United States Environmental Protection Agency
Region 10
Air & Radiation Division
1200 Sixth Avenue, Suite 155, 15-H13
Seattle, Washington 98101

Statement of Basis
Title V Air Quality Operating Permit
Renewal No. 2, Modification No. 1

Permit Writer: Rizwan Syed

McClarin Plastics, LLC D/B/A McCLARIN Composites
(formerly Amtech Corporation)

Yakama Reservation
Wapato, Washington

Purpose of Permit and Statement of Basis

Title 40 Code of Federal Regulations part 71 establishes a comprehensive air quality operating permit program under the authority of title V of the 1990 amendments to the federal Clean Air Act. The air quality operating permit is an enforceable compilation of all of the applicable air pollution requirements that apply to an existing affected air emissions source. The permit is developed via a public process, may contain additional new requirements to improve monitoring of existing requirements, and contains procedural and prohibitory requirements related to the permit program itself. The permit is valid for 5 years and may be renewed.

This document, the statement of basis, summarizes the legal and factual basis for the permit conditions in the air quality operating permit to be issued to McClarin Plastics, LLC D/B/A McCLARIN Composites (referred to herein as McClarin, Amtech (its former name), facility, source, or permittee). Unlike the air quality operating permit, this document is not legally enforceable. This statement of basis summarizes the emitting processes at the facility, air emissions, permitting and compliance history, the statutory or regulatory provisions that relate to the subject facility, and the steps taken to provide opportunities for public review of the permit. The permittee is obligated to follow the terms of the permit. Any errors or omissions in the summaries provided here do not excuse the permittee from the requirements of the permit.

The permit is being administratively amended pursuant to 40 CFR 71.7(d) to change the responsible official listed on page 5 of the permit

from:

Mr. Rahul Mukerjee
Vice President – Engineering & Integrated Management Systems
15 Industrial Drive
Hanover, PA 17331
Phone: 717-646-4703
Email: rmukerjee@mcclarincomposites.com

to:

Mr. Michael Gromacki
Chief Executive Officer
McCLARIN Composites
15 Industrial Drive
Hanover, PA 17331
Phone: 717-688-1173
Email: mgromacki@mcclarincomposites.com

During a MS Teams meeting on March 3, 2023, CEO Mr. Michael Gromacki and Ms. Ann Gonzalez (Director of Enterprise HSE / Sustainability Management Systems) notified EPA Region 10's Dan Meyer and Sara Conley that Mr. Rahul Mukerjee (responsible official identified in the February 16, 2023 final permit) had recently been separated from McClarin Plastics, LLC. During the meeting, EPA Region 10 notified Mr. Gromacki that Ms. Gonzalez was not eligible to become the delegated responsible official. EPA Region 10 notified Mr. Gromacki that he was the responsible official. Later that day after the conclusion of the meeting, Ms. Gonzalez sent an email to EPA Region 10 with the contact details for Mr. Gromacki identifying him as the responsible official.

Appendix – Statement of Basis for Title V Permit Renewal No. 2

Appendix

Statement of Basis for Title V Permit Renewal No. 2
Permit No. R10T5030002

Permit Number: R10T5030002 Effective: February 16, 2023
Issued: February 16, 2023 Expiration: February 16, 2028

United States Environmental Protection Agency
Region 10
Air & Radiation Division
1200 Sixth Avenue, Suite 155, 15-H13
Seattle, Washington 98101

Statement of Basis
Title V Air Quality Operating Permit
Renewal No. 2

Permit Writer: Christopher Familiare

McClarin Plastics, LLC D/B/A McCLARIN Composites
(formerly Amtech Corporation)

Yakama Reservation
Wapato, Washington

Purpose of Permit and Statement of Basis

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Abbreviations and Acronyms

Btu	British thermal units
ºC	Celsius degrees
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CAM	Compliance assurance monitoring
CBI	Confidential Business Information
CFR	Code of Federal Regulations
CO	Carbon monoxide
COMS	Continuous Opacity Monitoring System
EJ	Environmental Justice
ELOS	Emission Limit or Standard
EPA	United States Environmental Protection Agency (also U.S. EPA or "the Agency")
ESA	Endangered Species Act
EU	Emission Unit
FARR	Federal Air Rules for Reservations
FORS	FARR Online Reporting System
FR	Federal Register
FRP	Fiber-glass Reinforced Plastic
FWS	Fish and Wildlife Service
gal	United States Gallon
gr/dscf	Grains per dry standard cubic foot (7,000 grains = 1 pound)
HAP	Hazardous air pollutant
hr	Hour
K	Kelvin
lb	Pound
M	One thousand
MACT	Maximum Achievable Control Technology
Mg	Megagram
MM	One million
mo	Month
MSDS	Material safety data sheet (see SDS acronym)
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants (Title 40 CFR Parts 61 and 63)
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO_x	Nitrogen oxides
NOMA	Notice of MACT Approval
PM	Particulate matter
$PM_{2.5}$	Particulate matter less than or equal to 2.5 micrometers in aerodynamic diameter
PM_{10}	Particulate matter less than or equal to 10 micrometers in aerodynamic diameter
PSD	Prevention of significant deterioration
PTE	Potential to emit
QIP	Quality Improvement Plan
RM9	Reference Method 9
SDS	Safety Data Sheet (formerly called a Material Safety Data Sheet or MSDS)
SO_2	Sulfur dioxide
SoB	Statement of Basis
tpy	Tons per year
VMT	Vehicle miles traveled
VOC	Volatile organic compound

1. EPA Authority to Issue Title V Permits

On July 1, 1996, the EPA adopted regulations (see 61 FR 34202) codified at 40 CFR part 71 setting forth the procedures and terms under which the Agency would administer a federal operating permit program. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate the EPA's approach for issuing federal operating permits to affected stationary sources in Indian Country.

As described in 40 CFR 71.4(b), the EPA will implement and enforce a part 71 operating permitting program in Indian country when an operating permit program which meets the requirements of part 70 has not been granted approval by the Administrator. Unlike States, Indian Tribes are not required to develop operating permit programs, though the EPA encourages Tribes to do so. See, for example, Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). EPA may delegate the authority to administer a part 71 operating permit program, in whole or in part, to an Indian Tribe as described in 40 CFR 71.4(j) and 71.10.

2. Facility Information

Blackford Capital, LLC owns McClarin Plastics, LLC D/B/A McCLARIN Composites and Amtech, LLC (the plant operated under the name Amtech until 2016), which rents the land and buildings from the Tribe.

2.1 Location

The facility is located just north of Wapato, Washington, immediately east of Highway 97. The facility is entirely within the boundaries of the Yakama Reservation.

2.2. The Yakama Reservation

The creation of the Yakama Reservation resulted from a treaty signed in 1855 by Washington Territory Governor Isaac Stevens and representatives of the Yakama and several other Tribes. The treaty was ratified by the Senate on March 8, 1859, and signed by President James Buchanan on April 18, 1859.

Today, the Yakama Reservation has a population of about 32,000 and covers approximately 1.4 million acres east of the Cascades in southern, central Washington. Members of the Confederated Tribes and Bands of the Yakama Nation and the Yakama Reservation are governed by the Yakama Nation Tribal Council.

Reservation:	Yakama Reservation P.O. Box 151 Toppenish, Washington 98948 Phone: 509-865-5121
Tribal Leader:	Gerald Lewis, Chairman Yakama Nation Tribal Council
Tribal Contact:	Elizabeth Sanchey, Program Manager Yakama Nation Environmental Management Program P.O. Box 151 Toppenish, WA 98948 Phone: 509-865-5121 ext 6038 Email: esanchey@yakama.com

2.3 Local Air Quality and Attainment Status

The Yakama Reservation is in attainment or unclassifiable with all the national ambient air quality standards. With respect to Prevention of Significant Deterioration (PSD) impact evaluation, the majority of the reservation is classified as Class II lands, except for a small portion in the western part of the reservation, located within the boundary of the Mt. Adams National Wilderness Area, which is designated as a Class I area.

2.4 Facility Description

McClarin produces custom components from fiberglass-reinforced plastic (FRP or "fiberglass") for military, industrial, and commercial products, including: recreational vehicle and motor home parts, spas, military vehicle hard tops, bus parts, lavatory bath modules, food storage components for mobile food service vehicles, and industrial lift parts.

The FRP process involves fabrication of composite products from liquid resins structurally reinforced with glass fibers, or, less frequently, other fibers, such as carbon or paper. The most common resin used in FRP production is polystyrene. Polystyrene is a *thermoset resin*, which is applied as a liquid, hardens when heated, and remains a solid when cooled to room temperature. Other types of resins harden through exposure to ultraviolet light, through the addition of a hardener or catalyst, or by the combination two components that react upon contact.

The glass (or other) fibers can be either woven into a mat, sheet, or other regular shape or they can be randomly distributed (chopped) in the bulk resin. Inorganic filler materials, such as calcium carbonate, gypsum, talc, or clay, may be added to the resin to modify the final product's physical characteristics.

FRP components can be formed using several processes including:

1. Open molding, where resins are spray applied to a substrate (a mold or form) that is open to ambient air;
2. Closed molding, where resins are poured into matched dies or injected into closed forms that are not open to ambient air until the resin has set;
3. Centrifugal casting, where composite materials are positioned inside a rotating hollow mandrel and held in place by centrifugal forces [sic] and aerated until the part is sufficiently cured to maintain its shape;
4. Pultrusion, a continuous process where a substrate, such as paper or a woven mat, is drawn through a resin bath and an aerated curing chamber;
5. Filament winding, where a glass or carbon fiber impregnated with resin is wrapped around a rotating mandrel; and
6. Vacuum forming, where sheets of plastic are heated until pliable and placed over a mold in which an open valve draws a partial vacuum.

Resins can be applied by hand (e.g., with a brush or roller). In an industrial mass-production facility, this is generally done only for touch up work: to repair pieces or to add detail.

When lightweight components are desired, resin may be expanded by blowing a gas through it, thus generating a foam. One well-known example is expanded polystyrene foam, the material used to make Styrofoam "peanuts."

Frequently, a gel coat is applied to the surface to improve a final product's appearance and resilience. Gel coats can have a variety of colors and finishes added to them. In molding operations, the gel coat is applied first, spray applied to the empty form before the resin is applied.

A facility that produces custom FRP components will often require the use of more types of resins and gel coats than a facility that produces a few standard products on an assembly line, such as a plant that produces only tub and shower inserts.

FRP production facilities are often major emitters of volatile organic compounds (VOC), some of which are classified as hazardous air pollutants (HAP), such as styrene and methyl methacrylate. The largest sources of air emissions at FRP production facilities are usually those processes where resins, gel coats, and other coatings are applied in the open or when air is blown through a mold: open molding, centrifugal casting, pultrusion, filament winding, gel coat application, product painting, and the use of VOC-containing solvents to clean molds.

The Wapato facility conducts the following operations that have the potential to emit regulated air pollutants:

1. Open molding and resin mixing operations;
2. Cleaning of equipment used in open molding and resin mixing operations;
3. Resin storage tank;
4. Material storage (storage of resin and other materials in open or partially-open containers);
5. Repair operations on manufactured parts and on molds;
6. Painting of fiberglass, plastic and metal parts inside a spray booth;
7. Closed mold operations (resin transfer molding);
8. Vacuum infusion (a closed mold operation);
9. Vacuum forming;
10. Application of foams;
11. Support activities (grinding and sanding of manufactured parts, woodshop, painting of fiberglass, plastic and metal parts outside a spray booth, and maintenance activities);
12. Plant traffic; and
13. Combustion devices – natural gas-fired heaters and make-up air units:

    a) Heater, for original paint booth, 1.5 MMBtu/hr;
    b) Heater for additional paint booth, 1.2 MMBtu/hr;
    c) Make-up air unit, lamination area, 2.527 MMBtu/hr;
    d) Make-up air unit, future lamination, 1.775 MMBtu/hr;
    e) Make-up air unit, lamination area, 1.5552 MMBtu/hr;
    f) Make-up air unit, gelcoat area, 1.5552 MMBtu/hr;
    g) 5 space heaters, general plant, 230,000 Btu/hr each;
    h) 3 space heaters, general plant, 300,000 Btu/hr each;
    i) 2 space heaters, lunch room, 140,000 Btu/hr each;
    j) 2 space heaters, offices, 100,000 Btu/hr each;
    k) 12 space heaters in the second building, 200,000 Btu/hr each;
    l) Make-up air unit in the second building, 1.3 MMBtu/hr; and
    m) Quality Control Oven, 1.2 MMBtu/hr.

The facility standard industrial classification code is: 3089 Plastic Products, Not Elsewhere Classified.

