DRAFT/PROPOSED

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **June 16, 2020**

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

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

THROUGH: Phil Martin, P.E., Engineering Manager, Existing Source Permit Section

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

FROM: Kayla Cunningham, E.I., Existing Source Permit Section

SUBJECT: Evaluation of Permit Application No. **2019-1256-TVR4**
Beetle Plastics, LLC; A Midwest Towers Company
Ardmore Plant (SIC 3089/NAICS 326199)
Facility ID: 2756
Latitude: 34.30489; Longitude: -97.02769
Section 7, T3S, R3E, Carter County
Directions: From Oklahoma City, take I-35 South to Highway 53 East. Drive east for 6.1 miles, and continue straight onto General St. for 0.5 miles. Turn left onto Wright St. for 0.3 miles, and turn right onto Beetle St.

SECTION I. INTRODUCTION

Beetle Plastics, LLC (Beetle), has submitted an application to renew their current Part 70 operating permit. The facility is currently operating under Permit No. 2014-2367-TVR3, which was issued on July 8, 2015. No changes of the current permit have been requested. This permit will be updated to reflect all current rules and regulations. The facility is a minor source for Prevention of Significant Deterioration (PSD) and a major source of Hazardous Air Pollutants (HAPs).

SECTION II. FACILITY DESCRIPTION

Beetle manufactures fiberglass pipe, ducts, tanks, and associated fittings for specialty applications in a variety of industries. Piping is produced by either winding or hand layup operations. After curing under gas-fired heater units, some of the fiberglass piping manufactured at the fiberglass winding station moves to the chop gun operation for addition of specialty flanges. Similarly, stand-alone flanges and specialty fittings can be manufactured in the chop gun operation.

In the manufacturing process, liquid polyester resins with various additives (e.g. catalysts) are mixed in the mixing area. The resins are then applied using one of the following: filament winding machines, hand layup, or the chop gun. Three (3) 50 MBTU/hr natural gas-fired infrared heaters

are used to augment the polymerization of the resin into a solid product in the filament winding machines. Some specifications require the placement of a product into a separate natural gas-fired curing oven.

The thermosetting polyesters used are complex polymers resulting from the cross-linking reaction of a liquid, unsaturated polyester with a styrene monomer. Styrene emissions come from the evaporation of un-crosslinked styrene from the uncured resin. Different types of resin are used with a styrene monomer content of less than 50%. Other HAPs/VOCs are emitted from the mixing/fabrication process. The manufacturing of the reinforced plastic products is conducted in one building. The styrene and other HAPs or VOCs emissions are vented through fourteen (14) fans installed on the walls of the building.

SECTION III. EQUIPMENT

EUG 1. Fiberglass Reinforced Plastic Manufacturing Process

The facility was constructed before 1970. The process includes the following equipment:

Resin/Additive Storage
Resin/Additive Mixing Area
Filament Winding Area (Gelcoat and Resin Layup, Plastics Fabrication, and Drying/Curing)
Natural Gas-Fired Drying Heaters
Natural Gas-Fired Curing Oven

EUG 2. Storage Tanks

2,000-gallon Acetone Tank
500-gallon Diesel Tank
250-gallon Propane Tank
5,000-gallon Resin Tank (Three)
5,500-gallon Resin Tank (Two)

EUG 3. Mechanical Atomized Application

The chop gun was added to the facility in 10/2001.

Chop Gun

SECTION IV. EMISSIONS

Emission estimates of NO_X, CO, and VOC for the natural gas-fired heaters and oven are based on continuous operation and AP-42 (7/98), Tables 1.4-1 and 1.4-2.

Emissions from the Heaters and Oven

Equipment	NO_X		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
1	0.005	0.020	0.002	0.009	<0.001	0.001
2	0.005	0.020	0.002	0.009	<0.001	0.001
3	0.005	0.020	0.002	0.009	<0.001	0.001
4	0.147	0.644	0.124	0.541	0.008	0.035
Total	**0.162**	**0.704**	**0.130**	**0.568**	**0.009**	**0.038**

Emissions from the fiberglass fabrication process consist of HAPs (mainly styrene) and non-HAP VOC. The maximum organic HAP (mainly styrene) content in all the resins currently used is less than 50%. To be conservative, the facility's maximum potential to emit is based on the organic HAP emission factor for resins containing 50% by weight organic HAP. Actual emissions were based on operating 2,600 hours a year and potential emissions are factored up to 8,760 hours a year, except for resin applied using the chop gun. Other HAPs and toxic air contaminants (TACs) are present in the additives and resins.

