DRAFT

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **May 10, 2023**

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

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

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

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

FROM: Ryan Buntyn, P.E., New Source Permits Section

SUBJECT: Evaluation of Permit Application No. **2022-0014-C (M-2)**
Hubbell Utility Solutions
Hubbell Manufacturing OKC, Inc. (SIC 3444/NAICS 332322)
Facility ID: 22693
Latitude: 35.40044°N, Longitude: 97.44165°W
Section 30, Township 11N, Range 2W, Oklahoma County, Oklahoma
Directions: 6801 S. Sunnylane Road, Oklahoma City, OK 73135

SECTION I. INTRODUCTION

Hubbell Utility Solutions (Hubbell) has applied for a Part 70 construction permit for their Hubbell Manufacturing OKC, Inc. facility. The facility is currently constructed under minor source construction Permit No. 2022-0014-C (M-1).

Facility-wide emissions are estimated to be 18.20 TPY of NO_X, 14.22 TPY of CO, 39.25 TPY of VOC, 7.41 TPY of PM_{10}, and 39.03 TPY of HAPs. This facility will have controlled emissions of each of the criteria pollutants below the major source threshold of 100 TPY, however; HAP emissions are above the 10 TPY threshold for a single HAP and 25 TPY of combined HAPs. This application will be processed under the Traditional process.

SECTION II. REQUESTED CHANGES

Hubbell is requesting a Title V construction permit as a major source of HAP. Hubbell requests facility-wide emission limits on individual and total HAPs of 99.9 TPY. Hubbell intends to remain a minor source of criteria pollutants and requests the existing limits be maintained: NO_X (99.9 TPY), CO (99.9 TPY), VOC (99.9 TPY), SO_2 (99.9 TPY), and $PM_{10}/PM_{2.5}$ (99.9 TPY).

Based on logistical challenges identified during construction, Hubbell is not able to achieve 100% capture efficiency for the emission from the Armorcast and Quazite operations (EUG 1) as originally intended and presented construction Permits No. 2022-0014-C and 2022-0014-C (M-1) issued on July 5, 2022, and July 27, 2022, respectively. Based on this adjustment, emissions of

styrene will exceed 10 tons per year and the facility will become a major source of HAP. However, Hubbell will remain a minor source of criteria pollutants.

SECTION III. PERMIT HISTORY

Permits	Date Issued	Description
2022-0014-C	7/5/2022	Individual Minor Source Construction Permit
2022-0014-C (M-1)	7/27/2022	Modification to Individual Minor Source Construction Permit to add six additional operations: Rotational Molding, Quazite, HDPE Structural Foam, Spray Booths, Plasma Cutting, and Welding.
2022-0014-O	Not Issued	Individual Minor Source Operating Permit

SECTION IV. PROCESS DESCRIPTION

Hubbell operations include an Armorcast Products manufacturing operation (concrete-resin utility boxes and vaults), Rotational Molding, Quazite, HDPE Structural Foam, Spray Booths, Plasma Cutting, and Welding. The polyester resin used in the Armorcast and Quazite casting/molding processes contains styrene, a VOC and HAP; associated VOC / HAP emissions will be captured and controlled using a regenerative thermal oxidizer (RTO). Resin is stored in on-site storage tanks and totes.

Processes
The processes at the facility are described below.

1. Armorcast Compression Molding Presses (28)

   Materials are directed to the closed American Food Equipment Company (AMFEC) dual paddle mixer via closed loop auger systems, closed pump/pipe systems, or fed directly into the mixer. Following mixing, the Bulk Molding Compound (BMC) polymer concrete material is dumped from the mixers into open containers, manually transferred to the compression molding presses, and cured in place within the closed matched-metal molds. Cured parts are removed from the mold. Soybean oil is used in the compounded BMC material as an internal mold release agent and a wax-based compounds is used as an external mold release sacrificially applied to the match metal mold surfaces on an intermittent basis. Acetone or very limited amounts of styrene is used for cleaning purposes. Cured pieces are removed from the molds manually, using mallets if necessary. Hubbell may consider using cleaners or mold releases in the future.

2. Armorcast Autocasters (3)

   Non-Pads - Polymer Concrete Boxes (1) Materials are either fed directly to the Gruber Autocaster machine’s closed auger/mixing barrel or transferred via closed loop auger systems or closed pump/pipe systems. Mixed material is dispensed either to assembled matched composite and/or metal mold/tooling located directly beneath the autocaster dispensing auger. The Material is cured in place within the closed matched composite or

metal mold at room temperature. Cured parts are removed from the mold. A wax-based compound is used as a mold agent release in the process.

Pads and Frames (1) Materials are either fed directly to the Gruber Autocaster machine's closed auger/mixing barrel or transferred via closed loop auger systems or closed pump/pipe systems. The mixed material is dispensed directly to closed agitation holding vessels, then to Hobart mixers (equipped with 30-quart mixing bowls) along with methyl ethyl ketone peroxide (MEKP) catalyst, mixed, then hand-poured to pad molding/tooling. Molds are cured in place within the closed matched-metal mold at room temperature. Cured parts are removed from the mold.

A wax-based compound is used as a mold release agent in the process. Acetone is used for cleaning purposes. Cured pieces are removed from the molds manually, using a mallet if necessary. Hubbell may consider using other cleaners or mold releases in the future. The third Autocaster may be used to produce either pads or non-pads, depending on demand.

Armorcast Raw Materials

Raw materials involved in the processes include: sand, limestone, polyester resin, Benzoyl Peroxide (BPO) paste catalyst (press only), Methyl Ethyl Ketone Peroxide (MEKP) catalyst (Autocasters only), soybean oil, chopped fiberglass, and pigments. The BPO paste serves as a polymerization initiator with a vapor pressure of $5x10^{-5}$ mmHg (benzoyl peroxide) and therefore emissions are estimated to be negligible. MEKP is a reactive hardener with a vapor pressure of $8.05x10^{-5}$ mmHg at 25°C (2-butanone peroxide, CAS 1338-23-4) and emissions are estimated to be negligible. Soybean oil vapor pressure is negligible. The unsaturated polyester resins contain up to 45% styrene monomer - this is the primary source of emissions from the press and Autocasters. Safety Data Sheets for the two most likely resins were provided with the application. Other, similar resins may be used but styrene content of any resin used will be limited to 45%. Resin will be stored in any or all of the existing aboveground storage tanks (i.e., 1-5, 7, 9, & 10) and totes as necessary. Regardless of the number of tanks utilized, the annual throughput is not anticipated to exceed those included in the emissions estimates.

3. Rotational Molding – Four (4) Machines

Linear low-density polyethylene (LLDPE) pellets will be ground, and pigments will be added, prior to use in the rotational molds. The facility will be equipped with four (4) grinding mills, each rated at 1,000 pounds per hour. Fine particulates from the grinding are estimated to be minimal and larger particulates will be collected and directed to a cyclone then a dust collector that exhausts external to the building. Pigments will come in pellet form and will be conveyed and controlled in a manner similar to the LLDPE pellets (cyclone-controlled).

Rotational molding is used to produce hollow plastic parts. A hollow mold is filled with LLDPE pellets. The mold is then rotated while being heated; the heating softens the LLDPE, allowing it to flow and the rotation forces the LLDPE to the outside of the mold, forming a hollow product.

After molding, cosmetic repairs are performed on products. Electrically powered heat guns are used to soften the products prior to computer numerically controlled (CNC) routers being used to perform repairs.

Defective products are cut into strips with a band saw and are recycled through the process.

The main sources of emissions for this process are four natural gas-fired ovens which heat the rotational molds. Secondary emissions consist of limited particulate emissions from LLDPE and pigment handling and grinding. Since the LLDPE is a polymer, heating of the LLDPE is not considered a source of VOC emissions. A cyclone will be used to control PM emissions from grinding and mixing operations.

4. Quazite

A total of 73 casting stations will be installed for the Quazite process which produces polymer concrete boxes and covers. Installation of the Quazite casting stations began in 2022 and buildout of the 73 machines is expected to be completed during 2025. In this process, fine aggregate materials (sand, limestone, and potentially dolomite) are mixed with polystyrene resins to produce polymer concrete boxes and lids.

Emissions from this process consist of VOC/HAP (styrene) emissions from the resins and limited particulate emissions from aggregate handling. Styrene emissions will be captured and can be routed to any of the three regenerative thermal oxidizers (RTOs).

5. HDPE Structural Foam

Six vertical presses (extruders) will be installed to support the HDPE Structural Foam process. Three presses will be installed by the end of 2023 and another three will be installed between 2026 and 2029.

Virgin HDPE resin pellets are conveyed from silos to a surge bin associated with a press. From the surge bin, resin is pumped to blenders where color, HDPE recycled material (Regrind), and Virgin resin are mixed. The blender then feeds the extruder which then uses hydraulics to push resin mix into molds in the press cycle. Emissions are limited to HAP/VOC (N,N-Dimethylaniline) emissions from the resin promoter and VOC emissions from the thermoset mold release.

