

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

MEMORANDUM

September 13, 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 Permit Section

FROM: Alex Johnson, E.I., Existing Source Permit Section

SUBJECT: Evaluation of Permit Application No. **2021-0474-TVR4**
Fiber Glass Systems, LP
Fiber Glass Systems
AQD Facility ID: 638
Section 11, Township 19N, Range 11E, Tulsa County, Oklahoma
Latitude 36.13565° N and Longitude 96.10772° W
Address: 25 South Main, Sand Springs, OK 74063

SECTION I. INTRODUCTION

Fiber Glass Systems, LP (FGS or the applicant) has submitted an application for renewal of the Part 70 operating permit for the Fiber Glass Systems facility. The facility is currently operating under Permit No. 2016-0671-TVR3, issued on April 26, 2017. The facility is a fiberglass-reinforced pipe manufacturing facility (SIC 3084/NAICS 326122) and is located in an attainment area. The facility is not a Prevention of Significant Deterioration (PSD) major source and is a major source of Hazardous Air Pollutants (HAPs).

On June 26, 2023, FGS submitted an application for a minor modification of the Part 70 operating permit for the facility. This modification has been assigned as Permit No. 2016-0671-TVR3 (M-1) and was submitted to add a 4.18-MMBTUH boiler to the facility. This change has been incorporated into this Title V Renewal.

SECTION II. FACILITY AND PROCESS DESCRIPTIONS

The facility manufactures epoxy and vinyl-ester FRP composite piping systems and vinyl-ester resins. This facility has been in operation since 1948; therefore, some components of the facility had “grandfathered” status. However, “grandfathered” status was not claimed in the permit for any equipment. Additionally, NESHAP Subpart WWWW applies to existing sources. Based on the definition of “existing source” as specified in the subpart, the facility will always be an existing

source. The facility has two large buildings and a dozen small buildings occupying approximately 17 acres.

Normal operations for most of the facility consist of one shift per day, fifty weeks per year, for a total of 2,000 hrs/year, however, certain processes operate two shifts, and any process can be operated 24 hours per day, seven days per week, depending on customer demand.

FRP composite piping systems are tubular products containing glass fiber reinforcement embedded in, or surrounded by, cured thermosetting resin. The vinyl-ester resins contain styrene, which is a HAP. The epoxy resins do not contain any HAPs or volatile organic compounds (VOCs). The following processes are performed at the facility:

- Filament Wound Pipe (FWP);
- Centrifugal Cast Pipe;
- Bulk Molding Compounds (BMC) production/mixing and compression (press) molded fittings (PMF);
- Open Molding including hand layup (HLU), large diameter fittings (LDF), fabrications (FAB), Stub Flange and Assembly;
- Weldkit assembly (Weldkits); and
- Development Laboratory BMC mixing.

“*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. “*Filament application*” means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using non-mechanical tools prior to curing. All manufacturing operations conducted at the facility involve open molding processes, except the Compression-Molded Fittings, the Centrifugal Cast Pipe, and the BMC Mixers. A description of each of the facility’s various manufacturing processes is provided in the following paragraphs. “*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.

The processes described in this section constitute the only equipment scenario for this facility. Alternate materials are addressed in the OAC 252:100-37 discussions of Section VIII below. Many of the following processes have mixing tanks associated with them.

Winder Automated Process/Filament Wound Pipe (FWP)

Filament wound pipe is manufactured in Building No. 6. There are three large winders that manufacture pipes. Filament winding is the process of impregnating a number of glass reinforcing strands (roving) with a catalyzed thermosetting resin, then applying the wetted fibers to a mandrel

under controlled tensions in a predetermined pattern. The roving, connected to a rotating mandrel, is pulled through a catalyzed thermosetting resin-filled bath and wound in a helical pattern onto the mandrel. The winders wrap the resin impregnated fiberglass filament onto a rotating mandrel until the desired thickness is obtained. Vinyl ester resin used in this process is thermosetting polyester formed from a liquid resin cross-linked with styrene monomer through a polymerization catalyzed by an organic peroxide. Pipe is cured using catalytic natural gas or electric infrared heaters as the partially cured pipe is rotated on the winder. Upon curing, the pipe is removed from the mandrel, undergoes several post-production processes that may include cutting, sanding, and inspection, and then stored for shipping. The resulting product consists of multiple layers of bidirectional lamina.

Centrifugal Cast Pipe

Centrifugal cast pipe is manufactured in Building No. 2. There are sixteen closed-mold vented centrifugal casting machines currently in use for the manufacture of centrifugal cast pipe. Glass fiber reinforcement in the form of woven roving and/or chopped strand mat is placed in a temperature controlled steel mold. Once the fiberglass and resin are placed, the ends of the mold tube are closed and remain closed until the FRP is cured. Upon completion of the cure cycle, the mold tube stops rotating, the ends of the mold tube are opened, and the cured FRP pipe is removed from the mold tube.

The mold equipment consists basically of a rotating double walled pipe (steel inner tube mold with outer tube jacket) having heat transfer fluid circulation through the annular space between the two pipes to maintain a mold temperature at near 120 °F. The temperature of the heat transfer fluid is maintained using a chilled water/heat transfer oil heat exchanger and by slowing the rotational speed of the mold down during the cure cycle. These machines are considered to be closed molding operations.

Bulk Molding Compounds (BMC) and Compression-Molded Fittings

This process is used to produce small (up to 14”) fittings for low-pressure (less than 500 psi) applications. A weighed amount of bulk molding compound (BMC) is placed into a heated multi-piece die or press. Charge weights range from 19.50 through 54.50 pounds. Curing heat is supplied from a 4.2 MMBTUH boiler while the part is held in compression.

Associated with the use of BMC in this process is BMC production. BMC is manufactured in Building No. 2. There are two BMC mixers fed by two tanks. BMC is the pre-processed state of compression (press) molded fittings (PMF). BMC is produced by mixing a thermosetting resin with various fillers and chopped strand fiberglass along with curing agents. The fillers add consistency to the mixture that aids in processing, while the fiberglass contributes to the strength of the finished fittings.

Assembly

The assembly process is located in Building No. 5. This process produces piping assemblies by using adhesives to connect various pipes and fittings according to the customer's requirements.

Some of the pipes may require shortening to obtain desired lengths. Occasionally, overwrapping of joints is required. Overwrapping involves placing progressively wider pieces of resin saturated woven fiberglass mat over joints. After the part is adequately cured, it typically undergoes several post-production finishing steps that may include cutting or sanding prior to being shipped to the customer.

Hand Lay-up (HLU), Large Diameter Fittings (LDF), Fabrication (FAB), and Stub Flanges

The HLU, LDF, and stub flange processes use manual methods combined with open molds to produce fiberglass-reinforced products. There are ten HLU stations located in Building No. 5. Eight LDF stations and ten stub flange stations are located in Building No. 6. These processes are contact molding processes that involve the application of thermosetting resins and glass fiber onto a mold to produce fittings. Woven fiberglass roving and chopped strand mat are manually fitted to a mold wetted with catalyzed resin, after which it is saturated with more resin. Some mechanized stations allow the mold to rotate. Layers of woven fiberglass roving, chopped strand mat, and resin are added to build the desired laminate thickness. Squeegees, brushes, and rollers are used to smooth and compact each layer as it is applied. The part is then heated to facilitate curing. After the part is adequately cured in one of the natural gas-fired ovens, it is removed from the mold. The part then typically undergoes several post-production finishing steps that may include cutting or sanding prior to being placed into inventory for pre-assembly at the plant or for shipping to customers as a part. The LDF process involves the production of large parts by cutting and fitting other large parts, including large diameter piping, to obtain the desired shape. The cut ends of each part are glued together, and the joints are then wrapped and layered to the proper thickness. The large part is then cured in one of the HLU ovens and sanded to an acceptable finish. The stub flange process starts with a length of pipe that is used for the stub. The flange is produced with successive layers of pre-cut fiberglass that is saturated with catalyzed resin and placed around the base of the pipe until the desired flange thickness is obtained. After the part is adequately cured, it typically undergoes several post-production finishing steps, which include drilling the flange holes prior to being shipped to the customer.

