

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

MEMORANDUM

August 31, 2021

TO: Phillip Fielder, Chief Engineer

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

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

THROUGH: Iftekhar Hossain, P.E., New Source Permits Section

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

SUBJECT: Evaluation of Permit Application No. **2020-0466-TVR**
Jetta Corporation
Edmond Facility (SIC 3088 / NAICS 308899)
Facility ID: 2642
425 Centennial Boulevard, Edmond, Oklahoma
Latitude: 35.62854°N; Longitude: 97.49044°W
SW/4 of Section 2, T13N, R3W, Oklahoma County
Directions: From Oklahoma City take I-35 north to Edmond; Turn west on West 33rd Street, then north on South Kelly Avenue, and finally east on Centennial Boulevard, the facility is on the north side of the road.

SECTION I. INTRODUCTION

Jetta Corporation has submitted an application for renewal of the Part 70/Title V operating permit for their Edmond facility. Jetta Corporation produces jetted and non-jetted bathtubs. The facility is currently operating under Permit No. 2015-1127-TV issued on April 9, 2016. The facility is not subject to Prevention of Significant Deterioration (PSD). However, it is a major source of Hazardous Air Pollutants (HAPs) and may emit more than 10 TPY of a single Hazardous Air Pollutant (HAP) (styrene). This facility will remain subject to NESHAP, Subpart WWWW and the requirement to obtain a Part 70 operating permit.

SECTION II. FACILITY DESCRIPTION

Vacuum Forming

The vacuum forming process is used to modify a flat sheet of acrylic into the shape of a bathtub. A rigid acrylic sheet is clamped in a frame which is then mounted on a movable carriage. The carriage is used to position the sheet inside an electric oven that will heat the sheet to make it pliable. The sheet is then removed from the oven and positioned against a mold. A lubricating powder may be applied to the acrylic sheet to ensure that it moves freely along the surface of the mold during the forming process. Mold wax may also be applied to the mold surface to allow the sheet to slide more easily along the surface of the mold. A vacuum source is used to remove the

air between the mold and sheet causing atmospheric pressure to press the pliable acrylic against the mold. While under vacuum, fans blow ambient air over the formed acrylic, cooling it and causing it to become rigid and retain the shape of the mold. The formed acrylic is called a shell. Masking tape is applied to select exposed surfaces of the shell to protect them during the subsequent manufacturing processes.

Resin Storage

Resin is a primary component of the fiberglass that is used to provide structural reinforcement to the acrylic shell. As needed, a tanker truck of resin is delivered and transferred to plastic totes for storage and transport to the resin mixing area. Stored totes are secured inside a shipping container located on a concrete pad outside.

Resin Mixing

As needed, totes of resin are transported from the storage container to the resin mixing area. Resin, pigment, and filler are added to the mixer (TM-5, P5) and mixed in correct proportions to create the liquid component of the fiberglass.

Shell Preparation

In preparation for the fiberglass application, the acrylic shell is placed on a portable fixture designed to support and retain its shape. This shell orientation exposes only the back side of the shell to the fiberglass application operation, while also protecting the tub well surface from damage while the fiberglass is applied. Once placed on the fixture, shells are wiped down with water and/or solvent to remove any contaminants that may inhibit adhesion of the fiberglass to the acrylic.

Fiberglass Application

The fixture with the acrylic shell on it is rolled into a spray booth prior to application of fiberglass. As needed, mixed resin is pumped from the mixer to smaller tanks at each of two fiberglass proportioning systems. The proportioning pump supplies correct amounts of mixed resin and catalyst to the low pressure, non-atomizing fiberglass spray applicator (TM-2, P2). Operators manually direct the applicator to apply the catalyzed resin mixture and chopped fiberglass material to the back side of the acrylic shell.

Fiberglass Roll Out

The fixture with the fiberglass covered shell is removed from the spray booth and is positioned to enter a curing room. Manual rollers are used to roll out the fiberglass prior to entry into the curing room. This process forces the chopped fiberglass and resin mixture against the acrylic shell and releases trapped air.

Fiberglass Curing

To reduce fiberglass cure time, the shell with catalyzed fiberglass enters a curing room that is maintained at 100 to 120 degrees. A 0.8316 MMBTUH natural gas fired heater is used as required to heat the curing room. A fixture conveying system slowly moves fiberglassed shells through the curing room. When a fixture exits the curing room, the fiberglass is cured for further processing.

Final Fiberglass Layer

Multiple fiberglass layers may be required to obtain the desired reinforcement, in which case, the product repeats application, rollout, and curing steps for each layer. After the final fiberglass layer is applied, the shell base is added and weights are placed on the base to press it firmly into the uncured layer of fiberglass. The base becomes permanently adhered to the shell during the final cure.

Completed Fiberglass Tub

The fiberglass coated acrylic shell is removed from the fixture and sent to the cut-down and drilling area (TM-4, P4).