Other non-HAP VOC emissions are based upon the maximum non-HAP VOC content. All of the other non-HAP VOCs are assumed to be emitted to the atmosphere. VOC as defined in Subchapter 37 excludes acetone. Materials with a vapor pressure of less than 0.01 psia are not considered to be emitted to the atmosphere. Fugitive emissions are based on EPA's *1995 Protocol for Equipment Leak Emission Estimates* (EPA-453/R-95-017), SOCMI average emission factors, an estimated percentage of VOC, and an estimated equipment count.

Emissions originate from several points located within the building but are primarily generated in the winding and spray layup area during resin and gel coat application. HAP emissions estimates for the facility have been calculated using the required National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart WWWW, Emission Factor Equations in Table 1 of Subpart WWWW. As required in §§ 63.5796, 63.5799(a)(1) and (b), and 63.5810(a)(1), to calculate organic HAP emission factors for specific open molding process streams, the permittee must use the equations in Table 1 of Subpart WWWW, which is reproduced on the following pages.

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

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] …
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 without 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 × VSE factor))	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 without 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 × VSE factor))	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 without 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[4]	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[5]	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. Manual gel coat application[6]	Nonvapor-suppressed gel coat.	EF = 0.126 × % HAP × 2000 (for emissions estimation only, see footnote 6)	EF = ((0.286 ×%HAP) - 0.0529) × 2000 (for emissions estimation only, see footnote 6)
2. Centralfugal 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] 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.

[2] %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.

[3] 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.

[4] This equation is based on an 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.

[5] 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.

[6] Do not use this equation for determining compliance with emission limits in Tables 3 or 5 of Subpart WWWW. To determine compliance with emission limits, you must treat all gel coat as if it were applied as part of your gel coat spray application operations. If you apply gel coat by manual techniques only, you must treat the gel coat as if it were applied with atomized spray and use Equation 1.f. to determine compliance with the appropriate emission limits in Tables 3 or 5 of Subpart WWWW. To estimate emissions from manually applied gel coat, you may either include the gel coat quantities you apply manually with the quantities applied using spray, or use this equation to estimate emissions from the manually applied portion of your gel coat.

[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.

A small amount of particulate matter will result from overspray of the material. The particulate emissions were calculated with a 95% transfer efficiency and a 98% collection efficiency. Particulate emissions from overspray, welding, sanding, and grinding operations are considered insignificant and are not listed below.

Calculated Facility-Wide Styrene Emissions

Method of Application	Actual Usage (lb/yr)	Potential Usage (lb/yr)	Emission Factor (lb HAP per ton Resin)	Actual Emissions (TPY)	Potential Emissions (TPY)
Winding (Filament Application)	164,681	538,510	215.0	8.852	28.945
Hand (Manual)	109,874	370,275	180.2	4.950	16.681
Chop Gun (Mechanical Atomized)	40,000	40,000	354.4	3.544	3.544
Total				**17.346**	**49.170**

HAP Emissions from the Fiberglass Reinforced Plastic Manufacturing Process

Pollutant	CAS No.	Actual		Potential
		lb/hr	TPY	TPY
Styrene	100-42-5	14.075	17.346	49.170
Dimethylaniline	121-69-7	0.098	0.127	0.428
Toluene	108-88-3	0.102	0.133	0.448
Dimethyl Phthalate	131-11-3	0.039	0.051	0.172
Total HAP		**14.314**	**17.657**	**50.218**

This facility is a major source of HAP.

SECTION V. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Appropriate recordkeeping of activities, indicated below with a "*," is specified in the Specific Conditions.

1. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5-MMBTUH heat input (commercial natural gas). Three heaters are rated at 0.05 MMBTUH, and one curing oven is rated at 3.0 MMBTUH.

2. *Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. There is one 500-gallon diesel tank at the site.

3. *Bulk gasoline or other fuel distribution with a daily average throughput less than 2,175 gallons per day, including dispensing, averaged over a 30-day period. A 250-gallon propane tank and a 500-gallon diesel tank are used to distribute fuel with 0.67 gallons per day each over a 30-day period.