The FAB process is located in the High Bay Building to accommodate assembly of large piping configurations. The FAB process is similar to the Assembly process, except on a larger scale and usually involving larger components, using manual methods to produce made-to-order (i.e., custom) fiberglass pipe configurations. It may involve more elaborate, custom pipe configurations, usually much larger piping assemblies, sawing lengths of pipe at predetermined angles and lengths and using adhesives to connect various pipes and fittings according to the customer's requirements. Angled pieces are glued together using small amounts of adhesive, then a narrow woven fiberglass mat saturated with catalyzed resin is manually fitted onto each glued seam. This is followed by another resin saturated woven fiberglass mat which is somewhat wider than the preceding mat. Progressively wider resin saturated fiberglass mats are added until the desired thickness is obtained. After the part is adequately cured, it typically undergoes several post-production finishing steps that may include cutting or sanding prior to being shipped to the customer.

Developmental BMC Mixing

Located in Building No. 2, at the opposite end of the area where the two (2) production BMC mixers are located, is a small BMC mixer capable of producing small 100-pound batches. This mixer is primarily used by Product Engineering personnel in the “scale-up” phase of new product development. However, this mixer is occasionally used by production personnel for manufacturing specialty or other small volume BMC formulations that are atypical of the company’s standard BMC products. Maximizing production on this piece of equipment yields a maximum hourly emission rate of 0.025 lb/hr. This process is identical to that of the production BMC mixing process shown on Figure 5 of the permit application.

Weldkits

Weldkits are produced in Building No. 5. The Weldkits process involves dispensing resin into various sized metal cans, which are sealed after filling. Weldkits, each consisting of one (1) or more cans of resin, the required pieces of woven fiberglass mat, and a catalyst are packaged and placed into storage prior to shipping.

Insignificant and Non-Regulated processes

Acetone is used extensively for cleaning tools and molds. Acetone is not regulated as a HAP or a VOC. Numerous natural gas-fired space heaters are in use. These are insignificant or trivial activities. Several of the processes described above mentioned the grinding or sanding of parts to achieve a smooth surface. Such activities occur at machines with downdraft exhausts piped to a dust collector. Particulate emissions from the numerous stations involved in this process are insignificant.

SECTION III. PERMIT HISTORY

Permits	Date Issued	Description
97-031-O	01/27/1998	Initial operating permit
98-010-O	09/30/1998	Equipment moved from another facility to this one.
99-001-TV	04/29/2001	Initial Title V Permit
99-001-TV (M-1)	07/07/2003	Administrative Amendment
99-001-TV (M-2)	08/25/2004	Administrative Amendment
2005-020-TVR	04/10/2006	Title V Renewal
2005-020-AD (M-1)	05/07/2008	Applicability Determination to determine rules applicability for a prototype closed mold centrifugally cast fiberglass reinforced plastic piping process.
2005-020-C (M-2)	09/21/2011	Construction permit to implement the process described in 2005-020-AD (M-1), remove casting machines, and retire an catalytic oxidizer.
2010-549-TVR2	12/21/2011	Title V Renewal. Modifications from 2005-020-C (M-2) not incorporated.
2010-549-TVR2 (M-1)	04/29/2013	Modifications in 2005-020-C (M-2) implemented into Title V Operating Permit

Permits	Date Issued	Description
2016-0671-TVR3	04/26/2017	Title V Renewal

SECTION IV. REQUESTED CHANGES

The applicant has requested the following changes:

- A heater in EUG 12 has been consistently misidentified in previous permits. The smaller unit has been listed as having two 0.55-MMBTUH burners, but it instead has two 0.80-MMBTUH burners.
- The aggregate emissions for the heaters were evaluated at 10.75-MMBTUH, but the actual combined heating rate of the heaters is 9.35-MMBTUH. Estimated emissions and emission limits have been adjusted for the heaters to account for this change. This change results in a decrease in the emission estimates.
- The following equipment has been removed:
 - The Dualcast process and the lab winder in EUG 4 have been removed.
 - Resin manufacturing (EUG 8) has been discontinued. This change results in a decrease of 0.5 TPY in styrene emissions.
 - The following EUG 9 mixers have been removed: Large Diameter Fittings, Stub Flange, Weldkits, and FAB.
 - The styrene above-ground storage tanks (ASTs) of EUG 10 have been removed.
 - The vinyl ester ASTs of EUG 11 have been replaced by totes. The applicant requests that the 0.2 TPY combined styrene emissions limit for EUG 10 and EUG 11 be kept, but to calculate the tote losses based on loading emissions.
- EUG 3 consists of three (3) filament winders. An individual 6 TPY emission limit has been in place on each of these winders because of the requirements of OAC 252:100-39-49. The applicant requests that due to the revocation of OAC 252:100-39-49 and the lack of a similar requirement in NSPS Subpart WWWW, that these limits be combined into a single 18 TPY limit for the EUG.
- The BMC Mix Tanks in EUG 5 should be identified as mixers. This is a labeling change and causes no changes in the emission calculations.
- Per the application for 2016-0671-TVR3 (M-1), a 4.18-MMBTUH boiler has been added to the facility to provide supplemental steam for the processes

The changes requested in the Title V Renewal result in a slight decrease in styrene emissions by the facility. The boiler added in the minor modification results in an increase of less than 2 TPY for each criteria pollutant. Since the proposed changes do not significantly increase the emission limits for the permit or change the applicability of any rules, they do not require a construction permit.

All applicable rules and regulations were updated in the Permit Memorandum. The requirements for cold cleaning facilities from OAC 252:100-39-42(a) which are applicable to the facility were added to the Specific Conditions.

SECTION V. EQUIPMENT

EUG 1 - Entire Facility

This emission unit group is facility-wide. It includes all emission units and is established to discuss the applicability of those rules or compliance demonstrations that may affect all sources within the facility.

EUG 2 - Cast Pipe

There are 16 machines of varying pipe diameter. They are all subject to NESHAP Subpart WWWW. Emissions are minimized using a non-vented closed molding technique, which is open at the ends only during resin injection.

Point	Location	Service	Construction/ Reconstruction Date
Casting Machine	Building No. 2	6” to 14”	1980/2012
Casting Machine		10”	1976/2012
Three (3) Casting Machines		1”, 1.5”, 2.5”	1964/2012
Nine (9) Casting Machines		Three each 2”, 3”, 4”	1964/2012
Two (2) Casting Machines		Both 8”	1964/2012

EUG 3 - Pipe (Filament) Winders

This process is described in “Winder Automated Process”, Section II above. This process is subject to NESHAP Subpart WWWW.

Point	Make/Model	Construction/Reconstruction Date
1	Winder No. 1 - ICL	1974
2	Winder No. 2 - McClean-Anderson	1986
3	Winder No. 3 - Cleveland Machine Controls *	2002

* Previously F-Chem Winder, originally installed in 1966

EUG 4 – Open Molding

This is a final process area. No machines with point source emissions are used and all tools and supplies are portable. All processes listed below are subject to NESHAP Subpart WWWW.

Point	Location	Service	Construction Date
1 station	Building No. 5	Assembly	pre-1970
8 stations	Building No. 6/High Bay	Large Diameter Fittings (LDF)	pre-1970
10 stations	Building No. 6	Stub Flange	pre-1970
10 stations	Building No. 5	Hand lay up	pre-1970
1 station	High Bay	FAB	pre-1970

EUG 5 – BMC Mixers

The BMC Mixers are all subject to NESHAP Subpart WWWW. Emissions from the BMC mixer are vented inside Building No. 2.

Point	Location	Service	Construction Date
Two Mixers	Building No. 2	BMC	1950s
One Mixer	Building No. 2	BMC	2010

EUG 6 - Press Molded Fittings

The molds used at each station change with customer demand. This process is subject to NESHAP Subpart WWWW.

Point	Service	Construction Date
33 Stations	Presses	1950

EUG 7 - Weldkits

This facility was constructed pre-1970. No machines with point source emissions are used in this process area and all tools and supplies are portable. This process is subject to NESHAP Subpart WWWW.

EUG 9 - Mix Tanks and Containers

There are six mix tanks remaining in service included in this EUG. Other mixing operations involve small mixers used with small portable containers such as 5-gallon buckets. Emissions from the mix tanks and containers are controlled only by styrene content. All processes listed below are subject to NESHAP Subpart WWWW, except for the Developmental (lab) BMC.