Part 71 permits are ordinarily organized into sections based on discrete, physical pieces of equipment (emission units). In the case of McClarin, however, where production lines and activities are frequently rearranged based on what products need to be manufactured, it makes more sense to arrange the permit based on the underlying regulations that apply. Table 3-1 lists and describes how the permit is organized based on this regulatory structure, while maintaining this “emission unit” nomenclature. Any control devices that are required by rule or this permit are so noted.

Table 3-1
Emission Units (EU) & Control Devices

EU ID #	Emission Unit Description	Control Device
WWWW	Fiberglass Operations: activities subject to 40 CFR part 63, subpart WWWW. This includes open molding (including spray application of resins and gel coats and filament winding), closed molding (compression/injection molding only), resin mixing, cleaning of equipment used in fiberglass operations, HAP-containing material storage (except in unit TNK), and repair operations on parts manufactured on site. The following activities are allowed by the subpart but have not been reviewed by EPA and may require a permit revision: centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound manufacturing, and bulk molding compound manufacturing.	None.
PPPP	Fiberglass Coating Operations: activities subject to 40 CFR part 63, subpart PPPP. This includes the application of coatings to plastic parts and the equipment used to store mix and convey coatings, thinners, additives, and waste materials.	None.
MMMM	Metal Coating Operations: activities that *would* be subject to 40 CFR part 63, subpart MMMM, if a minimum volume threshold of HAP-containing coatings was applied to metal parts. This includes the application of coatings to miscellaneous metal parts and the equipment used to store mix and convey coatings, thinners, additives, and waste materials.	None.
BLDG	Building: this emission unit is a catch-all that refers to all general emission limits that apply to air pollutant-emitting activities that are located inside the building and emit through the building vents other than combustion emissions and activities that occur inside the spray booths.	Inside building
BOOTH	Spray Booth: this emission unit includes all air pollutant-emitting activities conducted inside either of the two spray booths. Combustion devices are not included in this emission unit.	Particulate filter[1]
COMB	Combustion Devices: combusting only natural gas, as listed below: 1. Heater, for one paint booth, 1.5 MMBtu/hr; 2. Heater, second paint booth, 1.2 MMBtu/hr; 3. Make-up air unit, lamination area, 2.527 MMBtu/hr; 4. Make-up air unit, lamination area, 1.775 MMBtu/hr. 5. Make-up air unit, lamination area, 1.5552 MMBtu/hr; 6. Make-up air unit, gelcoat area, 1.5552 MMBtu/hr; 7. 5 space heaters, general plant, 230,000 Btu/hr each; 8. 3 space heaters, general plant, 300,000 Btu/hr each; 9. 2 space heaters, lunch room, 140,000 Btu/hr each; 10. 2 space heaters, offices, 100,000 Btu/hr each; 11. 12 space heaters in second building, 200,000 Btu/hr each; 12. Makeup air unit in second building, 1.3 MMBtu/hr; and 13. Quality Control Oven, 1.2 MMBru/hr	None
TNK	Resin Storage Tanks	None
PT	Plant Traffic	None

[1] Required by title V permit

40 CFR 71.5(c)(11)(ii)(A) and (B) allow sources to separately list in the permit application such units or activities that qualify as "insignificant" (referred to as insignificant emission units (IEUs)). An emission

unit or activity qualifies as an IEU if it is in an identified source category or if its potential emissions are below two tons/year for all regulated pollutants that are not listed as HAPs under section 112(b) and below 1000 lbs/year or the de minimis level established under section 112(g), whichever is lower, for HAPs. However, a title V permit application may not omit information needed to determine the applicability of, or to impose, any applicable requirement, or to calculate the permit fee. In addition, activities or emission units that qualify as IEUs for the purpose of the title V permit application are in no way exempt from applicable requirements or any requirements of the title V permit. McClarin did not specifically request that any activity be treated as IEUs.

2.5 Permitting, Construction and Compliance History

The facility commenced operations on May 13, 2002. As this predated the new source review permitting program for minor sources located in Indian country in 40 CFR part 49, subpart C, no permit to construct was ever issued.

In late 2001, Amtech (the previous business name) applied for authorization to construct in compliance with the preconstruction requirements of 40 CFR part 63, subpart B. On April 23, 2002, the EPA issued a Notice of MACT Approval (NOMA) for the Amtech facility in Wapato. The NOMA contained compliance requirements for the fiberglass operations, in lieu of complying with subpart WWWW, which had not yet been promulgated. The NOMA continued to be effective, even after promulgation of 40 CFR part 63, subpart WWWW.

On March 23, 2004, Amtech submitted a request that, in part, sought to withdraw the NOMA and incorporate the final subpart WWWW requirements into its title V permit (which had not yet been issued). On July 8, 2005, the EPA issued a letter rescinding the NOMA and directing Amtech to comply with the requirements of subpart WWWW.

The EPA inspected Amtech Wapato in August 2003, and the subsequent inspection report did not indicate any deviations from compliance. The facility was again inspected on June 8, 2005. Although there were some minor follow-up items (title V fees not paid, and deficient annual reporting), again no deviations from compliance were recorded. The facility has since addressed the follow-up items.

On October 3, 2005, the EPA received an application from Amtech Corporation requesting emission limits on HAP emissions and on VOC emissions. Amtech later withdrew its request for a HAP limit. AMTECH requested the VOC limit in order to establish itself as a minor source of VOC emissions to avoid permitting under the PSD program. The EPA reviewed the request for a VOC limit and on April 12, 2006, issued a non-title V operating permit establishing a VOC emission limit and providing for monitoring, recordkeeping and reporting.

On November 30, 2009, Amtech Corporation submitted an application for a minor modification to the EPA requesting removal of Condition 5.10 from its title V permit. Condition 5.10 requires McClarin to submit an application for a modified permit before conducting filament winding, centrifugal casting, pultrusion, or certain other activities. Amtech asserted that part 71 already included the criteria necessary to determine when an application for a permit modification was necessary. Simultaneous with this application, Amtech submitted notification of an off-permit change that it was conducting filament winding.

The list below provides a summary of the chronology of McClarin/Amtech's permitting and inspection history:

November 1, 2001	Amtech applied for NESHAP preconstruction authorization
April 23, 2002	EPA issued a NOMA

May 13, 2002	Amtech commenced operations
December 31, 2002	EPA received Amtech's initial title V application
August, 2003	EPA inspected Amtech Wapato
March 23, 2004	Amtech submitted a request to withdraw the NOMA
June 3, 2005	EPA sent a letter requiring title V application update for Federal Air Regulations for Reservations (FARR)
June 8, 2005	EPA inspected Amtech Wapato
July 8, 2005	EPA rescinded the NOMA and required compliance with subpart WWWW
August 22, 2005	EPA received Amtech's updated title V application
October 3, 2005	EPA received application for a non-title V operating permit.
April 12, 2006	EPA issued a non-title V operating permit establishing a VOC emission limit
June 28, 2007	EPA inspected Amtech Wapato
August 18, 2009	EPA inspected Amtech Wapato
November 30, 2009	Amtech submitted an application for a minor modification to remove condition 5.10 from its title V permit and simultaneously submitted notice of an off-permit change to conduct filament application open molding
August 29, 2011	Amtech again submitted a notice of an off-permit change to expand open molding filament application and associated open molding operations into an adjacent building
December 22, 2011	EPA receives Amtech's title V permit renewal application
July 10, 2013	EPA inspected Amtech Wapato
March 1, 2016	EPA receives an application for an administrative amendment to change the source name to McClarin Plastics, LLC
September 28, 2016	EPA issued a title V and a non-title V operating permit
April 28, 2021	EPA received McClarin's title V permit renewal application
February 16, 2023	EPA issued a title V operating permit; source's name is updated to McClarin Plastics, LLC D/B/A McCLARIN Composites
March 03, 2023	EPA receives an application for an administrative amendment to change the source responsible official to Michael Gromocki, Chief Executive Officer, McCLARIN Composites
March 09, 2023	EPA makes the administrative amendment to change the responsible official and issues a revised Title V permit

3. Emission Inventory

3.1 Emission Inventory Basics

An emission inventory generally reflects either the "actual" or "potential" emissions from a source. Actual emissions generally represent a specific period of time and are based on actual operation and controls. Potential emissions, referred to as potential to emit, generally represent the maximum capacity of a source to emit a pollutant under its physical and operational design, taking into consideration regulatory restrictions, but only required control devices. PTE is often used to determine applicability to several EPA programs, including title V, PSD and section 112.

Emissions can be broken into two categories: point and fugitive. Fugitive emissions are those which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening. Examples of fugitive emissions are roads, piles that are not normally enclosed, wind-blown dust from open areas, and those activities that are normally performed outside buildings. Point sources of emissions include any emissions that are not fugitive.

The equation below represents the general technique for estimating emissions (in tons per year) from each

emission unit at the facility. Emissions are calculated by multiplying an emission factor by an operational parameter. To estimate actual emission, the permittee will need to track the actual operational rates. Note that emission factors may be refined over time. For those estimation techniques that require substantial site-specific parameter tracking, such as piles and roads, emissions associated with a defined operational rate can be estimated to establish a set ratio that can be used to multiply by the actual operational rate in

future years, significantly simplifying the annual inventory effort. All of the techniques and site-specific parameters and assumptions should be reviewed each year before estimating emissions to be sure they remain appropriate.

$$E = EF \times OP \times K$$

Where:

E = pollutant emissions in tons/year

EF = emission factor (see Appendix A to this Statement of Basis)

OP = operational rate (or capacity for PTE)

K = 1 ton/2000 lbs for conversion from pounds per year to tons per year

3.2 Potential to Emit

Potential to emit (PTE) means the maximum capacity of a source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable as a practical matter. EPA considers PTE when determining the applicability of federal programs including the title V operating permit program, the PSD permitting program, and many emission standards promulgated under section 112 of the Act.

EPA estimated McClarin's PTE based on information in Amtech's original permit application, McClarin's renewal application, a supplementary submittal and on EPA's review of its sources and emission summaries. A summary of McClarin's PTE is presented in Table 3-1.

Table 3-1
Facility Potential to Emit for PSD, Title V, and Section 112 in Tons per Year

EU ID #	Air Pollutants[1] CO - carbon monoxide; NOx – oxides of nitrogen; PM - particulate matter; PM_{10} - particulate matter with an aerodynamic diameter 10 micrometers or less; $PM_{2.5}$ - particulate matter with an aerodynamic diameter 2.5 micrometers or less; SO_2 - sulfur dioxide; VOC - volatile organic compounds; HAP - hazardous air pollutants [see Clean Air Act, Section 112(b)]								
	CO	**NOx**	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**VOC**	**HAP**	**Styrene**
WWWW[2]	-	-	-	-	-	-	-	> 25[3]	> 10[3]
PPPP[4]	-	-	-	-	-	-	-	See below[5]	See below[5]
MMMM[4]	-	-	-	-	-	-	-	See below[5]	See below[5]
BLDG	0	0	133[7]	133[7]	133[7]	0	See below[6]	See below[5]	See below[5]
BOOTH	0	0	26[7]	26[7]	26[7]	0	See below[6]	See below[5]	See below[5]
COMB	6.6	8.7	<1	<1	<1	<1	See below[6]	See below[5]	See below[5]
TNK	0	0	0	0	0	0	See below[6]	See below[5]	See below[5]
PT	0	0	9	2	2	0	0	0	0
TOTAL:	6.6	8.7	142	135	135	<1	249	> 25	> 10

[1] Emissions for each emission unit and for totals have been rounded to the nearest ton per year
[2] Emissions of criteria pollutants from this emission unit are reported under EU BLDG
[3] Emissions of HAPs can vary based on types of gel coat or resin used. However, it is certain that the facility's PTE exceeds the major source thresholds for both a single HAP and in aggregate.

[4] Emissions of criteria pollutants from this emission unit are reported under EU BOOTH
[5] Emissions of HAPs can vary based on types of coatings and other materials that might be used. The ratio of usage of these materials can change dramatically as materials usage is managed to remain below the VOC emission cap.
[6] Emissions of VOC can vary considerably based on material usage. Facility has an emission cap.
[7] Emissions of PM/PM_{10}/$PM_{2.5}$ from these two emission units are based on maximum usage of one emission unit with the other not operating. Consequently, PTE should be the maximum of these two values, not the sum.

3.3 Actual Emissions

McClarin Wapato is required to pay fees annually based on an inventory of its actual emissions for the preceding calendar year (see Permit Conditions 1.13 through 1.23). Tables 3-2 and 3-3 summarize McClarin's reported actual emissions in calendar year 2013.

