

United States Environmental Protection Agency
Region 10, Office of Air and Waste, OAW-150
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Seattle, Washington 98101-3140

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Technical Support Document
Non-Title V Air Quality Operating Permit
Revision No. 1

Permit Writer: Geoffrey L. Glass

McClarín Plastics, LLC
(formerly, Amtech Corporation)

Yakama Reservation
180 East Jones Road
Wapato, Washington

***Purpose of Owner-Requested Non-Title V Operating Permit
and Technical Support Document***

Title 40 Code of Federal Regulations section 49.139 establishes a permitting program to provide for the establishment of federally-enforceable requirements for air pollution sources located within Indian reservations in Idaho, Oregon and Washington. The owner or operator of an air pollution source who wishes to obtain a federally-enforceable limitation on the source's actual emissions or potential to emit must submit an application to the Regional Administrator requesting such limitation.

The United States Environmental Protection Agency, Region 10, then develops the permit via a public process. The permit remains in effect until it is modified, revoked or terminated by Region 10 in writing.

This document, the technical support document, fulfills the requirement of 40 CFR 49.139(c)(3) by describing the proposed limitation and its effect on the actual emissions and/or potential to emit of the air pollution source. Unlike the air quality operating permit, this document is not legally enforceable. The permittee is obligated to follow the terms of the permit. Any errors or omissions in the summaries provided here do not excuse the permittee from the requirements of the permit.

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1. Authority to Issue Non-Title V Permits

On April 8, 2005, EPA Region 10 adopted regulations (70 FR 18074) codified at 40 CFR parts 9 and 49, establishing Federal Implementation Plans (FIPs) under the Clean Air Act for Indian reservations in Idaho, Oregon and Washington. The FIPs, commonly referred to as the Federal Air Rules for Reservations (FARR), put in place basic air quality regulations to protect health and welfare on Indian reservations located in the Pacific Northwest. In the FARR, 40 CFR 49.139 creates a permitting program for establishing legally and practicably enforceable requirements for air pollution sources on Indian reservations. This permit has been developed pursuant to 40 CFR 49.139.

2. Project Description

Simultaneous with the renewal of McClarin Plastic's title V permit, EPA Region 10 is revising the Non-Title V permit, originally issued on April 12, 2006, to primarily add the specific emission estimation techniques required to demonstrate compliance with the volatile organic compound synthetic minor limits that were created in the originally-issued permit. The permit is also being revised to address a February 16, 2016, request by the plant's owner to change the name of the Facility from "Amtech, LLC" to "McClarin Plastics, LLC." Other minor changes have been made to the permit and are described in this Technical Support Document.

3. Analysis and Revisions to Permit and Technical Support Document

The only Non-Title V permit revision requested by the source was to change the name. The facility name change is not associated with a change in ownership. McClarin Plastics, LLC and Amtech, LLC are both business names owned by Blackford Capital, LLC. Blackford Capital, LLC purchased Amtech in 2008 and McClarin in 2015. In this document and related documents, the facility, the facility owners or operators, or the permittee may be called "Amtech" in an historical context or "McClarin" in a contemporary context.

The rest of the changes to the permit are being made by EPA Region 10. On the cover page of the permit, the source name and contact information has been revised. Two new general conditions have been added. Permit Conditions 1.3 and 1.4 are new conditions that state rights that EPA has always reserved in the past. Permit Condition 1.3 states that EPA may use any credible evidence to determine compliance with permit conditions. Permit Condition 1.4 states that EPA will reopen and modify the permit, when necessary, and follow the public notification procedures in the FARR when it reissues the permit such that there are substantive changes to the emission limitations or related monitoring, recordkeeping, or reporting requirements.

The most significant change to the permit occurs in Permit Condition 2.1, which establishes the volatile organic compound (VOC) synthetic minor limit. This condition is being expanded to add specificity in how the permittee will calculate VOC emissions on a monthly and rolling 12-month basis. Specifically, the permittee must use the following calculation methods:

1. For open molding, centrifugal casting, and hand application of resins, the permittee is required to use the mass-balance equation and emission factors from 40 CFR part 63,

subpart WWWW and specific information about the organic species content of the resins applied.¹ The equation in subpart WWWW was developed to calculate organic hazardous air pollutant (HAP) emissions. In this case, however, it is used to determine VOC emissions, so the permittee should include all resin monomer species listed on the material's safety data sheet (SDS) regardless of whether or not they are HAPs. If, according to the SDS, the resin formulation contains additional VOCs that are not resin monomers and could be emitted, they should be accounted for using a mass balance method using the equation for an added thinner (equation 2.1.4).

2. For closed molding, the permittee is required to use an emission estimation method developed by the Olympic Region Clean Air Agency (ORCAA) that assumes that one percent of the styrene present in the resin escapes from the closed mold and is emitted.
3. For painting operations, the permittee shall perform a mass balance calculation assuming that 100 percent of the VOC content of the paints applied is emitted.
4. The permittee shall perform a mass balance calculation assuming that 100 percent of the VOC content of cleaners, thinners, solvents, and additives (including the non-monomer VOC content of resins that the permittee could anticipate to be emitted) is emitted.²
5. For the application of polyurethane adhesives, the permittee shall use the MDI/PMDI Calculator, a tool developed by the American Chemistry Council and available for free download on its website. Because the output of the model is emissions of MDI (methylene diphenyl diisocyanate), one of the monomer components of polyurethane, the permittee must add to the calculator's output emissions resulting from any propellants or thinners that are VOCs using the equation for an added thinner (equation 2.1.4).
6. For the application of reactive adhesives, other than polyurethane adhesives, the permittee shall perform a mass balance equation assuming 30 percent of the liquid adhesive does not react and is emitted as VOC, as described in the definition of reactive adhesive (40 CFR 63.4581).
7. When applying polyurethane as a foam, the permittee shall use an emission estimation method developed by ORCAA that assumes that one one-millionth of the styrene present in the liquid resin escapes from the foam matrix as it hardens and is emitted.
8. The permittee is required to use EPA's Tanks model to estimate emissions from the resin storage tanks.³
9. The permittee is required to use EPA's AP-42 factor to estimate VOC emissions from natural gas combustion.⁴

Permit Condition 3.1 has been edited to require the use of the emission estimating methods now listed in Permit Condition 2.1.

