

**STATEMENT OF BASIS FOR MELCHER MANUFACTURING COMPANY INC
CHAPTER 401 AIR OPERATING PERMIT
AOP-15 – RENEWAL #2**

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LIST OF ABBREVIATIONS

BACT	Best available control technology
CEM	Continuous emission monitor
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
COMS	Continuous opacity monitoring system
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O ₂	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority (on June 3, 2007, SCAPCA was Renamed to SRCAA)
SRCAA	Spokane Regional Clean Air Agency (prior to June 3, 2007, agency was named SCAPCA)
scf	Standard cubic foot
SO ₂	Sulfur dioxide
SO _x	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

DEFINITIONS OF WORDS AND PHRASES

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(12), 10/4/93]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 10/4/93]
Emission Limitation	A requirement established under the FCAA or Chapter 70.94 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70.94 RCW [WAC 173-400-030(22), 9/13/96]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70.94 RCW, or 70.98 RCW [WAC 173-400-030(23), 9/13/96]
Federal Clean Air Act	Federal Clean Air Act, also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(13), 10/4/93]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(51), 9/13/96]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

STATEMENT OF BASIS FOR MELCHER MANUFACTURING COMPANY, INC CHAPTER 401 AIR OPERATING PERMIT AOP-15 RENEWAL #1

Melcher Manufacturing Company, Inc. (Melcher) manufactures fiberglass reinforced plastic (FRP) loading ramps at 6017 E Mission Ave, Spokane, WA. The facility has been in operation at the facility since 1968. The facility is classified as a major source, as defined in Chapter 173-401 WAC, due to styrene emissions given off during the fiberglass application to the loading ramps. In 2003, the facility estimated annual potential styrene emissions to be 16.1 tons. As a major source, Melcher is required to maintain an operating permit under SRCAA's Title V air operating permit program, as established in Chapter 173-401 WAC. WAC 173-401-700(8) requires a statement at the time a draft permit renewal is issued under the Title V program, setting forth the legal and factual basis for permit conditions, including reference to the applicable statutory or regulatory provisions for the conditions. This document provides the basis for the draft permit for Melcher.

The permit is organized into sections. The first section contains standard terms and conditions. This section is basically the same for all air operating permits, issued by SRCAA. The second section contains applicable requirements that apply to the facility, along with monitoring, recordkeeping, and reporting requirements, sufficient to assure compliance with each applicable requirement. This section is divided into subsections to address different emission units or classes of emission units. The third and final section addresses requirements that have been deemed inapplicable to the source or to emission units located at the source, i.e., the permit shield per WAC 173-401-640(2).

After a brief summary of operations at the facility, the format of this Statement of Basis will follow that of the permit, with the standard terms and conditions discussed first, followed by the applicable requirements, and finally the permit shield.

FACILITY SUMMARY

Melcher's facility produces fiberglass reinforced plastic loading ramps. The ramps are made out of plywood and fiberglass. To make the ramps, off-white gelcoat is sprayed on a fiberglass ramp mold, using an airless spray gun (atomized) and allowed to cure. Resin, mixed with fiberglass strands, also called fiberglass "chop" is then sprayed on the mold using a flow chop "gun" (non-atomized). Then, fiberglass strands are manually dipped into a resin bath and manually applied with squeegees to the mold. These fiberglass strands act as reinforcement in the ramp. A second application of fiberglass "chop" is then applied in specific areas of the mold, and plywood siding is clamped to the mold and allowed to dry. The fiberglass-plywood ramp is then trimmed and sanded in a booth that has a dust control system that exhausts inside. SRCAA does not consider the trimming / sanding booth as an emission unit because there is no direct outside exhaust. A third application of fiberglass "chop" is applied to the ramp and crushed walnut shell is applied to the exterior of the ramp and then allowed to cure. The ramp is then removed from the mold. Melcher sprays the gelcoat and resin material in a filtered resin and gelcoat application booth. The fiberglass strands are dipped in the resin bath in a filtered curing / directional dip booth.

The fiberglass molds are repaired in the testing or "tooling" area. Nicks and gouges in the molds are filled using mold wax, mold spray, tooling gelcoat (different from the gelcoat used in ramp production), and resin (same as used in ramp production).

Melcher uses several different cleaning solvents at the facility. Methylene chloride is used to clean gun tips and application equipment. A dibasic ester cleaner is used to flush the gun equipment. For all other cleaning, Melcher uses a water based emulsifier.

Plywood siding is made in the wood shop. The plywood is sized, using woodworking equipment, the particulate emissions from which are controlled using a cyclone. The cyclone exhausts back inside the building, so it is not considered an emission unit.

Melcher used to perform additional operations at the Aquarius Spas facility, located at 5318 E. Desmet. However, they no longer perform any operations at this location.

PERMITTING HISTORY

SRCAA has not issued any Notice of Construction (NOC) approval orders or regulatory orders to Melcher Manufacturing.

SRCAA has issued the following Air Operating Permits (AOP) to Melcher Manufacturing:

- AOP-15 was issued to Melcher Manufacturing on May 7, 1999,
- AOP-15 Renewal #1 was issued on May 18, 2004 and revised on January 5, 2007 to incorporate several requirements from 40 CFR 63, Subpart WWWW, "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production" that were inadvertently left out of the permit, issued on May 18, 2004.

COMPLIANCE HISTORY

SRCAA has performed a compliance inspection at Melcher Manufacturing either annually or biannually since 1996. The most recent inspection was performed on 1/30/07. During the past ten years, SRCAA has not issued any Notices of Violation to Melcher Manufacturing.

EMISSION UNITS

Emissions from the facility are primarily styrene (which also is a volatile organic compound or VOC) from the resin and gelcoat application and curing. There are also particulate matter emissions from these processes and combustion emissions from small space heaters. These heaters are considered insignificant emission units per WAC 173-401-533(2)(e).

The facility's significant emission units are listed in Table 1.

Table 1 – Significant Emission Units

DESCRIPTION	AIR POLLUTION CONTROL
Resin and Gelcoat Application Booth	Dry Filtration System
Curing / Directional Dip Booth	Dry Filtration System

Affected Sources at Reinforced Plastic Composites Production Facilities Covered under 40 CFR 63, Subpart WWWW

Since Melcher is a major source of styrene, which is a Hazardous Air Pollutant (HAP), the facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." Subpart WWWW applies to the open molding process, mixing, cleaning of equipment used in the reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts manufactured at

Melcher. The majority of the applicable regulations under 40 CFR 63, Subpart WWWW apply to the open molding process, which includes resin and gelcoat application and curing.