Cut-Down, Drilling, Back-facing

The cut-down process utilizes diamond impregnated saw blades to remove excess material from the tub making it easier to handle. Drilling involves cutting a variety of holes in the floor and walls of the tub for drains, overflows, and jets. The holes are back-faced to prepare the surface for plumbing. Dust collectors are located in this area to collect the dust generated by the cutting operations.

Jetting, Plumbing, and Pump Mounting

During the jetting process jet bodies and suction fittings are installed through the wall of the tub. Depending on the design of the fittings, silicone sealant may be used to seal around the fitting to prevent leaks. The plumbing process involves installing all the PVC piping and fittings required to complete the tub. PVC cement is used to weld the various plastic fitting and pipes together. The last component to be installed on a whirlpool tub in this area is the pump. The pump is fastened to the base. Plumbing fittings are sealed with rubber o-rings.

Finish Grinding

At this point a final cut and grind is performed on the lip of the tub. This precise operation ensures the surface where the tub contacts the tub deck does not have gaps. Dust collectors are located in this area of the plant.

Tub Testing

All products receive a water test to inspect for leaks and a test for correct operation. Test tanks are filled with fresh chlorinated tap water each week and drained at the end of the week. The water is recycled during the testing process. A small amount of chlorine bleach may be added to the test tank water to prevent the growth of algae. Any problems identified are repaired at the test station before the tub is moved into the spray booth where foam is applied.

Foaming

A portion of the tubs enter a spray booth (TM-6, P6) where a two-part expanding foam is applied to the exterior surface. Compressed nitrogen gas is used to propel the foam

Cleaning

Each tub is thoroughly inspected for cosmetic flaws. All contamination is removed from the tub surface by wiping with water and/or solvent. Any scratches or blemishes are removed with fine sanding and buffing. Buffing compound and hand glaze is used to polish all visible surfaces. The

tub receives a final visual inspection, documentation is added, and a protective plastic film is applied to cover the open top of the bathing well. The tub is then packaged and moved to finished goods.

Wood Shop

This area consists of a large table saw and a portable circular saw. Operators use these saws to cut sheets of plywood into bases for the tubs. A dust collection system is used to capture saw dust from the table saw.

Repair

Tubs that are damaged during the manufacturing process that can't be repaired in process are taken to the repair area. These tubs may have structural cracks and chips patched and filled. These areas will then be shaped and painted prior to being available for sale.

Tooling

The tooling area (TM-3, P3) creates gel-coat/fiberglass tools used for both the vacuum forming and fiberglass application operations. Gel-coats, parting film, and sealers are applied with atomizing spray equipment. Tooling resin and mold waxes are manually applied using brushes, rollers, and cloths. Glass mat is typically used as the reinforcing material embedded in the tooling resin. Tools are typically bonded to a steel frame so this area also uses welding and cutting equipment. All liquid application is performed in a spray booth.

SECTION III. PERMIT HISTORY

Permits	Date Issued	Description
2015-1127-TV	4/19/2016	Initial Title V operating permit
2001-272-O	2/21/2006	Initial Title V operating permit, changed to "synthetic minor"
96-468-O	12/2/1996	Initial operating permit as minor source

SECTION IV. REQUESTED CHANGES

The permit application did not request any changes to applicable standards.

SECTION V. EQUIPMENT

Tub Manufacturing Area

EU	Point	Description	Const. Date
TM-2	P2	Resin/Fiberglass Spray Applicators	1999
TM-3	P3	Tool Manufacturing	1997
TM-4	P4	Tub Finish Operations	1997
TM-5	P5	Resin/Filler Mixing Tank	1996
TM-6	P6	Foam Application	1996

SECTION VI. EMISSIONS

Most of the VOC/HAP emissions escape from the resins which bind the fiberglass components of the tub structure. Calculations are based on the total mass of resins received. Thus, all styrene facility-wide emissions are accounted for in the tub manufacturing area even though very small amounts are generated in the other process areas such as mold/forming. VOC as defined in Subchapter 37 excludes acetone.

Emissions of HAP are limited by 40 CFR Part 63, Subpart WWWW. As discussed in §§ 63.5796, 63.5799(a)(1) and (b), and 63.5810(a)(1), a facility may use the equations in Table 1 of Subpart WWWW to calculate organic HAP emission factors for specific open molding process streams. Styrene emission estimates from the use of resin and gel coats were calculated using the required NESHAP emission factors that were calculated using the equations in Table 1 of Subpart WWWW.

Emissions of particulate matter (PM₁₀) are generated in the tub manufacturing area. Fiberglass (yarn) is chopped into pieces about ½-inch long and blown with the resin stream onto the tub structures. The smaller particles and over-spray are pulled through a fabric filter and exhausted through the roof. Based on 95% transfer efficiency, 98% collection efficiency, and usage of 1,000 TPY of resin, the resulting PM₁₀ emissions are estimated to be approximately 1 TPY. In addition, PM₁₀ emissions are generated from the sanding and cutting operations of tubs and wooden bases.