Permit Condition 4.1 has been revised to change the annual reporting date from December 31 to December 1. McClarin has agreed to move their deadline for reporting up to allow EPA Region

¹ If the permittee has received approval to use a different emission factor, if a non-compliant, military specification resin is being used, for example, then an alternative emission factor would be used.

² One of the most commonly used solvents in the resin application industry is acetone, which is neither a VOC nor a HAP.

³ TANKS 4.09d, last updated: October 3, 2005

⁴ *AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Volume I: Stationary Point and Area Sources, Chapter 1.4, Natural Gas Combustion*; Office of Air Quality, Planning, and Standards; U.S. EPA, last updated: July, 1998.

10 some buffer time at the end of the calendar year. The report deadline in the title V permit, with which this report has always been aligned, is also being changed to December 1. While every attempt has been made to make the calculations in Permit Condition 2.1 complete, a new condition, Permit Condition 4.3, has been added which requires the permittee to notify EPA if it discovers additional sources of VOC emissions at the facility which must be added to the inventory. Condition 4.4, which is a new condition, specifies the address where reports should be sent and requires copies of reports to be sent to the Yakama Nation.

The previous version of the permit and technical support document have been appended to this technical support document as Attachments A and B to allow easy comparison with the new permit and access to previous explanations of the permit conditions. The original technical support document listed the tribal contact; that information has changed since the original permit was issued. Here is the new tribal contact:

Tribal Contact: Elizabeth Sanchez, Program Manager
Environmental Management Program
Yakama Nation
P. O. Box 151
Toppenish, Washington 98948
Phone: 509-865-5121 x6038
Email: esanchez@yakama.com

4. Permit Procedures

Because the modification is a significant change to the Non-Title V permit, EPA Region 10 is following the same procedures as is required for initial permit issuance as found in 40 CFR 49.139(c). The public noticing process occurred simultaneously with the public review of the Title V permit renewal. For this permit action, the following requirements of section 49.139(c)(5) were met.

Administrative Record: Make available for public inspection, in at least one location in the area affected by the air pollution source, a copy of the draft operating permit prepared by Region 10, the technical support document (TSD) for the draft permit, the application, and all supporting materials (see paragraph (c)(5)(i)).

Publish Public Notice: Publish the draft permit notice via a prominent advertisement in a newspaper of general circulation in the area affected by the emissions source. The public notice must describe the availability of the draft permit to operate, the supporting materials and the opportunity to comment. Where possible, notices will also be made in the Tribal newspaper (see paragraph (c)(5)(ii)).

Distribute Public Notice to Affected Parties: Provide copies of the public notice to the permittee, the Tribal governing body, and to the Tribal, State and local air pollution authorities having jurisdiction in areas outside of the Yakama Reservation potentially impacted by the air pollution source (see paragraph (c)(5)(iii)).

30-Day Public Comment Period: Provide for a 30-day period for submittal of public comments, starting upon the date of publication of the notice. If requested, the Regional Administrator may

hold a public hearing and/or extend the public comment period for up to an additional 30 days (see paragraph (c)(5)(iv)).

Accept All Comments: Region 10 will accept all comments received on the draft permit during the 30-day public comment period (see paragraph (c)(5)(iv)).

Prepare Final Permit and TSD: After the close of the public comment period, Region 10 will consider all comments received and prepare a final permit to operate and a final TSD. The final TSD will include a response to all comments received during the public comment period (see paragraph (c)(6)).

Make the Permit Available: Region 10 will make the final permit and TSD available at all of the locations where the draft permit was made available (see paragraph (c)(7)) and will post the final permit and TSD on Region 10's website.

Send Final Documents to All Commenters: Send the final permit and TSD to all persons who provided comments on the draft permit to operate (see paragraph (c)(7)).

4.1. Response to Public Comments

The public comment period for this permit ran from August 25 to September 26, 2016. EPA Region 10 received comments from Cathryn Carothers of C2Air, Inc., representing McClarin Plastics, LLC.

As required in 40 CFR 49.139(c)(6), the EPA has considered the comments and has developed a response to each. The comments received are listed below along with a response to the comment that explains whether or not any change to the permit resulted and why any change was made.

As required in 40 CFR 49.139(c)(7), the EPA will provide the final permit and TSD to the owner or operator of the air pollution source and each person who has submitted comments on the draft permit. The final permit and TSD are also being made available for 30 days at all of the locations where the draft permit was made available.

Responses to Comments from Cathryn Carothers of C2Air, Inc., representative of McClarin Plastics, LLC

Comments on Draft Non-Title V Air Quality Operating Permit

- 1. Section 2.1:** Please include a condition addressing that the emissions from the use of resin activators are zero (because the activator is basically used up during the reaction and therefore the emissions are negligible). Note that these activators are typically called catalysts in this industry.

EPA Response: The document titled *Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites*, prepared by Robert A. Haberlein, PhD., can be found in the administrative record for the draft permit on page 511. According to the document, activators, called catalysts in the resin industry, consist largely of methyl ethyl ketone peroxide (MEKP) dissolved in dimethyl phthalate (DMP).

Dr. Haberlein asserts that MEKP, which is highly reactive and has a low vapor pressure, reacts nearly instantly, which is not surprising for a reaction initiator,

and therefore none is emitted. DMP has a low vapor pressure (< 0.01 mm Hg at ambient temperature according to the NIOSH Pocket Guide to Chemical Hazards). According to the estimate in the paper, a typical facility that applies resins will emit 3.6 pounds of DMP per million pounds of resin applied. This is not a significant source of emissions relative to the emission limits and associated measurement uncertainty in 40 CFR part 63, subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production*, which enforces organic HAP limits on the order of hundreds of pounds per ton of resin applied.