Insignificant Emission Units

Insignificant emission units (IEUs) include any activity or emission unit located at a major source which qualifies as insignificant under the criteria listed in WAC 173-401-530. A list of the IEUs, identified in the permit application, is presented below in Table 2. In order to remain an IEU, emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels.

Insignificant emission units are subject to the generally applicable requirements (i.e., facility-wide emission limitations). According to WAC 173-401-530, testing, monitoring, recordkeeping, and reporting are not required for insignificant emission units unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the State Implementation Plan (SIP). SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units presented in Table 2 to assure compliance with the generally applicable requirements. SRCAA’s determination was based on the following:

- SRCAA has not documented a violation of any of the generally applicable requirements in the past from the list of IEUs in Table 2 (i.e., the IEUs have had a consistent compliance history); and
- Most of the IEUs emit small quantities of pollutants and/or do not operate continuously.

Table 2 – Insignificant Emission Units

Emission Unit Description	ID Number Used in Permit Application	Basis / Justification for IEU Designation
Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, sintering or polishing: Ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood	Section 5.1 of application	WAC 173-401-532(55)
Above-ground 7,500 gallon resin storage tank	Section 5.2 of application	WAC 173-401-533(2)(c)
Above-ground 400 gallon resin day tank	Section 5.2 of application	WAC 173-401-533(2)(c)
800,000 Btu/hr natural gas fired air make-up heater	Section 5.2 of application	WAC 173-401-533(2)(e)
400,000 Btu/hr natural gas fired air make-up heater	Section 5.2 of application	WAC 173-401-533(2)(e)

Emission Unit Description	ID Number Used in Permit Application	Basis / Justification for IEU Designation
140,000 Btu/hr natural gas fired wood shop furnace	Section 5.2 of application	WAC 173-401-533(2)(e)
75,000 Btu/hr natural gas fired office furnace	Section 5.2 of application	WAC 173-401-533(2)(e)

It should be noted that one activity, styrene usage for cleaning resin storage tank, listed in the initial air operating permit application as insignificant is no longer listed because Melcher no longer uses styrene as a cleaning solvent.

STANDARD TERMS AND CONDITIONS

This section of Melcher's permit contains standard terms and conditions that apply to all sources in SRCAA's Title V program. These conditions have been reviewed by EPA and include all terms required in Chapter 173-401 WAC, as well as requirements from other air quality laws and regulations. The standard terms have been organized in seven subsections including:

PERMIT ADMINISTRATION;
INSPECTION & ENTRY;
EMERGENCY PROVISIONS;
GENERAL MONITORING, RECORDKEEPING, & REPORTING;
COMPLIANCE CERTIFICATION;
TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS AND TREATMENT OF DOCUMENTS; and
APPLICABLE WHEN TRIGGERED REQUIREMENTS.

A discussion of each subsection follows. The requirements in each section are briefly discussed, along with the citations for each requirement. Using the same methodology as the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation. Although, in and of itself, Chapter 173-401 WAC is not federally enforceable, the requirements of this regulation are based on federal requirements for the operating permit program. Upon issuance of the original permit for Melcher, the terms based on Chapter 173-401 WAC became federally enforceable for the source. These terms will be replaced with the updated terms given in this renewal permit, upon issuance of the renewal permit.

NOTE: The adoption date for each requirement is also given. The adoption date may be important if an earlier version of the requirement is in the State Implementation Plan (SIP). In many instances, a revision may have occurred within a section that does not affect the requirement being cited. If this is the case, the most recent adoption date is given, along with the SIP version date in parentheses, and the requirement is federally enforceable. If a change was made in the requirement, both the earlier, SIP approved, requirement and the most recent requirement would go in the permit. The version in the SIP would be federally enforceable, and the more recent version would be enforceable at the state or local level.

If a new rule or a newer version of a rule has been submitted to EPA for inclusion in the SIP and EPA has proposed action, but not taken final action, the permit will be drafted so that when EPA action does occur, the requirement will become federally enforceable.

Permit Administration

Below are standard terms included in the subsection, Permit Administration. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirement.

1. Federal Enforceability - All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. [WAC 173-401-625, 10/4/93]
2. Duty to Comply - The permittee must comply with the terms and conditions of the permit. [WAC 173-401-620(2)(a), 10/4/93]
3. Schedule of Compliance. The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis. [WAC 173-401-630(3), 10/4/93]
4. Need to Halt or Reduce Activity Not a Defense - The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action. [WAC 173-401-620(2)(b), 10/4/93]
5. Permit Actions - This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If Melcher files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance. [WAC 173-401-620(2)(c), 10/4/93]
6. Reopening for Cause. This term lists instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements. [WAC 173-401-730, 10/4/93]
7. Emissions Trading - No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [WAC 173-401-620(2)(g), 10/4/93]
8. Property Rights. The permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]
9. Duty to Provide Information. The permittee must furnish, within a reasonable time to SRCAA, any information, including records required in the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. [WAC 173-401-620(2)(e), 10/4/93]
10. Duty to Supplement or Correct Application. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application,

must promptly submit such supplementary facts or corrected information. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit. [WAC 173-401-500(6), 9/16/02]

11. Permit Fees. The permittee must pay fees as a condition of this permit in accordance with SRCAA's fee schedule. [WAC 173-401-620(2)(f), 10/4/93]

12. Severability. If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable. [WAC 173-401-620(2)(h), 10/4/93]

13. Permit Appeals. The permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on SRCAA within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA, including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i), 10/4/93] [WAC 173-401-735(1), 4/2/97]

14. Permit Renewal and Expiration. The permit is in effect for five years. The permittee's right to operate this source terminates with the expiration of the permit unless a timely and complete application for renewal is submitted. Chapter 173-401-710(1) allows SRCAA to set, in the permit, the due date for the renewal as long as it is no more than 18 months and no less than six months prior to expiration of the permit. SRCAA specifies in the permit that the renewal must be submitted no more than 18 months and no less than 12 months prior to the permit expiration. The facility may continue to operate subject to final action by SRCAA on the application, as long as a timely and complete application has been filed and all requested additional information necessary to process the permit is submitted by the deadline specified in writing by SRCAA. [WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1) & (3), 9/16/02]

15. Permit Continuation. The permit will not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]

16. Permit Shield. Compliance with a permit condition is deemed compliance with the applicable requirements identified in the permit upon which that condition is based, as of the date of permit issuance except that this shield will not affect the following:

- a. The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;
- d. The ability of SRCAA to establish or revise requirements for the use of reasonably

available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(1) & (4), 10/4/93]

Inspection and Entry

Below are standard terms included in the subsection, Inspection & Entry. This subsection of the permit contains requirements for allowing authorized access to a facility for purposes of assuring/determining compliance with air quality requirements. Generally the language tracks the rule language closely with only minor changes for clarity and conciseness. There is no intent to alter the effect of the requirements.

17. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the permittee must allow SRCAA, or an authorized representative, to enter a Chapter 401 facility or location where records are kept, to have access to and copy, at reasonable times records, to inspect, at reasonable times, any facility or equipment or operations regulated by the permit, and/or to perform sampling or monitoring, at reasonable times, for the purpose of assuring compliance. [WAC 173-401-630(2), 10/4/93]

Nothing in this condition limits the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

18. Obstruction of Access. No person may obstruct, hamper, or interfere with any authorized representative of SRCAA who requests entry for the purpose of inspection, and who presents appropriate credentials; nor may any person obstruct, hamper or interfere with any such inspection. [RCW 70.94.200, 1998 - STATE/LOCAL ONLY] [SRCAA Regulation I, Section 2.02.E, 1/7/02 – STATE/LOCAL ONLY]

Emergency Provisions

Below are standard terms that are included in the subsection, Emergency Provisions. This subsection of the permit contains provisions, governing the treatment of periods of emissions in excess of applicable standards, when such emissions stem from unforeseeable events or arise from start-up, shutdown or maintenance, where design or operational practices could not preclude such emissions. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

19. Emergencies. This term incorporates the emergency provisions established in Chapter 173-401 WAC which allow for a positive defense to noncompliance with technology-based emission limitations if certain conditions are met. The time limits for reporting such emission events are included to assure that the permittee is aware of the timeframes. The time limits come from WAC 173-401-645 and WAC 173-401-615(3)(b). [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

20. Excess Emissions. This term incorporates the excess emissions provisions of Chapter 173-400 WAC which require that the excess emissions be excused and not be subject to penalty if certain criteria are met. As with the emergency provision above, the time limits for reporting excess emissions are included in this term. [WAC 173-400-107, 8/20/93] [WAC 173-

401-615(3)(b), 9/16/02]

21. Report of Breakdown. This term establishes the conditions under which violations of SRCAA Regulation I may be excused. It should be noted that this provision cannot be invoked for any federally enforceable requirement, as Section 6.08 is not in the State Implementation Plan. [SRCAA Regulation I, Section 6.08, 3/4/04 - STATE/LOCAL ONLY]

General Monitoring, Recordkeeping, & Reporting

Below are standard terms included in the subsection, General Monitoring, Recordkeeping, & Reporting. This subsection contains general requirements for monitoring, recordkeeping, and reporting. Monitoring, recordkeeping, & reporting requirements (MRRR) that apply to specific emission standards or specific emission activities are located in the second section of the permit. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the term, Monitoring Reports, attempts have been made to clarify SRCAA's expectation of how the requirements will be met. The discussions below provide more detail on these efforts and the regulatory authority relied upon to establish the terms.

22. Records of Required Monitoring Information. This term details what records must be kept relating to monitoring. [WAC 173-401-615(2)(a), 9/16/02]

23. Permanent Shutdown of an Emission Unit - If an emission unit is permanently shut down, rendering existing permit terms and conditions irrelevant, the permittee will not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emissions unit, once any residual requirements, such as the semi-annual report and annual compliance certification covering the last period during which the unit last operated, have been met. All records, relating to the shut down emissions unit, generated while the emissions unit was in operation, must be kept in accordance with Conditions 22 - Records of Required Monitoring Information and 26 – Retention of Records

Contemporaneous with the shutdown of the emission unit, the permittee must record the date that operation of the emissions unit ceased, using a log or file on site. The shutdown date must be reported to SRCAA on the monitoring report, required under Condition 27 - Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

24. Operational Flexibility. In the event that an emissions unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why, and lengths of time that, the emissions unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

25. Records of Changes. The permittee must keep records of changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from such a change. [WAC 173-401-615(2)(b), 9/16/02]

26. Retention of Records. The permittee must keep monitoring data and support information for a period of five years. [WAC 173-401-615(2)(c), 9/16/02]

27. Monitoring Reports. The permittee must submit a monitoring report that identifies all deviations from permit requirements as follows:

- Monitoring report covering the period from January 1 – June 30 each year shall be submitted to SRCAA and postmarked no later than July 30 of the same calendar year; and
- Monitoring report covering the period from July 1 – December 31 each year shall be submitted to SRCAA and postmarked no later than April 15 of the following calendar year.

The monitoring reports must be certified by a responsible official. SRCAA has added language to this condition that if monitoring reports are required, by an underlying requirement, to be submitted more frequently than every six months, the responsible official certification is only required for the semiannual reports but that the certification must cover all reports submitted since the last certification. The addition of this last requirement meets the intent of the law in that all reports are certified, while minimizing the burden on a source to go to the responsible official every time a report is submitted. Allowing a source this flexibility could become more important in the future, e.g., if SRCAA were to require a source to submit monitoring data by telemetry or by some other real time mechanism where responsible official certification would be difficult, if not impossible. [WAC 173-401-615(3)(a), 9/16/02]

28. Prompt Reporting of Deviations. The permittee must promptly report deviations from permit requirements, the probable cause of such deviations, and any corrective measures taken. (Prompt is defined in this permit term and is consistent with the reporting time limits of terms in the **Emergency Provisions** section.) [WAC 173-401-615(3)(b), 9/16/02]

29. Emission Inventory. The permittee must submit an inventory of emissions from the source each year and must maintain records sufficient to document reported emissions. [WAC 173-400-105(1), 8/15/01(8/20/93)]