6. Coating Booth

In this process, High Volume Low Pressure (HVLP) paint guns are used to apply coatings to products associated with gas utilities (fittings, valves, brackets, etc.) in a spray booth. The booth is equipped with an exhaust which is vented through particulate filters. Emissions consist of PM and VOC emissions from application of the coatings.

7. Plasma Cutter

   Mild Steel (A36) is cut using an Arc Cut Pro 20612 plasma table equipped with an XPR 300 cutting system and a water table.

   Emissions from the plasma table will consist of PM and NOx. PM emissions are reduced significantly when water in the water table is maintained within two inches of the cutting tip.

8. Welding

   Both robotic and hand welding will be used to conduct gas metal arc welding (GMAW) with E70S electrodes. Emissions from welding will consist of PM emissions.

Regenerative Thermal Oxidizers

The facility is equipped with three existing L & E America (Langbein Engelbracht America) / TANN Corporation RTOs (RTO-1, RTO-2, & RTO-3). While the facility intends to duct the molding equipment to RTO-1 and 2 as the primary control devices, it may additionally be ducted to RTO-3 for redundancy, in the event that a backup unit is needed.

SECTION V. EQUIPMENT

Process equipment for this phase is listed in the following table.

EUG	EU	Description	Capacity	Const. Date
EUG1	EU1	Armorcast Press	Undetermined	4/2022 (installation)
EUG1	EU2	Autocaster Non-Pads	100 lb/hr	4/2022 (installation)
EUG1	EU2	Autocaster Pads	100 lb/hr	4/2022 (installation)
EUG1	EU4	Quazite	N/A	2022
EUG2	EU2a	Armorcast Grinding Booth	2 TPH	2022
EUG2	EU2b	Armorcast Grinding Booth	2 TPH	2022
EUG3	EU3	Natural-Gas Fired Oven	4.25 MMBTUH	2022
EUG3	EU3	Natural-Gas Fired Oven	4.25 MMBTUH	2022
EUG3	EU3	Natural-Gas Fired Oven	6.5 MMBTUH	2022
EUG3	EU3	Natural-Gas Fired Oven	6.5 MMBTUH	2022
EUG4	EU3a	Fine Aggerates from Rotational Molding	N/A	2022
EUG5	EU5	HDPE Structural Foam	N/A	2022
EUG6	EU6	Coating Booths	3,655 gal/yr	2022
EUG7	EU7	Plasma Cutter	72 in/min	2022
EUG8	EU8	Welding	96,000 lb/yr	2022
EUG9	AST	Resin Storage Tanks (3)	20,000 gal	2003
EUG9	AST	Resin Storage Tanks (2)	30,000 gal	2003
EUG9	AST	Resin Storage Tank (3)	10,000 gal	2003
EUG10	RTO-1	Thermal Oxidizer	30,000 CFM	2013

EUG	EU	Description	Capacity	Const. Date
EUG10	RTO-2	Thermal Oxidizer	40,000 CFM	2013
EUG10	RTO-3	Thermal Oxidizer	40,000 CFM	2013
EUG11	Facility-Wide	Facility-Wide Emissions Unit Group	N/A	N/A

SECTION VI. EMISSIONS

EUG1 - Compression Molding Presses/Autocasters

VOC and HAP emissions from the casting process are from the polyester resin used in the casting/molding processes because the resin contains styrene. VOC and HAP emissions are based on estimated maximum annual resin usage under two operating scenarios: processing while controls are not operating and processing when controls are operational. Total estimated maximum annual resin usage is 11,400,000 pounds. The facility estimated annual resin processed without controls is approximately 1,140,000 pounds, as summarized in the following table. The emission factor for Autocasters (0.015 lb/lb resin) is from Guidelines for Calculating Emissions from Polyester Resin Operations (December 2019), South Coast Air Quality Management District (AQMD) for closed molding with vapor suppressant and is multiplied by the Styrene content (as a percent). Facility-wide Emissions of VOC and HAP (individual and total) will each be limited to 99.9 tons per year. Controlled emissions estimate for EUG1 are based on the material usage, established emission factors, process-specific capture efficiency, and RTO control efficiency.

Resin Usage - Emissions

EU	Equipment	Annual Estimated Maximum Resin Usage (processed with no controls)	Annual Estimated Maximum Resin Usage (processed with controls)	Typical Resin Styrene Content	Emission Factor
		lb/yr	lb/yr	%	lb VOC/ lb Resin
EU1	Armorcast Press	400,000	3,600,000	32.50	0.015
EU2	Autocaster Non-Pads	670,000	6,030,000	45.00	0.015
EU2	Autocaster Pads	70,000	630,000	45.00	0.015
	TOTALS	**1,140,000**	**10,260,000**	---	---

EU	Equipment	Capture Efficiency	Destruction Efficiency	Uncontrolled VOC/HAP Emissions		Controlled VOC/HAP Emissions	
		%	%	lb/yr	TPY	lb/yr	TPY
EU1	Armorcast Press	95	97	1,950.0	0.98	1377.68	0.69
EU2	Autocaster Non-Pads	95	97	4,522.5	2.26	3195.15	1.60
EU2	Autocaster Pads	95	97	472.50	0.24	333.82	0.17
	TOTALS			**6945.00**	**3.48**	**4906.45**	**2.46**

*While the facility intends to duct the molding equipment to RTOs-1 and 2 as the primary control device, RTO-3 may be used for redundancy purposes.

Total emissions from the Autocasters (controlled plus uncontrolled emissions) are presented in the following table.

Total Estimated Emissions from Autocasters

EU	Equipment	Total VOC/HAP Emissions	
		lb/yr	TPY
EU1	Armorcast Press	3327.68	1.66
EU2	Autocaster Non-Pads	7717.65	3.86
EU2	Autocaster Pads	806.32	0.40
TOTALS		**11851.64**	**5.92**

EUG1 - Quazite Process

A total of 73 casting stations will be installed for the Quazite process which produces polymer concrete boxes and covers using a polymer casting process. Fine aggregate materials (sand, limestone, and dolomite) are mixed with polystyrene resins to produce polymer concrete boxes and lids. Emission factors are from UEF Emission Factors for Open Molding and Other Composite Processes, American Composites Manufacturers Associations, 2019. Process is classified as Closed Molding. Styrene emissions will be captured and can be routed to any of the three RTOs. Hubbell requests 3% of resin emissions to be uncontrolled by the RTOs. Facility-wide Emissions of VOC and HAP (individual and total) will each be limited to 99.9 tons per year.

Estimated Resin Usage - Emissions

Product	Annual Usage	VOC Content	HAP Content	Emission Factor
	lbs/yr	wt %	wt %	lb VOC / wt %
Controlled Resin	15,035,000	46	46	0.015
Uncontrolled Resin	465,000			

Product	Capture Efficiency	Destruction Efficiency	VOC/HAP Emissions
	%	%	TPY
Controlled Resin	50	97	26.71
Uncontrolled Resin	0	0	1.60
TOTAL			**28.31**

EUG2 - Armorcast Grinding Booths

There are no significant emissions from the two (2) Armorcast grinding booths and are insignificant activities and do not have a specific emission limitation.

EU ID	Source
EU2a	Armorcast Grinding Booth
EU2a	Armorcast Grinding Booth

EUG3 - Rotational Molding

Emissions from the ovens are based on AP-42 (7/98), Section 1.4, a gas heating value of 1,020 BTU/SCF, and the rating shown in the following table.

Oven Emission Factors

ID#	NO_X	CO	VOC
	lb/MMSCF	lb/MMSCF	lb/MMSCF
#3 Oven - #6 Oven	100	84	5.5

Oven Emissions

ID#	Rating	NO_X		CO		VOC	
	MMBTUH	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
#3 Oven	4.25	0.42	1.83	0.35	1.53	0.02	0.10
#4 Oven	4.25	0.42	1.83	0.35	1.53	0.02	0.10
#5 Oven	6.50	0.64	2.79	0.54	2.34	0.04	0.15
#6 Oven	6.50	0.64	2.79	0.54	2.34	0.04	0.15
TOTALS		**2.12**	**9.24**	**1.78**	**7.74**	**0.12**	**0.50**

EUG4 – Fine Aggerates

Rotational Molding:

Emissions from grinding, mixing, and cutting consists of particulate emissions from LLDPE and pigment handling and grinding. A cyclone will be used to control PM emissions from grinding, mixing, and cutting operations. Emission factor for grinding of plastic pellets and cutting of plastic scraps is assumed similar to log de-barking (as fine particles are not readily produced), Table 10.3-1 from 4th edition AP-42 (02/80). Emission factor for handling of dry pigments is developed based on Equation 1 from Section 13.2.4 of AP-42 (11/06). The final emission factor assumes there are 4 drops for the process: drop into silo, drop out of silo, drop into mixing vessel, and drop into rotational molding unit.

