD)

This source is not currently subject to federal regulations for PSD because their potential emissions for criteria pollutants are well below 250 tpy.

12.f. Compliance Assurance Monitoring (CAM) Rule

Since no control device is used, CAM does not apply to this facility.

PLANT SITE EMISSION LIMITS

13. Provided below is a summary of the baseline emissions rate, netting basis, plant site emission limits, and emissions capacity.

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limit (PSEL)			SER (tons/yr)
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)	
PM	0	0	0	NA	NA	NA	25
PM ₁₀	0	0	0	NA	NA	NA	15
PM _{2.5}	0	0	0	NA	NA	NA	5
CO	0	0	0	NA	NA	NA	100
NO _x	0	0	0	NA	NA	NA	40
SO ₂	0	0	0	NA	NA	NA	40
VOC	0	0	0	78	78	0	40
GHG (CO ₂ e) (including biomass CO ₂)	0	0	0	NA	NA	NA	75,000
GHG (CO ₂ e) (excluding biomass CO ₂)	NA	NA	NA	NA	NA	NA	75,000

14. Because Statera started their operation in 2018, no baseline was established. The only potential emissions above the de minimis is VOC and a HAP. Potential emissions were calculated in the detail sheet based on material balance.

HAZARDOUS AIR POLLUTANTS

15.

Hazardous Air Pollutants	Potential to Emit (pounds/year)	Actual Emissions (pounds/year)
Styrene	143,220	49,520
Alpha-methyl Styrene	3,220	1,260
Total HAP emissions	146,440	50,780

CLEANER AIR OREGON

16. Statera has not been called in and therefore, has not performed a risk assessment.

TOXICS RELEASE INVENTORY

17. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which DEQ has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, [chemicals covered by the TRI Program](#) are those that cause:
 - 17.a. Cancer or other chronic human health effects;
 - 17.b. Significant adverse acute human health effects; or
 - 17.c. Significant adverse environmental effects.
18. There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical.
19. Statera reported the release of styrene for TRI-listed chemicals for the year 2020.

GENERAL BACKGROUND INFORMATION

20. The Title V permit will replace the ACDP, but the ACDP still exists for historical enforcement purposes and as a basis for determining applicable requirements.

COMPLIANCE HISTORY

21. No compliance inspections has been conducted at Statera yet. Once the Title V permit is issued, they will be inspected every other year as specified by EPA.

SOURCE TEST RESULTS

22. No source test is required.

PUBLIC NOTICE

23. This permit will be put on public notice from Sept. 7, 2021 to Oct. 12, 2021. Comments may be submitted in writing during the comment period. DEQ will hold a public hearing if requested by 10 or more individuals or one person representing a group of 10 or more individuals. After the comment period and hearing, if requested, DEQ will review the comments and modify the permit as may be appropriate. A proposed permit will be sent to EPA for a 45 day review period. DEQ may request and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period.
24. If EPA does not object in writing, any person may petition the EPA within 60 days after the expiration of EPA's 45-day review period to make such objection. Any such petition must be based only on objections to the permit that were raised with reasonable specificity during the public comment period provided for in OAR 340-218-0210, unless the petitioner demonstrates it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

EMISSIONS DETAIL SHEETS

Material	Pollutant	Type	%HAP	EF ^{*1} (lb/ton)	HAP Limit ^{*2} (lb/ton)	EF (lb/lb)	Annual Usage ^{*3} (lbs)	Emissions (tons/yr)
Production Resin (Facility-wide)	Styrene	VOC/HAP	30.30%	64.842	88	0.032421	1,775,232	28.78
	Alpha-methyl Styrene	VOC	1.70%	3.638	88	0.001819	1,775,232	1.61
Production Gel Coat (BTH1)	Styrene	VOC/HAP	28.80%	256.32	267	0.12816	385,920	24.73
Production Spray Core (BTH2)	Styrene	VOC/HAP	25.30%	225.17	377	0.112585	321,600	18.10
Tooling Resin Top (BTH4)	Styrene	VOC/HAP	44.00%	105.16	113	0.05258	200	0.005
Tooling Resin Body (BTH4)	Styrene	VOC/HAP	36.90%	82.866	113	0.041433	800	0.017
	Methyl Methacrylate	VOC/HAP	2.00%	4.28	113	0.00214	800	0.00086
Tooling Gel Coat (BTH4)	Styrene	VOC/HAP	44.55%	533.4859	605	0.266743	200	0.02667
	Methyl Alcohol	VOC/HAP	1.00%	8.9	605	0.00445	200	0.00045
	Light Aromatic Naphtha	VOC	1.00%	8.9	605	0.00445	200	0.00045
	Ethylbenzene	VOC/HAP	1.00%	8.9	605	0.00445	200	0.00045
VOC Total (tpy) ^{*4}								73.28
HAP Total (tpy)								71.66
Styrene (tpy)								71.66
Other HAP (tpy)								0.0017

1. Emission factors were calculated by using equations specified in Table 1 to 40 CFR Part 63 Subpart WWWW.
2. HAP emission limits are specified in Table 3 to 40 CFR Part 63 Subpart WWWW.
3. Annual material usages are reported by the facility.
4. Even though the maximum VOC emissions were estimated to be 73.28 tpy, it could be more based on their production rate. To accommodate the operational flexibility, Statera was given a VOC limit of 78 tpy during the last modification in 2021.

yp:xx