30. WAC 173-401-530(1)(a) Insignificant Emission Units. Emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels. No such insignificant emission units were identified in Melcher's permit application. If such insignificant emission units do exist, upon request from SRCAA, the permittee must demonstrate that the actual emissions from such a unit or activity are below the applicable emission thresholds. [WAC 173-401-530(6), 9/16/02]

31. Report Submittals. This term provides the address to which reports must be sent and requires all reports to be certified by a responsible official. [WAC 173-401-520, 10/4/93]

32. Rendering Device or Method Inaccurate. Melcher may not render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(8), 5/8/07]

Compliance Certification

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As part of SRCAA's Title V program, sources are required to submit annual compliance certifications. (SRCAA may require more frequent certifications if the source is out of compliance or if an underlying requirement specifies more frequent submittals.) This subsection of the permit addresses the details of these compliance certification submittals, including how often submittals must occur, what the submittals must contain and to whom the certifications must be sent. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

33. Compliance Certification Submittals. This term covers the frequency for submitting compliance certifications. [WAC 173-401-630(5)(a), 10/4/93]

34. Compliance Certification Contents. This term describes what must be included in each compliance certification. [WAC 173-401-630(5)(c), 10/4/93] [WAC 173-401-530(c), 9/16/02]

35. Submittal to EPA. This term requires that certifications be sent to EPA as well as SRCAA. [WAC 173-401-630(5)(d), 10/4/93]

Truth and Accuracy of Statements and Documents and Treatment of Documents

Below are standard terms contained in the subsection, Truth and Accuracy of Statements and Documents and Treatment of Documents. The terms are based on SRCAA's Regulation I. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

36. False Information. Melcher may not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(7), 8/15/01(8/20/93)]

37. Falsification of Statements. This term prohibits willfully making false statements to SRCAA in any matter within SRCAA's jurisdiction. [SRCAA Regulation I, 2.08.A, 8/3/06 - STATE/LOCAL ONLY]

38. Alteration of Documents. This term prohibits the reproduction or alteration of any document issued by SRCAA, if the purpose of such is to evade or violate any requirement. [SRCAA Regulation I, 2.08.B, 8/3/06 - STATE/LOCAL ONLY]

39. Availability of Documents. Any order required to be obtained by SRCAA Regulation I must be available on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 8/3/06 - STATE/LOCAL ONLY]

40. Posting of Notices. Notices which SRCAA requires to be displayed shall be posted. The permittee may not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA. [SRCAA Regulation I, 2.08.D, 8/3/06 - STATE/LOCAL ONLY]

Applicable When Triggered Requirements

The subsection, Applicable When Triggered Requirements, contains requirements that do not apply to the facility unless certain activities at the site trigger the requirement. SRCAA has included these requirements in the permit, either because they are often triggered at sources or are important enough that their inclusion in the permit is warranted. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the term, Source Testing, language has been added to clarify what an approved test method is, as the rule does not elaborate on what "approved" means. The discussion below provides more detail in regards to this.

41. New Source Review. Prior to the establishment of a new source, including modifications, the permittee may be required to file and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-110, 5/8/07 – STATE/LOCAL ONLY] [WAC 173-400-112, 113, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-110, -112, -113, 8/20/93] [Chapter 173-460 WAC, 7/21/98 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 12/7/06 - STATE/LOCAL ONLY]

42. Replacement or Substantial Alteration of Existing Control Equipment. Prior to replacing or substantially altering existing control equipment, the permittee shall file and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-114, 8/15/01 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 12/7/06 - STATE/LOCAL ONLY]

43. Demolition and Renovation (Asbestos). The permittee must comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR 61 Subpart M, 2006] [WAC 173-400-075, 5/8/07] [SRCAA Regulation I, Article IX, 9/4/08 - STATE/LOCAL ONLY]

44. Source Testing. To demonstrate compliance Ecology or SRCAA may conduct or require that a test be conducted using approved methods per WAC 173-400-050, -060, & -105(4). Chapter 173-400 WAC does not elaborate on what "approved" means. Language has been added to this condition to clarify what SRCAA considers "approved". The condition requires that in order for a method to be approved it must be submitted to SRCAA at least 30 days prior to the test date, or a shorter period of time if indicated in writing by SRCAA, and SRCAA must approve the method in writing. Changes must also be approved by SRCAA in writing. The condition also specifies that all testing must be performed in accordance with SRCAA Regulation I, Section 2.09, "Source Tests." [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 5/8/07 – STATE/LOCAL ONLY] [SRCAA Regulation I, Section 2.09, 2/7/08]

EMISSION LIMITATIONS & MONITORING, RECORDKEEPING & REPORTING

This section contains emission limitations and emission related requirements, including general requirements for the facility. The section is divided into several subsections. The first subsection lists limitations that apply facility-wide. Subsequent subsections focus on individual emission units or classes of similar emission units. As in all other sections of the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation.

This section of the permit is formatted differently from the STANDARD TERMS AND CONDITIONS section. Requirements are listed in columns. The actual requirement is given in the third column of

the table. The regulatory basis for the applicable requirements is listed in the second column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, are listed in the fourth and fifth columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to determine compliance with the requirement are listed in the last column of the emission limitation tables.

The monitoring, recordkeeping, and reporting requirements (MRRR) are enforceable and are given in the last subsection of the permit. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying requirement.

For Melcher, this section contains the following three subsections:

**FACILITY-WIDE EMISSION LIMITATIONS;
REINFORCED PLASTIC COMPOSITES PRODUCTION EMISSION LIMITATIONS; AND
MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (MRRR).**

The subsections and their contents are discussed in detail below except that rather than listing all MRRR at the end, MRRR are discussed in context of the applicable requirement(s) to which they apply.

If an applicable requirement does not include sufficient monitoring, recordkeeping, and reporting to satisfy WAC 173-401-615(1) & (2), the permit will establish adequate monitoring, recordkeeping and reporting. This is known as gapfilling. Applicable requirements for which gapfilling is proposed can be identified by the note, following the MRRR citation, indicating that at least a portion of the MRRR is from gapfilling.

Facility-wide Emission Limitations

This subsection contains applicable emission limitations which apply facility-wide. These emission limitations are applicable to all significant and insignificant emission units at the facility. However, monitoring, recordkeeping and reporting requirements are not required for the insignificant emission units because SRCAA has determined that they are not necessary to assure compliance with facility-wide emission limitations. Melcher is required to certify compliance with the facility-wide emission limitations for insignificant emission units (see Condition 34 of permit).