Emission Factors

Operation	Annual Usage	PM Emission Factor
	tons	lb/ton
Grinding	17,520	0.0240
Mixing	1,752	0.0143
Cutting	3,504	0.0240

Emissions

Operation	Uncontrolled Emissions	Control Efficiency	Controlled PM Emissions
	TPY	%	TPY
Grinding	0.21	70	0.06
Mixing	0.01	70	< 0.01
Cutting	0.04	70	0.01

Quazite:
Emission factor is developed based on Equation 1 from Section 13.2.4 of AP-42 (11/06). Fine aggerate emissions assumes there are 4 drops for the process: drop into silo, drop out of silo, drop into mixing vessel, and drop into spray application.

Fine Aggerates - Emissions

Product	Annual Usage	Emission Factor	PM Emissions
	Tons	lb/ton	TPY
Industrial Sand	36,500	0.0143	0.26
Limestone, Marblewhite 16-40	36,500	0.0143	0.26
Limestone, VICAL 100	36,500	0.0143	0.26
Dolomite	36,500	0.0143	0.26
TOTAL			**1.04**

EUG5 - HDPE Structural Foam
Six vertical presses (extruders) will be installed to support the HDPE Structural Foam. Virgin HDPE Resin pellets are conveyed from silos to a surge bin associated with a press. From the surge bin, resin is pumped to blenders where color, HDPE recycled material (Regrind), and Virgin resin are mixed. Weight percent is based on material SDS. The blender then feeds the extruder which then uses hydraulics to push resin mix into molds in the press cycle process.

Extruder Emissions

Product	Usage	VOC	VOC Emissions		HAP Emissions	
	lbs/yr	wt %	lbs/yr	TPY	lbs/yr	TPY
XO-385	80,000	0	0.00	0.00	0.00	0.00
Dark Green	130,000	0	0.00	0.00	0.00	0.00
Dimethyl Aniline	2,000	100	2,000.00	1.00	2,000.00	1.00
Foamazol 71	1,000	0	0.00	0.00	0.00	0.00
Gray	30,000	0	0.00	0.00	0.00	0.00
LLDPE	4,000	0	0.00	0.00	0.00	0.00
Recycled Polystyrene	1,430,000	0	0.00	0.00	0.00	0.00
Resin - Muehistein	8,600,000	1	0.00**	0.00	0.00	0.00
Resin - MDT		0	0.00	0.00	0.00	0.00
Resin – Formosa Plastics		0	0.00	0.00	0.00	0.00

Product	Usage	VOC	VOC Emissions		HAP Emissions	
	lbs/yr	wt %	lbs/yr	TPY	lbs/yr	TPY
Thermoset Mold Release	1,000	70	700.00	0.35	0.00	0.00
Tan	3,000	0	0.00	0.00	0.00	0.00
TOTALS			**2,700**	**1.35**	**2,000**	**1.00**

** Since the resins (linear low-density polyethylene and high-density polyethylene) are polymers, it is assumed that there are no VOC emissions when the product is melted. While the SDS lists VOC content as <1% for one of three HDPE resins (i.e., Muehlstein), based on the nature of this and similar material and the production process, emissions are estimated to be negligible.

EUG 6 - Coating Booth

Paint guns are used to apply coatings to products associated with gas utilities in a spray booth. The booth is equipped with an exhaust which is vented through particulate filters. VOC, HAP, and solid content is based on material SDS. Since the process does not use paint strippers and does not use coatings containing the metal compounds targeted, it is not subject to 40 CFR Part 63 Subpart HHHHHH and paint booth filters achieving 66% PM filtration may be used. Transfer efficiency for HVLP guns is given as 75% in Table 14-2 of Stappa/Alapco Automotive Spray Booths; however, used HVLP transfer efficiency of 65% is assumed by VCAPCD, SLOAPCD, SCAQMD. Facility-wide Emissions of VOC and HAP (individual and total) will each be limited to 99.9 tons per year.

Coating Properties

Product	Density	Annual Usage	VOC Content	Solid Content	HAP Content
	lb/gal	gal/yr	%	%	%
Amerlok 2/400 Medium Gray Resin	11.93	3,000	5.762	94.238	0
Amerlock 2 Cure	11.85	600	17.939	82.061	10
Amercoat 65 Thinner	7.26	55	100	0	100

Estimated Uncontrolled Coating Emissions

Product	VOC Emissions		PM Emissions		HAP Emissions	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Amerlok 2/400 Medium Gray Resin	0.45	1.03	7.37	16.86	0.00	0.00
Amerlock 2 Cure	0.28	0.64	1.28	2.92	0.16	0.36
Amercoat 65 Thinner	0.09	0.20	0.00	0.00	0.09	0.20
TOTALS	**0.82**	**1.87**	**8.65**	**19.78**	**0.24**	**0.56**

Controlled Coating Emissions

Product	PM Emissions		Transfer Efficiency	Filter Efficiency	PM Emissions	
	lb/hr	TPY	%	%	lb/hr	TPY
Amerlok 2/400 Medium Gray Resin	7.37	16.86	65	66	0.88	2.01
Amerlock 2 Cure	1.28	2.92	65	66	0.15	0.35
Amercoat 65 Thinner	0.00	0.00	65	66	0.00	0.00
TOTALS					**1.03**	**2.36**

EUG 7 - Plasma Cutters

Mild Steel (A36) is cut using an Arc Cut Pro 20612 plasma table equipped with an XPR 300 cutting system and a water table. Emissions from the plasma table will consist of PM and NOx. PM emissions are reduced significantly when water in the water table is maintained within two inches of the cutting tip. HAP emissions are based on the weight percent of each HAP in the emissions (2% chromium, 3% manganese, and 1% nickel). Data from a plasma table permitted in New Hampshire is taken to establish emission factors for plasma table cutting. Data taken from New Hampshire DES online database (OneStop: https://www4.des.state.nh.us/DESOnestop/). A 90% fume reduction for semi-dry cutting has been applied per "Emission of Fume, Nitrogen Oxides, and Noise in Plasma Cutting of Stainless and Mild Steel," Bromsen et. al. as referenced in Chapter 12 of AP-42.

Plasma Cutting Emissions

Process	Max Cut Speed	NO_X	PM	Uncontrolled NOx Emissions		Uncontrolled PM Emissions		HAP Emissions	
	in/min	lb/in	lb/in	lb/hr	TPY	lb/hr	TPY	TPY	lb/hr
Arc Cutter	240	0.000149	0.00045	2.15	9.40	6.48	28.40	1.70	0.39

Process	NOx Reduction	PM Reduction	Controlled NOx Emissions		Controlled PM Emissions	
	%	%	lb/hr	TPY	lb/hr	TPY
Arc Cutter	90	90	0.21	0.94	0.65	2.84

EUG 8 - Welding

Robotic welding (3 units) as well as hand welding (8 stations) will be used to conduct gas metal arc welding (GMAW) with E70S electrodes. Emissions from welding will consist of PM emissions. Emission factors are from AP-42, Fifth Edition Compilation of Air Pollutant Emissions Factors, Volume 1: Stationary Point and Area Sources, Tables 12.19-1 and 12.19-2 Emission Factors for E70S electrode with GMAW welding (01/1995). Per San Joaquin Valley APCD policy for plasma cutting of stainless steel, it is assumed that 5.0% of the steel's total chromium content is converted to hexavalent chromium during welding.

Welding Emissions

Process	Annual Usage	PM Emission Factor	HAP Emission Factor	PM Emissions	HAP Emissions
	lbs/yr	lb/lb	lb/lb	TPY	TPY
Welding	96,000	0.0052	0.003211	0.25	0.15

EUG 9 - Resin Storage

Working and breathing (W/B) emissions for the resin storage tanks (ASTs) were estimated using the Oklahoma DEQ Storage Tank Emissions Calculation Tool (which is based on AP-42, Section 7.1 (6/20)) and the following parameters.

Resin Storage Emissions

Parameter	Resin Storage Tanks (AST)
Throughput, gal/yr	10,000,000
Liquid in Tank(s)	Resin (Styrene)
Working/Breathing Method/Tool	AP-42 (06/20), Section 7.1
Flash Calculation Method/Tool	None
Working/Breathing Emissions, TPY	0.86
Flashing Emissions, TPY	None
Control Type	None
Total VOC Emissions, TPY	**0.86**

Storage tank emissions were conservatively assumed to pass through a single tank (this assumption maximizes turnovers and therefore over-estimates working losses).

EUG 10 - Regenerative Thermal Oxidizers

In addition to emissions from the presses and Autocasters themselves, emissions from natural gas combustion in the RTOs are included. To be conservative, emission estimates have assumed that the RTOs will be fully fueled by natural gas. Under actual operations, the RTOs will be fueled by the resin fumes and natural gas will provide supplemental fuel. In addition, while only one RTO is expected to be needed to control resin emissions, emissions from all three RTOs have been included.