4. *Activities that have potential to emit of no more than 5 TPY (actual) of any criteria pollutant. No such activities have been identified but may occur in the future.

SECTION VI. 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 and 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. Emission inventories have been submitted and fees paid for the past years.

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 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 the emission limits established by NESHAP, Subpart WWWW.

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 (PM)) [Applicable]
This subchapter specifies a PM emissions limitation of 0.6 lb/MMBTU from fuel-burning equipment with a rated heat input of 10 MMBTUH or less. AP-42, Table 1.4-2 (7/98), lists the total PM emissions for natural gas fired boilers to be 0.0075 lb/MMBTU. The permit requires the use of commercial-grade natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

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. When burning natural gas, there is little possibility of exceeding the opacity standards.

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) [Applicable]
Part 3 lists a maximum ambient air concentration limit of 1,200 $\mu g/m^3$ (one hour average) for existing equipment. SO_2 emissions from the natural gas-fired heaters and the curing oven are insignificant and are unlikely to exceed the limit.
Part 5 limits sulfur dioxide emissions from new equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input. There is no new SO_2 emitting equipment at the facility.

OAC 252:100-37 (Volatile Organic Compounds) [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. All storage tanks were constructed before 1970.
Part 3 requires VOC loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading and is not subject to this requirement.
Part 5 limits the VOC content of coatings from any coating line or other coating operation. This facility does not conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt. 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.
Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. Temperature and available air must be sufficient to provide essentially complete combustion.
Part 7 requires all effluent water separator openings, which receive water containing more than 200 gallons per day of any VOC, to be sealed or the separator to be equipped with an external floating roof or a fixed roof with an internal floating roof or a vapor recovery system. There are no effluent water separators located at this facility.

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.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

OAC 252:100-11	Alternative Emissions Reduction	not requested
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain Elevators	not in source category
OAC 252:100-33	Nitrogen Oxides	not in source category
OAC 252:100-35	Carbon Monoxide	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Municipal Solid Waste Landfills	not in source category

SECTION VII. 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.

New Source Performance Standards (NSPS), 40 CFR Part 60 [Not Applicable]
Subparts K, Ka, Kb, VOL Storage Vessels. The storage tanks at the facility were constructed before the effective dates of these subparts; therefore, they are not subject to these subparts.

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

NESHAP, 40 CFR Part 63 [Subpart WWWW is Applicable]
Subpart PPPP, Plastic Parts and Products Surface Coating. This subpart affects facilities that use 100 gallons per year or more of coatings which contain HAP for surface coating of plastic parts and products and that is a major source, is located at a major source, or is part of a major source of HAP. Plastic part and product means any piece or combination of pieces of which at least one has been formed from one or more resins. Affected source is the collection of the following:

1) All coating operations as defined in §63.4581;
2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

This facility is a major source of HAP. This facility does not coat any plastic parts or products. Therefore, it is not subject to this subpart.
Subpart WWWW, Reinforced Plastics Composites Production. This subpart was promulgated on April 21, 2003, and affects all existing and new reinforced plastic composite production facilities using thermoset resins located at a major source of HAP. This facility is a major source of HAP and is subject to this subpart. This facility is considered an existing facility and does not have any centrifugal casting or continuous lamination/casting operations and 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. All applicable requirements will be incorporated into the permit. The MACT standard requires the following work practices for existing 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
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 nonatomized 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 nonatomized 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

CAM, 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 of 100 TPY

The facility does not use a control device to achieve compliance with any applicable emission limits. Therefore, 40 CFR Part 64 does not apply.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
The facility does not store any substance listed in CAAA 90 Section 112(r) above its threshold. 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 are 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.
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.

Conditions are included in the standard conditions of the permit to 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 lbs. or more of refrigerant.

SECTION VIII. COMPLIANCE

Inspection
A full compliance inspection was performed on December 2, 2019, by Jennie Brixey, Environmental Programs Specialist of the Air Quality Division, accompanied by Steve Watt, Environmental Representative for Beetle. All significant emission sources were observed, and the facility was operating as described in the current permit application.

Tier Classification
This application has been determined to be Tier II based on the request for renewal of a Part 70 operating permit.