Table 3-2
Facility Actual Criteria Pollutant Emissions in Tons per Year

Year	CO	NO_x	PM	PM_{10}	$PM_{2.5}$	SO_x	VOC
2013	0.5	0.7	14.6	7.2	7.2	0.0	110.4
2020	0.7	0.8	12.4	5.0	5.0	0.0	79.1

Table 3-3
Facility Actual HAP Emissions in Tons per Year

Year	Styrene	Methyl methacrylate	Dimethyl phthalate	Toluene	Xylenes	Total
2013	75.7	10.8	1.3	0.4	0.4	88.6
2020	49	11.8	.6	.3	.8	62.7

4. Regulatory Analysis

The EPA is required by 40 CFR part 71 to include in this title V permit all emission limitations and standards that apply to the facility, including operational, monitoring, testing, recordkeeping and reporting requirements necessary to assure compliance. This section explains which air quality regulations apply to this facility and how those requirements are addressed in the permit.

Located within Indian Country, the Wapato facility is subject to federal air quality regulations, but not subject to state air quality regulations. The facility could be subject to tribal air quality regulations; however, the Yakama Nation has not gone through the process of obtaining authorization to be treated in the same manner as states under 40 CFR 49.6 and 49.7 (Tribal Authority Rule) and obtaining approval of air quality regulations as a "Tribal Implementation Plan." Therefore, Tribal air quality regulations, if any, are not federally enforceable and do not meet the definition of "applicable requirement" under 40 CFR part 71. As such, there are no Tribal air quality regulations in McClarin's title V permit.

The EPA relied on information provided in McClarin's title V permit application, Amtech's 2005 Non-Title V application and on supplementary information provided by McClarin to determine the requirements that are applicable to the facility. Future modifications to the facility could result in additional requirements.

4.1 Federal Air Quality Requirements

Title V Operating Permit Program. Title V of the CAA and the implementing regulation found in 40 CFR part 71 require major sources of air pollution (and certain other sources identified in section 71.3) located in areas where there is no approved part 70 (state) permitting program, or where the EPA has revoked a state's part 70 permit, to obtain operating permits. The McClarin facility is a major source of both VOC and HAP and is located in the Yakama Reservation where there is no part 70 program; therefore, the part 71 program applies. The Yakama Nation has not requested and the Administrator has not granted delegation of the part 71 program. The EPA is the permitting authority.

Compliance Assurance Monitoring. According to 40 CFR 64.2(a), a unit is subject to the CAM Rule if: (1) it is subject to an emission limitation or standard (or a surrogate thereof), (2) other than an emission limitation or standard that is exempt under paragraph 64.2(b)(1); uses a control device to achieve compliance; and (3) has potential, pre-control device emissions of the applicable regulated air pollutant in excess of 100 tpy. The table below demonstrates CAM applicability for the facility:

Table 4-1
Compliance Assurance Monitoring Analysis

Pollutant	Applicable Emission Limitation or Standard (ELOS)	ELOS Reference	Use Control Device to Comply with ELOS?	Potential PreControl Device Emissions (tpy)	Major Source Threshold	CAM Applicable to ELOS?	CAM Exemption : Post11/15/90 NSPS or NESAP	CAM Exemption: Continuous Compliance Determination Method	CAM Required for ELOS?
PM10 for Spray Booths	.1 gr/dscf	40 CFR 49.125	Y	742.24	100 tpy	Y	N	N	Y

As illustrated in Table 4-1, the only emission unit at the facility that uses a control device is the spray booth. The spray booths are fitted with a dual layer of particulate filters. The spray booth is subject to a grain loading standard under the FARR of .1 grains per dry standard cubic foot. In June 2022, the EPA requested that McClarin submit a CAM analysis for the spray booths and McClarin supplied this information back to the EPA in July 2022. According to the CAM plan that was provided, the monitoring indicators proposed by the facility includes observing the differential pressure across the exhaust filters as well as inspecting and maintaining the filters on a regular basis. An excursion is defined as any reading across the differential pressure gauge as being less than 0 inches of water or being greater than 1.0 inches of water. An exceedance is defined as an any measured emissions from the emission unit which exceeds the FARR grain loading standard of .1gr/dscf. The permittee is required to take corrective action upon discovery of an excursion as well as record and report the incident to the EPA. McClarin's CAM plan is attached to this SoB, see Attachment D.

Prevention of Significant Deterioration. Under the PSD program, 40 CFR 52.21, no major stationary source or major modification to a major stationary source may commence actual construction without first obtaining a PSD permit that meets the requirements of 40 CFR 52.21. In general, a major stationary source for purposes of the PSD program is a source with a PTE of at least 250 tons per year. During review and development of this permit, the EPA has not drawn any conclusions regarding compliance with past permitting requirements for this facility. Therefore, no permit shield is implied or explicit for past new source review, PSD, or for any applicable requirement not specifically identified in the permit.

Minor New Source Review (NSR). The Federal minor new source review program set forth in 40 CFR 49.151-165 establishes a preconstruction permitting program for new and modified minor sources and

minor modifications at major sources located in Indian country. The initial effective date of the program was August 30, 2011. Amtech commenced construction and operation before this date and has not submitted any applications for modification pursuant to this program after this date. Therefore, there are no applicable requirements that apply to the facility resulting from minor NSR permits associated with this program.

Nonattainment Major New Source Review. The Federal major nonattainment new source review program set forth in 40 CFR 49.166-173 establishes a preconstruction permitting program for new major sources and major modifications at major sources of nonattainment pollutants, including precursors, in nonattainment areas. As the facility has never been located in a nonattainment area, there are no requirements that apply to the facility resulting from approval orders associated with this program.

New Source Performance Standards. In its application for a part 71 permit, McClarin did not identify any standards in 40 CFR part 60 that applied to the Wapato facility.

National Emission Standards for Hazardous Air Pollutants (NESHAP) – Part 61. The NESHAP standards in part 61 apply to facilities that emit specific HAPs from specific operations (e.g., facilities that emit arsenic from copper smelters or benzene from storage vessels). McClarin has identified one NESHAP in 40 CFR part 61 that may apply to the Wapato facility: subpart M, the National Emission Standard for Asbestos.

The provisions of 40 CFR part 61, subpart M apply to facilities that handle asbestos, including during periods of demolition and renovation. This standard has been incorporated into the permit by high-level incorporation by reference to avoid the necessity of permit modification for demolition and renovation projects that would disturb asbestos-containing material but would otherwise not be subject to regulation.

National Emission Standards for Hazardous Air Pollutants – Part 63. The NESHAP standards in part 63 regulate emissions of HAP from facilities that operate certain types of emission units. Many NESHAPs apply only to major sources of HAP. The Wapato facility is a major source of HAP. During application review, six subparts were identified as possibly applying to the facility. They are discussed individually below.

Part 63 Requirements for Constructed and Reconstructed Major Sources. Subpart B of 40 CFR part 63 requires newly constructed and reconstructed sources of HAP subject to the title V program to undergo preconstruction review and obtain a source-specific MACT (maximum achievable control technology) limit unless the source type has been specifically regulated or exempted from regulation under section 112 of the Act. As described in Section 2.5, above, the facility applied for a source-specific MACT limit under 40 CFR part 63, subpart B prior to the initial effective date of 40 CFR part 63, subpart WWWW. After subpart WWWW became effective, however, it superseded the source-specific MACT.

NESHAP for Flexible Polyurethane Foam Production. Subpart III of 40 CFR part 63 applies to major sources of HAP that produce flexible polyurethane or rebond foam. McClarin has reported cutting and installing polyurethane foamboard that is purchased from other sources. Such activities are not subject to subpart III. To date, McClarin has not submitted a notification reporting that it has produced foamboard onsite and the applicability of the subpart has, therefore, not been evaluated.

NESHAP: Surface Coating of Automobiles and Light-Duty Trucks. Subpart IIII of 40 CFR part 63 applies to major sources of HAP that apply coatings to automobiles, light duty trucks, or other motor vehicle parts. According to sections 63.3081(b) and 63.3082(c) of the subpart, a coating operator may choose to make operations that include coating of "other motor vehicle parts" that would otherwise be subject to subpart MMMM or PPPP (discussed below) part of the affected source of subpart IIII.

McClarin performs coating operations on parts that meet the definition of "other motor vehicle parts," but has not requested to include such operations as part of an affected source regarding subpart IIII.

NESHAP for Miscellaneous Metal Parts and Products. The facility is a major source of HAP and applies coatings to miscellaneous metal parts and, according to 40 CFR 63.3881(b) would be subject to the requirements of 40 CFR part 53, subpart MMMM if it used 946 liters (250 gallons) or more of coatings that contain HAP to coat miscellaneous metal parts. Section 7 of the permit contains a condition requiring the permittee to monitor coating usage to determine if the threshold is exceeded

NESHAP for Plastic Parts and Products. The facility is a major source of HAP and applies coatings to plastic parts and, therefore, is subject to 40 CFR part 63, subpart PPPP. This subpart applies to all operations used for surface coating plastic parts including mixing vessels and storage containers. A facility subject to this standard can meet the emission limits by any of three options: the compliant material option, the emission rate without add-on controls option, or the emission rate with add-on controls option. The facility does not use add-on controls and may meet the emission limit through either of the other options.

The applicable requirements in subpart PPPP have been incorporated into Section 6 of the permit. Appendix B to this Statement of Basis contains a table that cross references the applicable requirements in subpart PPPP as well as subpart A (the general provisions) of 40 CFR part 63 to conditions in Section 6 of the permit.

NESHAP: Reinforced Plastics Composites Production. The facility is a major source of HAP that operates a reinforced plastic composite production line. Therefore, it is subject to 40 CFR part 63, subpart WWWW. Subpart WWWW applies different emission limits to different operations at the facility, but only requires add-on controls if total HAP emissions from molding operations exceed 100 tpy. To date, McClarin has not reported HAP emissions in excess of 100 tpy and has not added emissions controls.

The applicable requirements in subpart WWWW have been incorporated into Section 5 of the permit. Appendix A to this SoB contains a table that cross references the applicable requirements in subpart WWWW as well as subpart A (the general provisions) of 40 CFR part 63 to conditions in Section 5 of the permit.

<u>Section 111(d) and Section 129 Regulations</u>. There are no CAA, Section 111(d) or 129 regulations that apply to the type of emission units at the Wapato facility.

<u>Federal Air Rules for Reservations</u>. On April 8, 2005, the EPA promulgated a Federal Implementation Plan for Reservations in Idaho, Oregon and Washington, commonly referred to as the Federal Air Rules for Reservations. The EPA published the FARR rules that generally apply to Indian Reservations in Region 10 in 40 CFR 49.121 to 49.139. The FARR rules that specifically apply on the Yakama Reservation (Sections 123, 124, 125, 126, 129, 130, 131, 135, 137, 138 and 139) are codified at 40 CFR 49.11101 to 49.11110. FARR requirements that do not apply to the Wapato facility are not included in the permit; requirements that apply but do not create specific requirements for McClarin are also not included in the permit. Appendix C to this Statement of Basis contains a table that explains whether specific requirements of the FARR apply to the Wapato facility and, if included, where the requirements are located in the permit.

<u>Chemical Accident Release Program</u>. The facility has not reported storing a regulated substance above the threshold quantity. The permit contains a placeholder provision requiring the permittee to comply with the chemical accident prevention provisions in 40 CFR part 68 in a timely manner if it becomes subject.

Protection of Stratospheric Ozone. The provisions of 40 CFR part 82, subparts B and F apply to facilities that handle ozone depleting substances (e.g., refrigerants). The permit contains conditions that require the permittee to manage ozone depleting substances and maintain records according to these subparts.

Acid Rain Program. Title IV of the CAA created a SO_2 and NO_X reduction program found in 40 CFR part 72. The program applies to any facility that includes one or more *affected units* that produce power. The Wapato facility does not include any power generating units.

Mandatory Greenhouse Gas Reporting Rule. This rule requires sources above certain emission thresholds to calculate, monitor, and report greenhouse gas emissions. According to the definition of *applicable requirement* in 40 CFR 71.2, neither 40 CFR part 98, nor CAA 307(d)(1)(V), the CAA authority under which 40 CFR part 98 was promulgated, are listed as applicable requirements for the purpose of title V permitting. Although the rule is not an applicable requirement under 40 CFR part 71, the permittee is not relieved from the requirement to comply with the rule separately from compliance with their part 71 operating permit. It is the responsibility of each permittee to determine applicability to part 98 and to comply, if necessary.

4.2 Other Federal Requirements

EPA Trust Responsibility. As part of the EPA Region 10's direct federal implementation and oversight responsibilities, Region 10 has a trust responsibility to each of the 271 federally recognized Indian tribes within the Pacific Northwest and Alaska. The trust responsibility stems from various legal authorities including the U.S. Constitution, treaties, statutes, executive orders, historical relations with Indian tribes and, in this case, the Treaty of June 9, 1855. In general terms, the EPA is charged with considering the interest of tribes in planning and decision making processes. Each office within the EPA is mandated to establish procedures for regular and meaningful consultation and collaboration with Indian tribal governments in the development of EPA decisions that have tribal implications. Region 10's Office of Air and Waste has contacted the Tribe to invite consultation on this title V operating permit project.