The following requirements are included in this section.

Condition 45: All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040. [WAC 173-400-040, 8/20/93] [WAC 173-400-040, 1/10/05 – STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, Melcher must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 46: Visible emissions shall not exceed 20%, as specified in WAC 173-400-040. [WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 1/10/05 (8/20/93)]

MRRR: Melcher is required to meet the requirements given in a) and if triggered, the permittee shall meet the requirements given in b) and/or c).

- a) The permittee shall perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of visible emissions and PM emissions from all from all significant emission units and insignificant emission units listed in Table II.A-1 of this permit. The weekly inspections shall be conducted as follows:
 - 1) each inspection shall be conducted from a location(s) with a clear view of each emission source where the sun is not directly in the observer's eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the emission source;
 - 2) the observer shall be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun);
 - 3) each inspection shall consist of a minimum 15-second visual observation of each emission source to identify those emission sources which exhibit visible emissions; and
 - 4) records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If visible emissions are not observed from any emission source at the facility during the weekly inspection, no additional action is required. If visible emissions are observed from any emission source, the permittee shall take further action according to b).

- b) If visible emissions are observed during an inspection or are otherwise observed by the permittee, the permittee shall verify and certify that:
 - 1) the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
 - 2) the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
 - 3) if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If b) 1), b) 2), and/or, b) 3) are not being met, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28-Prompt

Reporting of Deviations.

The permittee shall keep records of any verifications made regarding b) 1), b) 2), and/or b) 3) and a description of any corrective action taken. Records shall be kept in accordance Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If b) 1), b) 2), and b) 3), are being met, but visible emissions are still observed, the permittee shall take further action according to c).

- c) If visible emissions are still observed and b) 1), b) 2), and b) 3) are being met, the permittee shall perform testing according to c) 1) and, if a particulate matter standard applies, testing according to c) 2).
 - 1) As a means of demonstrating compliance with the visible emissions standard(s), the permittee shall perform, or have performed, RM 9 (July 1, 1993) or Ecology Method 9A (July 12, 1990), whichever is applicable, on the source of the visible emissions. The test shall occur within a reasonable timeframe but no later than 24 hours after discovery of the emissions. If the visible emissions exceed the applicable standard, the permittee shall take timely and appropriate corrective action (as soon as possible, but within 24 hours) to address the problem. The results of the RM 9 or Ecology Method 9A test shall be submitted to SRCAA within two working days of the test.
 - 2) As a means of demonstrating compliance with PM emission limit(s), the permittee shall perform, or have performed, RM 5 (July 1, 1993) on the source of the emissions. The test shall occur within a reasonable timeframe but no later than 30 days after discovery of the emissions. The results of the RM 5 test shall be submitted to SRCAA as soon as possible but no later than 45 days after the testing. If measured emissions exceed the applicable standard, the permittee shall take appropriate and timely corrective action to address the problem.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28-Prompt Reporting of Deviations.

In addition, the particulate matter filtration systems for the resin and gelcoat application booth and curing / directional dip coat booth shall be properly maintained and operated at all times that particulate matter emissions from the booths can occur. Proper operation and maintenance shall include, but is not limited to:

- a. Daily checks, before the booths are used, to ensure that filters are in place and in good condition with no gaps where unfiltered air may pass through; and
- b. Following manufacturer recommended maintenance schedule for filtration system components.

Melcher is required to follow an operation and maintenance plan for the filtration

systems that shall include, at a minimum, items a. and b. above.

Monitoring shall include daily checks of each booth's filtration system prior to operating the booth to ensure that the filters are in place and in good condition to ensure that unfiltered air does not pass through to the ambient air. If a booth's filters are not in place, in good condition, or if gaps exist, corrective action shall be taken prior to spraying in the booth.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28- Prompt Reporting of Deviations.

Records shall be kept of each day's inspections, maintenance performed on each booth's filtration system, and any corrective actions taken as a result of inspections, in accordance with Condition 22- Records of Required Monitoring Information and Condition 26- Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

[WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 1/10/05 (2/19/91)] [WAC 173-400-060, (2/19/91)] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 1/10/05 – STATE/LOCAL ONLY]
NOTE: This is a gapfilling MRRR.

Condition 47: Visible Emissions shall not equal or exceed 20%, as specified in SRCAA Regulation I, 6.02 - STATE/LOCAL ONLY [SRCAA Regulation I, 6.02, 9/1/05 - STATE/LOCAL ONLY]

MRRR: The same monitoring is required as for Visible Emissions, WAC 173-400-040, given in Condition 46. [WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 1/10/05 (2/19/91)] [WAC 173-400-060, (2/19/91)] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 1/10/05 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

Condition 48: No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited or to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited. [WAC 173-400-040(2), 8/20/93 - STATE/LOCAL ONLY] [SRCAA Regulation I, 6.05A, 3/4/04(11/12/93)]

MRRR: Melcher must perform weekly inspections of the facility during daylight hours while the facility is operating to verify that fallout is not occurring and must record and investigate complaints received regarding fallout.

Potential fugitive emissions from the facility include particulate from the booth exhausts. Weekly inspections should reasonably assure compliance because Melcher has a consistent compliance history, and the exhausts are filtered, which should

minimize fugitive emissions.

If potential violations of the requirement are observed, Melcher must take timely and appropriate corrective action.

Taking corrective action does not relieve Melcher from the obligation to comply with the underlying emission limitation, nor does it relieve Melcher from reporting any permit deviations as required in Condition 28-Prompt Reporting of Deviations.

Melcher must maintain records of each inspection and complaint investigation. Records must include the date and time of the inspection, observations made, the date and time of any complaints received, the date and time of the complaint investigation, the results of complaint investigations, a description of any corrective action taken, and any other information required in permit condition 22-Records of Required Monitoring Information. Records must be kept in accordance with Condition 26-Retention of Records, and, upon request, such records must be made available for inspection by SRCAA staff or other authorized representatives.

If Melcher is unable to perform a weekly inspection, due to unavoidable circumstances, the inspection may be waived, provided that records are kept, documenting the missed inspection and reason(s) the inspection was not performed.