Location	Service	Vessel Type	Capacity (gallons)	Construction Date
Building No. 2	Cast Pipe	Tank – liner	135	1960s
		Tank – shell	225	
	Developmental Lab (BMC)	Mixer	2	1996
Building No. 5	Hand Lay Up	Tank	275	Pre-1970
Filament Winders	Filament Winder	Tank	330	1974
	Filament Winder	Tank	250	1986
	Two (2) Filament Winders	Tank	100	2002

EUG 11 - Vinyl Ester Resin Totes

This process is subject to NESHAP Subpart WWWW. Emissions from unloading styrene from the totes were estimated using AP-42 (6/08), Section 5.2, Equation 1, and the parameters listed in the table below. The saturation factor was conservatively assumed to be the worst case scenario saturation factor from AP-42 (6/08) Table 5.2-1. Vapor pressure was taken from the manufacturer safety data sheet for the resin used. Molecular weight is based off of styrene properties.

Temperature was assumed to be an annual average of 70°F. The applicant requested a conservative emissions estimate of 0.20 TPY of Styrene/VOC emissions.

Parameter	EUG 11
Liquids Loaded	Styrene
Throughput, gal/yr	25,000
Saturation Factor	1.45
Temp., °F	70
TVP, psia	0.10
MW, lb/lbmol	104
Emission Factor, lb/10 ³ gal ⁽¹⁾	0.355
VOC/Styrene Actual Emissions, TPY	0.004
VOC/Styrene Requested Limit, TPY	0.20

EUG 12 - Combustion Sources Subject to NESHAP Subpart DDDDD

Point	Service	MMBTUH	Construction date
Boiler	Presses (EUG 6)	4.2	1974
Curing oven	Cast pipe (EUG 2)	1	1991
Curing oven	HLU (EUG 4)	0.80 (x2)	Mid - 1990s
Curing oven	HLU (EUG 4)	0.85 (x3)	2014
Boiler	Presses (EUG 6)	4.18	2023

SECTION VI. EMISSION CALCULATIONS

The various manufacturing operations produce styrene emissions. The applicant utilizes emissions factors from NESHAP Subpart WWWW that are representative of processes conducted at the facility. NESHAP Subpart WWWW emission factors take into account the resin’s styrene content. The emission factors are based on a fixed styrene content of 48%, but some resins have much lower styrene content. For other processes not adequately represented by NESHAP Subpart WWWW factors, emissions factors based on material balance testing meeting the requirements of §63.5798 and §63.5850 were developed for previous permits and have been retained for subsequent permits. These two categories of emissions calculations are identified separately in the table that follows this discussion.

Because there were no applicable emissions factors from NESHAP Subpart WWWW for the non-vented mold cast pipe system, the applicant used a mass balance approach to calculate emissions generated from this process. This is only for presentation of emissions calculations in developing a permit limit in TPY. NESHAP Subpart WWWW does not have standards for this process and therefore does not require the development of an emissions factor to demonstrate compliance. The facility conducted a styrene emissions study on the prototype machine and found that uncontrolled styrene emissions are in the range of 0.75 to 2.0% by weight of the resin weight. At 2% emissions and an estimated material consumption of this particular material type of 345,000 pounds (vinyl ester resin), emissions of styrene for the system are anticipated to be no greater than 3.45 tons per year, the previously permitted styrene limits for the existing vented mold system when it was controlled by the oxidizer. Subsequent testing was performed on the installations to verify the proposed emissions factor.

Facility Styrene and VOC Emissions

EUG# and Process	Resin Usage (lbs/yr)	Emission Factor (lbs/lb)	Styrene Emiss. (TPY)
Emissions Using NESHAP Subpart WWWW Emission Factors			
EUG 3 - Pipe (Filament) Winders	117,670/winder	0.1020 ⁽¹⁾	18.00 ⁽³⁾
EUG 4 - Open Molding: Assembly Large Diameter Fittings Stub Flange Hand Layup (HLU) Fabrications (FAB)	142,210	0.0844 ⁽²⁾	6.00
Emissions Using Emissions Factors Developed by Applicant			
EUG 2 - Cast Pipe	345,000	0.02	3.45
EUG 5 - BMC Mixers, 2 Epoxy Resin tanks and 1 Vinyl Ester Resin	800,665	0.015	6.0
EUG 6 - Press Molded Fittings	800,665	0.001	0.40
EUG 7 - Weldkits	15,000	0.005	0.04
EUG 9 - Mix Tanks Cast Pipe, 2 tanks Filament Winders, tanks Open Molding: Hand Layup (HLU), 2 mixers Developmental (Lab) BMC, 1 tank	857,850 353,010	0.007	4.74
Emissions Using Vinyl Ester Resin Loading			
EUG 11 - Vinyl Ester Resin Totes			0.20
Total Styrene/VOC Emissions			38.83
Previous Permit Styrene/VOC Emissions (2016-0671-TPVR3)			39.37
Difference			-0.54

- (1) - This factor is a conservative estimate based on the highest styrene-content resins in use at the facility, based on Table 1 of NESHAP Subpart WWWW, Open Molding, Filament Application, nonvapor-suppressed resin.
- (2) - This factor is a conservative estimate based on the highest styrene-content resins in use at the facility, based on Table 1 of NESHAP Subpart WWWW, Open Molding, Manual Resin Application, nonvapor-suppressed resin.
- (3) - Three winders at 6.0 TPY each.

All of the process combustion sources are small and all use the same emission factors taken from Tables 1.4-1 & 2 of AP-42 (2/98). Process heater ratings are grouped together as follows, assuming 1,020 BTU/CF. The 27 space heaters are insignificant and not included in the count.

Oven/Boiler Emission Factors

ID#	NO_x	CO	VOC	PM	SO₂
	lb/MMSCF	lb/MMSCF	lb/MMSCF	lb/MMSCF	lb/MMSCF
All Sources	100	84	5.5	7.6	0.6

Oven/Boiler Emissions

Point	Service	Rating	NO _x	CO	VOC	PM	SO ₂
		MMBTUH	TPY	TPY	TPY	TPY	TPY
Boiler	Presses (EUG 6)	4.2	1.80	1.52	0.10	0.14	0.01
Curing oven	Cast pipe (EUG 2)	1	0.43	0.36	0.02	0.03	<0.01
Curing oven ⁽¹⁾	HLU (EUG 4)	0.80 (x2)	0.69	0.58	0.04	0.05	<0.01
Curing oven ⁽¹⁾	HLU (EUG 4)	0.85 (x3)	1.10	0.92	0.06	0.08	0.01
Boiler	Presses (EUG 6)	4.18	1.80	1.51	0.10	0.14	0.01
Total Combustion Emissions			5.82	4.89	0.32	0.44	0.03
Previous Permit Combustion Emissions (2016-0671-TVR3)			4.02	3.37	0.22	0.31	0.02
Difference			+1.80	+1.52	+0.10	+0.13	+0.01

(1) Emissions listed are combined for all units in group.

SECTION VII. INSIGNIFICANT ACTIVITIES

The following activities are identified by applicant as qualifying for insignificant status. Those preceded by an asterisk require that verifying records be kept. Any activity to which a State of federal applicable requirement applies is not insignificant even if it is included on this list.

1. Natural gas space heaters less than 5 MMBTUH heat input. Applicant has 27 space heaters with heat input of 0.15 MMBTUH each.
2. *Fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput does not exceed 2,175 gallons per day, averaged over a 30-day period. Applicant has a 400-gallon gasoline tank and a 300-gallon diesel tank for vehicle use. Since this facility is a major source, the gasoline tank is not subject to the area source standards of 40 CFR Part 63 Subpart CCCCCC.
3. * 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.
4. * Surface coating operations which do not exceed a combined total usage of more than 60 gallons/month of coatings, thinners, and clean-up solvents at any one emissions unit.
5. Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas.
6. *Welding and soldering operations using less than 100 pounds per year of solder and less than 53 tons per year of electrodes.
7. *Non-commercial water washing operations (less than 2,250 bbl/year) and drum crushing operations of empty barrels not greater than 55 gallons with less than 3%v residual material.

8. Hazardous waste and hazardous materials drum staging areas. Applicant has a large quantity generator and has staging areas for these materials.
9. * Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant and that are not subject to a state or federal requirement.

SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

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

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

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in “attainment” of these standards.