Endangered Species Act. Under this act, the EPA is obligated to consider the impact that a federal project may have on listed species or critical habitats. It is the EPA's conclusion that the issuance of this title V permit will not affect a listed species or critical habitat because it does not authorize new emissions units, increase existing emission limits or impose any new work practice requirements. Therefore, no additional analysis and no additional requirements will be added to this permit for the ESA reasons. The EPA's no-effect determination concludes the EPA's obligations under Section 7 of the ESA. For more information about the EPA's obligations, see the Endangered Species Consultation Handbook: Procedures for Conducting Consultation and Conference Activities under Section 7 of the ESA, published by the FWS and NMFS (March 1998, Figure 3-1).

National Environmental Policy Act. Under section 793(c) of the Energy Supply and Environmental Coordination Act of 1974, no action taken under the CAA shall be deemed a major Federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969. This permit is an action taken under regulations implementing the CAA and is therefore exempt from the NEPA.

National Historic Preservation Act. As noted earlier, the issuance of this title V permit does not authorize new emissions units, increase existing emission limits or impose any new work practice requirements. No changes to the facility are expected as a result of this permit action. Consequently, no adverse effects are expected, and further review under the NHPA is not necessary.

Environmental Justice (EJ) Policy. On February 11, 1994, President William J. Clinton signed Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, directing Federal agencies to identify and address, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on low-income populations and minority populations.

On July 24, 2014, EPA Administrator, Gina McCarthy, issued the Agency's *Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples* to better clarify and integrate EJ principles in the Agency's work with federally recognized tribes and indigenous peoples. According to the Policy, EPA incorporates EJ when the Agency directly implements federal environmental programs in Indian country. Furthermore, when issuing Clean Air Act permits in Indian country, the Agency consults with Tribal governments early in the process, allows those living in Indian country opportunity to comment on permits, and considers the concerns of indigenous peoples and those living in Indian country when making permitting decisions.

The EPA has developed an EJ mapping and screening tool called EJSCREEN. It is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. According to EPA's EJSCREEN Version 2.1 environmental justice screening and mapping tool, minorities comprise 90% of the community within a one-mile radius of the facility, and 77% of the 2,399-resident population within that area is characterized as low income. The percentage of minorities in the community is higher than the national average (40%). The percentage of low-income residents are also higher than the national average (30%).

The renewal of this title V permit will not result in an increase in emissions but instead maintain the emission limits already established in the initial permit that was issued. Therefore, EPA concludes that the issuance of this permit will not have disproportionately high and adverse impacts on minority or low-income populations.

5. Permit Content

This title V operating permit compiles all of the applicable requirements that apply to the permittee. Additional monitoring, recordkeeping and reporting requirements have been created where needed so the permit assures compliance with all of the applicable requirements. In general, each permit condition in the permit is explained below. Certain permit conditions are self-explanatory, and thus are not further discussed. The permit is organized into the following ten sections:

	Part 71 Permit Issuance History
	Permit Authority
	Source Information and Emission Units
Permit Section 1:	General Requirements
Permit Section 2:	Facility-Wide Requirements
Permit Section 3:	Emission Unit WWWW – Fiberglass Operations
Permit Section 4:	Emission Unit PPPP – Fiberglass Coating Operations
Permit Section 5:	Emission Unit MMMM – Metal Coating Operations
Permit Section 6:	Emission Unit BLDG – Building
Permit Section 7:	Emission Unit BOOTH – Spray Booth
Permit Section 8:	Emission Unit COMB – Combustion Devices

Part 71 Permit Issuance History

This permit section briefly lists the past (and current) permit actions related to this source.

Permit Authority

This permit section states the EPA's authority for issuing this permit.

Source Information and Emission Units

This permit section contains a brief description of the facility and a list of emission units. A more detailed description of the facility can be found in Section 2 of this Statement of Basis.

This permit section includes conditions that are required in all Title V permits. In some cases, facility-specific testing, monitoring, recordkeeping and reporting requirements for these permit conditions might be found in Section 2 of the permit because those requirements can vary from permit to permit. Unless otherwise specified, emission units are subject to the general requirements in Section 1 of the permit as well as the facility-specific in Section 2 and the unit-specific requirements in Sections 3 and 4.

Permit Section 1: General Requirements

Permit Condition 1.1 explains that the language in the underlying regulations takes precedence over paraphrased language in the permit. Some applicable requirements are paraphrased in the permit with the intention of clarifying the requirement, but with no intention of changing the underlying meaning of the requirement. Where there is a difference between the language in a permit and an underlying regulation, the wording in the underlying regulation should be used to interpret and implement the requirement. This permit condition also notes some underlying authorities that may have been used to create additional requirements in this permit.

Permit Conditions 1.5 and 1.6 are general compliance schedule requirements. Because the EPA is not aware of any non-compliance at the time of permit issuance, there is no issue-specific compliance schedule in the permit.

Permit Conditions 1.7 and 1.8 address a general permit shield which states that compliance with the permit is deemed compliance with the applicable requirements listed in the permit. The permittee is responsible for complying with any applicable requirements that exist but have not been included in the permit. The permittee did not request a specific permit shield for any specific requirement excluded from this permit and none is being granted.

Permit Condition 1.9 addresses other credible evidence. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [Section 113(a) and 113(e)(1) of the CAA, 40 CFR 49.123(d), 51.212, 52.12, 52.33, 60.11(g), and 61.12]

Permit Condition 1.10 requires the permittee to certify the truth, accuracy and completeness of all documents (notices, reports, data, and etc) submitted to EPA. The certification must be signed by a responsible official as defined in 40 CFR 71.2. CFI's responsible official is listed on the first page of the permit. The permittee should request an administrative amendment of the permit if the responsible official for the facility changes.

Permit Condition 1.11 explains how to submit information to EPA.

Permit Condition 1.12 requires an annual compliance certification. The permittee must certify compliance with all permit conditions. If a permittee is aware of any information that indicates noncompliance, that information must be included in the annual compliance certification. In a year when the permit is renewed or revised, the permittee must address each permit for the time that permit was in effect. Forms for the annual compliance certifications may be obtained on the internet at https://www.epa.gov/title-v-operatingpermits/epa-issued-operating-permits.

Permit Conditions 1.13 through 1.23 require submittal of an annual emission inventory (of actual emissions) and payment of fees for part 71 purposes. These requirements refer to Permit Condition 2.1 for the actual due date by which fees and emissions must be submitted each year. The per-ton fee rate varies each year; the permittee should contact EPA to obtain the current rate. Annual title V fees are based on actual emissions generated during the previous calendar year. As explained in Section 3 of this statement of basis, the emission estimation techniques listed in this statement of basis should be used to calculate the annual emissions inventory, unless the permittee has other information showing why another technique more accurately represents emissions. Also note that the actual emission estimates differ from the facility's PTE because actual emissions are calculated based on actual operations, not maximum operational capacity.

Permit Condition 1.24 requires submittal of an annual emission inventory (of actual emissions) for FARR registration purposes. Appendix A to this statement of basis documents the methods, techniques, and assumptions that EPA believes provide the most accurate basis for estimating actual emissions for this facility. As explained in Section 3.2 of this statement of basis, the emission estimation techniques listed in this statement of basis should be used to calculate the annual emissions inventory, unless the permittee has other information showing why another technique more accurately represents emissions. Also note that the actual emission estimates differ from the facility's PTE because actual emission are calculated based on actual operations, not maximum operational capacity. Note that the FARR emission inventory is required to be submitted to the EPA electronically via FORS unless it contains CBI. Submittals containing CBI are to be sent hardcopy to the addresses specified in Condition 1.11. Copies of each document sent to EPA should be sent to the Tribal Air Quality Coordinator except those containing CBI.

Permit Condition 1.25 and 1.26 require the permittee to submit or correct submitted information when requested by the EPA and as needed. The permittee has an ongoing obligation to assure that all data in its title V application is correct and to notify the EPA of any errors or omissions.

Permit Condition 1.28 requires the permittee to allow EPA-authorized representatives access to the facility and required records.

Permit Condition 1.29 address the expiration of the permit and the ramifications if the permittee does or does not renew their permit. It is important to note that, if the permittee does not submit a complete and timely renewal application, the permittee's right to operate is terminated. The expiration date of the permit is listed on the top right-hand corner of the front page of the permit.

Permit Condition 1.30 requires the permittee to submit an application for renewal and describe some of the information that must be included in the application.

Permit Conditions 1.31 through 1.33 address permit modifications and reopening.

Permit Conditions 1.34 through 1.36 address options for making certain physical and operational changes in the facility that do not require a permit modification.

Permit Condition 1.37 specifies the procedures that must be followed whenever the permit requires emissions testing or sampling in an emission unit-specific section of the permit. If there is a conflict

between these permit conditions and an emission unit-specific permit condition, the unit-specific permit condition should be followed. Concentration-based emission limits required to be corrected to a specific oxygen concentration in the flue gas often do not contain a protocol to convert measured concentrations to specified oxygen levels. Permit Condition 3.28 provides a protocol for such a conversion.

Permit Conditions 1.38 through 1.40 describe general recordkeeping that has been added to the permit using part 71 authority to assure that there is good documentation for any monitoring that the permittee performs. Permit Condition 1.38 describes recordkeeping requirements that apply only if the permittee makes off permit changes.

Permit Conditions 1.41 and 1.44 require semi-annual monitoring reports and prompt deviation reports. Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit. Failure to meet any permit term or permit condition, including emission standards, is considered a deviation. Other credible evidence (including any evidence admissible under the federal rules of evidence) must be considered by the source and the EPA in such determinations. The timing for reporting deviations, as well as other data collected, depends on the circumstances, as explained in these permit conditions.

Permit Condition 1.45 addresses the Stratospheric Ozone and Climate Protection Program found in 40 CFR part 82. This program requires sources that handle regulated materials to meet certain procedural and certification requirements. There may be equipment at the facility that uses or contains chlorofluorocarbons (CFCs) or other materials regulated under this program. All air conditioning and refrigeration units must be maintained by certified individuals if they contain regulated materials.

Permit Condition 1.46 addresses requirements in the Chemical Accident Prevention Program found in 40 CFR part 68. This program requires sources that use or store regulated substances above a certain threshold to develop plans to prevent accidental releases. Based on information in their application, there are no regulated substances above the threshold quantities in this rule at this facility; therefore, the facility is not currently subject to the requirement to develop and submit a risk management plan. However, this requirement is included in the permit as an applicable requirement because the permittee has an ongoing responsibility to submit a risk management plan if a listed substance exists at the facility in quantities over the threshold amount, or if the quantity of any regulated substance ever increases above the threshold quantity. Including this term in the permit minimizes the need to reopen the permit if the facility becomes subject to the requirement to submit a risk management plan.

Permit Condition 1.47 addresses asbestos demolition or renovation activity found in 40 CFR part 61, subpart M (NESHAP). This program requires sources that handle asbestos-containing materials to follow specific procedures. If the permittee conducts any demolition or renovation activity at their planer mill, they must assure that the project is in compliance with the federal rules governing asbestos, including the requirement to conduct an inspection for the presence of asbestos. This requirement is in the permit to address any demolition or renovation activity that may occur at the facility.

Permit Section 2: Facility-Wide Requirements

This permit section includes applicable requirements and related testing, monitoring, recordkeeping and reporting that apply either to multiple emission units or on a facility-specific basis. Unless otherwise specified, emission units are subject to the facility-specific requirements in Section 2 of the permit as well as the general and unit-specific requirements in Sections 1, 3 and 4 of the permit.

Permit Condition 2.1 lists the due date for the annual fees and emission reports.

Permit Condition 2.2 limits the sulfur content of the gaseous fuel burned in any combustion device and specifies the method for determining compliance. The facility currently burns only propane. Because the sulfur content of propane is significantly small, Region 10 is waiving the requirement to track the sulfur content in the fuel and requiring only that the Permittee keep records showing that only propane is burned.

Permit Conditions 2.3 through 2.8 restrict open burning wherever the FARR applies including at industrial facilities. If the permittee performs any open burning, recordkeeping requirements specific to open burning found in Permit Condition 2.8 will apply.

Permit Conditions 2.9 through 2.11 limit visible emissions, require the use of either Reference Method 9 or a continuous opacity monitoring system (COMS) for determining compliance with the limit and provide exception to the rule. Reference Method 9 includes specific guidance for reading opacity when there is a wet plume (both attached and detached and directs the observer to take readings excluding the portion of the plume that includes uncombined water (droplets). In the vast majority of cases, the likelihood of exceeding the 20% opacity limit due to the presence of uncombined water is very low because an experienced observer would know that he/she should not read that portion of the plume. However, there are meteorological conditions that can prevent uncombined water (droplets) from completely evaporating in a plume (e.g., 100% relative humidity and a saturated plume). Currently, this facility does not use (and is not required to use) continuous opacity monitoring systems (COMS) to monitor visible emissions.