Emissions from the thermal oxidizers are based on emission factors from AP 42, Fifth Edition Compilation of Air Pollutant Emissions Factors, Volume 1: Stationary Point and Area Sources, Table 1.4-1 (7/98) Emission Factors for Nitrogen Oxides and Carbon Monoxide from Natural Gas Combustion (NOx and CO), Table 1.4-2. Emission Factors for Criteria Pollutants and Greenhouse Gasses from Natural Gas Combustion (VOC) and EPA's emission factor spreadsheet natgas_procgas_lpg_pm_efs_not_ap42_032012_revisions.xls and the following parameters.

RTO Equipment Information

EU	Equipment	Fan Rating	Heat Input
		CFM[1]	MMBTUH
RTO-1	Thermal Oxidizer	30,000	6.0
RTO-2	Thermal Oxidizer	40,000	6.0
RTO-3	Thermal Oxidizer	40,000	6.0

[1] CFM = cubic feet per minute.

RTO Emissions

EU	Equipment	NO_X Emissions		CO Emissions		VOC Emissions	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
RTO-1	Thermal Oxidizer	0.59	2.58	0.49	2.16	0.03	0.14
RTO-2	Thermal Oxidizer	0.59	2.58	0.49	2.16	0.03	0.14
RTO-3	Thermal Oxidizer	0.59	2.58	0.49	2.16	0.03	0.14
TOTALS		**1.77**	**7.73**	**1.47**	**6.49**	**0.09**	**0.43**

Facility-wide emissions are included in the following table.

Facility-Wide Emissions Summary

EUG	Source	NO_x		CO		VOC		PM_{10}		HAPs	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EUG1	Armorcast Press	---	---	---	---	---	0.69	---	---	---	0.69
EUG1	Armorcast Press (Uncontrolled)	---	---	---	---	---	0.98	---	---	---	0.98
EUG1	Autocaster Non-Pads	---	---	---	---	---	1.60	---	---	---	1.60
EUG1	Autocaster Non-Pads (Uncontrolled)	---	---	---	---	---	2.26	---	---	---	2.26
EUG1	Autocaster Pads	---	---	---	---	---	0.17	---	---	---	0.17
EUG1	Autocaster Pads (Uncontrolled)	---	---	---	---	---	0.24	---	---	---	0.24
EUG1	Quazite	---	---	---	---	---	28.31	---	---	---	28.31
EUG3	Oven Emissions	2.12	9.24	1.78	7.74	0.12	0.50	---	---	---	---
EUG4	Fine Aggerates	---	---	---	---	---	---	---	1.11	---	---
EUG5	HDPE Structural Foam	---	---	---	---	---	1.35	---	---	---	1.00
EUG6	Coating Booths	---	---	---	---	0.82	1.87	1.03	2.36	0.24	0.56
EUG7	Plasma Cutter	0.21	0.94	---	---	---	---	0.65	2.84	1.70	0.39
EUG8	Welding	---	---	---	---	---	---	---	0.25	---	0.15
EUG9	Resin Storage	---	---	---	---	---	0.86	---	---	---	0.86
EUG10	Thermal Oxidizer	0.59	2.58	0.49	2.16	0.03	0.14	---	---	---	---
EUG10	Thermal Oxidizer	0.59	2.58	0.49	2.16	0.03	0.14	---	---	---	---

EUG	Source	NO_x		CO		VOC		PM_{10}		HAPs	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EUG10	Thermal Oxidizer	0.59	2.58	0.49	2.16	0.03	0.14	---	---	---	---
TOTALS		**4.10**	**17.92**	**3.25**	**14.22**	**1.03**	**39.25**	**1.68**	**6.56**	**1.94**	**37.12**

Emissions of each of the criteria pollutants are below the major source threshold of 100 TPY; however; the HAP emissions are above the major source threshold of 10 TPY for an individual HAP and 25 TPY of combined HAPs.

SECTION VII. 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 on 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 refer to those individual emission units either listed in Appendix I or whose actual calendar year emissions do not exceed the following limits.

a. 5 TPY of any one criteria pollutant
b. 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 a HAP that the EPA may establish by rule

Emission limitations for all the sources are taken from the applicable requirements, permit application and previous permit.

Section 8-4 requires a construction permit prior to the following:
- Construction of a new source that would require an operating permit under 40 CFR Part 70;
- Reconstruction of a major HAP source under 40 CFR Part 63;

- Any physical change or change in method of operation that would be a significant modification under OAC 252:100-8-7.2(b)(2); or
- Any physical change or change in method of operation that would increase the PTE of any one regulated air pollutant by more than 10 TPY, calculated using the approach in 40 CFR § 49.153(b).

This permit is for construction of a new major HAP source.

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 (PM)) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment. Particulate emission limits are based on maximum design heat input rating, as described in Appendix C. Since the RTOs are control devices, they are not considered fuel-burning equipment and are therefore not subject to this subpart. Rotational Molding Ovens are listed below.

Appendix C specifies a PM emission limitation of 0.60 lbs/MMBtu for all equipment at this facility with a heat input rating of 10 MMBtu/hr or less.

Equipment	Maximum Heat Input (MMBTUH)	Appendix C Emission Limit (lbs/MMBTU)	Potential Emission Rate (lbs/MMBTU)
#3 Oven	4.25	0.60	0.01
#4 Oven	4.25	0.60	0.01
#5 Oven	6.50	0.60	0.01
#6 Oven	6.50	0.60	0.01

Section 19-12 limits the emission of particulate matter from new and existing directly fired fuel-burning units and/or emission points in an industrial process based on the process weight rate, as specified in Appendix G. As shown in the table below, all emission points greater than 0.05 TPH are in compliance with Subchapter 19.

Source	Process Rate (TPH)	Potential Emission Rate (lbs/hr)	Appendix G Emission Limit (lbs/hr)
Rotational Molding Mill (4)	0.5 TPH	0.0000091	2.60
Mixing	0.2 TPH	> 0.01	1.39
Cutting	0.4 TPH	> 0.01	2.22
Fine Aggerates	16.67 TPH	0.24	27.01
Coating Booth (1)	>10 TPH	0.54	19.18
Plasma Cutter	10 TPH	6.51	19.18
Welding (11)	>0.01 TPH	0.057	0.187

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]
No discharge of greater than 20% opacity is allowed except for short-term occurrences that 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. The permit will require that natural gas be used as supplemental fuel for the RTOs to ensure compliance with these requirements. The permit will require maintenance of air pollution controls on the paint booth, grinding, mixing, and cutting operations to ensure compliance with this rule.

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2 limits the ambient air concentration of H_2S emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 $\mu g/m^3$. Fuel-burning equipment fired with pipeline natural gas will not have the potential to exceed the H_2S ambient air concentration limit.
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/MMBTU heat input, 3-hour average. AP-42 (3/98), Table 1.4-2, lists the total SO_2 emissions for natural gas to be 0.6 lb/$MMft^3$ or about 0.0006 lb/MMBTU which is in compliance with this limitation. The permit requires the use of pipeline natural gas for all fuel-burning equipment to ensure compliance with Subchapter 31.

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

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]
None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds) [Parts 5 and 7 Applicable]
Part 3 requires VOC 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. None of the tanks on-site store material which has a vapor pressure greater than 1.5 psia under actual storage conditions.
Part 5 limits the VOC content of coatings used in coating lines and operations. The limits are given in the following table.

Coating Type	**Limit [1] (lb VOC/gal. coating)**
Alkyd primer	4.8
Vinyls	6.0
NC lacquers	6.4
Acrylics	6.0
Epoxies	4.8
Maintenance finishes	4.8
Custom products finish	6.5

[1] These limits apply to the coatings as applied. The limits are expressed in pounds of VOC per gallon of coating, excluding the volume of any water and exempt organic compounds.

As an alternative to these VOC content limits for coatings used at the facility, the owner or operator may elect to develop a plant-wide emission plan in accordance with OAC 252:100-37-25(b) or the facility may reduce emissions of VOCs from coatings with higher VOC concentrations to the levels indicated by incineration, absorption/adsorption, or any other process of equivalent reliability and protectiveness provided that no air pollution, as defined by the Clean Air Act, results.
Part 5 requires all emissions of VOC from the cleanup of any article, machine, or equipment used in applying coatings to be included when determining compliance with the above stated solvent limitations and emission limits. All solvent usage not incorporated into the coatings as they are applied has been averaged over coating usage and all coatings still comply with the VOC limitations.
Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. Fuel burning equipment will be operated in accordance with manufacturer recommendations.