For this reason, it was not found necessary to add a condition to estimate emissions from activator (catalyst) usage in Condition 2.1. However, this issue is suitably addressed in the public record and does not need to become a permit condition.

- 2. Page 2 of 6, Footnote 1, second line, before the word monomer:** Please insert “organic” to be consistent with the *Ems* definition in condition 2.1.1.

EPA Response: This was an oversight and is consistent with the language in Condition 2.1.1. The language has been added.

- 3. Page 3 of 6, condition 2.1.3:** For operational flexibility, at the end of the condition, please include the option to use the material VOC content as applied (or as a system applied) if stated on the Safety Data Sheet (SDS) or Technical Data Sheet (TDS). Sample TDS and SDS’s are attached.

EPA Response: This is an acceptable option. Both calculation methods obtain the same results. Condition 2.1.10 has been created to allow for this alternative calculation methodology. The optional calculation method in footnotes 2, 3, and 4 of the draft permit have been moved to this condition.

- 4. Page 4 of 6, condition 2.1.5:** For operational flexibility, at the end of the condition, please include the option to use the material VOC content as applied (or as a system applied) if stated on the SDS or TDS.

EPA Response: If an SDS for a two-part polyurethane system includes a value a value for VOC content *as applied* then a mass balance calculation method is acceptable. This has been added as an alternative in Condition 2.1.5.

- 5. Page 4 of 6, condition 2.1.6:** For operational flexibility, at the end of the condition, please include the option to use the material VOC content as applied (or as a system applied) if stated on the SDS or TDS.

EPA Response: See the response to comment #3 (above).

Attachment A

Original Permit Conditions

Non-Title V Permit issued to Amtech Corporation, April 12, 2006

1. General Conditions

- 1.1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act.
- 1.2. Compliance with the terms of this permit does not relieve or exempt the permittee from compliance with other applicable Clean Air Act requirements or other applicable federal requirements, tribal, state or local laws or regulations.
- 1.3. At such time as this source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in Condition 2.1, then the requirements of 40 CFR 52.21(j) through (s) shall apply to the source or modification as though construction had not yet commenced on the source or modification.

2. Emission Limits and Work Practice Requirements

- 2.1. Volatile organic compound (VOC) emissions from this facility shall not exceed 249 tons per year as determined on a rolling, 12-month basis, which shall be determined by calculating the emissions (tons) for each month and adding the emissions (tons) for the previous eleven months. Monthly VOC emissions (tons) shall be determined by multiplying appropriate emission factors (lb/unit) by the recorded monthly operating rates (units/month) and dividing by 2000 (lb/ton). For emission sources, such as tanks, that rely on computer programs to calculate emissions, monthly VOC emissions can be determined by use of the computer program.

3. Monitoring and Recordkeeping Requirements

- 3.1. Each month, the permittee shall calculate and record facility-wide monthly and rolling 12-month total emissions (tons) for all emission units that emit VOC.
- 3.2. The permittee shall track and record the operations and production for each emission unit that emits VOC at the facility, such that facility-wide VOC emissions can be calculated on a monthly and 12-month basis. Records shall include, but not be limited to:
 - 3.2.1. Material purchase records;
 - 3.2.2. Monthly gelcoat usage;
 - 3.2.3. Monthly resin usage in open molding operations;
 - 3.2.4. Monthly quantity of resin or gelcoat mixed;
 - 3.2.5. Number of batches mixed each month;
 - 3.2.6. Monthly solvent usage to clean equipment used in open molding and mixing operations;
 - 3.2.7. Quantity of material stored in open or partially-open containers each month;
 - 3.2.8. Monthly resin usage in repair operations;
 - 3.2.9. Monthly resin usage in closed mold operations;
 - 3.2.10. Monthly usage of components of spa foam;
 - 3.2.11. Monthly usage of each coating or solvent used in the spray booth;
 - 3.2.12. Monthly usage of each material used in support activities;
 - 3.2.13. Monthly natural gas usage;
 - 3.2.14. Material Safety Data Sheets;
 - 3.2.15. Emission factors used;
 - 3.2.16. Vapor pressure of materials stored in the tank;
 - 3.2.17. Parameters used to determine emission factors; and
 - 3.2.18. Any other information used to determine monthly facility emissions of VOC.

- 3.3. The permittee shall maintain records of emission calculations and parameters used to calculate emissions for at least five years.

4. Reporting Requirements

- 4.1. Once each year, on or before December 31, the permittee shall, along with the annual registration required by 40 CFR § 49.138(e)(2), submit to EPA a report containing the twelve monthly rolling 12-month emissions calculations for the previous calendar year.
- 4.2. The report required under Condition 4.1 shall contain a description of all emissions estimating methods used, including emission factors and their sources, a summary of materials usage and VOC content, assumptions made and production data.

Attachment B

Original Technical Support Document

Non-Title V Permit issued to Amtech Corporation, April 12, 2006

United States Environmental Protection Agency
Region 10, Office of Air, Waste and Toxics
AWT-107
1200 Sixth Avenue
Seattle, Washington 98101

Permit Number: R10NT500100
Issued: April 12, 2006
AFS Plant I.D. Number: 53-077-00076

Technical Support Document Non-Title V Air Quality Operating Permit

Permit Writer: Pat Nair

AMTECH Corporation
Yakama Reservation
Wapato, Washington

Purpose of Owner-Requested Non-Title V Operating Permit and Technical Support Document

Title 40 Code of Federal Regulations Section 49.139 establishes a permitting program to provide for the establishment of Federally-enforceable requirements for air pollution sources located within Indian reservations in Idaho, Oregon and Washington. The owner or operator of an air pollution source who wishes to obtain a Federally-enforceable limitation on the source's actual emissions or potential to emit must submit an application to the Regional Administrator requesting such limitation.