A 0.8316 MMBTUH natural gas-fired heater is used to cure resins as required, typically during the colder winter months. Emissions from the heater are less than 1 TPY for all pollutants and the heater is a listed insignificant activity.

Facility Wide Styrene Emissions from Resin/Gelcoat Usage

Resin /Gel Coat Description	Styrene Content (%)	Method Of Application	Typical Usage (gal / yr)	Typical Usage (lb / yr)	Emission Factor (lb / Ton)	Emissions (TPY)
Tooling Resin ¹	37.86	Manual	165	1,440	110.8	0.040
Duraglass ²	20	Manual	32	435	50.4	0.005
Bondo ²	30	Manual	12	114	75.6	0.002
Mold Resin ¹	34.62	Manual	29	265	93.6	0.006
Tub Resin ³	38	Mech. Non-Atomized	49,480	447,794	86.4	9.672
Total						9.726

1. Emission Factor from manual resin application for non-vaporsupressed resins > 33% HAP equation (1.a.i. from Table 1 of WWWW)
2. Emission Factor from manual resin application for non-vaporsupressed resins < 33% HAP equation (1.a.i. from Table 1 of WWWW)
3. Emission Factor from manual resin application for non-vaporsupressed resins >33% HAP equation (1.c.i. from Table 1 of WWWW)

Table 1 to Subpart WWWW – Equations to Calculate Organic HAP Emission Factors Specific Open Molding and Centrifugal Casting Process Streams¹

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} ...
I. Open molding operations	a. Manual resin application	i. Nonvapor-suppressed resin.	$EF = 0.126 \times \%HAP \times 2000.$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000.$
		ii. Vapor-suppressed resin.	$EF = 0.126 \times \%HAP \times 2000 \times (1-(0.5 \times VSE \text{ factor}))$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times (1-(0.5 \times VSE \text{ factor})).$
		iii. Vacuum bagging/closed mold curing with roll-out.	$EF = 0.126 \times \%HAP \times 2000 \times 0.8.$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times 0.8.$
		iv. Vacuum bagging/closed mold curing with out roll-out.	$EF = (0.126 \times \%HAP \times 2000 \times 0.5.$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times 0.5.$
	b. Atomized mechanical resin application	i. Nonvapor-suppressed resin.	$EF = 0.169 \times \%HAP \times 2000.$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000.$
		ii. Vapor-suppressed resin.	$EF = 0.169 \times \%HAP \times 2000 \times (1-(0.45 \times VSE \text{ factor})).$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times (1-(0.45 \times VSE \text{ factor})).$
		iii. Vacuum bagging/closed mold curing with roll-out.	$EF = 0.169 \times \%HAP \times 2000 \times 0.85.$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times 0.85.$
		iv. Vacuum bagging/closed mold curing with out roll-out.	$EF = 0.169 \times \%HAP \times 2000 \times 0.55.$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times 0.55.$
	c. Nonatomized mechanical resin application	i. Nonvapor-suppressed resin.	$EF = 0.107 \times \%HAP \times 2000.$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000.$
		ii. Vapor-suppressed resin.	$EF = 0.107 \times \%HAP \times 2000 \times (1-(0.45 \times VSE \text{ factor})).$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times (1-(0.45 \times VSE \text{ factor})).$
		iii. Closed mold curing with roll-out.	$EF = 0.107 \times \%HAP \times 2000 \times 0.85.$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times 0.85.$
		iv. Vacuum bagging/closed mold curing with out roll-out.	$EF = 0.107 \times \%HAP \times 2000 \times 0.55.$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times 0.55.$
d. Atomized mechanical resin application with robotic or automated spray control ⁵		Nonvapor-suppressed resin.	$EF = 0.169 \times \%HAP \times 2000 \times 0.77.$	$EF = 0.77 \times ((0.714 \times \%HAP) - 0.18) \times 2000.$

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. Filament application ⁴	i. Nonvapor-suppressed resin	$EF = 0.184 \times \%HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000$
		ii. Vapor-suppressed resin	$EF = 0.12 \times \%HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000 \times 0.65$
	f. Atomized spray gel coat application	Nonvapor-suppressed gel coat	$EF = 0.446 \times \%HAP \times 2000$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000$
	g. Nonatomized spray gel coat application	Nonvapor-suppressed gel coat	$EF = 0.185 \times \%HAP \times 2000$	$EF = ((0.4506 \times \%HAP) - 0.0505) \times 2000$
	h. Atomized spray gel coat application using robotic or automated spray ⁵	Nonvapor-suppressed gel coat	$EF = 0.445 \times \%HAP \times 2000 \times 0.73$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000 \times 0.73$
2. Centrifugal casting operations. ^{6 7}	a. Heated air blown through molds	Nonvapor-suppressed resin	$EF = 0.558 \times (\%HAP) \times 2000$	$EF = 0.558 \times (\%HAP) \times 2000$
	b. Vented molds, but air vented through the molds is not heated	Nonvapor-suppressed resin	$EF = 0.026 \times (\%HAP) \times 2000$	$EF = 0.026 \times (\%HAP) \times 2000$

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.
- 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 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.
- 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 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.