Permit Condition 2.12 through 2.17 restricts fugitive particulate matter emissions and require a plan be created to assure the use of reasonable precautions to prevent fugitive emissions. The plan is based on a survey of the facility and is updated annually.

Permit Condition 2.18 through 2.24 requires a quarterly survey (also called a plant walkthrough) for visible and fugitive emissions as well as specific follow-up steps (investigation, corrective action, RM9 observation and additional recordkeeping and reporting) if visible or fugitive emissions are observed. If observed and visible or fugitive emissions cannot be eliminated within 24 hours, a tiered sequence of RM9 opacity observations must be performed. Observations of visible or fugitive emissions during a survey are not considered deviations; however, any resulting RM9 readings above 20% opacity are considered permit deviations. The annual fugitive particulate matter survey can be accomplished simultaneously with a quarterly survey as long as both requirements are fully complied with. This permit condition serves as the general periodic monitoring for several fugitive and particulate matter limits found in the permit. This requirement applies to emission sources that normally do not exhibit visible or fugitive emissions. If the permittee prefers a specific periodic monitoring approach for any emission sources subject to this requirement, the permittee can propose a new approach as a permit modification.

Permit Conditions 2.25 through 2.31 contain the voluntary VOC emission limit, which was originally requested by Amtech in their October 2005, as well as monitoring, recordkeeping and reporting requirements necessary to assure compliance with the limit. Permit Condition 2.27 addresses future relaxation of the VOC limit that could cause the source to become subject to PSD.

The technical basis for these conditions can be found in the Technical Support Document for the non-Title V permit, which is published on EPA Region 10's website alongside the title V permit and this Statement of Basis. Of particular interest is Permit Condition 2.33 which requires the permittee to notify EPA upon discovery of new processes that have the potential to emit significant quantities of VOC. Upon review, EPA will determine whether it is necessary to update the permit to verify ongoing compliance with the VOC limit.

Permit Section 3 – Emission Unit WWWW – Fiberglass Operations

This emission unit consists of fiberglass product manufacturing - this includes open molding operations, closed molding operations, resin mixing, equipment cleaning, resin storage tank, material storage (storage of resin and other materials in open or partially-open containers), and repair of manufactured parts. Section 3 of the permit contains requirements of 40 CFR part 63, subpart WWWW that apply to the fiberglass operations at the facility.

Appendix A to this Statement of Basis contains a table that cross references the applicable paragraphs in subpart WWWW as well as subpart A (the general provisions) of 40 CFR part 63 to conditions in Section 3 of the permit. Where conditions have been modified between the previous version of the permit and this version, it has been noted in the table. Conditions related to initial compliance and initial notification with the NESHAP have been deleted because the initial compliance period is over.

In addition, the NESHAP includes many requirements that apply to "open molding and centrifugal casting" (or some variation of that language). In the original permit, the phrase "centrifugal casting" had been deleted from the regulatory language in the Permit Conditions to make it clear that centrifugal casting had not been reviewed by EPA. The phrase is being returned to make the language of the Permit Conditions more similar to that of NESHAP. However, it is still the case that centrifugal casting has not been reviewed by EPA. Centrifugal casting is not included in the description of the emission unit in that section of the permit. If McClarin wishes to engage in centrifugal casting, a permit modification and/or new source review consistent with all applicable regulations may be required.

Permit Section 4 – Emission Unit PPPP – Fiberglass Coating Operations

This emission unit consists of fiberglass coating operations including coating of fiberglass or plastic parts and products, surface preparation, cleaning, mixing and storage. Section 4 of the permit contains requirements of 40 CFR part 63, subpart PPPP that apply to the fiberglass coating operations at the facility.

Appendix B to this Statement of Basis contains a table that cross references the applicable paragraphs in subpart PPPP as well as subpart A (the general provisions) of 40 CFR part 63 to conditions in Section 6 of the permit. Where conditions have been modified between the previous version of the permit and this version, it has been noted in the table.

Conditions related to initial compliance and initial notification with the NESHAP have been deleted because the initial compliance period is over. Certain paragraphs from the subpart section 4541(a) and (b) and section 4551(a) through (g), which no longer contain any applicable requirements but are referenced by applicable requirements, have been copied to Appendices C and D of the permit.

Permit Section 5 – Emission Unit MMMM – Metal Coating Operations

Subpart MMMM of 40 CFR part 63 establishes emission limits and work practice standards for facilities that are major sources of HAP and that apply at least 946 liters (250 gallons) of HAP-containing containing coatings to miscellaneous metal parts. Section 7 of the permit requires McClarin to monitor and record monthly and rolling 12-month usage of HAP-containing coatings used in the surface coatings of miscellaneous metal parts. McClarin is required to notify the EPA that it will become subject to the NESHAP prior to exceeding the 946 liter threshold as required by 40 CFR 63.5(d), 63.9(b), and 63.3910(b).

Permit Section 6 – Emission Unit BLDG – Building

This emission unit consists of the two large buildings that house all of the operations at the facility with the exception of surface coating conducted in the spray booths, combustion of natural gas and storage of resin in the large tank. The buildings are considered to be an emission unit because emissions from the activities within the buildings commingle and issue from the stacks, vents and openings on the buildings. The buildings are subject to certain requirements of the FARR. Some FARR requirements have already been included in the permit in Section 1 – Generally Applicable Requirements. Other FARR requirements are included in Section 6.

Permit Condition 6.1 is the FARR particulate matter limit that applies to non-combustion emission units. Compliance with this limit is determined through periodic opacity monitoring conducting during the plant walkthroughs required by Permit Conditions 2.18 through 2.24.

Permit Section 7 – Emission Unit BOOTH – Spray Booths

This emission unit consist of spray coating activities that occur within either of the Bleeker Brothers spray booths using high volume/low pressure spray guns to coat either manufactured fiberglass parts or metal parts. The spray booths are fully contained within the west building and emit above the roofline through their own stacks. Prior to release from either booth, air is drawn through banks of filters that serve to collect particulate matter. The booths are subject to certain requirements of the FARR. Gap filling monitoring requirements have been added to ensure compliance with the FARR requirements.

Permit Condition 7.1 is the FARR particulate matter limit that applies to non-combustion emission units. Compliance with this limit is determined through periodic opacity monitoring conducting during the plant walkthroughs required by Permit Conditions 2.18 through 2.24.

Permit Conditions 7.2 through 7.7 are work practice standards and compliance assurance monitoring requirements requiring McClarin to only operate the spray booths when fitted with booth filters meeting a minimum level of efficiency, to monitor pressure drop across the filters and to ensure that the filters are in good condition. These requirements are generally consistent with what is required by other permitting agencies in the northwest.

Permit Condition 7.8 requires McClarin, upon discovery of an indicator out of range, to expeditiously restore operation of the spray booths and fabric filters such that the indicator is no longer outside the range established in Condition 7.3. While failing to expeditiously restore the spray booths or fabric filters operations to normal or usual manner of operation (characterized by indicators operating within the acceptable range) is a permit deviation, an indicator out-of-range is not a permit deviation. McClarin is required to report each indicator out-of-range occurrence and its resolution in the semi-annual monitoring report required pursuant to Condition 7.11.

Permit Condition 7.9 serves as a safeguard against incorrectly set excursion/exceedance thresholds by requiring the redefinition of the thresholds as needed.

Permit Condition 7.10 simply states EPA's option to require a quality improvement plan (QIP); this condition becomes a requirement only in the event EPA informs the permittee that a QIP is required.

Permit Condition 7.11 requires reporting from 40 CFR part 64 to be combined with the part 71 semi-annual and deviation reports required in Permit Conditions 3.47 and 3.48

Permit Condition 7.12 requires, consistent with Permit Condition 1.40, the maintenance of all records and supporting information.

Permit Section 8 – Emission Unit COMB – Combustion Devices

This emission unit comprises all the combustion devices at the facility. All devices combust only natural gas and are subject to the requirements in the FARR:

Permit Condition 8.1 is the FARR particulate matter limit that applies to combustion emission units. Although properly maintained natural gas combustion units would not be expected to emit significant amounts of particulate matter, any malfunctioning units would be detected during the plant walkthroughs required by Permit Conditions 4.4 through 4.10.

Permit Conditions 8.2 is the FARR sulfur dioxide limit that applies to combustion emission units. No additional monitoring has been required because the facility only combusts pipeline quality natural gas, which is required to meet certain standards for quality, including a maximum sulfur content, which is much lower than the level required in the FARR.

6 Public Participation

6.1 Public Notice and Comment

As required in 40 CFR 71.11(a)(5) and 71.8, all draft operating permits must be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR 71.11(d). For the draft permit, the public comment period began on January 13, 2023 and ended on February 13, 2023. (30 day comment period)

For this permit action, the requirements of 40 CFR 71.11(a)(5) and 71.8 are satisfied as follows:

1. Posting the public notice, draft permit, statement of basis and the draft administrative record (which includes the application and relevant supporting materials) on EPA's website https://www.epa.gov/publicnotices/notices-search/location/Washington for the duration of the public comment period.

2. Providing a copy of the public notice to: the permit applicant, the affected states, the air pollution control agencies of affected states, the Tribal, city and county executives, any comprehensive land use planning agency, any state or federal land manager whose lands may be affected by emissions from the source, the local emergency planning authorities which have jurisdiction over the area where the source is located and all persons who submitted a written request to be included on the EPA's mailing list for title V permitting actions.

Notice of the draft permit action and opportunities to comment and request a hearing was posted on Region 10's website at https://www.epa.gov/publicnotices/notices-search/location/Washington January 13, 2023 and ended on February 13, 2023. The administrative record was available to review online over that same time period and at the same website. Region 10 also distributed the public notices to the necessary parties via e-mail. Region 10 announced an opportunity for a public hearing on the draft permit contingent upon public interest.

6.2 Response to Public Comments for Renewal #2

Region 10 received no comments from the public during the 30-day comment period. The permit is being issued as it was proposed without any changes. The permit is effective immediately upon issuance.

Appendix A

Tables Cross Referencing Applicable Requirements in 40 CFR Part 63, Subpart WWWW and the Associated General Requirements (Subpart A) with Conditions in Section 5 of the Permit

Applicability of 40 CFR Part 63, Subpart WWWW to McClarin, Wapato

WWWW Requirement	Permit Condition	Comments
63.5780		"What is the purpose of this subpart?" - no applicable requirements
63.5785	5.1	"Am I subject to this subpart?" - (a) describes reinforced plastics composites production (b) (exemption for repair-only facility) applies, (c) (exemption for a research and development facility and (d) (exemption for low usage facilities) do not.
63.5787		Coordination with Subpart VVVV (boat manufacturing) - not applicable to McClarin.
63.5790(a)		"What parts of my plant does this subpart cover?" – general applicability language – no conditions necessary.
63.5790(b)	5.1	"What parts of my plant does this subpart cover?" – Defines scope of affected source. **Condition has been reworded to list parts of affected source more clearly.**
63.5790(c)	5.2	"What parts of my plant does this subpart cover?" – Exemptions from Subpart WWWW.
63.5790(d)	5.3, 5.21	"What parts of my plant does this subpart cover?" – Exemptions and requirements for resins that must meet military specifications.
63.5795		"How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?" – no conditions necessary.
63.5796	5.4, 5.5	"What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?" – Condition 5.4 allows McClarin to use the emissions factors in Table 1 of the Subpart. Condition 5.5 allows McClarin to test to determine source-specific emissions factors.
63.5797	5.6	"How do I determine the organic HAP content of my resins and gel coats?"
63.5798		"What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?" – Although McClarin may pursue this option, it requires petitioning the Administrator to amend the NESHAP and is beyond the scope of part 71 permitting.
63.5799(a)		"How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?" – This paragraph applies to new facilities prior to startup. The facility is past the startup phase, so this does not apply.
63.5799(b)	5.7	"How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?" – allows emissions factors or performance testing
63.5799(c)	5.7	"How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?" – addresses timing of semiannual reporting
63.5800		"When do I have to comply with this subpart?" – Well, now, but that is not in itself an applicable requirement
63.5805(a) and (b)		"What standards must I meet to comply with this subpart?" – Not applicable as the standards in paragraphs (a) and (b) apply to existing sources
63.5805(c)	5.8, 5.11	"What standards must I meet to comply with this subpart?" – requires sources that emit less than 100 tpy of organic HAP to meet the emissions limits in Table 1 (Condition 5.8) and the work practice standards in Table 4 (Condition 5.11). **The permit now references the Tables in the NESHAP rather than partially incorporating the tables into the permit.**
63.5805(d)		"What standards must I meet to comply with this subpart?" – This paragraph applies to facilities that emit > 100 tpy of organic HAP.