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1. EPA Authority to Issue Non-Title V Permits

On April 8, 2005 EPA adopted regulations (70 FR 18074) codified at 40 CFR Parts 9 and 49, establishing Federal Implementation Plans (FIPs) under the Clean Air Act for Indian reservations in Idaho, Oregon and Washington. The FIPs, commonly referred to as the Federal Air Rules for Reservations (FARR), put in place basic air quality regulations to protect health and welfare on Indian reservations located in the Pacific Northwest. 40 CFR § 49.139 creates a permitting program for establishing Federally-enforceable requirements for air pollution sources on Indian reservations. This permit has been developed pursuant to 40 CFR § 49.139.

2. Facility Information

2.1 Location

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

Tribal Contact: Moses Squeochs, Program Manager
Yakama Nation Environmental Management Program
P.O. Box 151
Toppenish, WA 98948
Phone: 509-865-5121 ext 4659
Email: mose@yakama.com

2.2 Local Air Quality and Attainment Status

The Yakama Reservation is in attainment with the national ambient air quality standards or is unclassifiable. The subject facility is not located in a designated nonattainment area. With respect to prevention of significant deterioration (PSD) impact evaluation, the majority of the reservation is classified as Class II lands, except for a small portion in the western part of the reservation, located within the boundary of the Mt. Adams National Wilderness Area, which is designated as Class I.

2.3 General Description of Operations and Products

The AMTECH Wapato plant produces a number of custom components for military, industrial and commercial products such as recreational vehicle motor home parts, spas, military vehicle hard tops, bus parts, lavatory bath modules, food storage components for mobile food service vehicles and industrial lift parts. The types of products made at AMTECH vary with market demands. The process involves fabrication of products from liquid polyester resin reinforced with glass fibers and extended with various inorganic filler materials. The composite materials are often referred to as fiberglass-reinforced plastic (FRP) or fiberglass. Custom FRP products manufacturing requires the use of more types of resins and gel coats than what is used in an assembly line FRP products manufacturing plant such as those plants that only manufacture one or two products like tubs and showers.

The Wapato facility currently conducts the following operations (all uncontrolled for emissions of VOC) that have the potential to emit regulated air pollutants:

1. Open molding and resin mixing operations;
2. Cleaning of equipment used in open molding and resin mixing operations;
3. Resin storage tank;

4. Material storage (storage of resin and other materials in open or partially-open containers);
5. Repair operations on manufactured parts and on molds;
6. Closed mold operations (resin transfer molding);
7. Vacuum forming;
8. Application of spa foam;
9. Support activities (grinding and sanding of manufactured parts, woodshop, painting of fiberglass, plastic and metal parts outside a spray booth, and maintenance activities); and
10. Combustion devices – natural gas-fired space heaters and make-up air units:
 - a) 5 space heaters, general plant, 230,000 Btu/hr each;
 - b) 3 space heaters, general plant, 300,000 Btu/hr each;
 - c) 2 space heaters, lunch room, 140,000 Btu/hr each;
 - d) 2 space heaters, offices, 100,000 Btu/hr each;
 - e) Make-up air unit, lamination area, 2.527 MMBtu/hr;
 - f) Make-up air unit, lamination area, 1.5552 MMBtu/hr;
 - g) Make-up air unit, gelcoat area, 1.5552 MMBtu/hr.

The Wapato facility also plans to add the following operations (all with no VOC emission controls):

1. Additional open molding capacity;
2. Vacuum infusion (a closed mold operation);
3. Painting of fiberglass, plastic and metal parts inside a spray booth
4. Heater, for paint booth, natural gas or propane, 1.5 MMBtu/hr; and
5. Make-up air unit, future lamination, 1.775 MMBtu/hr.

The facility SIC code is: 3089 Plastic Products, Not Elsewhere Classified.

3. Project Description

On October 3, 2005, EPA received an application from AMTECH Corporation regarding their Wapato facility. In the application, AMTECH requested two emission limits:

1. Limit hazardous air pollutant (HAP) emissions from processes at AMTECH Wapato that are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for reinforced plastic composites production (i.e. 40 CFR Part 63, Subpart WWWW) to no more than 99 tons per year (tpy); and
2. Limit volatile organic compound (VOC) emissions from AMTECH Wapato to no more than 249 tpy.

AMTECH requested the HAP limit in order to avoid becoming subject to a provision of Subpart WWWW that requires the use of pollution control measures. In its application, AMTECH indicated that AMTECH wished to avoid the "requirements of 40 CFR 63.5805(d) and requests that EPA impose a federally enforceable limit on the AMTECH HAP emissions from open molding and mixing operations subject to WWWW of no more than 99 tpy." As discussed in Section 4.1, AMTECH has since withdrawn their request for a HAP limit. The permit does not contain any limit on HAP emissions.

AMTECH requested the VOC limit in order to establish itself as a minor source of VOC emissions for the Prevention of Significant Deterioration (PSD) program.

4. Regulatory Analysis and Permit Content

4.1 Evaluation of HAP Limit Request

40 CFR Part 63, Subpart WWWW applies to the following activities that exist at AMTECH Wapato:

1. Open molding;
2. Cleaning of equipment used in reinforced plastic composites manufacture;
3. HAP-containing materials storage; and
4. Repair operations on parts manufactured at AMTECH Wapato.

Based on an affected source's actual emissions for a specified 12-month period, the source is required to comply with one of several standards in 40 CFR § 63.5805. AMTECH wishes to avoid being subject to the requirements of 40 CFR § 63.5805(d), which requires controls of at least 95% efficiency. In this application, AMTECH has requested an enforceable limit on HAP emissions of 99 tpy. 40 CFR § 63.5799(b) contains a provision for existing facilities to assume an enforceable permit limit, but contains no such provision for new facilities. Based on the definitions in 40 CFR § 63.5795(a), AMTECH Wapato would be considered a new facility. For a new facility, applicability of 40 CFR § 63.5805(d) is determined, as specified in 40 CFR § 63.5805, by the process described in 40 CFR § 63.5799(b). An enforceable limit issued under authority of the FARR will not be able to avoid applicability of the requirements of 40 CFR § 63.5805(d) to AMTECH Wapato's lamination operations. AMTECH must use the procedures in 40 CFR § 63.5799(b) to determine applicability of 40 CFR § 63.5805(d).