- ⁷ 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.

Facility Wide VOC/HAP Emissions from Product Usage (Other than Resins/Gelcoats)

Material	Generic Name	Typical Usage (gal /yr)	Typical Usage (lb /yr)	Contents		Emissions	
				VOC (%)	HAP (%)	VOC (TPY)	HAP (TPY)
PartAll Paste (Mold Release)	Polyvinyl Alcohol (PVA)	42	272.58	68.58	0	0.093	0.000
Cream Hardener		1	9.88	20	0	0.001	0.000
White Pigment	Pigment	243	4199.04	0	0	0.000	0.000
PVC Cement	PVC Plastic Disolver	180	1393.2	55.01	0	0.383	0.000
Buffing Compound		24	246	22.3	0	0.027	0.000
Acrastrip	Solvent	220	1892	60.16	0	0.569	0.000
Turtle Wax	Wax	1	8.36	84	0	0.004	0.000
Wax and Grease Remover	MX 8000 G	1	6.33	100	0	0.003	0.000
Foam Supplies: SP	Foam Base, Part A ¹	924	9,434	45	45	0.236	0.236
Foam Supplies: Eco-2-08-1.9-SP	Foam Base, Part B	944	8,930	5	0	0.223	0.000
DDM-9 DR	Glassing Catalyst	982	8,160	2	0	0.082	0.000
Grey Acrylic Lacquer Primer	Grey Primer	2	19.58	46.2	30.82	0.005	0.003
Xylol	Paint Thinner	10	72.5	100	100	0.036	0.036
Mid Temp Thinner	Paint Thinner	13	88.4	100	22	0.044	0.010
Clear Coat Monomer Thinner	Paint Thinner	4	40.16	40	40	0.008	0.008
Finishing Solvent	Finishing Solvent	13	88.4	100	22	0.044	0.010
Base Coat, All Colors and Tones	Paint	16	174.24	84	62	0.073	0.054
ASI Structural Adhesive, Part A&B	Structural Adhesive	7	66.22	65	65	0.022	0.022
Totals						1.853	0.378

¹ 5% of the VOC/HAP in Foam Base Part A is estimated to escape from the cells during the hardening process.

VOC Emissions from Resin/Gel Coat Usage

Resin/Gel Coat	VOC Content (%)	Usage (lb/yr)	VOC Emissions (TPY)
Tooling Resin	50.13	16,513	1.47
Duraglass	20.00	3,802	0.05
Tooling Gel Coat (Vinylester)	36.00	30	0.00
Bondo	30.00	472	0.01
Patch Aid	51.70	17	0.00
Tool Resin (Aluminized)	39.00	698	0.02
Tool Resin (Secondary Resin)	45.00	523	0.02
Tub Resin	42.00	874,760	36.38
Total			37.95

Total VOC based on styrene emissions plus (material total VOC% less styrene%) times usage

Facility Wide Speciated HAP Emissions

Pollutant	CAS#	Emissions (TPY)
Styrene	100-42-5	9.762
Xylene	1330-20-7	0.090
Toluene	108-88-3	0.070
Methyl Ethyl Ketone	787-93-3	0.333
Diisocyanates	9016-87-9	0.074
Glycol Ethers	N230	0.006
Methanol	67-56-1	0.025
Methyl Isobutyl Ketone	108-10-1	0.043
Ethyl Benzene	100-41-4	0.074
1,1-trichloroethane	79-00-5	0.001
Methyl Methacrylate	80-62-6	0.022
Total HAP		10.500
Total HAP (non-Styrene)		0.738

Facility Wide Emissions Summary

Emission Source	Emissions (TPY)					
	VOC	HAP	NO _x	SO ₂	CO	PM
Resin/Gel Coat Usage	37.95	9.762	---	---	---	1
Non-Resin/Gel Coat Product Usage	1.85	0.738	---	---	---	---
Curing Heater	0.02	0.01	0.36	<0.01	0.3	0.03
Tubs / Molds Grinding, Sanding, Drilling	---	---	---	---	---	1
Totals	39.82	10.51	0.36	0	0.3	2.03

SECTION VII. 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. Any Activity to which a State of federal applicable requirement applies is not insignificant even if it is included on this list. Semi-annual Monitoring and Deviation Reports (SAR) do not need to include copies of records for Insignificant Activities.