Landowner Notification
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.

Public Review
The applicant published the "Notice of Filing a Tier II Application" in *The Ardmoreite* newspaper, a local newspaper in Carter County on December 24, 2019. The notice stated that the application was available for review at the facility. The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at http://www.deq.ok.gov.

The applicant will be required to publish a "Notice of Tier II Draft Permit." On publication of this notice, the 30-day public review period will start. The draft permit will also be available for public review on the Air Quality section of the DEQ web page at http://www.deq.ok.gov.

Notice of Affected States
This facility is located within 50 miles of the Oklahoma-Texas border. Notice of the draft permit will be provided to the state of Texas.

EPA Review
The proposed permit will be sent to EPA for a 45-day concurrent review by EPA Region 6. If public comments are received, the concurrent review process will be used and a complete "proposed" permit will be sent to EPA for a 45-day review period.

Fees Paid
The Part 70 source operating permit renewal application fee of $7,500 has been paid.

SECTION IX. SUMMARY

The facility is operating as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues

concerning this facility. Issuance of the operating permit is recommended, contingent on public and EPA review.

PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Beetle Plastics, LLC **Permit Number 2019-1256-TVR4**
A Midwest Towers Company **Facility ID: 2756**
Ardmore Plant

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on December 5, 2019. The Evaluation Memorandum dated June 16, 2020, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions: [OAC 252:100-8-6(a)(1)]

EUG 1. Fiberglass Reinforced Plastic Manufacturing Process

Resin/Additive Storage
Resin/Additive Mixing Area
Filament Winding Area
(Resin Layup, Plastics Fabrication and Drying/Curing)
Natural Gas-Fired Drying Heaters
Natural Gas-Fired Curing Oven

EUG 2. Storage Tanks

Resin Tanks
Acetone Tanks
Diesel Tanks
Propane Tanks

EUG 3. Mechanical Atomized Application

Chop Guns

2. The facility shall comply with all applicable requirements of National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart WWWW, Reinforced Plastic Composites Production, including but not limited to: [40 CFR §§ 63.5780-63.5935]

What This Subpart Covers

a. § 63.5790 What parts of my plant does this subpart cover?

(1) The affected source consists of all parts of your facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC)

manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture. [§ 63.5790(b)]

b. § 63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

(1) This facility is an existing source since it was constructed prior to August 2, 2001. [§ 63.5795(b)]

Calculating Organic HAP Emissions Factors for Open Molding and Centrifugal Casting

c. § 63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart and how are they used in this subpart?

(1) The equations in Table 1 of 40 CFR Part 63, NESHAP, Subpart WWWW, shall be used to calculate the emission factors for your facility. [§ 63.5796]

d. § 63.5797 How do I determine the organic HAP content of my resins and gel coats?

(1) In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs §§ 63.5797(a), (b), & (c), as applicable.

Compliance Dates and Standards

e. § 63.5800 When do I have to comply with this subpart?

(1) You must comply with this subpart by April 21, 2006. [§ 63.5800; Table 2 (1)(a)(i)]

f. § 63.5805 What standards must I meet to comply with this subpart?

(1) You must meet the annual average organic HAP emissions limits in Table 3 of 40 CFR Part 63, NESHAP, Subpart WWWW, unless complying with the organic HAP concentration limits of Table 7 of 40 CFR Part 63, NESHAP, Subpart WWWW, for use of the same resin across different operations that use the same resin type, and the work practices in Table 4 of 40 CFR Part 63, NESHAP, Subpart WWWW. [§ 63.5805(a) & (b)]

(2) Repair operations are also required to meet the annual average organic HAP emissions limits in Table 3 and the work practices in Table 4 of 40 CFR Part 63, NESHAP, Subpart WWWW. [§ 63.5805(g)]

Options for Meeting Standards

g. § 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

(1) You shall use one of the methods in paragraphs § 63.5810(a) through (d), listed below, to meet the standards in § 63.5805. When you are complying with an emissions limit in Table 3 of 40 CFR Part 63, NESHAP, Subpart WWWW, you may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, covered curing techniques, and routing part or all of your emissions to an add on control. You may use different compliance options for the different operations listed in Table 3 or 5 of 40 CFR Part 63, NESHAP, Subpart WWWW. The necessary calculations shall be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs § 63.5810(a) through (d). When you change to an option based on a