As requested, however, EPA can still issue a FARR non-operating permit with a HAP limit, although the limit would not enable AMTECH Wapato to avoid applicability of 40 CFR § 63.5805(d). When apprised of their options, AMTECH representatives, in an e-mail dated November 7, 2005, decided to withdraw their request for a HAP limit. Consequently, the permit contains no limits on HAP emissions.

4.2 Evaluation of VOC Limit Request

Under the PSD program, 40 CFR § 52.21, no "major stationary source" or "major modification" to a major stationary source can begin actual construction without first obtaining a PSD permit that meets the requirements of 40 CFR § 52.21. As AMTECH is not in one of the source categories named in 40 CFR § 52.21(b)(1)(i)(a), it would be considered a major stationary source for purposes of the PSD program only if it has a potential to emit (PTE) of at least 250 tons per year of any single PSD regulated air pollutant.

Based on AMTECH's application, actual VOC emissions for the 12-month period ending on June 05, 2005 were 44 tpy. During this period, the facility operated 12 hours a day, five days a week, 52 weeks a year – i.e. 3120 hours per year. AMTECH suggests that if the facility were operated 8760 hours per year, VOC emissions would be about 124 tpy, and that this reflects facility PTE.

Unlimited operation of spray coatings usually results in a PTE above 250 tpy. In AMTECH's case, however, continuous application of coating is not possible for a number of reasons:

1. Gelcoated molds must be moved out of the application area in order to bring empty molds into the application area;
2. Empty molds must be brought into the gel-coat application area;
3. Since AMTECH is a custom fabricator (as opposed to a large volume mass producer), gel-coats must periodically be changed out to spray a different gel-coat product;
4. Gel-coated molds must be moved to the lamination area;
5. Molds with lamination must be moved to a separate area for curing;
6. Molds must be emptied and readied for the next application.

Clearly, the facility's VOC PTE is less than estimated by continuous application of resin because of the physical limitations itemized above. The actual emissions of 44 tpy probably reflect the inherent limitations itemized above, as well as some operational practices that cannot be construed as physical limitations or as enforceable limitations. Factors such as streamlining of operations, increased staffing levels or increased staff experience could result in further productivity gains, resulting in slightly higher emissions. However, it is unlikely that this facility's PTE would increase enough above the 124 tpy for AMTECH to be considered a major source for PSD. Consequently, EPA concludes that the AMTECH Wapato facility is currently not a major stationary source of VOC for PSD purposes.

If the current facility is not major for PSD, a proposed modification at AMTECH can be considered to be a new major stationary source for VOC if the proposed modification, by itself, has a PTE of at least 250 tpy of VOC.

AMTECH has estimated that the proposed plant expansion (i.e. addition of an open lamination station and a spray booth) would result in a maximum emissions increase of 62 tpy from the open lamination area and 85 tpy from the spray booth. AMTECH's estimate of 62 tpy is extrapolated from their estimate of current PTE (based on a 50% increase over current operations). As noted earlier in this section, because of operational logistics, this is probably a reasonable estimate of PTE for the added lamination station. However, EPA believes that AMTECH's estimate of PTE of VOC for the spray booth is too low, as it is based on painting a specific number of helmet hard tops. As a custom production operation, in the future, AMTECH could easily take on additional product lines or contract out coating of parts manufactured elsewhere. As a result, PTE must be estimated considering the physical capability of the spray booth rather than based on expected maximum operation. This would almost certainly qualify as a new major stationary source, thereby making the proposed plant expansion subject to the requirements of PSD permitting. To ensure that the proposed plant expansion, together with existing operations, remain below PSD major source thresholds for VOC, AMTECH has asked for an enforceable permit limit of 249 tpy. This permit limit would apply to the entire AMTECH Wapato facility, including all the activities listed in Section 2.3.

The evaluation above applies to only VOC and for the equipment additions listed in Section 2.3. In their application, AMTECH did not submit an emission inventory for pollutants other than VOC. Consequently, EPA has not evaluated whether AMTECH Wapato is currently a major stationary source for any pollutants other than VOC. If in fact AMTECH Wapato's PTE for any other pollutant does exceed 250 tpy, AMTECH would be subject to PSD for the proposed expansion. Given the nature of operations at this facility, it is unlikely that the facility's current PTE of other pollutants exceeds 250 tpy or that the PTE of other pollutants from AMTECH's proposed expansion would exceed 250 tpy. Although the risk of triggering PSD review is small, this is a risk that AMTECH has opted to take. AMTECH was advised that this review is only valid for VOC and for the proposed change listed in Section 2.3. In addition, even with respect to VOC, any future physical change or change in the method of operation, aside from the proposed changes discussed in Section 2.3, must be evaluated to determine PSD applicability.

PSD and PSD-avoidance limits require compliance assurance on a rolling 12-month basis. The monitoring, recordkeeping and reporting for this permit will require the estimation of emissions from all of the above activities at least once a month. Details on the compliance assurance process are discussed in Section 4.4.

4.3 Other Federal Regulations

Endangered Species Act (ESA) Impacts - EPA is obligated to consider the impact that a federal project may have on listed species or critical habitats. Based on the fact that the permit contains a voluntarily-

requested emission limit, it is EPA's conclusion that the issuance of this permit to AMTECH Wapato will not affect a listed specie or critical habitat. Therefore, no additional requirements will be added to this permit for ESA reasons. EPA's no effect determination concludes EPA's obligations under Section 7 of the ESA. (See Endangered Species Consultation Handbook: Procedures for Conducting Consultation and Conference Activities Under Section 7 of the Endangered Species Act, FWS and NMFS, March 1998, at Figure 1).

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

National Historic Preservation Act (NHPA) - No part of the AMTECH facility is listed in the National Register. The existing building will be modified by the addition of a 29 ft by 14 ft structure. The new addition will be installed on ground that is currently paved. Consequently, no adverse effects are expected, and further review under NHPA is not indicated.