1. *Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The fiberglass curing area has a heater rated at 0.8316 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. Styrene resin is stored in sealed 350-gallon totes and has a vapor pressure of 0.09 psia.
3. * Torch cutting and welding of under 200,000 tons of steel fabricated per year. A very small amount of torch cutting and welding is performed for facility equipment and maintenance but it is not a normal part of the process. Maintenance is considered a trivial activity and records for this insignificant activity will not be required.
4. Hazardous waste and hazardous material drum staging areas. Waste resin is stored in designated areas.
5. Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas.
6. Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas. This is part of the tub manufacturing process.
7. * Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. These activities are listed below.
 - a. Sanding and Grinding Operations (PM₁₀)
 - b. Fabrication and Insulation (VOC)
 - c. Surface Coating Operations (VOC)
 - d. Hand Wiping and Spraying (VOC)
 - e. Fabrication and Insulation (VOC)

SECTION VIII. 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 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 of 99 TPY total VOC and incorporating the emission factors established by NESHAP, Subpart WWWW.

OAC 252:100-9 (Excess Emissions 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 specifies a particulate matter (PM) emissions limitation of 0.6 lb/MMBTU from fuel-burning equipment with a rated heat input of 10 MMBTUH or less. There are natural gas fired heaters and boilers located at this facility which are listed Insignificant Activities. For external combustion units burning natural gas, AP-42, Section 1.4, (7/98), lists the total PM emissions for natural gas to be 7.6 lb/MMft³ or about 0.0076 lb/MMBTU. Since the emission units are natural gas fired listed ISA, no specific conditions are established in the permit.

Subchapter 19 also specifies an allowable PM emission rate based on process weight rate. Assuming a 0.18 average TPH process weight rate, the allowable PM emission rate would be 1.35 lb/hr for each of the two operations with finite PM. The expected PM emission rate (1.00 lb/hr apiece) is in compliance with Subchapter 19.

OAC 252:100-25 (Emissions and Particulates) [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. Particulate emissions from the sanding and grinding are controlled by use of filters. PM emissions from the coating operations overspray are controlled by use of either HVLP or flow coat application and use of particulate emission filters. All other emissions are VOC. This facility has little possibility of exceeding the opacity standards; therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-29 (Fugitive Dust) [Applicable]
This subchapter states that 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 has negligible potential to violate this requirement, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Not Applicable]
Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/million BTU heat input. The small natural gas fired heater is fueled with commercial natural gas with a sulfur content of less than 4 ppm. Since the emission unit is a commercial natural gas fired listed ISA, no specific conditions are established in the permit.

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. The resin storage tanks store resins that have a vapor pressure less than 1.5 psia.

Part 5 limits the VOC content of alkyd primer, epoxy, and maintenance finish coatings to 4.8 lbs/gallon, vinyl and acrylic coatings to 6.0 lbs/gallon, lacquers to 6.4 lbs/gallon, and custom product finishes to 6.5 lbs/gallon less water. Facilities that emit less than 100 lbs of VOC per 24-hour day are exempt from this requirement. This facility does not have a surface coating operation. The resins are not surface coatings and are not subject to the VOC limitations.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

This subchapter regulates toxic air contaminants (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.

SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]

Final total emissions are less than the major source threshold 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]

Subparts K, Ka, Kb, VOL Storage Vessels. The storage tanks at the facility are below the de-minimis levels of 19,813 gallons of Subpart Kb and 40,000 gallons for Subparts K and Ka.

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 WWWW, Reinforced Plastics Composites Production. This subpart affects all existing and new reinforced plastic composite production facilities using thermoset resins located at a major source of HAP. This facility is considered a major source of HAP and subject to this subpart since it emitted more than 10 TPY of a single HAP. This facility is considered an existing facility and does not have any filament application, 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 are incorporated into the permit.

The organic HAP emission limits or organic HAP concentrations 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
	Manual resin application	123
Open Molding - Non-CR/HS		
	Mechanical resin application	88
	Manual resin application	87
Open Molding – Tooling		
	Mechanical resin application	254
	Manual resin application	157
Open Molding – Low Flame Spread/Low Smoke Products		
	Mechanical resin application	497
	Manual resin application	238
Open Molding – Shrinkage Controlled Resins		
	Mechanical resin application	354
	Manual resin application	180
Open Molding – Gel Coat		
	Tooling gel coating	440
	White/Off-white pigmented gel coating	267
	All other pigmented gel coating	377
	CR/HS or high performance gel coating	605
	Fire retardant gel coat	854
	Clear production gel coat	522

The MACT standard also requires the following work practices for existing sources:

- The cleaning operations shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- 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 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 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 Manual resin application	46.4

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

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

No other MACT standards are scheduled for promulgation that may affect this facility. Air Quality reserves the right to reopen this permit if any standard becomes applicable.

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 or more pounds of refrigerant.

SECTION X. COMPLIANCE

The Specific Conditions of this permit contain various testing, monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The specific method used to document compliance was based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

Inspections

In addition to the permitting requirements, the following periodic inspections were conducted since issuance of the last Title V renewal permit.