OAC 252:100-39 (Organic Compounds, Former Nonattainment Areas) [Not Applicable]
This subchapter imposes additional conditions beyond those of Subchapter 37 on emissions of organic materials from new and existing facilities in Tulsa and Oklahoma Counties. This facility is in Oklahoma County. The facility is not involved in any specific operations with additional requirements in Oklahoma county at this time.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior

to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated, there are no specific requirements for this facility at this time.

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

Each emissions unit must be evaluated for periodic testing in accordance with the Periodic Testing Standardization guidance issued December 1, 2011, on a pollutant-by-pollutant basis. The frequency of the periodic testing requirement is based on the quantity of emissions an emission unit is permitted to emit. Periodic testing requirements are not required for an emission unit that is subject to an applicable requirement that already requires periodic testing, continuous emission monitoring (CEMS), or predictive emission monitoring (PEMS). RTO-1 and 2 have potential HAP emissions greater than 25 TPY. The following table lists the applicable testing for each pollutant required under the guidance.

Periodic Testing Review

EUG/EU	Pollutant	Destructive Efficiency[1]	Current Monitoring	Periodic Testing
RTO-1 and 2	HAP	%	None	Yes, 5 Years

[1] – Measured using inlet and outlet concentrations.

SECTION VIII. FEDERAL REGULATIONS

NSPS, 40 CFR Part 60 [Not Applicable]
Subparts Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813 gallons capacity. Subpart Kb would apply to the resin storage tanks (AST) with a capacity of 20,000 gallons or greater if the maximum true vapor pressure of the liquid stored is 15.0 kPa or greater. The resins Hubbell is proposing to store all have vapor pressures less than 15 kPa. Therefore, Subpart Kb does not apply.

The following subparts affect surface coating, but not this facility:

Subpart EE: Metal Furniture
Subpart MM: Automobiles and Light-Duty Trucks
Subpart QQ: Graphic Arts (Rotogravure)

Subpart RR: Pressure-Sensitive Tape and Labels
Subpart SS: Large Appliances. No large appliances are coated at this facility.
Subpart TT: Metal Coil No metal coils are coated at this facility.
Subpart WW: Beverage Can
Subpart FFF: Flexible Vinyl and Urethane
SSS -Magnetic Tape
TTT – Plastic Parts Business Machines
VVV – Polymeric Supporting Substrates

NESHAP, 40 CFR Part 63 [Subpart MMMM and WWWW Applicable]
Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. This subpart establishes standards for miscellaneous metals parts and products surface coating facilities for major sources of HAP. This subpart sets forth limitations on coating HAP content. Compliance with these limitations can be met through one of three options: 1) compliance material, 2) emission rate without add-on controls, and 3) emission rate with add-on controls. The facility is a major source of HAP emissions; therefore, the facility is subject to this subpart. For each new general use coating affected source, limit organic HAP emissions to no more than 1.9 pound (lb) organic HAP per gal coating solids used during each 12-month compliance period. This subpart establishes requirements to demonstrate initial and continuous compliance with the emission limitations: (1) the applicant shall submit initial notification 120 days after initial startup and (2) shall submit notification of compliance status 30 calendar days following the end of the initial compliance period, and semi-annual compliance reports thereafter. The facility will be in compliance upon start up, expected later in 2023.

Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations. This subpart affects area sources of HAP involved in any of the following activities:

- Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), in paint removal processes;
- Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations; and
- Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

Target HAP are the compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). A spray-applied coating that contains any individual target HAP at a concentration of greater than 1.0% by weight meets the definition of target HAP containing coating.

This facility is a major source of HAPs, therefore not subject to area source standards.

Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. This subpart applies to reinforced plastic composites production facilities that are located at a major source of HAP emissions. Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic

molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites.

The affected source consists of all parts of the facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts manufactured.

Based on the Rule applicability, since the facility's Compression Molding Presses, Autocasters, and Quazite operations fabricate plastic products using thermoset resins containing styrene, Hubbell is an affected source and subject to the Regulation. However, the Armorcast casting and Quazite casting operations are specifically excluded from any requirements in the Subpart as Section 40 CFR 63.5790(c) of Subpart WWWW specifically excludes closed molding and polymer casting from any requirements in Subpart WWWW. Nonetheless the exclusions in 40 CFR 63.5790(c) specifically do not exclude compression/injection molding (compression/injection molding is an exception to the exclusion).

Closed molding, open molding, Polymer casting, and compression/injection molding are defined in Section 40 CFR 63.5935 of Subpart WWWW as follows:

> ***Closed Molding*** means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (*e.g.*, compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.
>
> ***Open molding*** means a process for fabricating composites in a way that HAP-containing materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold.
>
> ***Polymer casting*** means a process for fabricating composites in which composite materials are ejected from a casting machine or poured into an open, partially open, or closed mold and cured. After the composite materials are poured into the mold, they are not rolled out or worked while the mold is open, except for smoothing the material and/or vibrating the mold to remove bubbles. The composite materials may or may not include reinforcements. Products produced by the polymer casting process include cultured marble products and polymer concrete.
>
> ***Compression/injection molding*** means a grouping of processes that involves the use of compression molding and/or injection molding.

> ***Compression molding*** means a closed molding process for fabricating composites in which composite materials are placed inside matched dies that are used to cure the materials under heat and pressure without exposure to the atmosphere. The addition of mold paste or in-mold coating is considered part of the closed molding process. The composite materials used in this process are generally SMC or BMC.
>
> ***Injection molding*** means a closed molding process for fabricating composites in which composite materials are injected under pressure into a heated mold cavity that represents the exact shape of the product. The composite materials are cured in the heated mold cavity.

Since the press operations utilize compression molding, the presses are an exception to the exclusion and are not excluded from the requirements of Subpart WWWW. The press operations are not subject to the requirements of Table 1 as these requirements pertain to centrifugal casting and open molding operations (and do not apply to the presses). Similarly, the requirements to calculate and report emissions under Section 63.5799 of the Subpart do not apply as the facility does not utilize the following process types: open molding, centrifugal casting, continuous lamination/casting, or pultrusion. While the facility does use a material that may be considered a bulk molding compound (BMC), Table 3 does not contain organic HAP emissions limits for BMCs.

Per Section 40 CFR 63.5805 (b) and (c), the press operations must meet the requirements of Table 3 and Table 4 of the Regulation. However, the requirements of Table 3 are limited to open molding and to casting operations and therefore do not apply to the press operations. The press operation is required to comply with the Work Practice Standards in Table 4 of the Subpart as follows:

1. Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting. Hubbell's process complies with this requirement as material is used immediately after charging to the mold.

2. Cleaning solvents containing HAPs are not to be utilized (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 is defined as any equipment that directly contacts resin.

3. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

4. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. Mixers where the emissions are fully captured and routed to a 95 percent efficient control device are exempt from this requirement.

5. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.

6. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Since the emissions limits and controls requirements do not apply to the operations, the facility is not required to conduct the performance tests, monitoring requirements, required in the Regulation.

The press operations are subject to the reporting requirements of 40 CFR 63.5905. This section references Table 13 of the Regulation which in turn requires a new source subject to the subpart (but not subject to the emissions limits or control requirements) to notify the Regulator of the actual date of startup within 15 calendar days of startup.

Section 40 CFR 63.5910 requires the facility to submit Compliance reports to the Regulator concurrent with its semiannual monitoring report. Such Compliance Reports shall include a statement that there were deviations from the Work Practice Standards required of Table 4 above or if there were deviations the following shall be provided:

1. Total operating time of each press during the reporting period
2. Information on the number, duration, and cause of deviations (including unknown cause, if applicable) and the corrective action taken

Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This subpart applies to sources that own or operate industrial, commercial, or institutional boilers or process heaters as defined in 40 CFR 63.7575 that are located at a major source of hazardous air pollutants (HAP) except as specified in 40 CFR 63.7491 (boilers and process heaters not subject to this subpart). Included in the list of exclusions in 40 CFR 63.7491 are hot water heaters as defined in Section 63.7575 of the Regulation:

> ***Hot water heater*** means a closed vessel with a capacity of no more than 120 U.S. gallons in which water is heated by combustion of gaseous, liquid, or biomass fuel and hot water is withdrawn for use external to the vessel. Hot water boilers (i.e., not generating steam) combusting gaseous, liquid, or biomass fuel with a heat input capacity of less than 1.6 million Btu per hour are included in this definition. The 120 U.S. gallon capacity threshold to be considered a hot water heater is independent of the 1.6 million Btu per hour heat input capacity threshold for hot water boilers. Hot water heater also means a tankless unit that provides on-demand hot water.

Hubbell does not own or operate boilers at the site and since the water heaters in the bathrooms and kitchens at the facility meet the definition in 40 CFR 63. 7575, they are exempt from requirements of the Regulation.