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

OAC 252:100-8 (Part 70 Operating Permits) [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:

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

The facility emits styrene, a listed HAP, in excess of the 10 TPY major source threshold identified in 40 CFR §63.2, and therefore is considered a Part 70 source. Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from the permit application and the applicable requirements.

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).

The requested modification is not considered construction of a new major source or reconstruction of a new major source of HAP. The requested modification is not physical changes or changes in method of operation that would be a significant modification under OAC 252:100-8-7.2(b)(2). The requested modification is not physical changes or changes in method of operation that would increase the PTE of any one regulated air pollutant by more than 10 TPY. Based on this determination, the requested modification does not require a construction permit and qualifies as a minor modification. The modification is being incorporated into this Title renewal.

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 emissions 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 event describing the extent of the event and the actions taken by the owner or operator in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emissions 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 the combustion of fuel in any new and existing fuel-burning unit, with emission limits based on maximum design heat input rating. Fuel-burning unit is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus, the space heaters are subject to the requirements of this subchapter. Appendix C specifies a PM emission limitation of 0.60 lb/MMBTU for all equipment at this facility with a heat input rating of 10 Million BTU per hour (MMBTUH) or less. AP-42 (7/98) Table 1.4-2 lists natural gas total PM emissions to be 7.6 lbs/million scf or about 0.0076 lbs/MMBTU, which is in compliance.

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. All grinding, cutting, and sanding activities are less than the applicable threshold of 0.05 TPH.

OAC 252:100-25 (Visible Emissions and Particulate Matter) [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. When burning natural gas there is little possibility of exceeding the opacity standards. The permit will require maintenance of air pollution controls on the grinding, cutting, and sanding 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 originated 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 fugitive dust problems; therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Oxides) [Applicable]

Part 2 limits the ambient air concentration of H₂S emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 µg/m³. Fuel-burning equipment fired with pipeline natural gas will not have the potential to exceed the H₂S 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 averaged over 3 hours. All fuel-burning equipment at this facility is fired on commercial grade natural gas and would not likely approach the 0.2 lb/MMBTU limit. It is therefore not necessary to impose permit limits to meet this standard.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]

This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.20 lbs of NO_x per MMBTU, three-hour average. There are no equipment items that exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]

This subchapter affects gray iron cupolas, blast furnaces, basic oxygen furnaces, petroleum catalytic cracking units, and petroleum catalytic reforming units. It requires removal of 93% or more of CO by “complete secondary combustion” from new sources and also from existing sources located in or significantly impacting a non-attainment area for CO. There are no affected sources.

OAC 252:100-37 (Volatile Organic Compounds) [Part 7 Applicable]

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The vapor pressure of styrene is less than 1.5 psia, therefore, Part 3 does not apply. The 400-gallon gasoline storage tank is bottom-filled, which meets this requirement.

Part 5 limits the VOC content of coating used in coating lines or operations. Owners or operators of sources that emit less than 100 pounds of VOC per 24-hour day are exempt from the requirements of Section 25. The facility does not have any coating lines or operations.

Part 7 requires fuel-burning and refuse-burning equipment to be cleaned, operated, and maintained to minimize emissions of VOC. Fuel burning equipment will be operated in accordance with manufacturer recommendations.

OAC 252:100-39 (Organic Materials in Nonattainment Areas) [Part 7 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. The only applicable subsection is Subsection 42 Metal Cleaning.

Subsection 42(a) covers cold cleaning units, noting standards for construction and operation of such equipment.

- §39-42(a)(1) outlines equipment standards, including doors or covers, closed drainage, and conspicuous labeling. The facility is subject to these requirements.
- §39-42(a)(2) describes operating requirements; namely, appropriate draining procedures and times, keeping the unit covered when not in use, proper storage and disposal of waste solvent, and stipulates that spraying of VOC can only be in a solid stream. The facility is subject to these requirements.
- §39-42(a)(3) outlines requirements for controls if the solvent's vapor pressure exceeds certain limits. The product used is M-Pyrol, with a vapor pressure significantly below the 0.6 psia standard. Additionally, although the tank is heated, the temperature is well below the 248°F threshold set in the same paragraph. Therefore, the facility is not subject to these requirements.
- §39-42(a)(4) lists compliance and recordkeeping criteria. The facility is subject to these requirements.

All applicable requirements have been incorporated into the permit.

Subsection 42(b) covers vapor-type metal degreasing. This facility does not have any vapor degreasing units.

Subsection 42(c) covers conveyORIZED degreasing units. This facility does not have any conveyORIZED degreasing units.

Subsection 42(d) covers alternative control methods for metal cleaning facilities. This does not apply to this facility.

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

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

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be

submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

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

OAC 252:100-7	Minor Source Permits	not in source category
OAC 252:100-11	Alternative Emissions Reduction	not eligible
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Feed & Grain Facility	not in source category
OAC 252:100-33	Nitrogen Oxides	not in source category
OAC 252:100-35	Carbon Monoxide	not in source category
OAC 252:100-39	Nonattainment Areas	not in a subject area
OAC 252:100-47	Landfills	not in source category

SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]
 The facility is a glass fiber processing plant with a regulated NSR pollutant emission threshold of 100 TPY. However, the emissions of each regulated NSR pollutant at the facility is less than the 100 TPY threshold. Therefore, PSD does not apply.

NSPS, 40 CFR Part 60 [Not Applicable]
 There are no affected facilities or sources at this site covered under any subpart.

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

NESHAP, 40 CFR Part 63 [Subparts WWWW and DDDDD are Applicable]
Subparts U and JJJ MACT standards for polymers and resins, which identify styrene as a constituent, cover the manufacture of certain resins and other materials. The applicant uses some of these products, but does not manufacture them, and is not an affected source.

Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production facilities in which reinforced and/or non-reinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites and that are located at a

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

All operations described in the memorandum, except for the Developmental (lab) BMC and Insignificant activities are part of the affected source. Based on the definition of “existing source,” the facility will remain an existing source.

Section 63.5797 contains requirements for determining the organic HAP content of resins and gel coats. The applicant will comply with the provisions of §63.5797(a), (b), and (c) for the use of MSDSs to determine HAP content.

Section 63.5798 contains requirements for establishing organic HAP emissions factors for a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 of Subpart WWWW. The applicant utilized emissions factors from Table 1 for any applicable technologies. EUGs 2, 5, 6, 7, and 9, required site specific emission factors to be established by testing pursuant to §63.5799(b)(2).

Section 63.5799(b)(1), (b)(2), & (c) contains requirements for calculating organic HAP emissions in units of TPY for purposes of determining which paragraphs of §63.5805 apply. Pursuant to §63.5799(b)(1), the applicant utilizes calculated emissions factors from Table 1 of Subpart WWWW for centrifugal casting, filament application, and the following open molding processes: assembly, Large Diameter Fittings, Stub Flange, Hand Layup (HLU), Fabrications (FAB) . Pursuant to §63.5799(b)(2) the applicant utilizes emissions factors developed from performance testing for the following mixing operations: Cast Pipe – 2 tanks, Filament Winder – 4 tanks, Hand Layup – two mixers, , Developmental (Lab) BMC - 1 tank, and also for the non-vented cast pipe system.

Section 63.5800 contains requirements for compliance dates. For the originally permitted processes and equipment, the applicant was required to comply with the standards by April 21, 2006 and was in compliance. There are no standards for the non-vented cast pipe system and therefore no applicable compliance date.

Section 63.5805 contains specific standards. All affected operations must meet the organic HAP emissions limits in Table 3 and the work practice standards in Table 4 of Subpart WWWW, that apply. Table 3 allows limits of 25 lb/ton for corrosion-resistant and/or high-strength (CR/HS) centrifugal casting, 171 lbs/ton for filament application, and 123 lbs/ton for manual resin application.

Section 63.5810 contains four option categories to demonstrate compliance with Tables 3 and 5 for open molding or centrifugal casting operations. The applicant has designated §63.5810(d)(1), “*Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type,*” using a CR/HS resin having a HAP VOC content no greater than 48% as determined from Table 7 of Subpart WWWW. This option allows the use of the same resin having less than or equal to the maximum HAP VOC content required. The new centrifugal cast pipe system is not subject to this compliance demonstration since it has no standard under Subpart WWWW. However, the facility is required to demonstrate compliance with the permit emission limits for the new system when calculating emissions. Records of usage are also required if the applicant uses the weighted average methods provided by §63.5810(d)(2) or §63.5810(d)(3).