Inspection Type	Date	Summary/Results
Full Inspection	4/9/2020	In compliance
Full Inspection	5/30/2018	Multiple recordkeeping and reporting issues identified

There have been no other enforcement actions since issuance of the last Title V renewal permit.

SECTION XI. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

This application has been determined to be **Tier II** based on the request for renewal of a Part 70 operating permit. Part 70 operating permit renewal fee of \$7,500 has been received.

The “Notice of Filing Tier II Application” was published in the *Journal Record* on November 6, 2020. The notice stated that the application was available for review at the DEQ main offices in Oklahoma City. The draft permit will also be made available for public review by another published notice. The facility is not located within 50 miles of the Oklahoma border. The draft permit will be available for public review in a library close to where the facility is located and also on the Air Quality section of the DEQ web page at <http://www.deq.ok.gov>.

Upon completion of public review, the permit will be sent as “Proposed” to EPA for a 45-day review period. 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>.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of OAC 252:100-8-8 may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under OAC 252:100-8-8, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under OAC 252:100-8-8, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

SECTION XII. SUMMARY

The facility was constructed and is operated as described in the permit application and supplemental materials. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance issues concerning this facility. Issuance of the permit is recommended, contingent on public and EPA review.

**PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS**

**Jetta Corporation
Edmond Manufacturing Facility**

**Permit Number 2020-0466-TV
Facility ID: 2642**

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on October 15, 2020, and all supplemental information. The Evaluation Memorandum dated August 31, 2021, 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

EU	Point	Description
TM-2	P2	Resin/Fiberglass Spray Applicators
TM-3	P3	Tool Manufacturing
TM-4	P4	Tub Finish Operations
TM-5	P5	Resin/Filler Mixing Tank
TM-6	P6	Foam Application

- a. VOC emissions shall not exceed the following limit based on a twelve month rolling total. Each month the permittee shall calculate the emissions from the previous twelve months.

Facility Emissions Cap

VOC	TPY	99
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- b. All HAP/VOC emissions shall be calculated each month, from use of each product at the facility, for the previous 12 months.
- i) HAP/VOC emissions from materials other than resins and gel coats shall be based on the maximum VOC and/or HAP content of the material and the material usage.
 - ii) HAP emissions from resin and gelcoat usage shall be based on the maximum HAP content, material usage, and emission factors developed from Table 1 of 40 CFR Part 63, Subpart WWWW.
 - iii) Non-HAP VOC emissions from resin and gelcoat usage shall be based on the maximum non-HAP VOC content of the material and the material usage.
 - iv) All HAP emissions which are considered VOC shall be included in the VOC emission calculations.

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

What This Subpart Covers

- a. §63.5780 What is the purpose of this subpart?
- b. §63.5785 Am I subject to this subpart?
- c. §63.5787 What if I also manufacture fiberglass boats or boat parts?
- d. §63.5790 What parts of my plant does this subpart cover?
- e. §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

- f. §63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?
- g. §63.5797 How do I determine the organic HAP content of my resins and gel coats?
- h. §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?
- i. §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

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

Options for Meeting Standards

- l. §63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?
- m. §63.5820 What are my options for meeting the standards for continuous lamination/casting operations?
- n. §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

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

Testing and Initial Compliance Requirements

- p. §63.5840 By what date must I conduct a performance test or other initial compliance demonstration?
- q. §63.5845 When must I conduct subsequent performance tests?
- r. §63.5850 How do I conduct performance tests, performance evaluations, and design evaluations?
- s. §63.5855 What are my monitor installation and operation requirements?
- t. §63.5860 How do I demonstrate initial compliance with the standards?
- u. §63.5865 What data must I generate to demonstrate compliance with the standards for continuous lamination/casting operations?

- v. §63.5870 How do I calculate annual uncontrolled and controlled organic HAP emissions from my wet-out area(s) and from my oven(s) for continuous lamination/casting operations?
- w. §63.5875 How do I determine the capture efficiency of the enclosure on my wet-out area and the capture efficiency of my oven(s) for continuous lamination/casting operations?
- x. §63.5880 How do I determine how much neat resin plus is applied to the line and how much neat gel coat plus is applied to the line for continuous lamination/casting operations?
- y. §63.5885 How do I calculate percent reduction to demonstrate compliance for continuous lamination/casting operations?
- z. §63.5890 How do I calculate an organic HAP emissions factor to demonstrate compliance for continuous lamination/casting operations?

Continuous Compliance Requirements

- aa. §63.5895 How do I monitor and collect data to demonstrate continuous compliance?
- bb. §63.5900 How do I demonstrate continuous compliance with the standards?

Notifications, Reports, and Records

- cc. §63.5905 What notifications must I submit and when?
- dd. §63.5910 What reports must I submit and when?
- ee. §63.5915 What records must I keep?
- ff. §63.5920 In what form and how long must I keep my records?