The facility utilizes ovens in its Rotational Molding operation. The definition of Process Heater in Section 63.7575 of Subpart DDDDD reads as follows:

> ***Process heater*** means an enclosed device using controlled flame, and the unit's primary purpose is to transfer heat indirectly to a process material (liquid, gas, or solid) or to a heat transfer material (e.g., glycol or a mixture of glycol and water) for use in a process unit, instead of generating steam. Process heaters are devices in which the combustion gases do not come into direct contact with process materials."

Since the ovens are used to melt plastic to form a product, they are not used to heat a material for use in a process unit. (After the plastic is heated (melted), the plastic is not used in a process unit.) As such, the ovens do not meet the definition of a process heater and are not subject to 40 CFR 63, Subpart DDDDD.

Subpart XXXXXX, Nine Metal Fabrication and Finishing Source Categories. The provisions of this subpart apply to area sources primarily engaged in one of the nine listed source categories. This facility is not an area source and does not operate any of the nine-metal fabrication and finishing source categories. Therefore, the facility is not subject to this subpart.

SECTION IX. COMPLIANCE

Tier Classification and Public Review

This application has been determined to be Tier II based on the request for a construction permit for a new Part 70 source. Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web Page: http://www.deq.ok.gov.

The applicant published the "Notice of Filing a Tier II Application" in the *Oklahoman*, on February 17, 2023, a newspaper qualified to publish legal notices in Oklahoma County, Oklahoma. The notice stated that the application is available for review at the Air Quality Division's main office.

The applicant will publish the "Notice of Draft Tier II Permit" in the *Oklahoman*, a newspaper qualified to publish legal notices in Oklahoma County, Oklahoma. The notice will state that the Draft Permit is available for review at the Air Quality Division's main office or website.

Tribal Nations will be notified of the draft permit.

Fee paid

Construction permit fee of $7,500 was paid on February 13, 2023.

Landowner Affidavit

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation on land owned by others without their knowledge. The affidavit certifies that the applicant has a current lease for the property.

Enforcement Case/Violation
There is no active enforcement case for this facility.

Inspection
An initial inspection is not required for construction permits.

Environmental Justice Review

Environmental Justice is a federal initiative. Industrial facilities tend to be built on the cheapest land available. The surrounding population tends to be low-income citizens, and there tends to be a higher proportion of minorities in that surrounding area. Those low-income / minority citizens experience the highest impacts of air pollution coming from the adjacent industrial facilities.

Environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no population bears a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or from the execution of federal, state, and local laws; regulations; and policies. Meaningful involvement requires effective access to decision makers for all, and the ability in all communities to make informed decisions and take positive actions to produce environmental justice for themselves.

The following pages detail how the Department of Energy (DOE) implements environmental justice within the Department.

- Community Engagement Initiatives
- DOE Environmental Justice Documents and Publications
- DOE Environmental Justice Frequently Asked Questions
- DOE Environmental Justice Strategy Updates/Revisions
- History of Environmental Justice at the Department of Energy
- Place-based Initiatives
- Resources to Overburdened, Underserved, and Economically Distressed Communities
- Youth/Student Opportunities

EPA has prepared a screening tool, EJSCREEN, which incorporates census data to show the demographics adjacent to a facility. Eleven criteria have been identified to determine whether a disproportionate impact is occurring on nearby minority populations. When those impacts exceed the 80% percentile, additional public participation is warranted.

The indexes in the EJ Screening tool to be considered are the following:

- Particulate Matter 2.5
- Ozone
- Diesel Particulate Matter
- Air Toxic Cancer Risk
- Air Toxic Respiratory Hazard Index

- Traffic Proximity
- Lead Paint, this addresses lead paint based on number of homes built <1960
- Superfund proximity
- Risk management plan (RMP) facility proximity
- Hazardous waste proximity
- Underground storage tanks (UST) and leaking UST (LUST)

The following table shows the EJSCREEN finding for a 1.0-mile buffer surrounding the location of the plant.

Criterion	Screening Level of Concern	State Percentile	USA Percentile
$PM_{2.5}$	80th Percentile	88	87
Ozone	80th Percentile	83	90
Diesel Particulate Matter	80th Percentile	82	73
Air Toxic Cancer Risk	80th Percentile	79	78
Air Toxic Respiratory Hazard Index	80th Percentile	78	80
Traffic Proximity	80th Percentile	70	64
Lead Paint	80th Percentile	38	43
Superfund Proximity	80th Percentile	93	88
Risk Management Plan Facility Proximity	80th Percentile	92	86
Hazardous Waste Proximity	80th Percentile	88	80
Underground storage tanks (UST) and leaking UST (LUST)	80th Percentile	73	71
Wastewater Discharge	80th Percentile	87	79
People of Color	80th Percentile	88	74

Since EJSCREEN indicators exceeded the 80th percentile, additional outreach to the community will be conducted. Special public comment notices will be developed by DEQ and placed in the direct community. These notices will provide additional outreach to inform the community of the draft permit action and provide guidance on how to review the application and draft permit and how to provide comments.

SECTION XI. SUMMARY

The facility has demonstrated the ability to comply with all applicable Air Quality rules and regulations. There are no active Air Quality compliance or enforcement issues concerning this facility. Issuance of the construction permit is recommended, contingent on public review.

DRAFT

PERMIT TO CONSTRUCT
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Hubbell Utility Solutions **Permit No. 2022-0014-C (M-2)**
Hubbell Manufacturing OKC, Inc.

The permittee is authorized to construct in conformity with the specifications submitted to the Air Quality Division on February 10, 2023. The Evaluation Memorandum dated May 10, 2023, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Commencing construction and continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

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

EUG 1 CASTING AND COMPRESSION MOLDING

a. The press and casters (EU1 & EU2) shall use the emission factor equation: resin usage (lb) * 0.015 lb VOC / lb resin* WT % styrene = lb VOC emitted from Guidelines for Calculating Emissions from Polyester Resin Operations (December 2019), South Coast Air Quality Management District (AQMD) for closed molding with vapor suppressant, December 2019, when calculating emissions. Controlled emissions will take into account the capture and control efficiencies.

b. The Quazite process (EU4) shall use the emission factor equation: resin usage (lb) * 0.015 lb VOC / lb resin* WT % styrene = lb VOC emitted from Guidelines for Calculating Emissions from Polyester Resin Operations (December 2019), South Coast AQMD for closed molding with vapor suppressant, December 2019, when calculating emissions. Controlled emissions will take into account the capture and control efficiencies.

c. Emissions of VOC and HAP (both individual and aggregate) are each limited to 99.9 tons per year as demonstrated with a facility-wide 12-month rolling emissions calculations.

EUG 2 ARMORCAST GRINDING BOOTHS
Emissions from this EUG are insignificant activities.

EU ID	Source
EU2a	Armorcast Grinding Booth
EU2a	Armorcast Grinding Booth

EUG 3 ROTATIONAL MOLDING
Emissions from this EUG are insignificant activities.

EU ID	Source	Capacity
EU3	#3 Oven	4.25
EU3	#4 Oven	4.25
EU3	#5 Oven	6.50
EU3	#6 Oven	6.50

EUG 4 FINE AGGERATES

EU ID	Operation	Annual Usage
		tons
EU3a	Grinding	17,520
	Mixing	1,752
	Cutting	3,504

d. Emissions from grinding, mixing, and cutting in Rotational Molding shall be controlled by cyclones, or equivalent PM control devices, with a 70% or greater emission control efficiency.

e. Each air pollution control device shall be maintained in accordance with the manufacturer's specifications, which shall be kept on-site and made available to inspection staff upon request. An alternate pollution control device may be used provided that the new system has an efficiency equal to or greater than the replaced system.

Emissions from the following process are insignificant activities.

EU	Product	Annual Usage[1]
		Tons
EU3a	Industrial Sand	36,500
	Limestone, Marblewhite 16-40	36,500
	Limestone, VICAL 100	36,500
	Dolomite	36,500

[1] - Not an operating or permit limitation.

f. The emissions from fine aggregate materials in the Quazite process shall be calculated using the emission factor (0.0143 lb PM /ton) from UEF Emission Factors for Open Molding and Other Composite Processes, American Composites Manufacturers Associations, 2019 when calculating emissions.

EUG 5 HDPE STRUCTURAL FOAM

Emissions from this EUG are insignificant activities.

EU	Product	Usage[1] lbs/yr
EU5	XO-385	80,000
	Dark Green	130,000
	Dimethyl Aniline	2,000
	Foamazol 71	1,000
	Gray	30,000
	LLDPE	4,000
	Recycled Polystyrene	1,430,000
	Resin - Muehistein	8,600,000
	Resin - MDT	
	Resin – Formosa Plastics	
	Thermoset Mold Release	1,000
	Tan	3,000

[1] - Not an operating or permit limitation.

g. The emissions from the vertical extrusion presses in the HDPE Structural Foam process shall be calculated using the actual throughput of materials used and the weight percent from SDS.