WWWW Requirement	Permit Condition	Comments
63.5805(e)	5.9	"What standards must I meet to comply with this subpart?" – Provides a one-time exemption for exceeding the 100 tpy threshold.
63.5805(f)	5.10	"What standards must I meet to comply with this subpart?" – Indicates consequences of exceeding the 100 tpy threshold after receiving a one-time exemption in Condition 5.11.
63.5805(g)	5.8, 5.11	"What standards must I meet to comply with this subpart?" – Clarifies that repair operations are also subject to the requirements of tables 3 and 4 of WWWW.
63.5805(h)		"What standards must I meet to comply with this subpart?" – Applies to add-on controls – McClarin does not have these.
63.5810	5.12	"What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?"
63.5820		"What are my options for meeting the standards for continuous lamination/casting operations?" – McClarin does not perform these operations
63.5830		"What are my options for meeting the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement?" – McClarin does not perform these operations
63.5835	5.13, 5.14	"What are my general requirements for complying with this subpart?" – Condition 5.13 requires the owner/operator to be in compliance at all times. Condition 5.14 requires maintenance of equipment in good repair.
63.5840		"By what date must I conduct a performance test or other initial compliance demonstration?" – The initial compliance period is complete
63.5845		"When must I conduct subsequent performance tests?" – McClarin is not required to conduct performance tests
63.5850		"How do I conduct performance tests, performance evaluations, and design evaluations?" – McClarin is not required to conduct performance tests
63.5855		"What are my monitor installation and operation requirements?" – McClarin is not required to monitor any add-on control equipment
63.5860		"How do I demonstrate initial compliance with the standards?" – The initial compliance period is complete
63.5865		"What data must I generate to demonstrate compliance with the standards for continuous lamination/casting operations?" – McClarin does not perform these operations
63.5870		"How do I calculate annual uncontrolled and controlled organic HAP emissions from my wet-out area(s) and from my oven(s) for continuous lamination/casting operations?" – McClarin does not perform these operations
63.5875		"How do I determine the capture efficiency of the enclosure on my wet-out area and the capture efficiency of my oven(s) for continuous lamination/casting operations?" – McClarin does not perform these operations
63.5880		"How do I determine how much neat resin plus is applied to the line and how much neat gel coat plus is applied to the line for continuous lamination/casting operations?" – McClarin does not perform these operations
63.5885		"How do I calculate percent reduction to demonstrate compliance for continuous lamination/casting operations?" – McClarin does not perform these operations
63.5890		"How do I calculate an organic HAP emissions factor to demonstrate compliance for continuous lamination/casting operations?" – McClarin does not perform these operations
63.5895(a) and (b)		"How do I monitor and collect data to demonstrate continuous compliance?" – paragraphs (a) and (b) apply to facilities with add-on control devices. McClarin does not operate an add-on control device

WWWW Requirement	Permit Condition	Comments
63.5895(c) and (d)	5.24	"How do I monitor and collect data to demonstrate continuous compliance?" – requires records of resins and gel coat usage
63.5895(e)		"How do I monitor and collect data to demonstrate continuous compliance?" – paragraph (e) applies to pultrusion operations. McClarin does not perform pultrusion
63.5900	5.15, 5.16, 5.17, 5.29	"How do I demonstrate continuous compliance with the standards?" – These conditions refer to the criteria for showing compliance with the HAP limit (5.15), the requirement to demonstrate compliance with the work practice standards (5.16), the permittee shall meet the emissions limits and work practice standards during periods of startup and shutdown, and deviations must be reported with the facility's semiannual compliance report (5.29)
63.5905	5.27	"What notifications must I submit and when?" – requires the owner/operator to submit certain notifications, including notification of reconstruction and that previously submitted information needs to be amended
63.5910(a) and (h)	5.28, 5.29	"What reports must I submit and when?" – requires semiannual compliance reporting
63.5910(b)	5.28	"What reports must I submit and when? – Sets schedule for submittal of reports
63.5910(c)	5.29	"What reports must I submit and when? – Content of compliance report
63.5910(d)	5.29	"What reports must I submit and when? – Reporting of deviations from HAP emissions limitations.
63.5910(e)		Reporting of deviations from HAP emissions limitations where CMS is used to demonstrate compliance - McClarin does not use a CMS. .
63.5910(f)	5.30	"What reports must I submit and when? – Requires reporting if 100 tpy threshold is exceeded.
63.5910(g)	5.31	"What reports must I submit and when? – Deviation reporting consistency with title V.
63.5910(i)	5.29	"What reports must I submit and when? – Reporting on change in compliance options.
63.5915	5.23	"What records must I keep?"
63.5920	5.24, 5.25	"In what form and how long must I keep my records?"
63.5925		"What parts of the General Provisions apply to me?" – This is a cross-referencing table, no applicable requirements
63.5930		"Who implements and enforces this subpart?" administrative, no applicable requirements
63.5935		"What definitions apply to this subpart?" – no applicable requirements

Applicability of 40 CFR Part 63, Subpart A to McClarin, Wapato (for Subpart WWWW)

Subpart A Requirement	Permit Condition	Comments
63.1(a)		The General Applicability Requirements do not include any substantive requirements that apply to sources
63.1(b)		Applies to initial applicability determinations
63.1(c)		Requires owner of a Part 63 source to comply with the provisions of Subpart A as identified in each Subpart - no conditions necessary.
63.1(d)		[Reserved]
63.1(e)		The source has not made such a 112(j) request
63.2		Definitions
63.3		Units and abbreviations
63.4		(2) - requiring MR&R is duplicative of requirements that exist in the Subpart. Conditions to address circumvention are not necessary as pollutant of concern is organic HAP rather than visible emissions. It is unlikely that this facility could be effectively fragmented, and so, no condition necessary.
63.5(a)(1) and (2)		Informative language - no conditions necessary.
63.5(b)(1)		General applicability requirements - no conditions necessary.
63.5(b)(2)		[Reserved]
63.5(b)(3)	5.18	Requirement to seek EPA approval prior to reconstruction of WWWW source.
63.5(b)(4)		Notification requirement for non-major sources and those that become subject to the standard – facility is a major source
63.5(b)(5)		[Reserved]
63.5(b)(6)	5.19	Requirements regarding NESHAP applicability when adding subject equipment
63.5(c)		[Reserved]
63.5(d)(1)		See 63.5(b)(3)
63.5(d)(2)		See above
63.5(d)(3)		See above
63.5(d)(4)		See above
63.5(e)(1)-(5)		This piece addresses EPA actions in reviewing the approval. No conditions necessary.
63.5(f)(1) and (2)		Addresses using State preconstruction review processes to satisfy these preconstruction reviews – does not apply as there is no State air quality jurisdiction
63.6(a)(1)		General applicability requirements - no conditions necessary.
63.6(a)(2)		Requirement for an area source that subsequently becomes major – facility is already major
63.6(b)(1)-(5)		Source was installed after proposal of NESHAP WWWW (August 2, 2001) but prior to the effective date of April 21, 2003. The permit requires immediate compliance with PPPP and A, so (1) and (3) are satisfied. (2) does not apply since source had an initial startup date before the effective date. (4) does not apply. (5) will not apply during the term of this permit.
63.6(b)(6)		[Reserved]
63.6(b)(7)		Requirement for an area source that subsequently becomes major – facility is already major
63.6(c)(1) and (2)		This applies to existing sources. Facility is a new source according to NESHAP WWWW.

Subpart A Requirement	Permit Condition	Comments
63.6(c)(3) and (4)		This applies to existing sources. Facility is a new source according to NESHAP WWWW.
63.6(c)(5)		This applies to existing sources. Facility is a new source according to NESHAP WWWW.
63.6(d)		[Reserved]
63.6(e)(1)-(2)	5.14, 5.20	Requirements to operate and maintain equipment. Provisions for startup, shutdown and malfunction do not apply to a coating operation where no add-on controls are being used and where emissions are calculated based on a mass balance. Section (2) is reserved - does not exist.
63.6(e)(3)		Provisions for startup, shutdown and malfunction. Do not apply to a coating operation where no add-on controls are being used.
63.6(f)(1)	5.15	Compliance with nonopacity emission standards – essentially all the time since any startup, shutdown or malfunction does not affect McClarin's ability to comply with the emission limitation.
63.6(f)(2)-(3)		Addresses how EPA will determine compliance – no action items for McClarin
63.6(g)(1)-(3)		Use of an alternative nonopacity emission standard - does not apply to McClarin
63.6(h)		Compliance with opacity and visible emission standards. WWWW contains no opacity or visible emissions standards, and so no conditions are necessary.
63.6(i)(1)-(14)		Extension of compliance with emission standards. WWWW contains no opacity or visible emissions standards, and so no conditions are necessary
63.6(i)(15)		[Reserved]
63.6(i)(16)		Applies to extension of compliance and Administrator authority under section 114 of Clean Air Act (CAA).
63.6(j)		Exemption from compliance with emission standards by the President. This scenario does not apply to McClarin
63.7(a)(1)		This section applies to performance testing, which does not apply as McClarin is not required to conduct such tests for WWWW purposes.
63.7(a)(2)		See above
63.7(a)(3)		Addresses EPA authority to require performance testing under Section 114. No conditions necessary.
63.7(b)(1)		This section applies to performance testing, which does not apply as McClarin is not required to conduct such tests for WWWW purposes.
63.7(b)(2)		See above
63.7(c)-(h)		See above
63.8(a)(1)-(2)		63.8 contains requirements for CMS required under WWWW- McClarin is not required to have a CMS, so no conditions are necessary.
63.8(a)(3)		See above
63.8(a)(4)		See above
63.8(b)(1)		See above
63.8(b)(2) and (3)		See above
63.8(c)(1)		See above
63.8(c)(2)-(3)		See above
63.8(c)(4)		See above
63.8(c)(5)		See above
63.8(c)(6)-(8)		See above
63.8(d)		See above

Subpart A Requirement	Permit Condition	Comments
63.8(e)(1)		See above
63.8(e)(2)		See above
63.8(e)(3) and (4)		See above
63.8(e)(5)(i)		See above
63.8(e)(5)(ii)		See above
63.8(f)(1)-(3)		See above
63.8(f)(4)		See above
63.8(f)(5)		See above
63.8(f)(6)		See above
63.8(g)(1)-(5)		See above
63.9(a)(1)-(4)		No conditions necessary for (1) general applicability; (2) extension of compliance; (3) and (4) State-required notification and delegated States - these are not applicable to McClarin.
63.9(b)(1)		The deadline for initial notifications has passed, so no need for conditions.
63.9(b)(2)		See above
63.9(b)(3)		This section is reserved - does not exist.
63.9(b)(4)(i)	5.27	Requirement for a notification of intent to construct.
63.9(b)(4)(ii)-(iv)		These sections are reserved - do not exist.
63.9(b)(4)(v)	5.27	Requirement for a notification of the actual date of startup (if reconstructed only)
63.9(b)(5)		Notification requirements for operations where an application for approval of construction or reconstruction is not required - does not apply to McClarin
63.9(c)		Request for extension of compliance - does not apply to McClarin
63.9(d)		Notification that the source is subject to special compliance requirements - does not apply to McClarin
63.9(e)		Notification of performance test not applicable to McClarin
63.9(f)		Notification of opacity and visible emissions observations not applicable to McClarin under MACT.
63.9(g)(1)		Additional notification for sources with continuous monitoring systems – not applicable to McClarin.
63.9(g)(2)		See above
63.9(g)(3)		See above
63.9(h)(1)-(3)	5.28	Notification of compliance status – (1) is introductory language, (2) applies to prior to title V permit issuance, (3) applies to after.
63.9(h)(4)		[Reserved]
63.9(h)(5) and (6)		(5) Requirement to update estimates or preliminary information submitted and (6) advice on notification from Administrator (no condition for this requirement necessary).
63.9(i)		Adjustments to time periods or postmark deadlines - no conditions necessary.
63.9(j)	5.33	Requirement to change information provided, if necessary
63.10(a)		(1) is general applicability language; (2) applies to an extension of compliance; (3) -(5) apply to State implementations; (6) and (7) apply to coordinated reporting requested by the applicant - no conditions necessary.
63.10(b)(1)	5.24, 5.25	Additional recordkeeping requirements - records retention.
63.10(b)(2) (i)-(v)	5.26	Additional recordkeeping requirements for maintenance of monitoring equipment. No conditions necessary for requirements pertaining to startup, shutdown and malfunction.