[WAC 173-401-615(1) &(2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition 49: Reasonable precautions must be taken to:

- a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads;
- b. Prevent tracking of PM onto paved roadways open to the public;
- c. Prevent the release of air contaminants, as specific in WAC 173-400-040(3)(a), if located in an attainment area and not impacting a NAA;
- d. Prevent PM from becoming airborne when handling, transporting, and /or storing PM; and
- e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.

SRCAA Regulation I, 6.05.C, 3/4/04(11/12/93)] [SRCAA Regulation I, 6.05.D, 3/4/04(11/12/93)] [WAC 173-400-040(3)(a), 1/10/05(11/12/93)] [SRCAA Regulation I, Section 6.05.B, 3/4/04(11/12/93)] [WAC 173-400-040(8)(a), 1/10/05(8/20/93)]

MRRR: The same monitoring is required as for WAC 173-400-040(2) – Fallout, given in Condition 48. Melcher must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. Examples of what are considered reasonable precautions are included in the monitoring condition. [WAC 173-401-615(1) & (2), 9/16/02] NOTE:

This is a gapfilling MRRR.

- Condition 50: Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(4). [WAC 173-400-040(4), 1/10/05 – STATE/LOCAL ONLY]
- MRRR: The monitoring is the same as required for WAC 173-400-040(2) - Fallout, given in Condition 48. Melcher must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. Examples of what are considered recognized good practices and procedures are included in the monitoring condition. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.
- Condition 51: Effective control apparatus and measures shall be installed and operated to reduce odor-bearing gases and particulate matter to a reasonable minimum [SRCAA Regulation I, 6.04, 3/4/04- STATE/LOCAL ONLY]
- MRRR: The monitoring is the same as required for WAC 173-400-040(2) - Fallout, given in Condition 48. Melcher must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. Examples of what are considered effective control apparatus and measures are included in the monitoring condition. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.
- Condition 52: No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business [WAC 173-400-040(5), 1/10/05(8/20/93)] [SRCAA Regulation I, 6.06.A, 3/4/04- STATE/LOCAL ONLY]
- MRRR: The monitoring is the same as required for WAC 173-400-040(2) - Fallout, given in Condition 48. Melcher must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.
- Condition 53: No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC. [WAC 173-400-040(7), 8/15/01(8/20/93)] [SRCAA Regulation, 6.07, 1/13/99 - STATE/LOCAL ONLY]
- MRRR: No monitoring is required. As with all permit terms, Melcher must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.
- Condition 54: Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3). [WAC 173-400-050(1) & WAC 173-400-050(3), 8/15/01(2/19/91)]

- MRRR: Because the facility does not have any incineration units and the only combustion units are insignificant emission units, no monitoring is required for this requirement. [WAC 173-401-530(2)(c), 9/16/02]
- Condition 55: Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060. [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 8/15/01 – STATE/LOCAL ONLY]
- MRRR: The monitoring is the same as for Condition 46. Because of the general correlation between particulate matter emissions and visible emissions (i.e., visible emissions are an indicator of particulate matter), monitoring focuses on identifying visible emissions. In addition, the particulate matter filtration systems for the resin and gelcoat application booth and curing / directional dip coat booth must be properly operated and maintained. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.
- Condition 56: No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200. [WAC 173-400-200, 1/10/05(2/19/91)]
- MRRR: No monitoring is required. As with all permit terms, Melcher must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.
- Condition 57: No varying of emissions according to atmospheric conditions or ambient concentrations is allowed, except as allowed under WAC 173-400-205. [WAC 173-400-205, 2/19/91]
- MRRR: No monitoring is required. As with all permit terms, Melcher must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.
- Condition 58: No outdoor burning, except as allowed under Chapter 173-425 WAC and/or SRCAA Regulation I, 6.01. [Chapter 173-425 WAC, 3/13/00(10/18/90)] [SRCAA Regulation I, 6.01, 3/4/04 - STATE/LOCAL ONLY]
- MRRR: No monitoring is required. As with all permit terms, Melcher must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.
- Condition 59: Handling and use of chlorofluorocarbons (CFCs) must be in accordance with 40 CFR Part 82. [40 CFR Part 82, 2006] NOTE: This requirement was not included in the source's application as being applicable.
- MRRR: No monitoring is required. As with all permit terms, Melcher must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Reinforced Plastic Composites Production Emission Limitations

This subsection of the permit contains the requirements given in 40 CFR Part 63, Subpart WWWW, “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production” that apply to Melcher.

The following requirements are included in this section.

Condition 60: The permittee shall not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise be in noncompliance with a relevant standard under 40 CFR Part 63. [40 CFR § 63.4(b), 4/5/02]

MRRR: No monitoring is required. As with all permit terms, Melcher must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 61: At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source under 40 CFR 63, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions, according to the provisions of 40 CFR § 63.6(e), 2003. [40 CFR § 63.5835(c), 4/20/06] [40 CFR § 63.6(e), 4/20/06]

MRRR: The MRRR for this condition are outlined in the reinforced plastic composites MACT, given in 40 CFR 63, Subpart WWWW. According to Table 15 to Subpart WWWW of Part 63 – “Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63,” a startup, shutdown, and malfunction (SSR) plan and associated recordkeeping (required per 40 CFR 63.6(e)(3)) are only required for sources using add-on controls. Since Melcher is not using add-on controls, the SSR plan and associated recordkeeping are not required.

Since the SSR plan is not required, the MRRR established in 40 CFR 63, Subpart WWWW consists of submitting semiannual compliance reports.

Melcher is required to submit a semiannual compliance report to EPA Region 10 and SRCAA by July 30 every year to cover the period from January 1 – June 30 and April 15 every year to cover the period from July 1 – December 31. Each compliance report must contain the following:

1. Company name and address;
2. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
3. Date of the report and beginning and ending dates of the reporting period;
4. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period; and

5. For each deviation from an organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs, the compliance report must contain the total operating time of each affected source during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR §63.5900(b) & 5910, 2006]

Condition 62: The open molding and repair operations shall meet the applicable annual average organic HAP emissions limits in Table 3 to Subpart WWWW of Part 63 at all times, including periods of startup, shutdown, or malfunction. [40 CFR § 63.5805(b) & (g)] [40 CFR § 63.5835(a), 4/20/06] [40 CFR § 63.5900(c), 4/20/06]

MRRR: The MRRR for this condition are outlined in the reinforced plastic composites MACT, given in 40 CFR 63, Subpart WWWW. Melcher must use one of the following methods in paragraphs (a) through (d) below to meet the HAP emissions limits given in Condition 62.