EUG 6 COATING BOOTHS

h. The emissions from the coating booth process shall be calculated using the actual throughput of materials used for coating and gun cleaning and the weight percent from SDS. The coating booths controlled by particulate filters, or equivalent PM control devices, shall control emissions with 66% or greater control efficiency. Control devices shall be operated in the pressure differential range per manufacturer's specifications. The pressure differential of each control device shall be recorded at least once per operating day.

i. If pressure differential readings are outside the range, then visible emissions shall be observed (using Reference Method 9 or Reference Method 22), and then opacity readings shall be performed to ensure compliance. In addition, in the event of any malfunctioning system, records of work orders shall be maintained.

ii. This requirement does not apply to any baghouses vented inside a building.

i. The following table lists the limits of the VOC content of coatings used in coating lines and operations. The limits are given in the following table. [OAC 252:100-37-25]

Coating Type	Limit [1] (lb VOC/gal. coating)
Alkyd primer	4.8
Vinyls	6.0
NC lacquers	6.4

Coating Type	Limit [1] (lb VOC/gal. coating)
Acrylics	6.0
Epoxies	4.8
Maintenance finishes	4.8
Custom products finish	6.5

[1] These limits apply to the coatings as applied. The limits are expressed in pounds of VOC per gallon of coating, excluding the volume of any water and exempt organic compounds.

j. As an alternative to these VOC content limits for coatings used at the facility, the owner or operator may elect to develop a plant-wide emission plan in accordance with OAC 252:100-37-25(b) or the facility may reduce emissions of VOCs from coatings with higher VOC concentrations to the levels indicated by incineration, absorption/adsorption, or any other process of equivalent reliability and protectiveness provided that no air pollution, as defined by the Clean Air Act, results. [OAC 252:100-37]

k. For each new general use coating affected source, limit organic HAP emissions to no more than 1.9 pound (lb) organic HAP per gal coating solids used during each 12-month compliance period. This subpart establishes requirements to demonstrate initial and continuous compliance with the emission limitations: (1) the applicant shall submit initial notification 120 days after initial startup and (2) shall submit notification of compliance status 30 calendar days following the end of the initial compliance period, and semi-annual compliance reports thereafter. [§§63.3880 – 63.3981]

l. The permittee is subject to 40 CFR Part 63 Subpart MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products and shall comply with all applicable provisions including but not limited to: [§§63.3880 – 63.3981]

§§ 63.3880 – 63.3883	What This Subpart Covers
§§ 63.3890 – 63.3893	Emission Limitations
§§ 63.3900 – 63.3901	General Compliance Requirements
§§ 63.3910 – 63.3931	Notifications, Reports, and Records
§§ 63.3940 – 63.3942	Compliance Requirements for the Compliant Material Option
§§ 63.3950 – 63.3952	Compliance Requirements for the Emission Rate Without Add-On Controls Option
§§ 63.3960 – 63.3968	Compliance Requirements for the Emission Rate With Add-On Controls Option
§§ 63.3980 – 63.3981	Other Requirements and Information

EUG 7 PLASMA CUTTERS

EU	Process	Max Cut Speed
		in/min
EU7	Arc Cutter	240

m. The Arc Cut Pro 20612 plasma table equipped with an XPR 300 cutting system shall be equipped with a water table to reduce PM emission by at least 90%.

EUG 8 WELDING

Emissions from this EUG are insignificant activities.

EU	Process	Annual Usage[1]
		lbs/yr
EU8	Welding	96,000

[1] - Not an operating or permit limitation.

EUG 9 RESIN STORAGE

Emissions from this EUG are insignificant activities.

EU	Process	Size	Throughput
		bbl	gal/yr
EU9	Resin Storage Tanks (8)	238-714 (each)	10,000,000

EUG 10 REGENERATINE THERMAL OXIDIZERS

EU	Equipment	Fan Rating	Heat Input
		CFM	MMBTUH
RTO-1	Thermal Oxidizer	30,000	6.0
RTO-2	Thermal Oxidizer	40,000	6.0
RTO-3	Thermal Oxidizer	40,000	6.0

n. A performance test of RTO-1 and RTO 2 shall be performed within 180-days of permit issuance. The test shall determine control efficiency of the unit at representative operating conditions. Subsequent periodic testing will be required at least once every five years thereafter. Testing shall be conducted under representative conditions and using approved reference methods. [OAC 252:100-43]

i. A protocol describing the reference methods to be used, data to be collected, and proposed calculations shall be submitted to the Air Quality Division at least 30 days before the scheduled test date.

ii. A written report documenting the results of performance testing shall be submitted within 60 days of completion of on-site testing.

iii. Results of the test shall be used to identify the maximum allowable control efficiency for use in annual emission inventory and monthly emission calculations for processes controlled by RTO-1 and 2.

o. The thermal oxidizers (RTO-1, RTO-2, or RTO-3) shall be operated in accordance with manufacturer's specifications: recommended bed temperature: 1,450 to 1,700°F; recommended pressure drop: less than 14" w.c. at design flow. An alternate pollution control device may be used provided that the new system has an efficiency equal to or greater than the replaced system. [OAC 252:100-37]

EUG 11 Facility-Wide

2. Facility-Wide Emission Limits: NO_X, CO, VOC, SO_2, $PM_{10}/PM_{2.5}$, and HAP emissions from the facility shall be based on material usage, emission factors, and hours of operation, and shall be limited to the emission limits shown in the table below. Compliance with the emission limits for NO_X, CO, VOC, SO_2, and $PM_{10}/PM_{2.5}$ from the whole facility shall be demonstrated based on monthly fuel usage, based on a monthly 12-month rolling total basis. Emissions of HAP from the whole facility shall not exceed the following limits based on a monthly, 12-month rolling total. Each month the permittee shall calculate HAP emissions from the whole facility and add them to the previous eleven months.

Pollutant	Facility-Wide Emission Limit[1]
NOx	99.9 TPY
CO	99.9 TPY
VOC	99.9 TPY
SO2	99.9 TPY
$PM_{10}/PM_{2.5}$	99.9 TPY
Individual HAP	99.9 TPY
Combined HAPs	99.9 TPY

[1] TPY limits are based on a 12-month rolling emissions total.

3. The permittee is authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6 (a)]

4. The fuel-burning equipment shall be fired with pipeline natural gas as defined in 40 CFR Part 72. Compliance can be shown by a current natural gas company bill. Compliance shall be demonstrated at least once each calendar year. [OAC 252:100-31]

5. The permittee shall conduct monthly visual observations of the opacity from the exhausts associated with cyclones and keep a record of these observations. If visible emissions are detected, then the permittee shall conduct opacity readings in accordance with EPA Reference Method No. 9. [OAC 252:100-25]

6. 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.

7. The following records shall be maintained on-site to verify insignificant activities. No records are required for trivial activities. [OAC 252:100-43]

   a. Heat input documentation for space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas).
   b. For 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: records of tank capacity and true vapor pressure at maximum storage temperature.
   c. For emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature: records of tank capacity and true vapor pressure at maximum storage temperature.
   d. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant; the type of activity and the amount of emissions from that activity (cumulative annual).

8. Records of operations listed below shall be maintained on-site and shall be available for review by regulatory personnel during normal business hours. These records shall be maintained for a period of at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [OAC 252:100-43]

   a. Records of resin usage (monthly, 12-month rolling total basis).
   b. Records of material used in Rotational Molding - grinding, mixing, and cutting (monthly, 12-month rolling total basis).
   c. Records of material used in Quazite process (monthly, 12-month rolling total basis).
   d. Records of material used in HDPE Structural Foam process (monthly, 12-month rolling basis).
   e. Records of paint used in spray booths (monthly, 12-month rolling total basis).
   f. Records of material used in arc cutters and welding operations (monthly, 12-month rolling basis).
   g. Emission calculations showing compliance with the emission limits in Specific Conditions No. 1 & 2 (monthly, 12-month rolling total basis).
   h. For fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 4.
   i. Records as required by Specific Conditions No. 1, 3, 4 & 6.
   j. Records required by NESHAP Subpart MMMM.
   k. Records of excess emission events, per Specific Condition No. 5.
   l. Pressure readings for each thermal oxidizer and control device or other appropriate parameter or check to ensure proper operation of the control device (daily when operating).

9. No later than 180 days after start of normal operation of any new emission unit authorized under this construction permit, the permittee shall apply for an initial Title V operating permit and request that the specific conditions of this construction permit be incorporated into the Title V permit. [OAC 252:100-8-6]

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

SECTION I. DUTY TO COMPLY

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

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

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

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

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements.