Section 63.5835 requires, in addition to the work practice standards and emissions limits without the use of add-on controls, compliance with all organic HAP emissions limits met by the use of add-on controls, except during periods of startup, shutdown, and malfunction. The affected source, including air pollution control and monitoring equipment, must always be operated and maintained according to the provisions in §63.6(e)(1)(i). The facility no longer uses the catalytic oxidizer as a compliance method but is subject to other applicable requirements of this rule.

Section 63.5840 & Table 2 contain compliance dates for performance or other initial compliance demonstrations, except open molding and centrifugal casting operations that elect to meet an organic HAP emissions limit on a 12-month rolling average. These sources must initiate collection of the required data on the compliance date and demonstrate compliance one year after the compliance date. New sources that use add-on controls to initially meet compliance must demonstrate compliance within 180 days after their compliance date. For the most part, the facility is an existing source that demonstrated compliance before the April 21, 2006, deadline. The new cast pipe system is a closed-mold non-vented system not subject to the rule.

Section 63.5860 and Tables 8 and 9 summarize the procedures used to demonstrate initial compliance with the standards listed in paragraphs (a) through (h) of §63.5805.

Section 63.5895 contains requirements for monitoring and collecting data to demonstrate continuous compliance for add-on control devices, records of resin and gel coat use, organic HAP content, and operation where the resin is used. The applicant is required to collect and keep a record of data as indicated in 40 CFR Part 63, Subpart SS. The facility no longer uses the catalytic oxidizer as a compliance method but is subject to other applicable requirements of this rule.

Section 63.5900 contains requirements for demonstrating continuous compliance with the standards of §63.5805 for add-on controls, the organic HAP emission limits of Tables 3 and 5, the maximum HAP content limits of Table 7, and the work practice standards in Table 4. The facility no longer uses the catalytic oxidizer as a compliance method but is subject to other applicable requirements of this rule.

Section 63.5905 and Table 13 contains requirements for notifications and compliance dates.

Section 63.5910 and Table 14 contains requirements for reporting, schedule for submission, frequency of reporting periods, and information content of the reports.

Section 63.5915 contains requirements for recordkeeping, including notification reports submitted to comply with this subpart; documentation supporting any Initial Notification or Notification of Compliance Status according to the requirements in §63.10(b)(2)(xiv); records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction, records of performance tests, design, and performance evaluations as required in §63.10(b)(2); records required in 40 CFR Part 63, subpart SS for add-on control devices; all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 of Subpart WWWW; and a certified statement of compliance with the work practice requirements in Table 4 of Subpart WWWW, as applicable. The facility no longer uses the catalytic oxidizer as a compliance method but is subject to other applicable requirements of this rule.

Section 63.5920 requires that all applicable records be maintained in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1), for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record onsite must be kept for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). Records may be kept

offsite for the remaining 3 years. Records may be kept in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. **Section 63.5925** contains requirements for General Provisions. Table 15 shows which parts of the General Provisions in §§63.1 through 63.15 are applicable.

Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from at major sources of HAP. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and work practice standards. The boiler and the six curing ovens are affected sources.

The facility has new and existing boilers that are designed to burn gas 1 fuels as specified in the table below.

Point	Service	MMBTUH	Construction date	Boiler Type
Boiler	Presses (EUG 6)	4.2	1974	Existing
Curing oven	Cast pipe (EUG 2)	1	1991	Existing
Curing oven	HLU (EUG 4)	0.80 (x2)	Mid - 1990s	Existing
Curing oven	HLU (EUG 4)	0.85 (x3)	2014	New

Unit(s) designed to burn gas 1 subcategory includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory must conduct tune-ups as a work practice for all regulated emissions under Subpart DDDDD as indicated:

Heat Input Capacity	Tune-up
≤ 5 MMBTUH	Every 5 years

Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of Subpart DDDDD, or the operating limits in Table 4 of Subpart DDDDD, but are subject to the work practice standards, notifications, reporting, and recordkeeping requirements under this Subpart. All applicable requirements have been incorporated into the permit.

CAM, 40 CFR Part 64 [Not Applicable]

This part applies to any pollutant-specific emission unit at a major source that is required to obtain an operating permit, for any application for an initial operating permit submitted after April 18, 1998, that addresses “large emissions units,” or any application that addresses “large emissions units” as a significant modification to an operating permit, or for any application for renewal of an operating permit, if it meets all of the following criteria.

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY or 10/25 TPY of a HAP

There are no control devices utilized to reduce emissions. The catalytic oxidizer was removed from service under Permit No. 2005-020-C (M-2).

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

Stratospheric Ozone Protection, 40 CFR Part 82 [Not Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

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

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

To the extent that applicable operations are conducted, compliance is required. The facility does not produce, consume, recycle, import, or export any controlled substances or controlled products

as defined in this part, nor does this facility perform service on motor (fleet) vehicles which involves ozone-depleting substances. Therefore, as currently operated, this facility is not subject to these requirements. To the extent that the facility has air-conditioning and process units that apply, the permit requires compliance with Part 82.

SECTION X. COMPLIANCE

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

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

Inspection Type	Date	Summary/Results
Full Evaluation	2/26/2018	The facility is in compliance.
Full Evaluation	1/29/2020	Discovered the following violations, leading to compliance case 10041: <ol style="list-style-type: none"> 1. DEQ alleges FGS was operating in violation of 40 CFR §63.5805(b) by failing to perform the work practice standards of Table 4 of NESHAP Subpart WWWW for the Bulk Mixing Containers. 2. DEQ alleges that FGS was in violation of NESHAP Subpart WWWW at EUGs 3 and 4 by failing to utilize resins with a maximum organic HAP content of 48.0% as required by 40 CFR § 63.5810 or by complying with the emissions standards of Table 3 of the subpart as referenced § 63.5805. 3. DEQ alleges that FGS was operating in violation of 40 CFR § 63.7500(a)(1) by failing to meet the work practice standards of Table 3 of NESHAP Subpart DDDDD on each of the curing ovens.
Full Evaluation	9/30/2021	Area of concern discovered: <ol style="list-style-type: none"> 1. The 5-year compliance report required by NESHAP Subpart DDDDD was submitted late.

The following enforcement cases have been started since issuance of the last Title V renewal permit.

Compliance Case	Date Referred	Date Resolved	Summary/Results
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10041	3/2/2021	6/16/2023	Enforcement case to resolve the issues discovered during the FCE conducted 1/29/2020.
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SECTION XI. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

Tier Classification

The Title V renewal application (2021-0474-TVR4) has been determined to be a **Tier II** based on the request for renewal of a Part 70 permit.

The Title V modification application (2016-0671-TVR3 (M-1)) has been evaluated below:

OAC 252:100-8-7.2(b)(1)(A)(i) states that minor permit modification procedures may be used only for those permit modifications that:

- (I) Do not violate any applicable requirement, or state-only requirements;
The requested permit modification does not violate any applicable requirement or state-only requirement.
- (II) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
The requested permit modification will not change any existing requirements.
- (III) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
The requested change does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
- (IV) Do not seek to establish a change in a permit term or conditions for which the is no corresponding underlying applicable requirement or state-only requirement which the source has assumed to avoid some other applicable requirement or state-only requirement to which the source would otherwise be subject. Such terms and conditions include federally-enforceable emissions caps assumed to avoid classification as a modification under any provisions of Title I and alternative emissions limits approved pursuant to regulations promulgated under §112(i)(5) of the Act; and
The requested change does not seek to establish or change a permit term of condition to avoid applicable requirements.
- (V) Are not modifications under any provisions of Title I of the Act.

New Source Performance Standards (NSPS):

Under section 111 of the Act, the term "modification" means any physical change in, or change in the method of operation of, a stationary source which increases the amount of any air pollutant emitted by such source or which results in the emission of any air pollutant not previously emitted. However, the different provisions of Title I of the Act are modified by the applicable regulations which implement them. 40 CFR Part 60, NSPS implements Section 111 of the Act and defines the term "modification" in §60.14 as any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies. The new boiler is not an affected facility of any NSPS Subpart.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

Under section 112 of the Act, the term "modification" means any physical change in, or change in the method of operation of, a major [HAP] source which increases the actual emissions of any hazardous air pollutant emitted by such source by more than a de minimis amount or which results in the emission of any hazardous air pollutant not previously emitted by more than a de minimis amount. The EPA determined through rulemaking to not implement the requirements for modification of major HAP sources in 40 CFR Part 63 because major HAP sources would become subject to the requirements of the promulgated MACT standards. The new boiler is not subject to NESHAP Subpart DDDDD.