- (a) Demonstrate that each individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 to Subpart WWWW of Part 63, according to the procedure given in 40 CFR §63.5810(a);
- (b) Demonstrate that on average the individual HAP emissions limits are met for each combination of operation type and resin application method or gel coat type, according to the procedure given in 40 CFR §63.5810(b);
- (c) Demonstrate compliance with a weighted average emission limit, according to the procedure given in 40 CFR §63.5810(c); or
- (d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type, according to the procedure given in 40 CFR §63.5810(d).

To comply with the emission limits given in Condition 62, Melcher may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, and using covered curing techniques. The calculations required under 40 CFR §63.5810 must be completed within 30 days after the end of each month. Melcher may switch between the compliance options in paragraphs (a) through (d) of this section. If Melcher changes to a compliance option based on a 12-month rolling average, the average must be based on the previous 12 months of data calculated using the compliance option being changed to, unless the previous compliance option being used did not require Melcher to maintain records of resin and gel coat use. In this case, Melcher must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

Melcher must collect and keep records of resin and gel coat use, organic HAP content,

and operation where the resin is used, if Melcher is meeting any organic HAP emissions limits in Table 3 to Subpart WWWW of Part 63, except as described in the paragraph below for individual resins and gel coats that are demonstrated to meet their applicable emission limit. Melcher must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the permittee is meeting any organic HAP content limits in Table 7 to Subpart WWWW of Part 63, if Melcher is averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on Material Safety Data Sheets (MSDS) or on resin specifications supplied by the resin supplier.

Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limit, as defined in 40 CFR §63.5810(a). However, Melcher must retain the records of resin and gel coat organic content, and the list of these resins and gel coats and their application methods must be included in the semiannual compliance reports. If Melcher has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the application method is changed, Melcher must demonstrate that the individual resin or gel coat meets its emission limit as specified in 40 CFR §63.5810(a). If any changes result in a situation where an individual resin or gel coat now exceeds its applicable emission limit given in Table 3 to Subpart WWWW of Part 63, Melcher must begin collecting resin and gel coat use records and calculate compliance using one of the average options on a 12-month rolling average.

The following records shall be kept in accordance with Condition 26 - Retention of Records and 40 CFR § 63.10(b)(1), as applicable, and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives:

- a. A copy of each notification and report that the permittee submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv);
- b. All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents; and
- c. A certified statement that the permittee is in compliance with the work practice requirements given in Conditions 63 - 67.

As specified in 40 CFR § 63.10(b)(1), each record must be kept for 5 years following the date of each occurrence, measurement, corrective action, report, or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept off-site for the remaining 3 years. Records may be kept in hard copy or computer readable form, including but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

The semiannual reports, described in the MRRR for Condition 61, are also required.

[40 CFR §63.5810 & 5840, 2006] [40 CFR §63.5895, 8/25/05] [40 CFR §63.5900(b) & 5910, 2006] [40 CFR §63.10(b)(1) and (b)(2)(xiv), 2006] [40 CFR §63.5915 & 5920, 2006]

Condition 63: The permittee may not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. [40 CFR § 63.5805(b) & (g), 8/25/05] [40 CFR § 63.5835(a), 4/20/06] [40 CFR § 63.5900(c), 4/20/06]

MRRR: The MRRR for this condition are outlined in the reinforced plastic composites MACT, given in 40 CFR 63, Subpart WWWW. Melcher is required to keep a certified statement that they are in compliance with the work practice requirements given in Conditions 63 - 67, in accordance with Condition 26 - Retention of Records and 40 CFR § 63.10(b)(1), as applicable, and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives.

The semiannual reports, described in the MRRR for Condition 61, are also required.

[40 CFR §63.5900(b) & 5910, 2006] [40 CFR §63.10(b)(1) and (b)(2)(xiv), 2006] [40 CFR §63.5915 & 5920, 2006]

Condition 64: The permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing storage tanks may be vented as necessary for safety. [40 CFR § 63.5805(b) & (g), 8/25/05] [40 CFR § 63.5835(a), 4/20/06] [40 CFR § 63.5900(c), 4/20/06]

MRRR: The MRRR for this condition are outlined in the secondary plastic composites MACT, given in 40 CFR 63, Subpart WWWW. The same monitoring is required as for Condition 63. Melcher is required to keep a certified statement that they are in compliance with the work practice requirements given in Conditions 63 - 67 and submit semiannual reports, described in the MRRR for Condition 61.

[40 CFR §63.5900(b) & 5910, 2006] [40 CFR §63.10(b)(1) and (b)(2)(xiv), 2006] [40 CFR §63.5915 & 5920, 2006]

Condition 65: The permittee must use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. This requirement must be met at all times, including periods of startup, shutdown, or malfunction. [40 CFR § 63.5805(b) & (g) 8/25/05] [40 CFR § 63.5835(a), 4/20/06] [40 CFR § 63.5900(c), 4/20/06]

MRRR: The MRRR for this condition are outlined in the secondary plastic composites MACT, given in 40 CFR 63, Subpart WWWW. The same monitoring is required as for Condition 63. Melcher is required to keep a certified statement that they are in

compliance with the work practice requirements given in Conditions 63 - 67 and submit semiannual reports, described in the MRRR for Condition 61.

40 CFR §63.5900(b) & 5910, 2006] [40 CFR §63.10(b)(1) and (b)(2)(xiv), 2006] [40 CFR §63.5915 & 5920, 2006]

Condition 66: The permittee must close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. This requirement must be met at all times, including periods of startup, shutdown, or malfunction. [40 CFR § 63.5805(b) & (g), 8/25/05] [40 CFR § 63.5835(a), 4/20/06] [40 CFR § 63.5900(c), 4/20/06]

MRRR: The MRRR for this condition are outlined in the secondary plastic composites MACT, given in 40 CFR 63, Subpart WWWW. The same monitoring is required as for Condition 63. Melcher is required to keep a certified statement that they are in compliance with the work practice requirements given in Conditions 63 - 67 and submit semiannual reports, described in the MRRR for Condition 61.