4.4 Permit Content

The permit includes the requested emission limit as well as monitoring, recordkeeping and reporting requirements necessary to assure compliance with the limit. Each section of the permit is discussed below. The permit is organized into four sections as follow:

4.4.1 Permit Section 1: General Conditions

This section of the permit contains conditions of a general nature that apply to the facility. Permit Condition 1.1 requires AMTECH Wapato to comply with the conditions in the permit.

This permit establishes owner-requested limits and related compliance assurance provisions to restrict AMTECH Wapato's potential to emit VOC. It does not contain other Clean Air Act requirements to which the AMTECH Wapato facility is or may be subject, such as the FARR; New Source Performance Standards, 40 CFR Part 60, National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 61 and 63; and the Title V operating permit program, 40 CFR Part 71. As specified in Permit Condition 1.2, compliance with the terms of this permit in no way relieves or exempts AMTECH Wapato of compliance with other applicable Clean Air Act requirements or of any other applicable federal, tribal, state, or local law or regulation.

Permit Condition 1.3 addresses a provision (40 CFR § 52.21(r)(4)) of the PSD regulations regarding emission limits established to avoid PSD requirements. If in the future, AMTECH Wapato obtains a relaxation of the VOC limit in Permit Condition 2.1, and the plant expansion addressed in this permit action is later found to be a new major stationary source solely due to the relaxation of the emission limit, then the PSD provisions of 40 CFR § 52.21(j) through (s) would apply to AMTECH Wapato as though the plant expansion had never taken place. This could result in the imposition of Best Available Control Technology that is difficult or expensive to retrofit. Consequently, if in the future, any relaxation to the VOC limit in Permit Condition 2.1 is being contemplated, it is recommended that AMTECH thoroughly evaluate any potential PSD applicability.

4.4.2 Permit Section 2: Emission Limits and Work Practice Requirements

This section of the permit contains any emissions limits or work practice requirements that have been

established as a result of the subject permit action. As discussed earlier, in Sections 4.1 and 4.2, for this permit action, the only limit established is the 249 tpy VOC limit.

4.4.3 Permit Section 3: Monitoring and Recordkeeping Requirements

Permit Condition 3.1 requires AMTECH to calculate monthly emissions every month. The rolling 12-month emissions must be determined by adding the emissions calculated for the most recent month with the emissions for the immediately preceding 11 months. Emissions are to be calculated from the entire facility, including, but not limited to, the activities listed in Section 2.3. The following paragraphs describe accepted emissions calculation methods for the emission units discussed in Section 2.3. It is EPA's expectation that AMTECH will use the emission estimating techniques set forth in this section unless AMTECH has other information showing why another technique more accurately represents its emissions.

Open molding operations: At present, there is no single emission factor for emissions of VOC from open molding operations. Instead, the emission estimation method involves determining an emission factor based on the content (in the resin) of organic HAPs, all of which are VOCs. The most common HAPs from lamination and gelcoat operations are styrene and methyl methacrylate. The emission factor determination method is the same as specified in the reinforced plastic composites production MACT (40 CFR Part 63, Subpart WWWW).

The permittee is expected to determine monthly VOC emissions (tons) from open molding operations by aggregating the monthly emissions of styrene, methyl methacrylate and any other organic hazardous air pollutant, calculated as follows:

1. Monthly emissions (tons) of all organic hazardous air pollutants from gelcoat operations are determined by multiplying monthly gelcoat usage (tons) by the corresponding emission factor for atomized spray gelcoat application, as specified in Table 1 to 40 CFR Part 63, Subpart WWWW, and dividing by 2,000; and
2. Monthly emissions (tons) of all organic hazardous air pollutants from fiber reinforced resin operations are determined by multiplying monthly resin usage (tons) by the corresponding emission factor for nonatomized, mechanical resin application, as specified in Table 1 to 40 CFR Part 63, Subpart WWWW, and dividing by 2,000.

Resin mixing operations: Emissions from resin mixing operations and from open containers can be determined by the methodology listed in the Environmental Inventory Improvement Project, Volume II, Chapter 8: Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, February 2005:

The permittee is expected to determine monthly VOC emissions (tons) from mixing of resin or gelcoat by aggregating the monthly emissions of each VOC species and resin or gelcoat mixed. Monthly emissions of each VOC species are determined using the equation below to calculate each emission factor.

$$E_O = \frac{M_O \times K_O \times A \times P_O \times 3600 \times H \times B}{R \times T \times 2000}$$

where

- | | | |
|-------|---|--|
| E_O | = | emissions of VOC species (ton/month) |
| M_O | = | molecular weight of VOC species O (lb/lb-mole) |
| K_O | = | gas-phase mass transfer coefficient for VOC species (ft/sec) |
| A | = | surface area of exposure or opening (ft ²) |

P_O	=	true vapor pressure of VOC species O (if a pure chemical is used) or the partial pressure of chemical O (if a mixture of VOCs is used) at temperature T (psia)
3600	=	3600 sec/hr
H	=	batch time (hr/batch)
T	=	temperature of the liquid (degrees Rankine ($^{\circ}R$))
R	=	universal gas constant at 1 atmosphere of pressure, 10.73 psia-ft ³ / $^{\circ}R$ -lb mole
2000	=	2000 lb/ton
B	=	number of batches per month

K_O is determined by calculating as follows:

$$K_O = 0.00438 \times U^{0.78} \times (18/M_O)^{1/3}$$

where

U	=	wind speed (mile/hr)
M_O	=	molecular weight of VOC species O (lb/lb-mole)

If a mixture of VOC is used, the partial pressure P_O is determined as follows:

$$P_O = m_O \times VP_O$$

where

m_O	=	liquid mole fraction of VOC species O (mole/mole)
VP_O	=	true vapor pressure of VOC species O (psia)

Open or partially-open containers: The monthly VOC emissions (tons) from the storage of resin and other VOC-containing materials in open or partially-open containers (materials storage) are determined by using the methodology specified for resin mixing operations, except that the following terms have the meaning specified below:

H	=	hours per month that container was used to store material (hr/month)
B	=	1

Cleaning of equipment used in open molding and mixing operations: Emissions from cleaning of equipment used in open molding and mixing operations can be calculated from the VOC content of the cleaning materials. As solvent-based cleaners are used to clean the equipment, this methodology assumes that the total VOC content of the cleaners is lost by evaporation. The VOC content of the cleaners are available from Material Safety Data Sheets provided by the product manufacturer.

