DRAFT

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **May 11, 2020**

TO: Phillip Fielder, P.E., Chief Engineer

THROUGH: Rick Groshong, Compliance and Enforcement Manager

THROUGH: Eric L. Milligan, P.E., Engineering Section Manager

THROUGH: David Schutz, P.E., New Source Permits Section

FROM: Kyle Walker, E.I., New Source Permits Section

SUBJECT: Evaluation of Construction Permit Application No. **2017-1990-C (M-1)**
Cooling Tower Composites and Fabrication, Inc.
Chickasha Facility (Facility ID: 18506)
2500 Frisco Avenue, Chickasha, OK
SW1/4 Section 20, Township 7N, Range 7W, Grady County, Oklahoma
Latitude: 35.05866°N; Longitude: 97.96693°W

INTRODUCTION

Cooling Tower Composites and Fabrication, Inc. (CTCF) has requested a construction permit for a reinforced plastic composite products manufacturing facility in Chickasha, OK (SIC 3089/NAICS 326199). The facility has two buildings. One building is a multi-use building primarily composed of office space, a mold-making area, and storage. The other building contains the resin and gel coat spraying areas. CTCF requests a major source construction permit for volatile organic compounds (VOC) and hazardous air pollutants (HAP).

The facility was constructed under synthetic minor source construction Permit No. 2017-1990-C, issued February 12, 2018. The facility submitted a self-disclosure on June 6, 2019. The self-disclosure stated, "The violation began in February of 2019 when calculated emissions of styrene exceeded 10 TPY." This was an exceedance of the synthetic minor source permit limit. Enforcement Case ID 9587 was opened to address the self-disclosure. The facility is now requesting a major source construction permit as partial resolution of the enforcement case.

The facility is not a Prevention of Significant Deterioration (PSD) source and is not subject to the requirements of 40 CFR Part 64 (Compliance Assurance Monitoring). The facility is subject to 40 CFR Part 60, National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart WWWW. The facility does not require a Best Available Control Technology review because the facility is requesting a volatile organic compound limitation of 99 TPY. Additionally, the major pollutant is subject to Subpart WWWW.

PROCESS DESCRIPTION

CTCF manufactures reinforced plastic composite products utilizing mechanical atomized and non-atomized spray for application of resin and gel coat. The facility consists of two buildings.

Building One consists of offices and a wood pallet and mold making shop. Cooling tower molding plugs are made out of wood to order specifications. The wood shop operation consists of building wooden pallets and crates in which finished product is stored and shipped. The wood shop is also where molding plugs are constructed from wood and other materials to fabricate molds for production. This process consists of joining specially cut pieces of wood, finished fiberglass and various other materials to form a shape per product-specific drawings as required for each job. Occasional hand layup process is used in building single items as needed on a limited basis.

Tools consist of:

i. Various circular and reciprocating saws
ii. CNC machine
iii. Various hand tools

Fiberglass operations are contained within the second building. Production of reinforced plastic composite products begins with a wax being applied to the wooden or fiberglass reinforced plastic molds by hand with rags to ensure easy removal of the products from the mold after curing. A layer of gel coat is sprayed onto the mold with a low pressure, air-assisted spray applicator to form the outermost surface of the products. The gel coat is heated during application and cured in dust free conditions. The heater is electric and has no emissions.

Once the gel coat has cured, polyester resin is applied with an applicator that has a glass chopper attachment. This allows simultaneous spraying of resin and chopped glass into the mold or dry fiberglass material is hand laid on the mold and wet out. The ratio of resin to fiberglass is typically 60 percent resin to 40 percent fiberglass by weight but varies by product. To reduce resin usage, the lines are wet out with resin and heated to promote efficient spraying. The resin applicator has an internal mix system where the resin and catalyst streams are mixed as they exit the applicator. Liquid peroxide catalyst is used to promote curing at room temperature. The sprayed resin is hand rolled to remove voids and ensure proper compaction of resin and reinforcing material. The part cures on the mold and gel coated in place. Once the final gel coat is dry, the part is sent to the fiberglass finishing area. In the fiberglass finishing area, each part is checked for defects in workmanship and repaired or rejected.

Tools consist of:

i. Flow coat applicators
ii. Rollers
iii. Brushes
iv. Gel coat spray gun

EMISSIONS

The facility is a major source of styrene emissions. The applicant has provided emission calculations based on National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart WWWW requirements. The applicant has requested emission limits of 99.00 TPY for both volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions to allow for potential business growth. NESHAP Subpart WWWW Table 1 provided calculations to determine HAP emissions factors for resins and gel coats. Table 1 is included in the Federal Regulation section of this memorandum and in the Specific Conditions. Subpart WWWW sample calculations of annual emissions are shown following. The facility will comply with the requested emissions limitations by recording product usage and calculating emissions on a 12 month rolling total basis.