40 CFR §63.5900(b) & 5910, 2006] [40 CFR §63.10(b)(1) and (b)(2)(xiv), 2006] [40 CFR §63.5915 & 5920, 2006]

Condition 67: The permittee must keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels. This requirement must be met at all times, including periods of startup, shutdown, or malfunction. [40 CFR § 63.5805(b) & (g) 8/25/05] [40 CFR § 63.5835(a), 4/20/06] [40 CFR § 63.5900(c), 4/20/06]

MRRR: The MRRR for this condition are outlined in the secondary plastic composites MACT, given in 40 CFR 63, Subpart WWWW. The same monitoring is required as for Condition 63. Melcher is required to keep a certified statement that they are in compliance with the work practice requirements given in Conditions 63 - 67 and submit semiannual reports, described in the MRRR for Condition 61.

40 CFR §63.5900(b) & 5910, 2006] [40 CFR §63.10(b)(1) and (b)(2)(xiv), 2006] [40 CFR §63.5915 & 5920, 2006]

Table 13 to Subpart WWWW of Part 63 requires that an existing source subject to Subpart WWWW submit an Initial Notification, containing the information specified in §63.9(b)(2). The Initial Notification is required to be submitted no later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard). Subpart WWWW became effective on April 21, 2003, so the Initial Notification was required to be submitted by August 19, 2003. Melcher submitted an Initial Notification, containing the information required in §63.9(b)(2), to SCAPCA and EPA Region 10 on August 8, 2003. Therefore, this requirement has already been met and therefore, was not put into the permit.

Table 13 to Subpart WWWW of Part 63 requires that an existing source subject to Subpart WWWW that is complying with organic HAP content limits submit a Notification of Compliance Status,

containing the information specified in §63.9(h). The Notification of Compliance Status is required to be submitted no later than 30 calendar days after the facility's compliance date for a facility that is using all compliance coatings (i.e., not using averaging techniques). The compliance date for Melcher Manufacturing was April 21, 2006, so the Notification of Compliance Status was required to be submitted by May 21, 2006. Melcher submitted a Notification of Compliance Status to SCAPCA on May 16, 2006. Therefore, this requirement has already been met and therefore, was not put into the permit.

OPERATIONAL FLEXIBILITY

According to WAC 173-401-650, each permit shall contain terms and conditions for reasonable anticipated operating scenarios identified by the source in its application as approved by the permitting authority. According to WAC 173-401-650(1)(a)-(c), such terms and conditions:

- (a) Shall require the source, contemporaneously with making a change from one operating scenario to another, to record in a log at the permitted facility a record of the scenario under which it is operating;
- (b) Shall extend the permit shield described in WAC [173-401-640](#) to all terms and conditions under each such operating scenario; and
- (c) Shall ensure that the terms and conditions of each such alternative scenario meet all applicable requirements and the requirements of this chapter.

Melcher did not specifically identify any alternate operating scenarios in their air operating permit application. However, 40 CFR 63, Subpart WWWW already contains some operational flexibility in the control methods available for Melcher to comply with the required organic HAP emission limits in the rule. Melcher may use one of four methods to comply with the HAP emission limits. See MRRR associated with Condition 62 for description of methods.

PERMIT SHIELD FINDINGS

This final section of the permit lists regulations for which the facility has requested, and SRCAA proposes to grant, a permit shield per WAC 173-401-640(2). The findings on which this shield is based are given below. These findings are also included in the permit.

Registration. SRCAA Regulation I, Article IV requires that certain air contaminant sources register with SRCAA. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. [SRCAA Regulation I, Article IV, 2/1/07 - STATE/LOCAL ONLY]

Registration. WAC 173-400-100 [8/20/93] requires certain air contaminant sources to register with the appropriate air pollution control authority. This registration requirement, while no longer a part of the state regulation, is in the State Implementation Plan and is still a federal requirement. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. [WAC 173-400-100, 1/10/05]

Registration Program. WAC 173-400-099 [3/22/95] presents the purpose and components of registration programs established under RCW 70.94.151. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section does not contain any specific requirements for sources, it merely explains the registration program. [WAC 173-400-100, 1/10/05]

Registration Program. WAC 173-400-100 [1/10/05] lists source categories that, if located in a county without an activated local air pollution control authority, must register with Ecology. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section would not apply within Spokane County anyway because there is a local air pollution control authority, SRCAA. [WAC 173-400-100, 1/10/05 - STATE/LOCAL ONLY]

Registration issuance. WAC 173-400-101 [3/22/95] requires certain air contaminant sources to register with the appropriate air pollution control authority. This section specifically exempts air operating permit sources from the requirement to register in WAC 173-400-101(7). Because the permittee is an air operating permit source, the rule does not apply. [WAC 173-400-101, 3/22/95 - STATE/LOCAL ONLY]

Scope of Registration and Reporting Requirements. WAC 173-400-102 establishes reporting requirements for registered sources that are located in a county without an activated local air pollution control authority. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section would not apply within Spokane County anyway because there is a local air pollution control authority, SRCAA. [WAC 173-400-102, 1/10/05 - STATE/LOCAL ONLY]

Emission Estimates. WAC 173-400-103 [3/22/95] establishes reporting procedures for estimating emissions from registered sources that are located in a county without an activated local air pollution control authority. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section would not apply within Spokane County anyway because there is a local air pollution control authority, SCAPCA. [WAC 173-400-103, 3/22/95 - STATE/LOCAL ONLY]

Registration Fees. WAC 173-400-104 [3/22/95] establishes fees for sources that are located in a county without an activated local air pollution control authority. This section is established pursuant to RCW 70.94.151. This section does not apply within Spokane County because there is a local air pollution control authority, SRCAA. [WAC 173-400-104, 3/22/95 - STATE/LOCAL ONLY]

General Surface Coating. SRCAA Regulation I, Section 6.13 establishes requirements for sources that perform surface coating. In Section 6.13.F.2.b, fiberglass resin application operations are

exempted from the rule. Because the permittee is a fiberglass resin application operation, the source is exempt from the surface coating regulation. [SRCAA Regulation I, Section 6.13, 3/4/04 - STATE/LOCAL ONLY]

PREPARED BY: _____
April L. Westby

DATE: _____

This Statement of Basis and the Operating Permit to which it applies have been reviewed by:

_____, P.E.
April Westby, P.E.

DATE: _____

Ronald J. Edgar, Chief of Technical Services

DATE: _____

William Dameworth, Control Officer

DATE: _____