12-month rolling average, you shall base the average on the previous 12 months of data calculated using the compliance option you are currently using unless you were using the compliant materials option in paragraph § 63.5810(d). In this case, you shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

i) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of 40 CFR Part 63, NESHAP, Subpart WWWW. [§ 63.5810(a)]

ii) Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type. [§ 63.5810(b)]

iii) Demonstrate compliance with a weighted average emission limit. [§ 63.5810(c)]

iv) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. [§ 63.5810(d)]

General Compliance Requirements

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

(1) You shall be in compliance at all times with the work practice standards in Table 4 of 40 CFR Part 63, NESHAP, Subpart WWWW, as well as the organic HAP emissions limits in Table 3 of 40 CFR Part 63, NESHAP, Subpart WWWW, or the organic HAP content limits in Table 7 of 40 CFR Part 63, NESHAP, Subpart WWWW, as applicable, that you are meeting without the use of add-on controls. [§ 63.5835(a)]

Testing and Initial Compliance Requirements

i. § 63.5840 By what date must I conduct a performance test or other initial compliance demonstration?

(1) Open molding and centrifugal casting operations that elect to meet a organic HAP emissions limit on a 12-month rolling average shall initiate collection of the required data on the compliance date and demonstrate compliance 1 year after the compliance date. [§ 63.5840]

(2) All other operations must demonstrate compliance by April 21, 2006.

j. § 63.5860 How do I demonstrate initial compliance with the standards?

(1) You demonstrate initial compliance with each organic HAP emissions standard in § 63.5805(a) through (h) that applies to you by using the procedures shown in Tables 8 and 9 of 40 CFR Part 63, NESHAP, Subpart WWWW. [§ 63.5860(a)]

Continuous Compliance Requirements

k. § 63.5895 How do I monitor and collect data to demonstrate continuous compliance?

(1) You shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 of 40 CFR Part 63, NESHAP, Subpart WWWW. You shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 of 40 CFR Part 63, NESHAP, Subpart WWWW, if you are averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how

the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [§ 63.5895(c)]

(2) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in § 63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or you change the application method or controls, then you again must demonstrate that the individual resin or gel coat meets its emission limit as specified in § 63.5810(a). If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 of 40 CFR Part 63, NESHAP, Subpart WWWW, you must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.[§ 63.5895(d)]

l. § 63.5900 How do I demonstrate continuous compliance with the standards?

(1) Compliance with organic HAP emissions limits shall be demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 of 40 CFR Part 63, NESHAP, Subpart WWWW, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in § 63.5895(d). [§ 63.5900(a)(2)]

(2) Compliance with organic HAP content limits in Table 7 of 40 CFR Part 63, NESHAP, Subpart WWWW, shall be demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 of 40 CFR Part 63, NESHAP, Subpart WWWW, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits, as discussed in § 63.5895(d). [§ 63.5900(a)(3)]

(3) Compliance with the work practice standards in Table 4 of 40 CFR Part 63, NESHAP, Subpart WWWW, shall be demonstrated by performing the work practice required for your operation. [§ 63.5895(a)(4)]

(4) You must report each deviation from each standard in § 63.5805 that applies to you in accordance with the requirements in § 63.5910. [§ 63.5900(b)]

Notifications, Reports, and Records

m. § 63.5905 What notifications must I submit and when?

(1) You must submit all of the notifications in Table 13 of 40 CFR Part 63, NESHAP, Subpart WWWW, that apply to you by the dates specified in Table 13 of 40 CFR Part 63, NESHAP, Subpart WWWW. The notifications are described more fully in 40 CFR Part 63, Subpart A, referenced in Table 13 of 40 CFR Part 63, NESHAP, Subpart WWWW. [§ 63.5905(a)]

n. § 63.5910 What reports must I submit and when?