Prevention of Significant Deterioration (PSD):

This facility is not a PSD source; therefore, the requested permit modifications are not considered modifications under PSD.

Non-attainment NSR (NNSR)

The facility is not located in a non-attainment area; therefore, the requested permit modifications are not considered modifications under NNSR.

The requested changes are not modifications under any provision of Title I of the Act.

Therefore, the Title V modification application has been determined to be **Tier I and** has been incorporated into this Title V Renewal permit.

Landowner Notification

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

Public Review

The applicant published the "Notice of Filing a Tier II Application" in the *Tulsa World* newspaper, a daily local newspaper in Tulsa County on January 16, 2021. The notice stated that the application

was available for review at the Charles Page Library in Tulsa County, and also at the Air Quality Division's main office in Oklahoma City. The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>.

The applicant will publish the "Notice of Tier II Draft Permit" as a legal notice in a newspaper of general circulation in the area where the source is located. The notice of draft permit will state that the draft permit will be available for public review at a location in the county where the facility is located and that the draft permit will also be available for public review at the Air Quality Division main office and on the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>. The draft permit will be available for a 30-day public review period.

Information on all permit actions is available for review by the public in the Air Quality Section of the DEQ Web Page. <https://www.deq.ok.gov>.

EPA Review

The applicant requested and was granted concurrent public and EPA review periods. As long as there are no public comments, the draft permit will be deemed the proposed permit. The draft/proposed permit will be sent to EPA for a 45-day review period.

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

Bordering State Review

The facility is not located within 50 miles of any state border.

Tribal Review

Tribal Nations will be notified of the draft permit.

Testing

No equipment at this facility requires periodic testing.

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. Twelve criteria have been identified to determine whether a disproportionate impact is occurring on nearby minority populations. These include eleven indexes from EJSCREEN and a demographic indicator with respect to people of color. 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}	80 th Percentile	44	72
Ozone	80 th Percentile	44	60
Diesel Particulate Matter	80 th Percentile	48	31
Air Toxic Cancer Risk	80 th Percentile	17	35
Air Toxic Respiratory Hazard Index	80 th Percentile	11	31
Traffic Proximity	80 th Percentile	74	55
Lead Paint	80 th Percentile	84	78
Superfund Proximity	80 th Percentile	49	22
Risk Management Plan Facility Proximity	80 th Percentile	99	98
Hazardous Waste Proximity	80 th Percentile	98	86
Underground storage tanks (UST) and leaking UST (LUST)	80 th Percentile	64	55
People of Color	80 th Percentile	43	48

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.

Fees Paid

A Part 70 permit renewal fee of \$7,500 has been paid.

SECTION XII. SUMMARY

This facility was constructed as described in the application. There are no active Air Quality compliance or enforcement issues that would affect the issuance of this permit. Issuance of the operating permit is recommended, contingent on public and EPA review.

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

**Fiber Glass Systems, LP
Fiber Glass Systems**

Permit No. 2021-0474-TVR4

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality October 25, 2021. The Evaluation Memorandum dated September 13, 2023, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein.

1. Points of emissions and authorized annual emission limits follow. [OAC 252:100-8-6(a)]

EUG# and Process	Emission Factor (lbs/lb)	Styrene Emiss. (TPY)
Emissions Using NESHAP Subpart WWWW Emission Factors		
EUG 3 - Pipe (Filament) Winders	0.1020	18.0
EUG 4 - Open Molding: Assembly Large Diameter Fittings Stub Flange Hand Layup (HLU) Fabrications (FAB)	0.0844	6.0
Emissions Using Emissions Factors Developed by Applicant		
EUG 2 - Cast Pipe	0.02	3.5
EUG 5 - BMC Mixers, 2 Epoxy Resin tanks and 1 Vinyl Ester Resin	0.015	6.0
EUG 6 - Press Molded Fittings	0.001	0.4
EUG 7 - Weldkits	0.005	0.1
EUG 9 - Mix Tanks Cast Pipe, 2 tanks Filament Winders, tanks Open Molding: Hand Layup (HLU), 2 mixers Developmental (Lab) BMC, 1 tank	0.007	4.8
Emissions Using Vinyl Ester Resin Loading		
EUG 11 - Vinyl Ester Resin Totes		0.2

EUG 12 - Combustion Sources Subject to NESHAP Subpart DDDDD

Criteria pollutant totals from all combustion sources are shown in the following table.

Point	Service	MMBTUH	Construction date
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Boiler	Presses (EUG 6)	4.2	1974
Curing oven	Cast pipe (EUG 2)	1	1991
Curing oven	HLU (EUG 4)	0.80 (x2)	1990s
Curing Oven	HLU (EUG 4)	0.85 (x3)	2014
Boiler	Presses (EUG 6)	4.18	2023

Pollutant	Emissions	
	lb/hr	TPY
PM	0.07	0.44
NO _x	0.92	5.82
CO	0.77	4.89
SO ₂	0.01	0.03
VOC	0.05	0.32

2. Compliance with the limits established in Specific Condition No. 1 shall be demonstrated by the following methods:

- a. EUG 2, 3, 4, 5, 6, 7, 9: Using the appropriate emission factors and the usage of raw materials to calculate emissions (monthly and 12-month rolling total).
- b. EUG 12: Maximum heat rating of the boiler or oven as listed in Specific Condition No. 1, and the fuel limitation of Specific Condition 3.

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

3. Fuel-burning equipment shall use only pipeline natural gas having 0.5 grains TRS/100 scf to ensure compliance with Subchapter 31. A current, valid purchase contract, a tariff sheet, a current gas company bill, or a transportation contract may be used to ensure compliance for natural gas.

[OAC 252: 100-31-25(1)(A)]

4. Except for the Developmental (lab) BMC, the boiler, and the curing ovens, all operations listed in Specific Condition No. 1 are subject to NESHAP Subpart WWWW and must comply with all applicable requirements, including but not limited to the following:[40 CFR Part 63, Subpart WWWW]

- a. §63.5797 for determining the organic HAP content of resins and gel coats.
- b. §63.5798 for establishing organic HAP emissions factors a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to this subpart.
- c. §63.5799(b)(1) and (c) for calculating organic HAP emissions in units of TPY for purposes of determining which paragraphs of §63.5805 apply.
- d. §63.5800 for compliance dates.
- e. §63.5805 standards, reduction of emissions by 95% weight in accordance with compliance with §63.5805(a)(1) or meet the organic HAP limits of Table 5 of Subpart WWWW.
- f. §63.5810 to demonstrate compliance with Tables 3 and 5 of Subpart WWWW for open molding or centrifugal casting operations.
- g. §63.5835 for work practice standards and emissions limits without the use of add-on controls.

- h. §63.5840 for compliance dates for performance or other initial compliance demonstrations, except open molding and centrifugal casting operations that elect to meet a organic HAP emissions limit on a 12-month rolling average.
 - i. §63.5860 for procedures used to demonstrate initial compliance with the standards listed in paragraphs (a) through (h) of §63.5805.
 - j. §63.5895 records of resin and gel coat use, organic HAP content, and operation where the resin is used.
 - k. §63.5900 for demonstrating compliance with the organic HAP emissions limits of Tables 3, 5, and 7 of Subpart WWWW, and work practice standards.
 - l. §63.5905 for notifications and compliance dates.
 - m. §63.5910 for reporting, schedule for submission, frequency of reporting periods, and information content of the reports.
 - n. §63.5915 for recordkeeping
 - o. §63.5920 for record maintenance.
 - p. §63.5925 for General Provisions.
5. The Boiler and Curing Ovens shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters including, but not limited to the following. [40 CFR Part 63, Subpart DDDDD]
- a. §63.7480 What is the purpose of this subpart?
 - b. §63.7485 Am I subject to this subpart?
 - c. §63.7490 What is the affected source of this subpart?
 - d. §63.7491 Are any boilers or process heaters not subject to this subpart?
 - e. §63.7495 When do I have to comply with this subpart?
 - f. §63.7499 What are the subcategories of boilers and process heaters?
 - g. §63.7500 What emission limitations, work practice standards, and operating limits must I meet?
 - h. §63.7501 Affirmative Defense for Violation of Emission Standards During Malfunction.
 - i. §63.7505 What are my general requirements for complying with this subpart?
 - j. §63.7510 What are my initial compliance requirements and by what date must I conduct them?
 - k. §63.7515 When must I conduct subsequent performance tests, fuel analyses, or tune-ups?
 - l. §63.7520 What stack tests and procedures must I use?
 - m. §63.7521 What fuel analyses, fuel specification, and procedures must I use?
 - n. §63.7522 Can I use emissions averaging to comply with this subpart?
 - o. §63.7525 What are my monitoring, installation, operation, and maintenance requirements?
 - p. §63.7530 How do I demonstrate initial compliance with the emission limitations, fuel specifications and work practice standards?
 - q. §63.7533 Can I use efficiency credits earned from implementation of energy conservation measures to comply with this subpart?
 - r. §63.7535 Is there a minimum amount of monitoring data I must obtain?
 - s. §63.7540 How do I demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards?

