



State of Utah

Department of
Environmental Quality

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DIVISION OF AIR QUALITY
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11199

Title V Operating Permit

PERMIT NUMBER: 3500354002
DATE OF PERMIT: August 30, 2005
Date of Last Revision: January 16, 2008

This Operating Permit is issued to, and applies to the following:

Name of Permittee:

Delta Equipment Industrial Systems Inc.
1235 S. Pioneer Rd.
Salt Lake City, UT 84104

Permitted Location:

Salt Lake Manufacturing Facility
1235 S. Pioneer Rd.
Salt Lake City, UT 84104

UTM coordinates: 401,140 m Easting, 4,484,067 m Northing
SIC code: 2851 (Paints, Varnishes, Lacquers, Enamels, & Allied Products)

UTAH AIR QUALITY BOARD

By:

M. Cheryl Heying, Executive Secretary

Prepared By:

Brandy Cannon

ENFORCEABLE DATES AND TIMELINES

The following dates or timeframes are referenced in
Section I: General Provisions of this permit.

Annual Certification Due: August 13 of every calendar year that this permit is in force.
Renewal application due: February 28, 2010
Permit expiration date: August 30, 2010
Definition of “prompt”: written notification within 14 days.

ABSTRACT

Delta Equipment Industrial Systems Inc. (DEI) operates a manufacturing plant in Salt Lake City. The company fabricates storage tanks, stripping towers, duct-work, large tank covers, and clarifier covers. The manufacturing processes include filament winding and laminating operations that involve the use of polyester and vinyl ester resins. The company is a major source of HAP (styrene). DEI is subject to NESHAP Subparts A and WWW.

OPERATING PERMIT HISTORY

Permit/Activity	Date Issued	Recorded Changes
Title V reopening for cause by DAQ (Project #OPP0111990005)	1/16/2008	Additions: Incorporate by reference the requirements from 40 CFR 63 Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, and 40 CFR 82 Subparts B, F.
Title V renewal application (Project #OPP0111990003)	8/30/2005	
Title V administrative amendment by DAQ (Project #OPP0111990002)	7/19/2004	Changes: due to issuance of new Approval Order DAQE-AN1199003-04.
Title V initial application (Project #OPP0111990001)	8/13/1999	

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Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

SECTION I: GENERAL PROVISIONS

I.A Federal Enforcement.

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

I.B Permitted Activity(ies).

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

I.C Duty to Comply.

- I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))
- I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))
- I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))
- I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D Permit Expiration and Renewal.

I.D.1 This permit is issued for a fixed term of five years and expires on the date shown under "Enforceable Dates and Timelines" at the front of this permit. (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due on or before the date shown under "Enforceable Dates and Timelines" at the front of this permit. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E Application Shield.

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F Severability.

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G Permit Fee.

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H No Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

I.I Revision Exception.

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J Inspection and Entry.

I.J.1 Upon presentation of credentials and other documents as may be required by law, the

permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

- I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))
- I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))
- I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))
- I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))
- I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

I.K Certification.

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

I.L Compliance Certification.

- I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than the date shown under "Enforceable Dates and Timelines" at the front of this permit, and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))
 - I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;
 - I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;
 - I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible

exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.

I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Environmental Protection Agency, Region VIII
Office of Enforcement, Compliance and Environmental Justice
(mail code 8ENF)
1595 Wynkoop Street
Denver, CO 80202-1129

I.M Permit Shield.

I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:

I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))

I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))

I.M.2 Nothing in this permit shall alter or affect any of the following:

I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))

I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))

I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

I.N Emergency Provision.

I.N.1 An "emergency" is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))

I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))
- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))
- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

I.O **Operational Flexibility.**

Operational flexibility is governed by R307-415-7d(1).

I.P **Off-permit Changes.**

Off-permit changes are governed by R307-415-7d(2).

I.Q **Administrative Permit Amendments.**

Administrative permit amendments are governed by R307-415-7e.

I.R **Permit Modifications.**

Permit modifications are governed by R307-415-7f.

I.S **Records and Reporting.**

I.S.1 Records.

I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))

I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.

For reports, notifications, or other correspondence related to permit modifications, applications, etc.:

Environmental Protection Agency, Region VIII
Office of Partnerships & Regulatory Assistance Air & Radiation Program
(mail code 8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129
Phone: 303-312-6440

I.T Reopening for Cause.

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2 Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the Acid Rain Program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into this permit. (R307-415-7g(1)(b))

I.T.3 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U Inventory Requirements.