(1) You must submit each report in Table 14 of 40 CFR Part 63, NESHAP, Subpart WWWW, that applies to you. [§ 63.5910(a)]

(2) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you shall submit each report by the date specified in Table 14 of 40 CFR Part 63, NESHAP, Subpart WWWW, and according to §§ 63.5910(b)(1) through (5). [§ 63.5910(b)]

(3) The compliance report must contain the information in §§ 63.5910(c)(1) through (3). [§ 63.5910(c)]

(4) For each deviation from an organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in §§ 63.5910(c)(1) through (4) and in §§ 63.5910(d)(1) and (2). This includes periods of startup, shutdown, and malfunction. [§ 63.5910(d)]

(5) You must report if you have exceeded the 100 TPY organic HAP emissions threshold if that exceedance would make your facility subject to §§ 63.5805(a)(1) or (d). Include with this report any request for an exemption under § 63.5805(e). If you receive an exemption under § 63.5805(e) and subsequently exceed the 100 TPY organic HAP emissions threshold, you must report this exceedance as required in § 63.5805(f). [§ 63.5910(f)]

(6) Each affected source that has obtained a title V operating permit pursuant to 40 CFR Part 70 must report all deviations as defined in this subpart in the semiannual monitoring report required by § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR NESHAP, Subpart WWWW, along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§ 63.5910(g)]

(7) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report. [§ 63.5910(i)]

o. § 63.5915 What records must I keep?

(1) You shall keep a copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in § 63.10(b)(2)(xiv). [§ 63.5915(a)(1)]

(2) You shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3 and 7 of 40 CFR NESHAP, Subpart WWWW. [§ 63.5915(c)]

(3) You shall keep a certified statement that you are in compliance with the work practice requirements in Table 4 of 40 CFR NESHAP, Subpart WWWW, as applicable. [§ 63.5915(d)]

p. § 63.5920 In what form and how long must I keep my records?

(1) You shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to § 63.10(b)(1). [§ 63.5910(a)]

(2) As specified in § 63.10(b)(1), you shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§ 63.5920(b)]

(3) You shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). You can keep the records offsite for the remaining 3 years. [§ 63.5920(c)]

(4) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§ 63.5920(d)]

Other Requirements and Information

q. § 63.5925 What parts of the General Provisions apply to me?

(1) Table 15 of 40 CFR NESHAP, Subpart WWWW, shows which parts of the General Provisions in §§ 63.1 through 63.15 apply to your facility.

3. 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)]

4. The fuel-burning equipment shall use only pipeline-grade natural gas. [OAC 252:100-31]

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

a. For storage tanks containing volatile organic liquids with vapor pressures less than 1.0 psia and having capacities less than 10,000 gallons: capacity of the tanks, and contents.

b. For bulk gasoline or other fuel distribution: daily average throughput over a 30-day period.

c. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: type of activity and the amount of emissions from that activity (cumulative annual).

6. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6 (a)(3)(B)]

    a. Resin and gel coat usage (monthly and cumulative annual) by type of application and styrene content.
    b. Material Safety Data Sheets (MSDSs) for all resins and other materials used at the facility showing the weight per gallon, percent by weight of styrene, and the percent by weight of all other HAP constituents.
    c. Records required by NESHAP, Subpart WWWW.

7. No later than 30 days after each anniversary date of the issuance of the original Title V permit (April 28, 2000), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]

8. This permit supersedes all other Air Quality operating permits for this facility, which are now cancelled.

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

(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.

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

(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.

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

(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.

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]

DRAFT/PROPOSED

PART 70 PERMIT

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

Permit No. 2019-1256-TVR4

Beetle Plastics LLC,

having complied with the requirements of the law, is hereby granted permission to operate the Ardmore Plant located in Section 7, T3S, R3E, Carter County, Oklahoma, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both of which are attached.

This permit shall expire on five years from the date of issuance, except as Authorized under Section VIII of the Standard Conditions.

Division Director **Date**

Air Quality Division

SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Beetle Plastics, LLC
Attn: Mr. Steve Watt
Production Manager
1156 East Highway 19
Chickasha, OK 73018

SUBJECT: Permit No. 2019-1256-TVR4
Facility: Ardmore Plant (Facility ID: 2756)
Location: S7, T3S, R3E, Carter County, Oklahoma

Dear Mr. Watt:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which you must accomplish.

1. Publish at least one legal notice (one day) of "Notice of Tier II Draft Permit" 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 AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation in this matter. If we may be of further service, please contact Kayla Cunningham at Kayla.Cunningham@deq.ok.gov or (405) 702-4187.

Sincerely,

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