- t. §63.7541 How do I demonstrate continuous compliance under the emissions averaging provision?
 - u. §63.7545 What notifications must I submit and when?
 - v. §63.7550 What reports must I submit and when?
 - w. §63.7555 What records must I keep?
 - x. §63.7560 In what form and how long must I keep my records?
 - y. §63.7565 What parts of the General Provisions apply to me?
 - z. §63.7570 Who implements and enforces this subpart?
 - aa. §63.7575 What definitions apply to this subpart?
 - bb. Table 2 to Subpart DDDDD of Part 63—Emission Limits for Existing Boilers and Process Heaters
 - cc. Table 3 to Subpart DDDDD of Part 63—Work Practice Standards
 - dd. Table 4 to Subpart DDDDD of Part 63—Operating Limits for Boilers and Process Heaters
 - ee. Table 5 to Subpart DDDDD of Part 63—Performance Testing Requirements
 - ff. Table 6 to Subpart DDDDD of Part 63—Fuel Analysis Requirements
 - gg. Table 7 to Subpart DDDDD of Part 63—Establishing Operating Limits
 - hh. Table 8 to Subpart DDDDD of Part 63—Demonstrating Continuous Compliance
 - ii. Table 9 to Subpart DDDDD of Part 63—Reporting Requirements
 - jj. Table 10 to Subpart DDDDD of Part 63—Applicability of General Provisions to Subpart DDDDD
 - kk. Table 11 to Subpart DDDDD of Part 63—Toxic Equivalency Factors for Dioxins/Furans
6. All operations listed in Specific Condition 1 are subject to OAC 252:100-39-42 and must comply with all applicable requirements, including but not limited to not limited to the following. [OAC 252: 100-39-42]:
- (a) Cold cleaning facility.
 - (1) Equipment requirements. An owner or operator of any cold cleaning unit for metal degreasing which uses a VOC shall:
 - (A) install a cover or door on the facility that can be easily operated with one hand;
 - (B) provide an internal drain board that will allow lid closure if practical; if not practical, provide an external drainage facility; and,
 - (C) attach a permanent, conspicuous label summarizing the operating requirements specified in 252:100-39-42(a)(2) to the facility.
 - (2) Operating requirements. Owners or operators shall at a minimum:
 - (A) drain clean parts at least 15 seconds or until dripping ceases before removal;
 - (B) close degreaser cover when not handling parts in cleaner;
 - (C) store waste VOC in covered containers;
 - (D) not dispose or allow disposition of waste VOC in such a manner that more than 20 percent by weight can evaporate into the atmosphere.
 - (E) use a solid fluid stream, not an atomized spray, when VOC is sprayed. 190
 - (3) Requirements for controls. If the vapor pressure of the VOC is greater than 0.6 psi (4.1 kPa) measured at 100°F (38°C) or if VOC is heated to 248°F (120°C), the owner or operator shall apply one or more of the following control devices/techniques.
 - (A) Freeboard that gives a freeboard ratio greater than or equal to 0.7.
 - (B) Water cover where the VOC is insoluble in and denser than water or such equivalent.

- (C) Another system of equivalent control as approved by the Division Director.
- (4) Compliance and recordkeeping. Compliance shall be determined in accordance with EPA guidance document "Control of Volatile Organic Emissions from Solvent Metal Cleaning," 450/2-77-022. Test reports and maintenance and repair records of control equipment shall be maintained by the source for at least two years.
7. Liquid wastes and/or hazardous wastes from the facility, including cleaning solvents, shall be disposed in accordance with any applicable federal, state and local rules and regulations.
8. All records necessary to demonstrate compliance with permit conditions shall be maintained on-site or at a readily accessible location and shall be available for review by regulatory personnel during normal business hours. All records shall be maintained for a period of at least five years from the date of recording. Such records include, but are not necessarily limited to, the following. [OAC 252:100-43]
- a. Material Safety Data Sheets (MSDS) for all materials, cleaning solvents, etc. showing the HAP and VOC content of each.
 - b. Usage of raw materials to demonstrate compliance with Specific Condition No. 2 for each EUG. (monthly and 12-month rolling total).
 - c. Records, reports, and notifications required by 40 CFR Part 63 Subparts WWWW and DDDDD.
 - d. Records as required by OAC 252:100-39-42.
9. Permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, an Annual Compliance Certification for each twelve (12) month period, no later than 30 days after December 31, 2016, and each 12 month anniversary date thereafter for the duration of this permit. The certification shall include a monthly summary of any noncompliance with the permit or applicable regulations for the past year. Permittee shall also submit to Air Quality Division of DEQ, a Semi-Annual Monitoring and Deviation Report for each six (6) month period, no later than 30 days after and December 31, 2016, and June 30, 2017, and each six (6) month anniversary date thereafter for the duration of this permit. The report shall include the results of any required monitoring for each six (6) month monitoring period. [OAC 252:100-8-6(c)(5)(A), (C) & (D)]
10. This permit supersedes all previous Air Quality operating permits for this facility, which are now cancelled.
11. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility.
- a. OAC 252:100-4 NSPS
 - b. OAC 252:100-7 Minor Source Permits
 - c. OAC 252:100-11 Alternative Emissions Reduction
 - e. OAC 252:100-17 Incinerators
 - f. OAC 252:100-23 Cotton Gins
 - g. OAC 252:100-24 Grain Elevators

- h. OAC 252:100-33 Nitrogen Oxides
- i. OAC 252:100-35 Carbon Monoxide
- j. OAC 252:100-47 Municipal Solid Waste Landfill

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

SECTION I. DUTY TO COMPLY

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

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

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

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

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

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

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

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

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

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

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

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

[OAC 252:100-43]

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

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

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

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

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

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

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM₁₀). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

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

SECTION IV. COMPLIANCE CERTIFICATIONS

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

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

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or

intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source. [OAC 252:100-8-6(c)(5)(C)(i)-(v)]

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

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

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

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

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

SECTION VI. PERMIT SHIELD

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

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

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

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

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

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

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

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

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

SECTION X. PROPERTY RIGHTS

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

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

SECTION XI. DUTY TO PROVIDE INFORMATION

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

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

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

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

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

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

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

SECTION XII. REOPENING, MODIFICATION & REVOCATION

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

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

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances:

[OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

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

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

[OAC 100-8-7.3(d)]

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

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

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

SECTION XIII. INSPECTION & ENTRY

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

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

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

SECTION XIV. EMERGENCIES

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

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

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

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

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

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

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

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

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

SECTION XV. RISK MANAGEMENT PLAN

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

SECTION XVI. INSIGNIFICANT ACTIVITIES

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

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

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

SECTION XVII. TRIVIAL ACTIVITIES

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

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

SECTION XVIII. OPERATIONAL FLEXIBILITY

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

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

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

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

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

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

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
 - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
 - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
 - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
 - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of

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

- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

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

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

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

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

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

- certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
 - (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
 - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

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

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

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

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

SECTION XXII. CREDIBLE EVIDENCE

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



PART 70 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. 2021-0474-TVR4

Fiber Glass Systems, LP,

having complied with the requirements of the law, is hereby granted permission to operate all sources within the boundaries of their Fiber Glass Systems facility, located at 25 South Main, Sand Springs, Tulsa County, Oklahoma, subject to standard conditions dated June 21, 2016 and specific conditions, both attached.