HAP Emissions

- **Resin**

  HAP Emission Factor (EF) Equations for Resin from NESHAP Subpart WWWW Table 1. The facility uses mechanical non-atomized resins. The facility utilized Equation 1.c. "nonatomized mechanical resin application" to estimate emissions based on a styrene content of 44%. Compliance with emissions limitations is based on mass balance calculations and 12-month rolling totals.

  1. Open Molding Operation.
     c. Non-atomized mechanical resin application.
        i. Nonvapor-suppressed resin with 33% or more HAP.

  $EF = (0.157 \times \%HAP) - 0.0165$

  Where: %HAP = Percent of HAP in the total volume of resin. Maximum of 44%.

- **Gel Coat**

  HAP Emission Factor Equation for Gel Coat from NESHAP Subpart WWWW Table 1. The facility uses atomized spray gel coats. The facility utilized Equation 1.f. "atomized spray gel coat application" to estimate emissions based on a styrene content of 44%. Compliance with emissions limitations is based on mass balance calculations and 12-month rolling totals.

  1. Open Molding Operation.
     g. Atomized spray gel coat application for materials with 33% or greater HAP.

  $EF = (1.036460 \times \%HAP) - 0.195$

  Where: %HAP = %HAP in in the total volume of resin.

- **Hand Lay-Up**
  HAP emissions from hand lay-up operations were calculated based on an estimated product use and NESHAP Subpart WWWW Table 1. The facility utilized Equation 1.a. "manual resin application" to estimate emissions based on a styrene content of 44%. Compliance with emissions limitations is based on mass balance calculations and 12-month rolling totals. No hand lay-up emissions were estimated for gel coat application.

  1. Open Molding Operation.
     a. Manual resin application for nonvapor-supressed resin materials with 33% or greater HAP.

     EF = (0.286 x %HAP) – 0.0529

     Where: %HAP = %HAP in in the total volume of resin.

Estimated Emissions

The calculated emissions are based on average styrene content and estimated product usage. The facility has requested synthetic minor source limits for VOC emissions and major source limits for styrene emissions. The facility will demonstrate compliance based on actual product use, monthly NESHAP Subpart WWWW calculations, and a 12-month rolling-total of annual emissions.

Estimated resin use was based on 1,095,000 lbs of resin product used every 365 days. Estimated gel coat use was based on 365,000 lbs of gel coat product used every 365 days. The resin used in hand lay-up operations was estimated to be 1% or less of total resin used in the facility.

Annual Styrene Emission Estimate Calculations

Operation	Use (lbs/yr)	Styrene (%)	Subpart WWWW Equation	EF ($lb_{styrene}/lb_{material}$)	Styrene (TPY)
Resin[1]	1,095,000	44.00	(0.157x%HAP)–0.0165	0.0526	28.79
Gel Coat[2]	365,000	44.00	(1.03646x%HAP)–0.195	0.2610	47.64
Hand Lay-up	10,950	44.00	(0.286x%HAP)–0.0529	0.0729	0.40

1 - nonatomized mechanical application. 2 – atomized mechanical application.

PM Emissions

CTCF assumes emissions associated with woodworking operations are negligible. There is a dust collector in the fiberglass manufacturing area. CTCF calculated a fiberglass PM emissions estimate based on the Ultra-Web MERV 15 rating and assumes the lower resistance rate for the PolyKlean Blue filter (Southern California Air Quality Management District, based on the PM emission factor for general plastics manufacturing). The calculation is as follows:

(0.2 lb PM filterable/ton material)(1,095,000 lb resin/year)(1 ton/2000 lb)(ton PM filterable/2000 lb PM filterable)(1-0.95)(1-0.825) = 0.0005 TPY

Based on the above calculation fiberglass PM emissions are negligible.

Facility-Wide Emissions

Description	HAP (%)	Usage (lbs/yr)	Emission Factor ($lb_{styrene}/lb_{material}$)	Styrene (TPY)	VOC (TPY)
Resin (nonatomized)	44	1,095,000	0.0526	28.79	28.79
Gel Coat (atomized)	44	365,000	0.2610	47.64	47.64
Hand Lay-up	44	10,950	0.0729	0.40	0.40
Totals				**76.83**	**76.83**
Requested Limits				**99.00**	**99.00[1]**
2017-1990-C limits				**9.90**	**99.00**
Difference				**89.10**	**0.00**

Note: VOC is the limiting pollutant. VOCs cannot exceed major source thresholds based on permit limits.

OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emissions Inventory & Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the "Insignificant Activities" or "Trivial Activities" thresholds require prior notification to AQD and may require a permit modification. Insignificant activities mean individual emission units that either are on the list in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits:

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for single HAP that the EPA may establish by rule

Emission limits have been established for the facility based on NESHAP, Subpart WWWW requirements, and the permit application.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]
This subchapter limits emissions of PM from directly fired fuel-burning units and industrial processes based on their process weight rates. For process rates of 60,000 lb/hr (30 TPH) or less, the emission rate in pounds per hour (E) is not to exceed the rate calculated using the process weight rate in tons per hour (P) and the formula in Appendix G ($E = 4.10*P^{(0.67)}$). Listed in the following table is the process weight rate, the estimated emissions, and the allowable emission limits. The table demonstrates that all equipment at the facility will be in compliance with this subchapter.