Subpart A Requirement	Permit Condition	Comments
63.10(b)(2) (vi)-(xi)		No conditions necessary for requirements pertaining to CMS, performance testing, CEMS.
63.10(b)(2) (xii)		Requirement to maintain any information demonstrating whether McClarin is meeting the requirements of a waiver under (f) - does not apply.
63.10(b)(2) (xiii)		No conditions necessary for requirements pertaining to CMS.
63.10(b)(2) (xiv)	5.23	Requirement to maintain all documentation supporting initial notifications and notifications of compliance status under 63.9.
63.10(b)(3)		Requires records that a NESHAP does not apply
63.10(c) (1)		Additional recordkeeping requirements for sources with CMS – McClarin does not maintain a CMS
63.10(c) (2)-(4)		[Reserved]
63.10(c) (5)-(8)		Additional recordkeeping requirements for sources with CMS – McClarin does not maintain a CMS
63.10(c) (9)		[Reserved]
63.10(c) (10)-(15)		Additional recordkeeping requirements for sources with CMS – McClarin does not maintain a CMS
63.10(d)(1)	5.27, 5.28, 5.29, 5.30, 5.31, 5.32	Requires reporting to the Administrator in accordance with the relevant standard
63.10(d)(2)		Requirements regarding reporting of performance tests. McClarin is not required to conduct performance tests – no conditions necessary.
63.10(d)(3)		Requirements regarding reporting of opacity or visible emission observations. McClarin is not required to conduct these – no conditions necessary.
63.10(d)(4)		Requirements regarding submittal of progress reports as a condition of receiving an extension of compliance – does not apply to McClarin. No conditions necessary.
63.10(d)(5)		Reporting requirements for startup, shutdown and malfunction do not apply to a coating operation where no add-on controls are being used and where emissions are calculated based on a mass balance.
63.10(e) (1)-(3)		Additional reporting requirements for sources with CMS – McClarin does not maintain a CMS
63.10(e) (4)		Additional reporting requirements for sources with COMS – McClarin does not maintain a COMS
63.10(f)		Requirements pertaining to waiver of recordkeeping or reporting – no conditions necessary.
63.11		Control device requirements - McClarin does not maintain a control device
63.12		State authority and delegations – no conditions necessary.
63.13		Addresses of State air pollution control agencies and EPA Regional Offices – no conditions necessary.
63.14		Incorporations by reference – no conditions necessary.
63.15		Requirements relating to availability of information and confidentiality. No conditions necessary.

Appendix B

Tables Cross Referencing Applicable Requirements in 40 CFR Part 63, Subpart PPPP and the Associated General Requirements (Subpart A) with Conditions in Section 6 of the Permit

Applicability of 40 CFR Part 63, Subpart PPPP to McClarin, Wapato

PPPP Requirement	Permit Condition	Comments
63.4480		"What is the purpose of this subpart?" – no applicable requirements
63.4481(a)		"Am I subject to this subpart?" – describes plastic parts and types of activities that may be subject to the standard
63.4481(b)		"Am I subject to this subpart?" – states that major HAP sources that engage in the described activities will be subject, but does not contain any requirements
63.4481(c)	6.2	"Am I subject to this subpart?" – exemption for subpart WWWW activities in paragraph (c) included in Permit Condition 6.2
63.4481(d)		"Am I subject to this subpart?" – Coordination with subpart IIII – not applicable to facility
63.4481(e)		"Am I subject to this subpart?" – Coordination with other surface coating NESHAPs – not applicable to facility
63.4482(a)		"What parts of my plant does this subpart cover?" – states that the subpart applies to each new, existing, and reconstructed source – does not contain any requirements
63.4482(b)	6.1	"What parts of my plant does this subpart cover?" – definition of subject equipment included in Permit Condition 6.1
63.4482(c)-(e)		"What parts of my plant does this subpart cover?" – defines new, reconstructed, and existing sources – no applicable requirements
63.4483		"When do I have to comply with this subpart?" – initial compliance date has passed, no applicable requirements
63.4490(a)(1)	6.3	"What emission limits must I meet" – applies emission limit for general use coatings
63.4490(a)(2)-(4)		"What emission limits must I meet" – applies emission limit for non-general use coatings, does not apply to the facility
63.4490(b)		"What emission limits must I meet" – this paragraph applies to existing sources, facility is a new source
63.4490(c)		"What emission limits must I meet" – this paragraph applies if operations are subject to more than one of subcategory limits in (a) or (b) – not applicable to the facility
63.4491	6.4, 6.5	"What are my options for meeting the emission limits?" – describes in general the compliance options that may be used and requires all coatings, thinners, and additive to be used to be used to determine compliance
63.4491(a)	6.6	"What are my options for meeting the emission limits?" – explains the compliant material option
63.4491(b)	6.7	"What are my options for meeting the emission limits?" – explains the emission rate without add-on controls option
63.4491(c)		"What are my options for meeting the emission limits?" – explains the emission rate with add-on controls option – the facility does not use add-on controls
63.4492		"What operating limits must I meet?" – operating limits are only required with add-on controls
63.4493		"What work practice standards must I meet?" – work practice standards are only required with add-on controls
63.4500(a)(1)	6.3	"What are my general requirements for complying with this subpart?" – must comply with the emission limit at all times (if not using add-on controls)
63.4500(a)(2)		"What are my general requirements for complying with this subpart?" – must comply with the emission limit at all times (if not using add-on controls). Facility does not operate add-on controls
63.4500(b)	6.8	"What are my general requirements for complying with this subpart?" – must operate and maintain equipment per section 63.6(e)(1)(i)

PPPP Requirement	Permit Condition	Comments
63.4500(c)		"What are my general requirements for complying with this subpart?" – must develop a startup, shutdown, and malfunction plan consistent with section 63.6(e)(3) for emissions capture systems and add-on controls.
63.4501		"What parts of the General Provisions apply to me?" – identifies which parts of the General Provisions apply, but does not create any applicable requirements
63.4510(a)		"What notifications must I submit?" – requires submission of notifications in 63.7(b) and (c), 63.8(f), 63.9(b) through (e) and (h) that apply. None of these reporting requirements apply. McClarin does not operate a control device that requires testing or monitoring and is required to submit semiannual compliance reports under the title V program.
63.4510(b)		"What notifications must I submit?" – requires submittal of initial notification. Initial notification date has passed
63.4510(c)		"What notifications must I submit?" – requires submittal of notification of compliance status for the initial semiannual period. Initial semiannual period is over
63.4520	6.19	"What reports must I submit?" – semiannual compliance reports are required
63.4530	6.13, 6.14, 6.15	"What records must I keep?" – does not include recordkeeping for compliance option with add-on controls.
63.4531	6,16, 6.17	"In what form and for how long must I keep my records?" – records must be readily available and maintained for at least five years (three years on site)
63.4540		"By what date must I conduct the initial compliance demonstration?" (compliant material option) – initial compliance date has passed
63.4541		"How do I demonstrate initial compliance with the emission limitations?" (compliant material option) – initial compliance date has passed
63.4542	6.6, 6.12, 6.14, 6.19	"How do I demonstrate continuous compliance with the emission limitations?" (compliant material option) – **note that references to equations that had previously been in Permit Conditions used to demonstrate initial compliance now refer to equations in the CFR**
63.4550		"By what date must I conduct the initial compliance demonstration?" (emission rate without add-on controls option) – initial compliance date has passed
63.4551		"How do I demonstrate initial compliance with the emission limitations?" (emission rate without add-on controls option) – initial compliance date has passed
63.4552	6.7, 6.12, 6.14, 6.19	"How do I demonstrate continuous compliance with the emission limitations?" (emission rate without add-on controls option) – **note that references to equations that had previously been in Permit Conditions used to demonstrate initial compliance now refer to equations in the CFR**.
63.4560-4568		Compliance requirements for the emission rate with add-on controls option – the facility does not operate add-on controls to comply with the NESHAP
63.4580		"Who implements and enforces this subpart?" – no applicable requirements
63.4581		"What definitions apply to this subpart?" – no applicable requirements

Applicability of 40 CFR Part 63, Subpart A to McClarin, Wapato (for Subpart PPPP)

Subpart A Requirement	Permit Condition	Comments
63.1(a)		The General Applicability Requirements do not include any substantive requirements that apply to sources
63.1(b)		Applies to initial applicability determinations
63.1(c)		Requires owner of a Part 63 source to comply with the provisions of Subpart A as identified in each Subpart - no conditions necessary.
63.1(d)		[Reserved]
63.1(e)		The source has not made such a 112(j) request
63.2		Definitions
63.3		Units and abbreviations
63.4(a)(1)	6.9	Requires facility to operate in compliance with the subpart
63.4(a)(2)		Duplicative requirement to keep records and submit reports
63.4(a)(3)-(5)		[Reserved]
63.4(b)-(c)		Conditions to address circumvention are not necessary as pollutant of concern is organic HAP rather than visible emissions. It is unlikely that this facility could be effectively fragmented, and so, no condition necessary.
63.5(a)		Informative language - no conditions necessary.
63.5(b)(1)-(6)	6.10, 6.11	(b)(3)(i) applicable to original install, i.e. new source, and (b)(3)(ii) applies to future reconstructions. 63.5(b)(6) is reflected in Condition 6.12. No conditions necessary for others.
63.5(d)		Application for approval of construction. Amtech did this in 2004. No conditions necessary.
63.5(e)		This piece addresses EPA actions in reviewing the approval. No conditions necessary.
63.5(f)		Addresses using State preconstruction review processes to satisfy these preconstruction reviews - does not apply as there is no State air quality jurisdiction over the facility
63.6(a)		General applicability requirements - no conditions necessary.
63.6(b)(1)-(7)		Since source is being installed after the PPPP effective date (4-19-04) (1) does not apply. The permit requires immediate compliance with PPPP and A, so (2) is satisfied. (3) does not apply since source is being constructed after the effective date. (4) does not apply as there is no 112(f) standard. Since (3) and (4) do not apply, neither does (5). (6) does not exist. (7) addresses area sources.
63.6(c)(1)-(5)		This applies to existing sources.
63.6(e)(1)-(2)	6.8	Requirements to operate and maintain equipment. Provisions for startup, shutdown and malfunction do not apply to a coating operation where no add-on controls are being used and where emissions are calculated based on a mass balance.
63.6(e)(3)		Provisions for startup, shutdown and malfunction. Do not apply to a coating operation where no add-on controls are being used.
63.6(f)(1)	6.3	Compliance with nonopacity emission standards - essentially all the time since any startup, shutdown or malfunction does not affect McClarin's ability to comply with the emission limitation.
63.6(f)(2)-(3)		Addresses how EPA will determine compliance – no action items
63.6(g)(1)-(3)		Use of an alternative nonopacity emission standard – does not apply
63.6(h)		Compliance with opacity and visible emission standards. PPPP contains no opacity or VE standards, and so no conditions are necessary.
63.6(i)(1)-(16)		Extension of compliance with emission standards. This scenario does not apply

Subpart A Requirement	Permit Condition	Comments
63.6(j)		Exemption from compliance with emission standards by the President. This scenario does not apply
63.7(a)(1)		General applicability requirements – no conditions necessary.
63.7(a)(2)		63.7 addresses performance tests, which apply to the emission rate with add-on controls option – facility does not operate add-on controls
63.7(a)(3)		Addresses EPA authority to require performance testing under Section 114. No conditions necessary.
63.7(b)-(e)		63.7 addresses performance tests, which apply to the emission rate with add-on controls option – facility does not operate add-on controls
63.7(f)		63.7 addresses performance tests, which apply to the emission rate with add-on controls option – facility does not operate add-on controls.
63.7(g)-(h)		63.7 addresses performance tests, which apply to the emission rate with add-on controls option – facility does not operate add-on controls
63.8(a)(1)-(3)		63.8 contains requirements for CMS required under PPPP – facility is not required to have a CMS, so no conditions are necessary.
63.8(a)(4)		See above
63.8(b)		See above
63.8(c)(1)-(3)		See above
63.8(c)(4)		See above
63.8(c)(5)		See above
63.8(c)(6)		See above
63.8(c)(7)		See above
63.8(c)(8)		See above
63.8(d)-(e)		See above
63.8(f)(1)-(5)		See above
63.8(f)(6)		See above
63.8(g)(1)-(5)		See above
63.9(a)-(d)		Initial notification period is over
63.9(e)		Notification of performance test not applicable
63.9(f)		Notification of opacity and VE observations not applicable under MACT.
63.9(g)(1)-(3)		Additional notification for sources with continuous monitoring systems not applicable
63.9(h)	6.19	Paragraph (3) requires notification of compliance status
63.9(i)		Adjustments to time periods or postmark deadlines – no conditions necessary
63.9(j)	6.18	Change in information provided
63.10(a)		(1) is general applicability language; (2) applies to an extension of compliance; (3) -(5) apply to State implementations; (6) and (7) apply to coordinated reporting requested by the applicant - no conditions necessary.
63.10(b)(1)	6.16, 6.17	Additional recordkeeping requirements - records retention.
63.10(b)(2) (i)-(v)		Additional recordkeeping requirements for maintenance of monitoring equipment (McClarin has none to comply with PPPP), and for startup, shutdown and malfunction. No conditions necessary.
63.10(b)(2) (vi)-(xi)		No conditions necessary for requirements pertaining to CMS, performance testing, CEMS.
63.10(b)(2) (xii)		Requirement to maintain any information demonstrating whether facility is meeting the requirements of a waiver under (f) – does not apply.
63.10(b)(2) (xiii)		No conditions necessary for requirements pertaining to CMS.