This permit shall expire five (5) years from the date below, except as authorized under Section VIII of the Standard Conditions.

DRAFT / PROPOSED

Director, Air Quality Division

Date

September 13, 2023

Fiber Glass Systems, LP
Attn: John W. Story II
25 South Main
Sand Springs, OK 74063

Subject: Operating Permit No. **2021-0474-TVR4**
Fiber Glass Systems
AQD Facility ID: 638
Section 11, Township 19N, Range 11E, Tulsa County, Oklahoma.

Dear Mr. Story:

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

Sincerely,



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

Fiber Glass Systems, LP
Attn: John W. Story II
25 South Main
Sand Springs, OK 74063

Subject: Operating Permit No. **2021-0474-TVR4**
Fiber Glass Systems
AQD Facility ID: 638
Section 11, Township 19N, Range 11E, Tulsa County, Oklahoma.

Dear Mr. Story:

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

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

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or Alex Johnson, the permit writer, at (405) 702-4201.

Sincerely,

DRAFT

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

Enclosure

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.
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 NOTICES: On Page 2

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

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

A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., significant modification to a Title V permit or Title V/Title V renewal permit)... 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 operating 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: , which represents (identify the emissions change involved in the modification), or add: . The modification will not result in a change in emissions]

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.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8.

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45-day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j).

**Information on all permit actions 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.

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-10-21

ACFM	Actual Cubic Feet per Minute	GDF	Gasoline Dispensing Facility
AD	Applicability Determination	GEP	Good Engineering Practice
AFRC	Air-to-Fuel Ratio Controller	GHG	Greenhouse Gases
API	American Petroleum Institute	GR	Grain(s) (gr)
ASTM	American Society for Testing and Materials	H₂CO	Formaldehyde
		H₂S	Hydrogen Sulfide
BACT	Best Available Control Technology	HAP	Hazardous Air Pollutants
BAE	Baseline Actual Emissions	HC	Hydrocarbon
BBL	Barrel(s)	HCFC	Hydrochlorofluorocarbon
BHP	Brake Horsepower (bhp)	HFR	Horizontal Fixed Roof
BTU	British thermal unit (Btu)	HON	Hazardous Organic NESHAP
		HP	Horsepower (hp)
C&E	Compliance and Enforcement	HR	Hour (hr)
CAA	Clean Air Act	I&M	Inspection and Maintenance
CAM	Compliance Assurance Monitoring	IBR	Incorporation by Reference
CAS	Chemical Abstract Service	ICE	Internal Combustion Engine
CAAA	Clean Air Act Amendments	LAER	Lowest Achievable Emission Rate
CC	Catalytic Converter	LB	Pound(s) [Mass] (lb, lbs, lbm)
CCR	Continuous Catalyst Regeneration	LB/HR	Pound(s) per Hour (lb/hr)
CD	Consent Decree	LDAR	Leak Detection and Repair
CEM	Continuous Emission Monitor	LNG	Liquefied Natural Gas
CFC	Chlorofluorocarbon	LT	Long Ton(s) (metric)
CFR	Code of Federal Regulations	M	Thousand (Roman Numeral)
CI	Compression Ignition	MAAC	Maximum Acceptable Ambient Concentration
CNG	Compressed Natural Gas	MACT	Maximum Achievable Control Technology
CO	Carbon Monoxide or Consent Order	MM	Prefix used for Million (Thousand-Thousand)
COA	Capable of Accommodating	MMBTU	Million British Thermal Units (MMBtu)
COM	Continuous Opacity Monitor	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
D	Day	MMSCF	Million Standard Cubic Feet (MMscf)
DEF	Diesel Exhaust Fluid	MMSCFD	Million Standard Cubic Feet per Day
DG	Demand Growth	MSDS	Material Safety Data Sheet
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MWC	Municipal Waste Combustor
		MWe	Megawatt Electrical
EGU	Electric Generating Unit	NA	Nonattainment
EI	Emissions Inventory	NAAQS	National Ambient Air Quality Standards
EPA	Environmental Protection Agency	NAICS	North American Industry Classification System
ESP	Electrostatic Precipitator	NESHAP	National Emission Standards for Hazardous Air Pollutants
EUG	Emissions Unit Group	NH₃	Ammonia
EUSGU	Electric Utility Steam Generating Unit	NMHC	Non-methane Hydrocarbon
FCE	Full Compliance Evaluation	NGL	Natural Gas Liquids
FCCU	Fluid Catalytic Cracking Unit	NO₂	Nitrogen Dioxide
FEL	Federally Enforceable Limit(s)	NO_x	Nitrogen Oxides
FESOP	Federally Enforceable State Operating Permit	NOI	Notice of Intent
FIP	Federal Implementation Plan		
FR	Federal Register		
GACT	Generally Achievable Control Technology		
GAL	Gallon (gal)		

NSCR	Non-Selective Catalytic Reduction	SIP	State Implementation Plan
NSPS	New Source Performance Standards	SNCR	Selective Non-Catalytic Reduction
NSR	New Source Review	SO₂	Sulfur Dioxide
		SO_x	Sulfur Oxides
O₃	Ozone	SOP	Standard Operating Procedure
O&G	Oil and Gas	SRU	Sulfur Recovery Unit
O&M	Operation and Maintenance		
O&NG	Oil and Natural Gas	T	Tons
OAC	Oklahoma Administrative Code	TAC	Toxic Air Contaminant
OC	Oxidation Catalyst	TEG	Triethylene Glycol
		THC	Total Hydrocarbons
PAH	Polycyclic Aromatic Hydrocarbons	TPY	Tons per Year
PAE	Projected Actual Emissions	TRS	Total Reduced Sulfur
PAL	Plant-wide Applicability Limit	TSP	Total Suspended Particulates
Pb	Lead	TV	Title V of the Federal Clean Air Act
PBR	Permit by Rule		
PCB	Polychlorinated Biphenyls	µg/m³	Micrograms per Cubic Meter
PCE	Partial Compliance Evaluation	US EPA	U. S. Environmental Protection Agency
PEA	Portable Emissions Analyzer		
PFAS	Per- and Polyfluoroalkyl Substance	VFR	Vertical Fixed Roof
PM	Particulate Matter	VMT	Vehicle Miles Traveled
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	VOC	Volatile Organic Compound
		VOL	Volatile Organic Liquid
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	VRT	Vapor Recovery Tower
		VRU	Vapor Recovery Unit
POM	Particulate Organic Matter or Polycyclic Organic Matter	YR	Year
ppb	Parts per Billion		
ppm	Parts per Million	2SLB	2-Stroke Lean Burn
ppmv	Parts per Million Volume	4SLB	4-Stroke Lean Burn
ppmvd	Parts per Million Dry Volume	4SRB	4-Stroke Rich Burn
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		

September 13, 2023

Cherokee Nation
Attn: Chuck Hoskin, Jr., Principal Chief
P.O. Box 948
Tahlequah, OK 74465

Re: Permit Application No. **2021-0474-TVR4**
Fiber Glass Systems, LP
Fiber Glass Systems AQD Facility ID: 638
Section 11, Township 19N, Range 11E, Tulsa County, Oklahoma
Date Received: October 25, 2021

Dear Mr. Hoskin:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II/Tier III application referenced above. A Tier II/III application requires the facility provide a 30-day public comment period on the draft Tier II/III permit and a 20-day public comment period on a proposed Tier III permit at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

Copies of draft permits and comment opportunities are also provided to the public on the ODEQ website at the following location:

<https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/>

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,



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

September 13, 2023

Muscogee Creek Nation
Attn: David Hill, Principal Chief
P.O. Box 580
Okmulgee, OK 74447

Re: Permit Application No. **2021-0474-TVR4**
Fiber Glass Systems, LP
Fiber Glass Systems AQD Facility ID: 638
Section 11, Township 19N, Range 11E, Tulsa County, Oklahoma
Date Received: October 25, 2021

Dear Mr. Hill:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II/Tier III application referenced above. A Tier II/III application requires the facility provide a 30-day public comment period on the draft Tier II/III permit and a 20-day public comment period on a proposed Tier III permit at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

Copies of draft permits and comment opportunities are also provided to the public on the ODEQ website at the following location:

<https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/>

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,



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