Emission Point	Description	Maximum Design Rate	Subchapter 19 Appendix G Limit	Calculated Controlled Max Emission Rate
		TPH	lb/hr	lb/hr
SN-01	Resin/Gel Coat	0.25	1.62	<0.01

OAC 252:100-25 (Visible Emissions and Particulate Matter) [Applicable]
No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case, shall the average of any six-minute period exceed 60% opacity.

OAC 252:100-29 (Fugitive Dust) [Applicable]
No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility will not cause

a problem in this area, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Not Applicable]
Part 2 limits the ambient air concentration of hydrogen sulfide (H_2S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 $\mu g/m^3$. Fuel-burning equipment fired with commercial natural gas will not have the potential to exceed the H_2S ambient air concentration limit. The facility does not have any stationary combustion units.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NOx per MMBTU. There are no equipment items that exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]
This facility has none of the affected sources: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic reforming unit, or petroleum catalytic cracking unit

OAC 252:100-37 (Volatile Organic Compounds) [Not Applicable]
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. There are no tanks at the facility with a vapor pressure of 1.5 psia or greater.
Part 5 limits the VOC content of coatings from any coating line or other coating operation. Facilities that emit less than 100 lbs of solvent per 24-hour day are exempt from this requirement. The resins and gel coats are not surface coatings and are not subject to the solvent content limitations of Part 5.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and

submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]
The potential emissions are less than the level of significance of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60 [Not Applicable]
There are no affected facilities or sources at this site covered under any subpart.
The following subparts of NSPS affect surface coating operations. However, none of the following apply to this facility for the reasons given in the following table.

Subpart	Description	Applicability	Comments
EE	Metal Furniture Coating	No	Not in source category
MM	Automobiles and Light-Duty Trucks Coating	No	Not in source category
QQ	Graphic Arts (Rotogravure)	No	Not in source category
RR	Pressure-Sensitive Tape and Label Coating	No	Not in source category
SS	Surface Coating of Large Appliances	No	Not in source category
TT	Metal Coil Surface Coating	No	Not in source category
WW	Beverage Can Surface Coating	No	Not in source category
FFF	Flexible Vinyl and Urethane Coating	No	Not in source category
SSS	Magnetic Tape Coating	No	Not in source category
TTT	Surface Coating Plastic Parts & Business Machines	No	Not in source category
VVV	Polymeric Coating of Supporting Substrates	No	Not in source category

NESHAP, 40 CFR Part 61 [Not Applicable]
There are no emissions of any of the regulated pollutants: arsenic, asbestos, benzene, beryllium, coke oven emissions, mercury, radionuclides, or vinyl chloride.

NESHAP, 40 CFR Part 63 [Subpart WWWW Applicable]
Subparts U and JJJ - National Emission Standards for Hazardous Air Pollutants for polymers and resins. This subpart identifies styrene as a constituent and covers the manufacture of certain resins and other materials. The applicant uses some of these products, but does not manufacture them, and is not an affected source.
Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The facility is not subject to Subpart PPPP because it is subject to Subpart WWWW.
Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. This subpart establishes standards for facilities in which reinforced and/or non-reinforced plastic composites or plastic molding compounds are

manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites and that are located at a major source of HAP emissions. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites. This subpart also establishes requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards.

This facility is a major source of HAP and is subject to this subpart. This facility is considered a new affected source that emits less than 100 TPY of HAP and does not have any centrifugal casting or continuous lamination/casting operations. The facility is subject to the annual average organic HAP emission limits in Table 3 of Subpart WWWW or the alternative organic HAP concentration limits of Table 7 of Subpart WWWW and the work practice standards in Table 4 of Subpart WWWW. Large open mold part manufacturing is exempt from the control requirements of §63.5805(d)(1). All applicable requirements will be incorporated into the permit. The MACT standard requires the following work practices for new open molding sources:

- The cleaning operations shall not use cleaning solvents that contain organic HAP, except that organic HAP containing cleaners may be used to clean cured resin from application equipment.
- When storing organic HAP containing materials the containers shall be closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

The organic HAP emission limits shown below will apply to the listed operations on a 12-month rolling average basis:

Open Molding - Corrosion-Resistant (CR)/High Strength (HS)	**lb HAP/Ton Resin**
Mechanical resin application	113
Filament application	171
Manual resin application	123
Open Molding - Non-CR/HS	
Mechanical resin application	88
Filament application	188
Manual resin application	87
Open Molding – Tooling	
Mechanical resin application	254
Manual resin application	157
Open Molding – Low Flame Spread/Low Smoke	
Mechanical resin application	497
Filament application	270
Manual resin application	238
Open Molding – Shrinkage Control	
Mechanical resin application	354