Other Requirements and Information

- gg. §63.5925 What parts of the General Provisions apply to me?
- hh. §63.5930 Who implements and enforces this subpart?
- ii. §63.5935 What definitions apply to this subpart?

- 4. Particulate filters shall be installed and operable during all operations.
 - a. The filters shall be maintained in accordance with manufacturer's recommendations on a scheduled basis to insure maximum operating efficiency of the particulate filters.
 - b. The particulate filters may be replaced only by a control device with an equal or greater control efficiency (98%) without prior approval from DEQ.
- 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.
 - 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 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. Facility wide raw material usage (monthly and 12-month rolling totals).

- b. Resin and gel coat usage (monthly and 12-month rolling totals) by type of application and styrene content.
 - c. Material Safety Data Sheets (MSDS) or equivalent documentation for all resins and other materials used at the facility showing the weight per gallon, % styrene by weight, and the % by weight of all other VOC/HAP constituents.
 - d. VOC and HAP emission calculations (monthly and 12-month rolling totals)
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, No. 2020-0466-TVR, replaces and supersedes all other Air Quality operating permits for this facility, which are now cancelled.



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. 2020-0466-TVR

Jetta Corporation,

having complied with the requirements of the law, is hereby granted permission to operate the Edmond Manufacturing facility located in Section 2, T13N, R3W, Oklahoma 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, Air Quality Division

Date



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Jetta Corporation
Attn: Mr. Craig Armstrong
V.P. - Operations
425 Centennial Boulevard
Edmond, OK 73013

SUBJECT: Permit No. 2020-0466-TVR
Facility: Edmond Facility
Facility ID: 2642
Location: SW/4 of S2, T13N, R3W, Oklahoma County, Oklahoma

Dear Mr. Armstrong:

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to standard and specific conditions, that 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 (405) 702-4198.

Sincerely,

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

Enclosures



**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 (PM₁₀). 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]

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
4-15-21

ACFM	Actual Cubic Feet per Minute	GACT	Generally Achievable Control Technology
AD	Applicability Determination	GAL	Gallon (gal)
AFRC	Air-to-Fuel Ratio Controller	GDF	Gasoline Dispensing Facility
API	American Petroleum Institute	GEP	Good Engineering Practice
ASTM	American Society for Testing and Materials	GHG	Greenhouse Gases
		GR	Grain(s) (gr)
BACT	Best Available Control Technology	H₂CO	Formaldehyde
BAE	Baseline Actual Emissions	H₂S	Hydrogen Sulfide
BHP	Brake Horsepower (bhp)	HAP	Hazardous Air Pollutants
BTU	British thermal unit (Btu)	HC	Hydrocarbon
		HCFC	Hydrochlorofluorocarbon
C&E	Compliance and Enforcement	HFR	Horizontal Fixed Roof
CAA	Clean Air Act	HON	Hazardous Organic NESHAP
CAM	Compliance Assurance Monitoring	HP	Horsepower (hp)
CAS	Chemical Abstract Service	HR	Hour (hr)
CAAA	Clean Air Act Amendments		
CC	Catalytic Converter	I&M	Inspection and Maintenance
CCR	Continuous Catalyst Regeneration	IBR	Incorporation by Reference
CD	Consent Decree	ICE	Internal Combustion Engine
CEM	Continuous Emission Monitor		
CFC	Chlorofluorocarbon	LAER	Lowest Achievable Emission Rate
CFR	Code of Federal Regulations	LB	Pound(s) [Mass] (lb, lbs, lbm)
CI	Compression Ignition	LB/HR	Pound(s) per Hour (lb/hr)
CNG	Compressed Natural Gas	LDAR	Leak Detection and Repair
CO	Carbon Monoxide or Consent Order	LNG	Liquefied Natural Gas
COA	Capable of Accommodating	LT	Long Ton(s) (metric)
COM	Continuous Opacity Monitor		
		M	Thousand (Roman Numeral)
D	Day	MAAC	Maximum Acceptable Ambient Concentration
DEF	Diesel Exhaust Fluid	MACT	Maximum Achievable Control Technology
DG	Demand Growth	MM	Prefix used for Million (Thousand-Thousand)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMBTU	Million British Thermal Units (MMBtu)
		MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
EGU	Electric Generating Unit	MMSCF	Million Standard Cubic Feet (MMscf)
EI	Emissions Inventory	MMSCFD	Million Standard Cubic Feet per Day
EPA	Environmental Protection Agency	MSDS	Material Safety Data Sheet
ESP	Electrostatic Precipitator	MWC	Municipal Waste Combustor
EUG	Emissions Unit Group	MWe	Megawatt Electrical
EUSGU	Electric Utility Steam Generating Unit		
		NA	Nonattainment
FCE	Full Compliance Evaluation	NAAQS	National Ambient Air Quality Standards
FCCU	Fluid Catalytic Cracking Unit		
FIP	Federal Implementation Plan		
FR	Federal Register		