Subpart A Requirement	Permit Condition	Comments
63.10(b)(2)(xiv)	6.18	Requirement to maintain all documentation supporting initial notifications and notifications of compliance status under 63.9.
63.10(b)(3)		Applies if source determines that PPPP does not apply – not the case.
63.10(c) (1)-(6)		Additional recordkeeping requirements for sources with CMS – PPPP does not require a CMS
63.10(c) (7)-(8)		Additional recordkeeping requirements for sources with CMS – PPPP does not require a CMS
63.10(c) (9)-(15)		Additional recordkeeping requirements for sources with CMS – PPPP does not require a CMS
63.10(d)(1)	6.19	Requirement to report as required under PPPP
63.10(d)(2)		Requirements regarding reporting of performance tests. Facility is not required to conduct performance tests – no conditions necessary.
63.10(d)(3)		Requirements regarding reporting of opacity or visible emission observations. Facility is not required to conduct these – no conditions necessary.
63.10(d)(4)		Requirements regarding submittal of progress reports as a condition of receiving an extension of compliance – does not apply
63.10(d)(5)		Reporting requirements for startup, shutdown and malfunction do not apply to a coating operation where no add-on controls are being used and where emissions are calculated based on a mass balance.
63.10(e) (1)-(2)		Additional reporting requirements for sources with CMS – PPPP does not require a CMS
63.10(e) (3)		Additional reporting requirements for sources with CMS – PPPP does not require a CMS
63.10(e) (4)		Additional reporting requirements for sources with COMS – PPPP does not require a COMS
63.10(f)		Requirements pertaining to waiver of recordkeeping or reporting – no conditions necessary.
63.11		Control device requirements – facility does not maintain control devices for compliance with PPPP. No conditions necessary.
63.12		State authority and delegations – no conditions necessary.
63.13		Addresses of State air pollution control agencies and EPA Regional Offices – no conditions necessary.
63.14		Incorporations by reference – no conditions necessary.
63.15		Requirements relating to availability of information and confidentiality. No conditions necessary.

Appendix C

Applicability of FARR Requirements

FARR Applicability, 40 CFR Part 49

Citation	Description	Applicability
49.121 – 49.122	Introduction and delegation	Apply, but are not included in the permit.
49.123(a-c)	Definitions, testing, monitoring, recordkeeping, reporting, and credible evidence and incorporation by reference	Apply, but are not included in the permit.
49.124(a-b, f)	Visible emission limits purpose, applicability and definitions	Apply, but are not included in the permit.
49.124(c)	Exemptions	Applies, see Permit Condition 3.10.
49.124(d)(1-2)	Visible emission limit	Applies; see Permit Conditions 3.9 and 3.11.
49.124(d)(3)	Visible emission limit for oil and solid fuel	Does not apply because only gaseous fuel is burned.
49.124(e)	Reference method	Applies; see Permit Condition 3.9.
49.125(a-c, f)	PM limits purpose, applicability and definitions	Apply, but are not included in the permit.
49.125(d)(1, 3)	PM limits	Apply; see Permit Conditions 8.1, 9.1 and 10.1.
49.125(d)(2)	PM limit for wood fuel	Does not apply because only gaseous fuel is burned.
49.125(e)	Reference method	Applies; see Permit Conditions 8.1, 9.1 and 10.1.
49.126(a-b, f)	Fugitive PM limits purpose, applicability and definitions	Apply, but are not included in the permit.
49.126(c)	Exemptions	Applies; see Permit Condition 3.17.
49.126(d-e)	Fugitive PM	Apply; see Permit Conditions 3.12-3.16 and 3.33.
49.129(a-c, f)	SO_2 limits purpose, applicability and definitions	Apply, but are not included in the permit.
49.129(d)(1)	SO_2 limit for combustion sources	Applies; see Permit Condition 10.2
49.129(d)(2)	SO_2 limit for process sources	Does not apply because none of McClarin's processes emit SO_2.
49.129(e)	Reference method	Applies; see Permit Condition 10.2
49.130(a-c, g)	Fuel sulfur limit purpose, applicability and definitions	Apply, but are not included in the permit.
49.130(d)(1-7)	Fuel sulfur limits for liquid and solid fuels	Do not apply because only gaseous fuel is burned.
49.130(d)(8)	Fuel sulfur limit for gaseous fuels	Applies; see Permit Condition 4.2.
49.130(e)(1-3)	Reference methods for liquid and solid fuels	Do not apply because only gaseous fuel is burned.
49.130(e)(4)	Reference method for gaseous fuels	Applies; see Permit Condition 4.2.
49.130(f)(1)(i, iii)	Recordkeeping for liquid and solid fuels	Do not apply because only gaseous fuel is burned.
49.130(f)(1)(ii)	Recordkeeping for gaseous fuels	Applies; see Permit Condition 4.3.
49.130(f)(2)	Recordkeeping for gaseous fuels	Applies; see Permit Condition 3.35.
49.130(f)(3)	Recordkeeping exemption for residences	Does not apply because McClarin is not a residence.
49.131(a, b, f)	Open burning purpose and applicability	Apply, but are not included in the permit.
49.131(c, d, e)	Open burning	Apply; see Permit Conditions 3.4-3.8.
49.135	Detrimental emissions	Applies, but are not included in the permit.
49.137(a, b, d)	Air pollution episode purpose, applicability and definitions	Apply, but are not included in the permit.
49.137(c)(1-3)	Air pollution episodes	Apply, but are not included in the permit.
49.137(c)(4)(i-ii)	Air pollution episodes	Apply; see Permit Conditions 3.6 and 3.7.
49.137(c)(4)(iii)	Air pollution episodes	Apply, but are not included in the permit.

Citation	Description	Applicability
49.138(a-c, g)	Registration purpose, applicability and definitions	Apply, but are not included in the permit.
49.138(d)	Registration and reporting for Part 71 sources	Apply; see Permit Condition 3.46.2.
49.138(f)	Registration and reporting for Part 71 sources	Apply; see Permit Condition 3.46.
49.138(e)(1-2, 5-8)	Reporting for non-Part 71 sources	Do not apply because McClarin is a Part 71 source.
49.138(e)(3)(i-xi, xiii-xiv)	Reporting for non-Part 71 sources	Do not apply because McClarin is a Part 71 source.
49.138(e)(3)(xii)	Reporting for Part 71 sources	Apply; see Permit Condition 3.46.
49.138(e)(4)	Reporting for Part 71 sources	Apply; see Permit Conditions 3.46 and 3.46.1.
49.139	Non-Title V operating permits	Applies, but is not included in the permit.

Appendix D

CAM Plan submitted by facility

Compliance Assurance Monitoring Plan
Mcclarin Plastics, LLC
180 East Jones Road, Wapato, WA 98951
Spray Booths

I. BACKGROUND

A. Emission Unit

Description: Particulate matter collection system;

Emission Unit: BOOTH - Spray Booth

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation: 40 CFR 49.125(d)(3)
Title V Operating Permit No. R10T5030001, *Condition 9.1*

Pollutant: PM, PMIO

Emission Limit: Particulate matter emissions must not exceed an average of 0.23 grams per dry standard cubic meter (0.1grains per dry standard cubic foot) during any three-hour period.

Monitoring Requirements: Exhaust filters controlling particulate matter from spray booth, (which in this case is considered to be an "Other PSEU" (pollutant-specific emissions unit)).
See CAM rule 64.3(b)(4)(iii) and CAM Technical Guidance Document section 2.2.2.2 (4) Frequency of Monitoring: For other PSEU's (postcontrol potential to emit less than 100 percent of the major source threshold), monitoring may be less frequent but must include some data collection at least once per 24-hour period.

Assumption: When unit is not operating data does not need to be collected.

Emission Unit BOOTH - Spray Booth does not continuously operate, in fact it *does not* always have daily operations (e.g. consecutive 24-hour periods of operation).

C. Control Technology

Dual layer exhaust filters
See *Condition 9.2* of air operating permit (AOP): Spray booth shall not be operated unless all exhaust air passes through a dual-layer exhaust filter. The first filter layer shall have a control efficiency of at least 93%, per manufacturer's specifications. The second filter layer shall have a control efficiency of at least 98%, per manufacturer's specifications.

II. Monitoring Approach

The key elements of the monitoring approach are presented below in Table A. The selected performance indicators are Differential Pressure and Inspections & Maintenance.

Table A - Monitoring Approach

	Indicator #1	**Indicator #2**
I. **Indicator**	**Differential pressure across exhaust** filters.	**Inspections** & **Maintenance**
II. **Measurement Approach**	Differential pressure measured across spray booth exhaust filters by a manometer. See AOP *Condition* 9.5: Install, calibrate, operate and maintain a gauge to indicate, in inches of water, the static pressure differential across the exhaust filters.	Visual inspection of the condition of the exhaust filters. Inspect for proper installation of filters and good filter condition. See AOP *Condition 9.4:* The exhaust filters shall be maintained in good operating condition such that the filters are not over-loaded; the filters are properly aligned and seated; and the filters do not have visible rips, tears or holes.
III. **Indicator Range**	An excursion is a differential pressure reading across the exhaust filters outside of the acceptable range. The acceptable range is >Oto 1.0 inches water. Replace exhaust filters before the pressure drop exceeds 1.0 inches water. See AOP *Condition 9.3:* Pressure differential across the exhaust filters shall not exceed 1.0 inches of water.	An excursion is visible exhaust filter damage **(e.g.** rips, tears, holes); mis-alignment or improperly installed exhaust filters (e.g. not fully seated or gaps); or over-loaded exhaust filters resulting in a pressure drop> 1.0 inches of water. Take corrective action as soon as possible or prior to operating the spray booth to eliminate problems associated with the filters. See AOP *Condition 9.3:* Pressure differential across the exhaust filters shall not exceed 1.0 inches of water. See AOP *Conditions 9.4.1-3:* The exhaust filters shall be maintained such that the filters are not over-loaded with accumulated material to the point of being blinded; the filters are properly aligned and seated; and the filters do not have visible rips, tears or holes.
IV. Performance Criteria		
A. Data Representativeness	The differential pressure is measured across the exhaust filters. See AOP *Condition 9.5:* Install, calibrate, operate and maintain a gauge to indicate, in inches of water, the	Visual inspection of the condition of the exhaust filters. See AOP *Condition* 9.4: The exhaust filters shall be maintained in good operating condition such that the

	static pressure differential across the exhaust filters.	filters are not over-loaded; the filters are properly aligned and seated; and the filters do not have visible rips, tears or holes.
B. Verification of Operational Status	Manometers will be calibrated, operated, and maintained according to the manufacturer's specifications. See AOP *Condition 9.7:* The monitoring equipment required under Condition 9.5 (manometer) shall be operated in accordance with manufacturers specifications.	Visually inspect the exhaust filters for proper installation and good operating condition. See AOP *Condition* 9.4: The exhaust filters shall be maintained in good operating condition such that the filters are not over-loaded; the filters are properly aligned and seated; and the filters do not have visible rips, tears or holes.
C. QA/QC Practices and Criteria	Manometers will be calibrated, operated, and maintained according to manufacturer's specifications. See AOP *Condition 9.7:* The monitoring equipment required under Condition 9.5 (manometer) shall be operated in accordance with manufacturers specifications.	Operate and maintain exhaust filters in accordance with the manufacturer's specifications. Replace exhaust filters before the pressure drop exceeds 1.0 inches water. See AOP *Condition* 9.3: Pressure differential across the exhaust filters shall not exceed 1.0 inches of water.
D. Monitoring Frequency	The differential pressure will be inspected a minimum of once per day when the spray booth is operating. See AOP *Condition* 9.6: Monitor and record the static pressure differential across the exhaust filters at least once per operational shift.	Once per day when the spray booth is operating, visually inspect the condition of the exhaust filters with respect to alignment, rips, tears, holes, and over-loading.
E. Data Collection Procedures	Results of spray booth differential pressure checks will be recorded. See AOP *Condition* 9.6: Monitor and record the static pressure differential across the exhaust filters at least once per operational shift. The records shall include the date and time that the static pressure differential reading was taken.	Operators record exhaust filter inspections and maintenance activities performed on log sheets.