Open Molding - Corrosion-Resistant (CR)/High Strength (HS)		**lb HAP/Ton Resin**
	Filament application	215
	Manual resin application	180
Open Molding – Gel Coat		
	Tooling gel coating	440
	White/Off white pigmented gel coats	267
	All other pigmented gel coats	377
	CR/HS or high performance gel coat	605
	Fire retardant gel coat	854
	Clear production gel coat	522
Centrifugal Casting – CR/HS		25
Centrifugal Casting - Non-CR/HS		20

The following alternative organic HAP content limitations from NESHAP, Subpart WWWW, Table 7 can be used at a facility with multiple operations to allow the use of the same resin type across different operations (This option is limited to resins of the same type and may be used only for CR/HS, non-CR/HS resins, and tooling resins):

For facilities with centrifugal casting using CR/HS resins, the highest resin weight percent or highest average resin weight percent organic HAP content allowable is:

For Resin Type and Application Method:	**% HAP**
CR/HS Mechanical resin application	48.0
CR/HS Filament application	
CR/HS Manual resin application	

For facilities with non-atomized mechanical application of CR/HS resins, the highest resin weight percent or highest average resin weight percent organic HAP content allowable is:

For Resin Type and Application Method:	**% HAP**
CR/HS Filament application	46.4
CR/HS Manual resin application	

For facilities with filament application of CR/HS resins, the highest resin weight percent or highest average resin weight percent organic HAP content allowable is:

For Resin Type and Application Method:	**% HAP**
CR/HS Manual resin application	42.0

For facilities with filament application of non-CR/HS resins, the highest resin weight percent or highest average resin weight percent organic HAP content allowable is:

For Resin Type and Application Method:	% HAP
Non-CR/HS Mechanical resin application	45.0
Non-CR/HS Manual resin application	
Non-CR/HS Centrifugal Casting	

For facilities with non-atomized mechanical application of non-CR/HS resins, the highest resin weight percent or highest average resin weight percent organic HAP content allowable is:

For Resin Type and Application Method:	% HAP
Non-CR/HS Manual resin application	38.5
Non-CR/HS Centrifugal Casting	

For facilities with centrifugal casting using CR/HS resins, the highest resin weight percent or highest average resin weight percent organic HAP content allowable is:

For Resin Type and Application Method:	% HAP
Non-CR/HS Manual resin application	37.5

For facilities with nonatomized mechanical application of tooling resins, the highest resin weight percent or highest average resin weight percent organic HAP content allowable is:

For Resin Type and Application Method:	% HAP
Tooling Manual	91.4

For facilities with manual application of tooling resins, the highest resin weight percent or highest average resin weight percent organic HAP content allowable is:

For Resin Type and Application Method:	% HAP
Tooling Atomized Application	45.9

NESHAP Subpart WWWW is applicable to this facility, because the facility is a major source. The emission factor (EF) for styrene shall be calculated using the appropriate formulation in the NESHAP Subpart WWWW Table 1 that is shown on the following pages. The styrene emission calculations are shown above under the EMISSIONS section of this memorandum.

Table 1 to Subpart WWWW – Equations to Calculate Organic HAP Emission Factors Specific Open Molding and Centrifugal Casting Process Streams[1]