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

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

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

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

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

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made, and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions, it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. [OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

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

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

SECTION IV. COMPLIANCE CERTIFICATIONS

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

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

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source. [OAC 252:100-8-6(c)(5)(C)(i)-(v)]

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

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.
[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

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

SECTION VI. PERMIT SHIELD

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

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

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

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

SECTION VIII. TERM OF PERMIT

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

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

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

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

SECTION IX. SEVERABILITY

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

SECTION X. PROPERTY RIGHTS

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

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

SECTION XI. DUTY TO PROVIDE INFORMATION

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

terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

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

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

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

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

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

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

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

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

SECTION XIII. INSPECTION & ENTRY

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

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

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

SECTION XIV. EMERGENCIES

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

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

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

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

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

(1) an emergency occurred and the permittee can identify the cause or causes of the emergency;

(2)the permitted facility was at the time being properly operated;
(3)during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

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

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

SECTION XV. RISK MANAGEMENT PLAN

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

SECTION XVI. INSIGNIFICANT ACTIVITIES

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

(1) 5 tons per year of any one criteria pollutant.
(2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.
[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

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

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

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

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

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

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

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

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

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

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

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

(4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of

adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

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

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

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

SECTION XX. STRATOSPHERIC OZONE PROTECTION

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

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

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

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

(1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
(2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
(3) Persons performing maintenance, service, repair, or disposal of appliances must be

certified by an approved technician certification program pursuant to § 82.161;

(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;

(5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and

(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

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

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

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

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

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

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

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

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

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

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

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

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

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [OAC 252:100-43-6]

PERMIT

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

Permit No. 2022-0014-C (M-2)

Hubbell Utility Solutions

having complied with the requirements of the law, is hereby granted permission to construct the Hubbell Manufacturing OKC Inc Facility located in Section 30, Township 11N, Range 2W, Oklahoma County, Oklahoma, subject to standard conditions dated June 21, 2016, and specific conditions, both of which are attached.

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

DRAFT

Division Director
Air Quality Division

Date

Mark Kemp
Hubbell Utility Solutions
40 Waterview Drive
Shelton, CT 06484

Subject: Construction Permit No. **2022-0014-C (M-2)**
Hubbell Manufacturing OKC, Inc. (Fac. ID: 22693)
Section 30, Township 11N, Range 2W, Oklahoma County

Dear Mr. Kemp:

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

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

Thank you for your cooperation in this matter. If we may be of further service, please contact the permit writer at Ryan.Buntyn@deq.ok.gov, or at 405-702-4213.

Sincerely,

DRAFT

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

Enclosure

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List

9-10-21

ACFM	Actual Cubic Feet per Minute
AD	Applicability Determination
AFRC	Air-to-Fuel Ratio Controller
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAE	Baseline Actual Emissions
BBL	Barrel(s)
BHP	Brake Horsepower (bhp)
BTU	British thermal unit (Btu)
C&E	Compliance and Enforcement
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CAAA	Clean Air Act Amendments
CC	Catalytic Converter
CCR	Continuous Catalyst Regeneration
CD	Consent Decree
CEM	Continuous Emission Monitor
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CI	Compression Ignition
CNG	Compressed Natural Gas
CO	Carbon Monoxide or Consent Order
COA	Capable of Accommodating
COM	Continuous Opacity Monitor
D	Day
DEF	Diesel Exhaust Fluid
DG	Demand Growth
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)
EGU	Electric Generating Unit
EI	Emissions Inventory
EPA	Environmental Protection Agency
ESP	Electrostatic Precipitator
EUG	Emissions Unit Group
EUSGU	Electric Utility Steam Generating Unit
FCE	Full Compliance Evaluation
FCCU	Fluid Catalytic Cracking Unit
FEL	Federally Enforceable Limit(s)
FESOP	Federally Enforceable State Operating Permit
FIP	Federal Implementation Plan
FR	Federal Register
GACT	Generally Achievable Control Technology
GAL	Gallon (gal)
GDF	Gasoline Dispensing Facility
GEP	Good Engineering Practice
GHG	Greenhouse Gases
GR	Grain(s) (gr)
H_2CO	Formaldehyde
H_2S	Hydrogen Sulfide
HAP	Hazardous Air Pollutants
HC	Hydrocarbon
HCFC	Hydrochlorofluorocarbon
HFR	Horizontal Fixed Roof
HON	Hazardous Organic NESHAP
HP	Horsepower (hp)
HR	Hour (hr)
I&M	Inspection and Maintenance
IBR	Incorporation by Reference
ICE	Internal Combustion Engine
LAER	Lowest Achievable Emission Rate
LB	Pound(s) [Mass] (lb, lbs, lbm)
LB/HR	Pound(s) per Hour (lb/hr)
LDAR	Leak Detection and Repair
LNG	Liquefied Natural Gas
LT	Long Ton(s) (metric)
M	Thousand (Roman Numeral)
MAAC	Maximum Acceptable Ambient Concentration
MACT	Maximum Achievable Control Technology
MM	Prefix used for Million (Thousand-Thousand)
MMBTU	Million British Thermal Units (MMBtu)
MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
MMSCF	Million Standard Cubic Feet (MMscf)
MMSCFD	Million Standard Cubic Feet per Day
MSDS	Material Safety Data Sheet
MWC	Municipal Waste Combustor
MWe	Megawatt Electrical
NA	Nonattainment
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NH_3	Ammonia

NMHC	Non-methane Hydrocarbon
NGL	Natural Gas Liquids
NO_2	Nitrogen Dioxide
NOx	Nitrogen Oxides
NOI	Notice of Intent
NSCR	Non-Selective Catalytic Reduction
NSPS	New Source Performance Standards
NSR	New Source Review
O_3	Ozone
O&G	Oil and Gas
O&M	Operation and Maintenance
O&NG	Oil and Natural Gas
OAC	Oklahoma Administrative Code
OC	Oxidation Catalyst
PAH	Polycyclic Aromatic Hydrocarbons
PAE	Projected Actual Emissions
PAL	Plant-wide Applicability Limit
Pb	Lead
PBR	Permit by Rule
PCB	Polychlorinated Biphenyls
PCE	Partial Compliance Evaluation
PEA	Portable Emissions Analyzer
PFAS	Per- and Polyfluoroalkyl Substance
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers
PM_{10}	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers
POM	Particulate Organic Matter or Polycyclic Organic Matter
ppb	Parts per Billion
ppm	Parts per Million
ppmv	Parts per Million Volume
ppmvd	Parts per Million Dry Volume
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
psig	Pounds per Square Inch Gage
RACT	Reasonably Available Control Technology
RATA	Relative Accuracy Test Audit
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement
RFG	Refinery Fuel Gas
RICE	Reciprocating Internal Combustion Engine
RO	Responsible Official
ROAT	Regional Office at Tulsa
RVP	Reid Vapor Pressure
SCC	Source Classification Code
SCF	Standard Cubic Foot
SCFD	Standard Cubic Feet per Day
SCFM	Standard Cubic Feet per Minute
SCR	Selective Catalytic Reduction
SER	Significant Emission Rate
SI	Spark Ignition
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SNCR	Selective Non-Catalytic Reduction
SO_2	Sulfur Dioxide
SOx	Sulfur Oxides
SOP	Standard Operating Procedure
SRU	Sulfur Recovery Unit
T	Tons
TAC	Toxic Air Contaminant
TEG	Triethylene Glycol
THC	Total Hydrocarbons
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulates
TV	Title V of the Federal Clean Air Act
$\mu g/m^3$	Micrograms per Cubic Meter
US EPA	U. S. Environmental Protection Agency
VFR	Vertical Fixed Roof
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VRT	Vapor Recovery Tower
VRU	Vapor Recovery Unit
YR	Year
2SLB	2-Stroke Lean Burn
4SLB	4-Stroke Lean Burn
4SRB	4-Stroke Rich Burn

Scott A. Thompson
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Mark Kemp
Hubbell Utility Solutions
40 Waterview Drive
Shelton, CT 06484

Subject: Construction Permit No. **2022-0014-C (M-2)**
Hubbell Manufacturing OKC, Inc. (Fac. ID: 22693)
Section 30, Township 11N, Range 2W, Oklahoma County

Dear Mr. Kemp:

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. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing;**
3. 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;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation in this matter. If we may be of further service, please contact Ryan Buntyn at Ryan.Buntyn@deq.ok.gov or (405) 702-4213.

Sincerely,

Phillip Fielder

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

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. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
   Version 1 – Traditional NSR process for a construction permit
   Version 2 – Enhanced NSR process for a construction permit
   Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

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 (a location in the county where the site/facility is located must be included);
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 *(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 new major facility or construction permit for a modification at an existing 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 construction permit [modification] (Permit Number: *…xxxx-xxxx-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 under Permits for Public Review on the DEQ 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))***.** [For facility modifications only, either add the phrase**: , which represents** (*identify the emissions change involved in the modification)***.**, or add the sentence: **The modification will not result in a change in emissions.**] [For PSD permits only, add**: The project will consume the following increment levels:** *(list the amount of increment consumption for each pollutant in ug/m^3).*]

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 or as directed through the corresponding online notice. [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 staff.**

Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are 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, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677.Phone No. (405) 702-4100.**