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From: ccarrothers@c2air.com
To: Familiare, Christopher S.
Cc: elizabeth_sanchey@yakama.com; noelle; phil_rigdon@yakama.com; Glass, Geoffrey; Pepple, Karl; rmukerjee@mcclarincomposites.com; smathews@mcclarincomposites.com; agonzalez@mcclarincomposites.com
Subject: Re: McClarin"s Pre-draft title V Permit and Support Document
Date: Monday, December 12, 2022 10:22:47 PM

Hi Christopher,

It was very nice to chat with you today. Thank you very much for the opportunity to review the pre-draft permit!

As we discussed today you did receive the updates to Table 3-2 below, that I sent on Friday. Also, I mentioned I currently only had time for a limited cursory review of the draft permit. (For example, I did not review any regulatory citations for typos and I did not cross-check conditions that reference to other conditions. I did not get a chance to review equations, appendices or the Statement of Basis).

However as you mentioned today, when the permit is in the public comment period there is another opportunity for review and comment.

I did note the following during this review:

1. The **name/branding for the company has changed to**

McClarin Plastics, LLC D/B/A McCLARIN Composites.

Please update as necessary in the draft (including the footer).

2. The current **Responsible Official** is:

Mr. Rahul Mukerjee

Vice President – Engineering & Integrated Management Systems

McCLARIN Composites

15 Industrial Drive

Hanover, PA 17331

Phone: 717-646-4703

E-mail: rmukerjee@mcclarincomposites.com

3. The current **Company Contact** is:

Mr. Shawn Mathews

Interim General Manager

McClarin Plastics, LLC D/B/A McCLARIN Composites

180 East Jones Road

Wapato, WA 98951

Phone: 509-877-2228

E-mail: smathews@mcclarincomposites.com

4. **Condition 1.12:** As we discussed today, for logistic purposes please retain the current submittal date of February 28th (this has been the date since the inception of the facility's first Title V permit about 2 decades ago). Therefore the 2nd sentence of 1.12 is suggested to state: "The annual certification report shall be submitted to EPA and shall be postmarked no later than February 28th."

5. Condition 1.14, second sentence: For clarification, after the word "and" please include the words "submit payment of" and delete "pay". Also delete the part of the sentence referring to the anniversary date of its initial fee calculation work sheet because I believe that initially (many years ago) that was December 31st. It has since been moved up to December 1st for logistical reasons (that we discussed today, e.g. having a date of Dec. 31st meant that often EPA did not receive reports until January which hindered their processing and therefore the date was changed to Dec. 1st).

The suggested sentence would then read (following and): "submit payment of the annual fee each year on or before December 1st. Note: As we discussed today moving up the deadline to November 1st is acceptable also and should not create any hardships on our side.

6. Condition 1.16: Please include that the form name is FF, e.g. change "completed fee filing form" to completed fee filing form (FORM FF)".

Reason: There are forms FF and FEE and it can be confusing which form is being referred to unless the specific names of the forms are used in addition to their lengthy description.

7. Condition 1.24.2: Following the last sentence in the 1st paragraph please include:

"Also since paper hardcopies are allowed according to EPA's website, it is allowable to submit a FARR hardcopy report to EPA." Or alternatively simply state that it is allowable to submit a hardcopy report to EPA.

Basis for request: More than once I have attempted to submit detailed reports (FARR, FEE) using the CDX. I have never had complete success entering all of the necessary required data, including some items as basic as titles or addresses. I believe that the CDX database software has some limitations. I have contacted CDX twice (2 different reporting years) in the past to discuss the problems and to determine if there are any work-arounds and have been told basically that it is what it is, so I moved on and created hard copy reports instead.

Perhaps currently the CDX reporting software has become much more eloquent and inclusive? I will try again and hope for the best, but I would like to retain the option (as allowed on the EPA website) to continue to prepare hardcopy reports as an option.

8. Conditions 1.12 (Annual Compliance Certifications); 1.14 and 1.17 (Annual Fee Payment, FEE form); 1.24.2 (FARR report); 3.28 (WWWW reports); and 4.19.2 (PPPP reports):

SEE COMMENT DIRECTLY ABOVE for condition 1.24.2: Please also allow paper hard copies to be submitted (if the CDX database is not yet equipped to handle these reports in an efficient manner).

9. Just above condition 1.24, headline of Annual Registration: For clarity please include the name of the report which is FARR. For instance the headline could be FARR Annual Registration or Annual Registration (FARR reporting).

10. Condition 2.1: As we discussed today, for logistical purposes, please change this date of April 1 to November 1st or else retain the current permitted date of December 1st, whichever EPA prefers.

11. Condition 2.1: Also, please clarify that the reports must be submitted on or before the due date (vs. the current proposed statement of "due on" which is more vague and can lead to compliance misunderstandings). Therefore suggested wording is: fees and emission reports required by this permit must be submitted on or before…(the due date).

12. Condition 2.14: Please change the word "prepare" to "review" because it is not necessary to "prepare" a written fugitive dust plan each year unless changes need to be made to the current plan in place. Therefore the suggested wording is "The permittee shall ***review***, and update as necessary following each survey,"

13. Condition 2.18, first sentence just before the word pollutant: Please insert the word "air" to clarify that the survey is applicable to air pollutant emitting activities.

14. Condition 7.3: Please clarify that this condition only applies when a booth is operating. For example the condition can read: "The pressure differential across the exhaust filters ***when the booth is operating*** shall not be less than 0 inches of water…" or else "When a booth is operating, the pressure differential across the exhaust filters shall not be less than 0 inches of water…"

Note that when a booth is turned off or shut down (e.g. not operating) the pressure differential gauge needle may appear to be below zero, thus the reason for the clarification request.

15. Condition 7.8, first sentence: For clarity and continuity with the description of this emission unit (e.g. "spray booth") please replace "pollutant specific emissions unit" with "spray booth"

Please let me know if you have any questions or need further information.

Thanks!

Cathryn

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Cell: 206-841-4882

On Mon, 28 Nov 2022 20:28:10 +0000, "Familiare, Christopher S." <familiare.christopher@epa.gov> wrote:

Hi Carolyn,

Hope all has been going well.

Region 10 has prepared the following 2 pre-draft title V documents for your review:

1. Pre-Draft Permit (20221128 McClarin T5 Predraft Permit.pdf)
2. Pre-Draft Statement of Basis (20221128 McClarin T5 Predraft SoB.pdf)

There is one table that specifically does require additional input from the facility. On page 11 of 41 in the SoB, Table 3-2 needs the updated 2020 emissions output data for all the RAPs minus VOCs:

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	X	X	X	X	X	X	79.1

Please review the documents and provide the requested emissions data and any written comments or feedback by no later than **Monday December 12th 2022**. Let me know if you have any questions or concerns with any of the material and we can find a time for us to discuss them if needed. We look forward to hearing from you soon.

Christopher Familiare

Environmental Engineer | Air Permits and Toxics Branch

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