If your operation type is a new or existing …	And you use …	With …	Use this organic HAP Emission Factor (EF) Equation for materials with less than 33 % organic HAP (19 % organic HAP for nonatomized gel coat)[2 3 4] …	Use this organic HAP Emission Factor (EF) Equation for materials with 33 % or more organic HAP (19 % organic HAP for nonatomized gel coat)[2 3 4] …
1. Open molding operations	a. Manual resin application	i. Nonvapor-suppressed resin.	EF = 0.126 × %HAP × 2000.	EF = ((0.286 × %HAP) - 0.0529) × 2000.
		ii. Vapor-suppressed resin.	EF = 0.126 × %HAP × 2000 × (1-(0.5 × VSE factor))	EF = ((0.286 × %HAP) - 0.0529) × 2000× (1-(0.5 × VSE factor)).
		iii. Vacuum bagging/closed mold curing with roll-out.	EF = 0.126 × % HAP × 2000 × 0.8.	EF = ((0.286 × %HAP) - 0.0529) × 2000 × 0.8.
		iv. Vacuum bagging/closed mold curing with out roll-out.	EF = (0.126 × % HAP × 2000 × 0.5.	EF = ((0.286 ×%HAP) - 0.0529) × 2000× 0.5.
	b. Atomized mechanical resin application	i. Nonvapor-suppressed resin.	EF = 0.169 × %HAP × 2000.	EF = ((0.714 × %HAP) - 0.18) × 2000.
		ii. Vapor-suppressed resin.	EF = 0.169 × %HAP × 2000 × (1-(0.45 × VSEfactor)).	EF = ((0.714 × %HAP) - 0.18) × 2000 ×(1!(0.45 × VSE factor)).
		iii. Vacuum bagging/closed mold curing with roll-out.	EF = 0.169 × %HAP × 2000 × 0.85.	EF = ((0.714 × %HAP) - 0.18) × 2000 ×0.85.
		iv. Vacuum bagging/closed mold curing with out roll -out.	EF = 0.169 × %HAP × 2000 × 0.55.	EF = ((0.714 × %HAP) - 0.18) × 2000 ×0.55.
	c. Nonatomized mechanical resin application	i. Nonvapor-suppressed resin.	EF = 0.107 × %HAP × 2000.	EF = ((0.157 × %HAP) - 0.0165) × 2000.
		ii. Vapor-suppressed resin.	EF = 0.107 × %HAP × 2000 × (1-(0.45 × VSEfactor)).	EF = ((0.157 × %HAP) - 0.0165) × 2000× (1!(0.45 × VSE factor)).
		iii. Closed mold curing with roll-out.	EF = 0.107 × %HAP × 2000 × 0.85.	EF = ((0.157 × %HAP) - 0.0165) × 2000 × 0.85.
		iv. Vacuum bagging/closed mold curing with out roll -out.	EF = 0.107 × %HAP × 2000 × 0.55.	EF = ((0.157 × %HAP) - 0.0165) × 2000 × 0.55.
	d. Atomized mechanical resin application with robotic or automated spray control[5]	Nonvapor-suppressed resin.	EF = 0.169 × %HAP × 2000 × 0.77.	EF = 0.77 × ((0.714 × %HAP) – 0.18) × 2000.

Table 1 to Subpart WWWW – Equations to Calculate Organic HAP Emission Factors Specific Open Molding and Centrifugal Casting Process Streams (Cont.)

If your operation type is a new or existing …	And you use …	With …	Use this organic HAP Emission Factor (EF) Equation for materials with less than 33 % organic HAP (19 % organic HAP for nonatomized gel coat)[1] [2] [3] …	Use this organic HAP Emission Factor (EF) Equation for materials with 33 % or more organic HAP (19 % organic HAP for nonatomized gel coat)[1] [2] [3] …
	e. Filiment application[6]	i. Nonvapor-suppressed resin	EF = 0.184 × %HAP × 2000	EF = ((0.2746 × %HAP) - 0.0298) × 2000
		ii. Vapor-suppressed resin	EF = 0.12 × %HAP × 2000	EF = ((0.2746 × %HAP) - 0.0298) × 2000× 0.65
	f. Atomized spray gel coat application	Nonvapor-suppressed gel coat	EF = 0.446 × %HAP × 2000	EF = ((1.03646 × %HAP) - 0.195) × 2000
	g. Nonatomized spray gel coat application	Nonvapor-suppressed gel coat	EF = 0.185 × %HAP × 2000	EF = ((0.4506 × %HAP) - 0.0505) ×2000
	h. Atomized spray gel coat application using robotic or automated spray	Nonvapor-suppressed gel coat	EF = 0.445 × % HAP × 2000 × 0.73	EF = ((1.03646 × %HAP) - 0.195) × 2000 × 0.73
2. Centrifugal casting operations.[7] [8]	a. Heated air blown through molds	Nonvapor-suppressed resin	EF = 0.558 × (%HAP) × 2000	EF = 0.558 × (%HAP) × 2000
	b. Vented molds, but air vented through the molds is not heated	Nonvapor-suppressed resin	EF = 0.026 × (%HAP) × 2000	EF = 0.026 × (%HAP) × 2000

Footnotes to Table 1

[1] The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in Subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of § 63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

[3] %HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, *i.e.* 33 %HAP should be input as 0.33, not 33.

[4] The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

[5] This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

[6] Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

[7] These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

[8] If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

The following subparts of NESHAP affect surface coating operations. The table lists Subpart WWWW as applicable. No other NESHAPs apply to this facility at this time for the reasons given in the following table.