NAICS	North American Industry Classification System	RACT	Reasonably Available Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants	RATA	Relative Accuracy Test Audit
NH₃	Ammonia	RAP	Regulated Air Pollutant
NMHC	Non-methane Hydrocarbon	RFG	Refinery Fuel Gas
NGL	Natural Gas Liquids	RICE	Reciprocating Internal Combustion Engine
NO₂	Nitrogen Dioxide	RO	Responsible Official
NO_x	Nitrogen Oxides	ROAT	Regional Office at Tulsa
NOI	Notice of Intent	RVP	Reid Vapor Pressure
NSCR	Non-Selective Catalytic Reduction	SCC	Source Classification Code
NSPS	New Source Performance Standards	SCF	Standard Cubic Foot
NSR	New Source Review	SCFD	Standard Cubic Feet per Day
		SCFM	Standard Cubic Feet per Minute
O₃	Ozone	SCR	Selective Catalytic Reduction
O&G	Oil and Gas	SER	Significant Emission Rate
O&M	Operation and Maintenance	SI	Spark Ignition
O&NG	Oil and Natural Gas	SIC	Standard Industrial Classification
OAC	Oklahoma Administrative Code	SIP	State Implementation Plan
OC	Oxidation Catalyst	SNCR	Selective Non-Catalytic Reduction
		SO₂	Sulfur Dioxide
PAH	Polycyclic Aromatic Hydrocarbons	SO_x	Sulfur Oxides
PAE	Projected Actual Emissions	SOP	Standard Operating Procedure
PAL	Plant-wide Applicability Limit	SRU	Sulfur Recovery Unit
Pb	Lead	T	Tons
PBR	Permit by Rule	TAC	Toxic Air Contaminant
PCB	Polychlorinated Biphenyls	THC	Total Hydrocarbons
PCE	Partial Compliance Evaluation	TPY	Tons per Year
PEA	Portable Emissions Analyzer	TRS	Total Reduced Sulfur
PFAS	Per- and Polyfluoroalkyl Substance	TSP	Total Suspended Particulates
PM	Particulate Matter	TV	Title V of the Federal Clean Air Act
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	µg/m³	Micrograms per Cubic Meter
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	US EPA	U. S. Environmental Protection Agency
POM	Particulate Organic Matter or Polycyclic Organic Matter	VFR	Vertical Fixed Roof
ppb	Parts per Billion	VMT	Vehicle Miles Traveled
ppm	Parts per Million	VOC	Volatile Organic Compound
ppmv	Parts per Million Volume	VOL	Volatile Organic Liquid
ppmvd	Parts per Million Dry Volume	VRT	Vapor Recovery Tower
PSD	Prevention of Significant Deterioration	VRU	Vapor Recovery Unit
psi	Pounds per Square Inch	YR	Year
psia	Pounds per Square Inch Absolute	2SLB	2-Stroke Lean Burn
psig	Pounds per Square Inch Gage	4SLB	4-Stroke Lean Burn
		4SRB	4-Stroke Rich Burn



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Jetta Corporation
Attn: Mr. Craig Armstrong
425 Centennial Blvd.
Edmond, OK 73013

Permit Number: 2021-0237-TVR4
Permit Writer: David Schutz
Date: August 31, 2021

SUBJECT: Permit Application No. 2020-0466-TVR
Jetta Corporation
Edmond Manufacturing Facility (Facility ID: 2642)

Dear Mr. Armstrong:

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) 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 the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility.
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. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

A handwritten signature in black ink that reads 'Phillip Fielder'.

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

enclosures



NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a **Tier II** or **Tier III** draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD. Note that if a public meeting is requested by either the applicant or the public, this must be arranged through the Customer Services Division of the DEQ.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed;
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE on page 2.

SAMPLE NOTICE (*Italicized print is to be filled in by the applicant.*):

DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT

A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., Construction Permit for a Major Facility)... has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.

The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be] located at ...physical address (if any), driving directions, and legal description including county....

In response to the application, DEQ has prepared a draft permit [modification] (Permit Number: ...xx-xxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review in the Air Quality Section of DEQ's Web Page: <http://www.deq.ok.gov/>

This draft permit would authorize the facility to emit the following regulated pollutants: (list each pollutant and amounts in tons per year (TPY))

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below. [Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.] A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ/CSD staff.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8. [For Construction Permits, add: The requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process. Therefore, no additional opportunity to provide comments or EPA review, EPA objection, and petitions to EPA will be available to the public when requirements from the construction permit are incorporated into the Title V permit.]

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45 day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j). Information on all permit actions and applicable review time lines is available in the Air Quality section of the DEQ Web page: <http://www.deq.ok.gov/>.

For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Permits & Engineering Group, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.