The permittee is expected to determine monthly VOC emissions (tons) from the cleaning of equipment used in open molding and mixing operations by first determining an emission factor for each cleaning material. The emission factor to be used is the VOC content (lbs/gallon) listed in each product Material Safety Data Sheet, or otherwise available from the product vendor. Many Material Safety Data Sheets list VOC content less water and exempt solvents – this is not the value to be used for this purpose as it will serve to overestimate emissions. The permittee should take care to use the VOC content that includes water and exempt solvents. The Monthly VOC emissions (tons) can then be calculated by multiplying the cleaning material monthly usage (gallons) by the emission factor (lbs/gallon) for the cleaning material, and dividing by 2000 (lb/ton).

Resin storage tank: Monthly VOC emissions (tons) from the storage of resin in the resin storage tank are determined by using one of the methods specified below:

1. Use EPA's TANKS program, which can be downloaded from EPA's website. The calculation methodology is based on numerous tank operational parameters, including capacity, paint condition, relief valve settings, resin throughput, and typical operating levels; or
2. Use EPA's TANKS program to calculate emissions from the tank, based on a tank throughput of 1,500,000 lbs of resin per year. The resultant annual emissions are divided by the resin throughput to yield an emission factor in lbs VOC/lb of resin. This emission factor can then be applied to monthly resin throughput to determine monthly VOC emissions. If annual resin throughput rises above 1,500,000 lbs, or if the vapor pressure of the resin varies by more than 10%, the emission factor should be recalculated using TANKS.

Repair of manufactured parts: AMTECH does not repair fiberglass parts commercially. Rather, they repair parts that are damaged during the manufacturing process. Typically this involves the manual application of catalyzed resin. The permittee is expected to determine monthly VOC emissions (tons) from repair operations on manufactured parts and on molds by aggregating the monthly emissions of styrene and any other organic hazardous air pollutant. Monthly emissions of all organic hazardous air pollutants from repair operations on manufactured parts and on molds are determined by multiplying monthly resin usage (tons) by the corresponding emission factor for manual application, as specified in Table 1 to 40 CFR Part 63, Subpart WWWW, and dividing by 2,000.

Closed mold processes: AMTECH's closed mold processes include resin transfer molding, vacuum molding and vacuum infusion. Because these processes minimize contact between the resin and air, emissions are correspondingly lower. The emission estimation method was established by the Olympic Regional Clean Air Agency, and is based on the styrene content of the resin.

The permittee is expected to determine monthly VOC emissions from resin transfer molding and vacuum infusion (closed mold) operations by multiplying monthly resin usage (tons) by the following emission factor:

$$EF = 0.01 \times P_s$$

where

$$\begin{aligned} EF &= \text{emission factor (tons/ton)} \\ P_s &= \text{styrene content in resin (weight fraction)} \end{aligned}$$

Vacuum forming operations: This section contains no method to calculate emissions of VOC from vacuum forming, which involves forming of purchased acrylic sheets into desired shapes using heat and a vacuum. No emissions of VOC are expected from these operations.

Application of spa foam: The emission estimation method for the application of methylenebis (phenyl isocyanate) (MDI) foam to the undersides of manufactured spa shells is adapted from a method developed by the Alliance for the Polyurethane Industry (MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry, 2002). The permittee is expected to calculate the emission factor below, and divide by 2000 (lb/ton).

$$L_{fd} = V_{air} \times \frac{1}{359} \times \frac{273.15}{T_{proc}} \times \frac{VP_{MDI}}{760} \times M_w \times K_{MDI}$$

where

$$\begin{aligned} L_{fd} &= \text{emissions of VOC lb/month} \\ V_{air} &= \text{monthly volume of displaced air in ft}^3/\text{month} \\ T_{proc} &= \text{process temperature in } ^\circ\text{K (maximum temperature of the MDI)} \\ VP_{MDI} &= \text{vapor pressure of MDI in mm. Hg at process temperature} \\ M_w &= 250.26 \text{ (this is the molecular weight of MDI)} \end{aligned}$$

K_{MDI} = adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the temperature

Spray booth: Estimation of emissions from the spray booth is based on a mass balance method for VOC. As with the cleaning of equipment used in open molding and mixing operations, it is assumed that the total VOC content of coatings, thinners and solvents is volatilized and emitted from this emission unit. The VOC content of the products are available from Material Safety Data Sheets provided by the product manufacturer.

The permittee is expected to determine monthly VOC emissions (tons) from the spray booth by first determining an emission factor for each product. The emission factor to be used is the VOC content (lbs/gallon) listed in each product Material Safety Data Sheet, or otherwise available from the product vendor. Many Material Safety Data Sheets list VOC content less water and exempt solvents – this is not the value to be used for this purpose as it will serve to overestimate emissions. The permittee should take care to use the VOC content that includes water and exempt solvents. The Monthly VOC emissions (tons) can then be calculated by multiplying each product monthly usage (gallons) by the emission factor (lbs/gallon) for the product, and dividing by 2000 (lb/ton).

Support activities: Activities supporting production operations at AMTECH Wapato include grinding operations, woodshop, painting with spray cans and maintenance activities. VOC-containing materials are used in these activities. For these materials, it is assumed that the total VOC content is volatilized and emitted from the support activities. The VOC content of the products are available from Material Safety Data Sheets provided by the product manufacturer.

The permittee is expected to determine monthly VOC emissions (tons) from the support activities by first determining an emission factor for each product. The emission factor to be used is the VOC content (lbs/gallon) listed in each product Material Safety Data Sheet, or otherwise available from the product vendor. Many Material Safety Data Sheets list VOC content less water and exempt solvents – this is not the value to be used for this purpose as it will serve to overestimate emissions. The permittee should take care to use the VOC content that includes water and exempt solvents. The Monthly VOC emissions (tons) can then be calculated by multiplying each product monthly usage (gallons) by the emission factor (lbs/gallon) for the product, and dividing by 2000 (lb/ton).