Subpart	Description	Applicable	Comments
N	Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	No	Not in source category
U	Group I Polymers and Resins	No	Not in source category
JJJ	Group IV Polymers and Resins	No	Not in source category
GG	Aerospace Manufacturing and Rework Facilities	No	Not in source category
II	Shipbuilding and Ship Repair (Surface Coating)	No	Not in source category
IIII	Surface Coating of Automobiles and Light Trucks	No	Not in source category
JJJJ	Paper and Other Web Coating	No	Not in source category
KKKK	Surface Coating of Metal Cans	No	Not in source category
MMMM	Paint Stripping and Surface Coating of Miscellaneous Metal Parts and Products	No	Not in source category
NNNN	Surface Coating of Large Appliances	No	Not in source category
OOOO	Coating of Fabrics and Other Textiles	No	Not in source category
PPPP	Surface Coating of Plastic Parts and Products	No	Subject to WWWW, exempt
QQQQ	Surface Coating of Wood Building Products	No	Not in source category
RRRR	Surface Coating of Metal Furniture	No	Not in source category
SSSS	Surface Coating of Metal Coil	No	Not in source category
VVVV	Boat Manufacturing	No	Not in source category
WWWW	**Reinforced Plastic Composites Production**	**Yes**	**Facility is a major source of HAPs**
DDDDD	Industrial, Commercial, and Institutional Boilers and Process Heaters	No	Not in source category
HHHHH	Miscellaneous Coating Manufacturing	No	Not in source category
HHHHHH	Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	No	Not engaged in following operations as defined in 40 CFR §63.11169: a) No paint stripping operations that involve the use of chemical strippers that contain MeCl. b) No auto body refinishing operations. c) No spray application of coating containing Target HAPs (Cr, Pb, Mn, Ni or Cd).
WWWWWW	Area Source Standards for Plating and Polishing Operations	No	Not in source category

Subpart	Description	Applicable	Comments
XXXXXX	Area Source Standards for Nine Metal Fabrication and Finishing Source Categories	No	Not in any of these 9 source categories (1) Electrical and Electronic Equipment Finishing Operations; (2) Fabricated Metal Products; (3) Fabricated Plate Work (Boiler Shops); (4) Fabricated Structural Metal Manufacturing; (5) Heating Equipment, except Electric; (6) Industrial Machinery and Equipment Finishing Operations; (7) Iron and Steel Forging; (8) Primary Metal Products Manufacturing; and (9) Valves and Pipe Fittings.
CCCCCCC	Area Source Standards for Paints and Allied Products Manufacturing	No	Not in source category

Compliance Assurance Monitoring, 40 CFR Part 64 [Not Applicable]
Compliance Assurance Monitoring (CAM), as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source that is required to obtain a Title V permit, if it meets all of the following criteria:

* It is subject to an emission limit or standard for an applicable regulated air pollutant
* It uses a control device to achieve compliance with the applicable emission limit or standard
* It has potential emissions, prior to the control device, of the applicable regulated air pollutant greater than the major source threshold.

This facility does not use a control device to comply with an emission limit, where the potential emissions prior to the control device are greater than the major source thresholds, and is therefore not subject to CAM.

Accidental Release Prevention, 40 CFR Part 68 [Not Applicable]
This facility will not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: *www.epa.gov/rmp*.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subparts A and F Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor

vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030. This facility does not utilize any Class I & II substances.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The Standard Conditions of the permit address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; § 82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

COMPLIANCE

Enforcement

The facility was constructed under synthetic minor source construction Permit No. 2017-1990-C, issued February 12, 2018. The facility submitted a self-disclosure on June 6, 2019. The self-disclosure stated, “The violation began in February of 2019 when calculated emissions of styrene exceeded 10 TPY.” This was an exceedance of the synthetic minor source permit limit. Enforcement Case ID 9587 was opened to address the self-disclosure. Issuance of this permit is partial resolution of the enforcement case.

Tier Classification

This application has been determined to be Tier II based on the request for an initial construction permit for a major source of emissions. The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant has a current lease given to accomplish the

permitted purpose. Information on all permit actions is available for review by the public on the Air Quality section of the DEQ web page at: *http:/www.deq.ok.gov/.*

Public Review
The applicant published the "Notice of Filing a Tier II Application" in *The Oklahoman*, a daily newspaper printed and published in Oklahoma City, Oklahoma County, Oklahoma, on February 14, 2020. *The Oklahoman* circulates in Grady County. The notice stated that the permit application was available for public review at the Chickasha Public Library, located at 527 West Iowa Avenue; Chickasha, OK 73018, or at the Air Quality Division's Main Office in Oklahoma City, Oklahoma. The applicant will publish a "Notice of Draft Tier II Permit" in a newspaper circulated in Grady County to inform the public of the 30 day public review. The notice shall state a copy of the draft permit and permit application are available on the Air Quality section of the DEQ web page at *www.deq.ok.gov*. The facility is not located within 50 miles of the boarder of Oklahoma and any other state.

EPA Review
The proposed permit will be forwarded to EPA Region VI for a 45-day review period.

Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page *http://www.deq.ok.gov/.*

Inspection
Kyle Walker of DEQ-AQD met with Joe Chapman of Cooling Tower Composites and Fabrication, Inc. and Jeremy Townley of Trinity Consultants at 10:00 am on February 14, 2019, to perform an initial compliance inspection at the Chickasha Facility. The facility was constructed and is operating as described in the permit applications.

Fee Paid
The fee for an application for an individual major source construction permit is $7,500 and $7,500 has been received.