An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.V Title IV and Other, More Stringent Requirements

Where an applicable requirement is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, Acid Deposition Control, both provisions shall be incorporated into this permit. (R307-415-6a(1)(b))

SECTION II: SPECIAL PROVISIONS

- II.A **Emission Unit(s) Permitted to Discharge Air Contaminants.**
(R307-415-4(3)(a) and R307-415-4(4))
- II.A.1 **Permitted Source**
Source-wide
- II.A.2 **1: Chopper Guns**
Ten chopper guns for spraying fiberglass-resin mix. No unit-specific applicable requirements.
- II.A.3 **2: Gel Coat Guns**
Three spray guns used for applying gel coat finishes. No unit-specific applicable requirements.
- II.A.4 **3: Natural Gas Fired heaters**
Individually rated less than 5MMBTU/hr. Natural gas by design. No unit-specific applicable requirements.
- II.A.5 **4: Workshop Exhausts**
Ground-level vents equipped with paint arrestor particulate filters to control particulate emissions.

II.B **Requirements and Limitations**

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated:

II.B.1 **Conditions on permitted source (Source-wide)**

II.B.1.a **Condition:**

Emission of Styrene from the permitted source shall be no greater than 28.00 tons per 12-month period. [Origin: DAQE-AN1199003-04] Authority: R307-401-8(1)(a) [BACT]

II.B.1.a.1 **Monitoring:**

HAP emissions shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 15 days after the end of each calendar month.

II.B.1.a.2 **Recordkeeping:**

HAP emissions shall be determined by maintaining a record of HAP emitting materials used each month. The records shall include the following data for each material used:

- Name of the HAP emitting material, such as; paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- Density of each material used (pounds per gallon).
- Percent by weight of HAP in each material used.
- Gallons of each HAP emitting material used each month.
- The amount of HAP emitted monthly by each material used, calculated by the following procedure:
$$\text{HAP} = \frac{(\% \text{ HAP by Weight})}{(100)} \times (0.09) \times \frac{(\text{Density lb})}{(\text{gal})} \times (\text{gal consumed}) \times \frac{(1 \text{ ton})}{(2,000 \text{ lb})}$$
- The total amount of HAP emitted monthly from all materials used.

- (g) The amount of HAP's reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above, to provide the monthly total HAP emissions.

II.B.1.a.3 Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.b Condition:

Emissions of VOC from the permitted source shall be no greater than 28.02 tons per 12-month period. [Origin: DAQE-AN1199003-04] Authority: R307-401-8(1)(a) [BACT]

II.B.1.b.1 Monitoring:

VOC emissions shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 15 days after the end of each calendar month.

II.B.1.b.2 Recordkeeping:

VOC emissions shall be determined by maintaining a record of VOC emitting materials used each month. The records shall include the following data for each material used:

- (a) Name of the VOC emitting material, such as; paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- (b) Density of each material used (pounds per gallon).
- (c) Percent by weight of VOC in each material used.
- (d) Gallons of each VOC emitting material used each month.
- (e) The amount of VOC emitted monthly by each material used, calculated by the following procedure:
$$\text{VOC} = \frac{(\% \text{ VOC by Weight})}{(100)} \times (0.09) \times \frac{(\text{Density lb})}{(\text{gal})} \times (\text{gal Consumed}) \times \frac{(1 \text{ ton})}{(2,000 \text{ lb})}$$
- (f) The total amount of VOC emitted monthly from all materials used.
- (g) The amount of VOCs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above, to provide the monthly total VOC emissions.

II.B.1.b.3 Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.c Condition:

At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any permitted plant equipment, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. This general duty to minimize emissions requires that the permittee reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of

the source. [Origin: DAQE-AN1199003-04 and 40 CFR 63 Subpart WWW] Authority: R307-401-8(2), 40 CFR 63.5835(c), 40 CFR 63.6 (Subpart A)

II.B.1.c.1 Monitoring:

Records required for this permit condition will serve as monitoring.

II.B.1.c.2 Recordkeeping:

The permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.c.3 Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.d Condition:

The permittee shall comply with the applicable requirements for recycling and emission reduction for class I and class II refrigerants pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction. [Origin: 40 CFR 82] Authority: 40 CFR 82.150(b)

II.B.1.d.1 Monitoring:

The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart F.

II.B.1.d.2 Recordkeeping:

All records required in 40 CFR 82, Subpart F shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

II.B.1.d.3 Reporting:

All reports required in 40 CFR 82, Subpart F shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

II.B.1.e Condition:

The permittee shall comply with the applicable requirements for servicing of motor vehicle air conditioners pursuant to 40 CFR 82, Subpart B - Servicing of Motor Vehicle Air Conditioners. [Origin: 40 CFR 82] Authority: 40 CFR 82.30(b)

II.B.1.e.1 Monitoring:

The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart B.