Combustion sources: Emissions from the numerous space heaters, make-up air units and spray booth heater are readily calculated using emission factors published in EPA's AP 42, Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources. With the exception of the spray booth heater, which may be propane-fired, all of these units are fired on natural gas. The permittee is expected to use the most current, fuel-specific emission factor from AP 42, Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources. Monthly VOC emissions (tons) from combustion devices are determined by multiplying the monthly fuel usage of natural gas (million standard cubic feet) or propane (thousand gallons), as appropriate, by the latest, fuel-specific emission factor listed in EPA's AP 42, Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources, and dividing by 2,000.

Additionally, if AMTECH Wapato engages in VOC-emitting activities not identified in this technical support document, AMTECH is expected to calculate emissions from these VOC-emitting activities by using emission estimation methods that are verifiable using currently accepted engineering criteria.

The permittee is required to maintain copies of required emissions calculations and all supporting documentation for a period of five years.

4.4.4 Permit Section 4: Reporting Requirements

Condition 4.1 requires AMTECH to annually submit to EPA a record of the 12 monthly 12-month emissions calculations. For ease in coordinating submittals, this report is required to be submitted concurrently with the annual FARR registration submittal. As specified in 40 CFR § 49.139(f), the annual FARR registration submittal must be submitted with the annual emission report and fee calculation required by 40 CFR Part 71. For AMTECH Wapato, the due date for these reports is December 31 of each year.

This annual report must include details on how the emissions were calculated as well as identifying the sources for various data elements.

5. Permit Procedures

5.1 Permit Revision, Termination and Reissuance

This section provides details on procedures for revision, termination, revocation and reissuance of non-Title V operating permits.

AMTECH may request EPA to revise the conditions of this permit by submitting an application that contains the information specified in 40 C.F.R. 49.139(d). EPA will revise the permit using the same procedures that apply to initial permit issuance.

If AMTECH wishes to terminate the permit, a written request must be submitted to EPA explaining the reasons for the request and, if necessary for continued operation, submitting applications for any Clean Air Act permits or approvals that AMTECH Wapato avoided by establishment of the limits contained in this permit.

This permit may be terminated, revised, or revoked and reissued by EPA for cause.

Cause exists to terminate, revise, or revoke and reissue this permit under the following circumstances:

1. This permit contains a material mistake;
2. Inaccurate statements were made in establishing the terms or conditions of this permit;
3. The permittee fails to comply with any condition of this permit; or
4. This permit must be terminated, revised, or reopened and reissued to assure compliance with Clean Air Act requirements.

EPA will use the same proceedings to terminate, revise, or revoke and reissue a permit for cause as for initial permit issuance. Before initiating proceedings to terminate, revise, or revoke and reissue a permit, EPA will provide AMTECH Wapato at least 30 days' advance written notice of EPA's intent to terminate, revise, or revoke and reissue the permit, except that EPA may provide a shorter notice period in the case of an emergency.

5.2 Public Notice and Comment

As required under 40 CFR § 49.139(c), all draft owner-requested operating permits must be publicly noticed and made available for public comment. For this permit action, the requirements of 40 CFR § 49.139(c)(5) are as follow:

1. Make available for public inspection, in at least one location in the area affected by the air pollution source, a copy of the draft operating permit prepared by EPA, the technical support

- document for the draft permit, the application, and all supporting materials (see 40 CFR 49.139(c)(5)(i));
2. Publish public notice for this draft permit, by prominent advertisement in a newspaper of general circulation in the area affected by this source, of the availability of the draft permit to operate and supporting materials and of the opportunity to comment. Where possible, notices will also be made in the Tribal newspaper (see 40 CFR 49.139(c)(5)(ii));
 3. Provide copies of the notice to the owner or operator of the air pollution source, the Tribal governing body, and the Tribal, State and local air pollution authorities having jurisdiction in areas outside of the Indian reservation potentially impacted by the air pollution source (see 40 CFR 49.139(c)(5)(iii)); and
 4. Provide for a 30-day period for submittal of public comments, starting upon the date of publication of the notice. If requested, the Regional Administrator may hold a public hearing and/or extend the public comment period for up to an additional 30 days (see 40 CFR 49.139(c)(5)(iv)).

40 CFR § 49.139(c) also contains requirements that apply after the draft permit is made available for public comment. These additional requirements must be satisfied prior to issuance of the final permit:

1. EPA will accept comments on the draft permit, during the 30 day public comment period (see 40 CFR 49.139(c)(5)(iv));
2. After the close of the public comment period, EPA will consider all comments received and prepare a final permit to operate and final technical support document. The final technical support document will include a response to all comments received during the public comment period (see 40 CFR 49.139(c)(6));

After issuance of the final permit and technical support document, the following requirements must also be satisfied:

1. Make the final permit and technical support document available at all of the locations where the draft permit was made available (see 40 CFR 49.139(c)(7)); and
2. Send the final permit and technical support document to all persons who provided comments on the draft permit to operate (see 40 CFR 49.139(c)(7)).

5.3 Response to Public Comments

The draft permit and technical support document were made available during a public comment period that lasted from March 10, 2006 to April 10, 2006. No comments were received during this time.

6. Abbreviations and Acronyms

CFR	Code of Federal Regulations
EPA	United States Environmental Protection Agency (also U.S. EPA)
FARR	Federal Air Rules for Reservations
FR	Federal Register
HAP	Hazardous air pollutant
MDI	Methylenebis (phenyl isocyanate)
NESHAP	National Emission Standards for Hazardous Air Pollutants (Title 40 CFR Parts 61 and 63)
PSD	Prevention of significant deterioration
PTE	Potential to emit
^o R	Degrees Rankine, ^o R = ^o Fahrenheit + 460
tpy	Tons per year
VOC	Volatile organic compound, as defined in 40 CFR § 51.100 (s)