SUMMARY

The facility has demonstrated the ability to comply with the requirements of the applicable Air Quality rules and regulations.. Ambient air quality standards are not threatened at this site. Compliance and Enforcement concur with issuance of the permit.. Issuance of the construction permit is recommended, contingent on public and EPA review.

DRAFT

PERMIT TO CONSTRUCT
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Cooling Tower Composites and Fabrication, Inc. **Permit No. 2017-1990-C (M-1)**
Chickasha Facility

The permittee is authorized to construct and operate in conformity with the specifications submitted to the Air Quality Division on May 25, 2018, and supplemental information. The Evaluation Memorandum dated May 11, 2020, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Commencing construction and continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and emissions limitations for each point: [OAC 252:100-8-6(a)(1)]

Facility-Wide Emission Limits

Point	Description	HAP Limit	VOC Limit
		TPY	TPY
Facility	Manufacture Fiberglass Parts	99.00	99.00[1]

1 – VOC is the limiting pollutant.

2. Calculated emissions to demonstrate compliance with the TPY limits shall be based on 40 CFR Part 60 New Source Performance Standards, Subpart WWWW Table 1. [OAC 252:100-8-6(a)(1)]

3. The permittee shall keep records of operations as listed below. These records shall be retained on-site or at a local field office, or at a readily accessible location for a period of at least five years following dates of recording, and shall be made available to regulatory personnel upon request. Such records include, but are not necessarily limited to, the following. [OAC 252:100-8-6(a)(1)]

   a. Material Safety Data Sheets (MSDSs) for all resins, gelcoats, and other materials used at the facility showing the percentage by weight of VOCs, HAPs, and all air toxic constituents.
   b. Resin usage by type of application and organic HAP content, gelcoat usage by type of application and organic HAP content (monthly and 12-month rolling totals).
   c. Records required to perform NESHAP Subpart WWWW compliance demonstrations, including but not limited to percentage of HAP and vapor suppression effectiveness factors ("VSE" in NESHAP Subpart WWWW) used in resins and gel coats.
   d. Emission calculations of VOCs and HAPs (monthly and 12-month rolling total).

4. Upon issuance of an operating permit, the permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)(1)]

5. All resin application must be performed using either manual application or nonatomized mechanical application methods as defined in NESHAP Subpart WWWW. Gelcoat application may be performed using either atomized or non-atomized methods. Non-Atomized Methods involve use of flow coaters, pressure fed rollers, or fluid impingement spray guns. [OAC 252:100-8-6(a)(1)]

6. The permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production for all affected facilities located at this site including but not limited to the following: [§63.5780 through §63.5935]

WHAT THIS SUBPART COVERS

§63.5780 What is the purpose of this subpart?
§63.5785 Am I subject to this subpart?
§63.5787 What if I also manufacture fiberglass boats or boat parts?
§63.5790 What parts of my plant does this subpart cover?
§63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

CALCULATING ORGANIC HAP EMISSIONS FACTORS FOR OPEN MOLDING AND CENTRIFUGAL CASTING

§63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?
§63.5797 How do I determine the organic HAP content of my resins and gel coats?
§63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?
§63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?

COMPLIANCE DATES AND STANDARDS

§63.5800 When do I have to comply with this subpart?
§63.5805 What standards must I meet to comply with this subpart?

OPTIONS FOR MEETING STANDARDS

§63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?
§63.5820 What are my options for meeting the standards for continuous lamination/casting operations?
§63.5830 What are my options for meeting the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement?

GENERAL COMPLIANCE REQUIREMENTS

§63.5835 What are my general requirements for complying with this subpart?

TESTING AND INITIAL COMPLIANCE REQUIREMENTS

§63.5840 By what date must I conduct a performance test or other initial compliance demonstration?
§63.5845 When must I conduct subsequent performance tests?
§63.5850 How do I conduct performance tests, performance evaluations, and design

Table 9 to Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards
Table 10 to Subpart WWWW of Part 63—Data Requirements for New and Existing Continuous Lamination Lines and Continuous Casting Lines Complying With a Percent Reduction Limit on a Per Line Basis
Table 11 to Subpart WWWW of Part 63—Data Requirements for New and Existing Continuous Lamination and Continuous Casting Lines Complying With a Percent Reduction Limit or a Lbs/Ton Limit on an Averaging Basis
Table 12 to Subpart WWWW of Part 63—Data Requirements for New and Existing Continuous Lamination Lines and Continuous Casting Lines Complying With a Lbs/Ton Organic HAP Emissions Limit on a Per Line Basis
Table 13 to Subpart WWWW of Part 63—Applicability and Timing of Notifications
Table 14 to Subpart WWWW of Part 63—Requirements for Reports
Table 15 to Subpart WWWW of Part 63—Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63
Appendix A to Subpart WWWW of Part 63—Test Method for Determining Vapor Suppressant Effectiveness

7. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations which qualify as Trivial Activities. [OAC 252:100-8-6 (a)(3)(B)]

   a. Storage tanks less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than 1.0 psia at maximum storage temperature: records of capacity of the tanks and contents.
   b. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia: records of capacity of the tanks and contents.
   c. Non-commercial water washing operations (less than 2,250 barrels per year) and drum crushing operations of empty barrels less than or equal to 55 gallons with less than three percent by volume of residual material: records of number of barrels, volume of each barrel, and materials stored in each barrel.
   d. Surface coating operations which do not exceed a combined total usage of more than 60 gallons per month of coatings, thinners, and clean-up solvents at any one emissions unit: volume of coatings, thinners, and clean-up solvents, monthly.
   e. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: the type of activity and the amount of emissions from that activity (annual).

8. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-43]

   a. Quantity of each resin and gel coat used by application method (monthly);
   b. The styrene content of each resin and gel coat;
   c. Updated Material Safety Data Sheets (MSDS) for all resins, gel coats, and other materials used at the facility showing the % styrene by weight, the percentage by weight of other organic HAP constituents, and percent by weight VOC;
   d. Records as required by Specific Condition 3.c.

e. Records as required by NESHAP Subpart WWWW;
f. Records of insignificant activities;
g. Calculations indicating compliance with the limit in Specific Condition No. 1 (monthly and 12-month rolling totals).

MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(June 21, 2016)

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.
[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements.
[OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

1. the date, place and time of sampling or measurement;
2. the date or dates analyses were performed;
3. the company or entity which performed the analyses;
4. the analytical techniques or methods used;
5. the results of such analyses; and
6. the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report. [OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions. [OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act. [OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM_{10}). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification. [OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.
[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
[OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege.
[OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking,

reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.
[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.
[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.
[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.
[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

1. Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
2. The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
4. DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d). [OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a "grandfathered source," as defined under AQD rules. Such changes may require a permit modification.
[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E.Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

1. enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance.

[OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

1. an emergency occurred and the permittee can identify the cause or causes of the emergency;
2. the permitted facility was at the time being properly operated;
3. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

1. 5 tons per year of any one criteria pollutant.
2. 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.
[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the

permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

1. result in no net emissions increases,
2. are not modifications under any provision of Title I of the federal Clean Air Act, and
3. do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

1. Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]

2. No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]

3. For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]

   a. Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
   b. Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
   c. An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
   d. Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.

4. No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

5. No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

6. Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]

7. All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

(1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
(2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
(3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
5. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

(1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.

(2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).

(3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).

(4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R.§ 70.8(a) and (c).

(5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.

(6) The DEQ complies with 40 C.F.R. § 70.8(d).

(7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).

(8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.

(9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

(10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]

SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Cooling Tower Composites and Fabrication, Inc.
Attn: Joe Chapman
2500 Frisco Avenue
Chickasha, Oklahoma 73018

Permit Number: **2017-1990-C (M-1)**
Permit Writer: Kyle Walker, E.I.

SUBJECT: Facility: Chickasha Facility (Fac ID: 18506)
Location: 2500 Frisco Avenue
Chickasha, Oklahoma 73018

Dear Mr. Chapman:

Enclosed is the permit authorizing construction of the referenced facility. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at kyle.walker@deq.ok.gov or (405) 702-4193.

Sincerely,

DRAFT

Phillip Fielder, P.E.
Chief Engineer
Air Quality Division

Enclosure

DRAFT

PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 N. ROBINSON, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2017-1990-C (M-1)

Cooling Tower Composites and Fabrication, Inc.

having complied with the requirements of the law, is hereby granted permission to construct the Chickasha Facility in the SW1/4 Section 20, Township 7N, Range 7W, Grady County, Oklahoma, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both of which are attached.

In the absence of construction commencement, this permit shall expire 18 months from the issuance date, except as authorized under Section VIII of the Standard Conditions.

DRAFT

Eddie Terrill **Date**
AQD Division Director

SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Cooling Tower Composites and Fabrication, Inc.
Attn: Joe Chapman
2500 Frisco Avenue
Chickasha, Oklahoma 73018

Permit Number: **2017-1990-C (M-1)**
Permit Writer: Kyle Walker, E.I.

SUBJECT: Facility: Chickasha Facility (Fac ID: 18506)
Location: 2500 Frisco Avenue
Chickasha, Oklahoma 73018

Dear Mr. Chapman:

Air Quality Division has completed the initial review of your permit application referenced above. This application has been determined to be a **Tier II**. In accordance with 27A O.S. § 2-14-302 and OAC 252:004-7-13(c) the enclosed draft permit is now ready for public review. The requirements for public review include the following steps which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instructions enclosed)

2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of this draft permit on the DEQ website and access to the application through the DEQ website.

3. Send to AQD a copy of the proof of publication notice from Item #1 above together with any additional comments or requested changes which you may have on the draft permit.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION
Enclosure