II.B.1.e.2 Recordkeeping:

All records required in 40 CFR 82, Subpart B shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

- II.B.1.e.3 Reporting:**
- All reports required in 40 CFR 82, Subpart B shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.
- II.B.1.f Condition:**
- The permittee shall comply with all applicable requirements in 40 CFR 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production including, but not limited to, the following: all operations, including repair operations, shall meet the applicable organic HAP emission limits and work practice standards in Table 3 and 4 of 40 CFR 63 Subpart WWWW. [Origin: 40 CFR 63 Subpart WWWW] Authority: 40 CFR 63.5785(a), 40 CFR 63.5805(b) and (g), 40 CFR 63.5835(a)
- II.B.1.f.1 Monitoring:**
- The permittee shall perform all applicable monitoring required in 40 CFR 63.5796, 63.5797, 63.5805, 63.5810 (first paragraph), (a), (b), (d), 63.5895(d), 63.5900(a), (a)(2)-(a)(4), (c). The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the applicable requirements of 40 CFR 63, Subpart WWWW.
- II.B.1.f.2 Recordkeeping:**
- The permittee shall maintain all records required in 40 CFR 63.5915(a)(1), (c), (d), 63.5895(c), (d), 63.5920. There are no additional recordkeeping requirements except as outlined in Provision I.S.1 of this permit.
- II.B.1.f.3 Reporting:**
- The permittee shall submit all reports required in 40 CFR 63.5900, 63.5910(a), (b)(5), (c), (d), (g), (i). There are no additional reporting requirements except as outlined in Section I of this permit.
- II.B.2 Conditions on Workshop Exhausts (4)**
- II.B.2.a Condition:**
- Visible emissions shall be no greater than 10% opacity. [Origin: DAQE-AN1199003-04] Authority: R307-401-8(1)(a) [BACT]
- II.B.2.a.1 Monitoring:**
- In lieu of monitoring via visible emissions observations, the external vents and particulate filters shall be inspected weekly. Inspections shall consist of the following:
- (a) Inspection for holes in the particulate filters.
 - (b) Inspection of the particulate filters to determine proper installation within the support rack.
- II.B.2.a.2 Recordkeeping:**
- Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.
- II.B.2.a.3 Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C Emissions Trading
(R307-415-6a(10))

Not applicable to this source.

II.D Alternative Operating Scenarios.
(R307-415-6a(9))

Not applicable to this source.

SECTION III: PERMIT SHIELD

A permit shield was not granted for any specific requirements.

SECTION IV: ACID RAIN PROVISIONS

This source is not subject to Title IV. This section is not applicable.

REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

Incorporates	DAQE-AN1199003-04 dated April 14, 2004
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1. Comment on an item originating in DAQE-AN1199003-04, AO condition 10 regarding Permitted Source
Approval Order (AO) condition #10: This is not carried over into the Title V permit as a condition, but as a design requirement. The heaters at DEI are all natural gas by design, and that has been noted in the emissions unit description. [6/14/2005] [Last updated October 3, 2007]

2. Comment on an item originating in DAQE-AN1199003-04, AO condition 9 regarding Permitted Source
Approval Order (AO) condition #9: This condition requires no greater than 10% opacity site-wide. The 10% opacity limit is identified specifically for the exhaust vents in this Title V permit. The exhaust vents are the only emissions units with a potential to have visible emissions. [8/23/2005] [Last updated October 3, 2007]

3. Comment on an item originating in 40 CFR 63 Subpart WWWW regarding Permitted Source
Comments clarifying current DEI operations to determine applicable requirements from Subpart WWWW: DEI is an open molding operation type. It is not a centrifugal casting, continuous lamination/casting, or pultrusion operation type. It is not a closed molding operation using compression/injection molding. DEI does not manufacture sheet molding compounds (SMC) or bulk molding compounds (BMC). The above terms are defined in 40 CFR 63.5935.

DEI does not use any add-on control devices.

DEI does not use filament application as defined in 40 CFR 63.5935 which feeds reinforcements through a resin bath. [Last updated January 7, 2008]

4. Comment on an item originating in CAM Applicability regarding 4: Workshop Exhausts
Compliance Assurance Monitoring: CAM applicability has been evaluated. There are no CAM requirements in this permit. [8/23/2005] [Last updated October 3, 2007]