



*Serving Island, Skagit & Whatcom Counties*

**ERSHIGS, Inc.  
BELLINGHAM, WASHINGTON**

**STATEMENT OF BASIS for the  
AIR OPERATING PERMIT**

**FINAL**

**21 September, 2009**

# AIR OPERATING PERMIT – STATEMENT OF BASIS GENERAL INFORMATION

**Ershigs, Incorporated**  
**742 Marine Drive and**  
**1001 C Street, Building J, Bellingham, WA 98227**

SIC: 3089  
EPA AFS NUMBER: 53-073-0040

NWCAA ID NUMBER: 033-V-W

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<b>Air Operating Permit Number:</b>	<b>Issuance Date:</b>
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July 31, 2007	September 21, 2013

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## 1 INTRODUCTION (PERMITTING HISTORY)

Ershigs, Inc., hereinafter collectively referred to as Ershigs or as the facility or as the permittee, conducts fiberglass fabrication processes at facilities located at 742 Marine Drive and at 1001 C Street, Building J, both in Bellingham, Washington. Ershigs was originally identified as a source of air contaminants by a NWCAA emissions inventory in 1968 and was officially registered in 1971. Ershigs is required to have an Air Operating Permit because the facility has the potential to emit more than 10 tons per year of styrene, a regulated hazardous air pollutant listed in section 112(b) of the Federal Clean Air Act. Styrene is released during mixing, layup and subsequent curing of polyester resins applied at the Ershigs facilities.

Air Operating Permit Chronology:

Original air operating permit (AOP 001) was issued on March 17, 1997.

First revision (an administrative amendment, also numbered AOP 001) was issued on May 27, 1999 to document company personnel changes.

Ershigs applied for AOP renewal on August 10, 2001 and provided additional information on May 17, 2001.

A revised permit (AOP 001R1) was issued on February 3, 2003. That permit expired on February 3, 2008.

Ershigs applied for the renewal on July 16, 2007. The application was found to be complete on October 16, 2007.

There are two major differences between AOP 001R2 (the current revision) and AOP 001R1:

The current AOP revision includes the conditions contained in Part 63 of Title 40 of the Code of Federal Regulations (CFR), subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Note that certain sections of the general conditions of Part 63 of Title 40 of the CFR, contained in Subpart A, also apply, and are included in the current AOP revision.

The current AOP revision also includes the conditions contained in OAC 1014, issued on March 18, 2008, that apply specifically to the Ershigs facilities on C Street.

The purpose of this Statement of Basis (SOB) is to set forth the legal and factual basis for the Ershigs AOP conditions and to provide background information to facilitate review of the permit by interested parties. This SOB is not a legally enforceable document.

## 2 FACILITY DESCRIPTION

### 2.1 Identification

Ershigs in Bellingham, Washington manufactures and provides engineering services for custom fiberglass reinforced plastic (FRP) composite products. These activities are classified under S.I.C. Code 3089, Plastic Products. In addition, there is a separate business activity at the site, Sheet Metal Work. The Sheet Metal Work operating conditions (for a plasma cutter and a laser cutter) are covered under OAC 926, issued on June 28, 2005, and are not included in the Ershigs AOP. WAC 173-401-200 states that a major source for AOP purposes means any stationary source (or any group of stationary sources) that are located on one or more contiguous or adjacent properties, are under common control by the same person (or persons under common control), and are part of the same SIC major industrial grouping. The Sheet Metal Work is assigned a different standard industrial code (SIC 3444) than the FRP manufacturing side of the facility (SIC 3089). Further, the Sheet Metal Work products are mostly sold to outside customers, except when some molds are needed in the FRP manufacturing side of the facility. According to the source, approximately only 20% of the annual output from the Sheet Metal Work facility supports the FRP manufacturing operations. As a result, this SOB does not discuss the Sheet Metal Work OAC Conditions.

Overhead photographs of the Ershigs Marine Drive and C Street facilities are shown in Figure 1 and Figure 2 of this SOB. As shown in Figures 1 and 2, there are eight buildings or structures at the facility. In addition, there is some outside storage of raw materials and occasional outdoor fabrication work. The emission units at both Ershigs facilities are identified in Table 1 of the AOP, which is included in this document as Table 6 in Appendix A.



Figure 1 Overhead View of the Ershigs Marine Drive Facility



Figure 2 Overhead View of the Ershigs C Street Facility

## 2.2 Production System

In general, fiberglass and catalyzed polyester resin are applied to molds that are purchased or constructed at the facility. Depending on the piece being constructed, the resin/fiberglass composite is applied via hand layup, spray layup or filament winding layup. After the resin hardens the piece is removed from the mold and is trimmed, machined and perhaps attached to other pieces to construct the final product. Finally, the product is crated and loaded on trucks or trains for shipment.

Ershigs also manufactures pipes and tubes of varying sizes. The mold in that case consists of a cylinder mandrel secured between two support stocks. The cylinder rotates, and a carriage slides longitudinally back and forth, applying the resin and fiberglass until the desired tube thickness is reached. Filament winding is sometimes supplemented with spray chop applied resin/glass.

At their facilities at C Street, Ershigs also employs closed molding for the manufacture of parts. In closed molding, the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold. In this manner, styrene emissions are greatly minimized.

## 2.3 Emission Units

### 2.3.1 Changes to emission units since issue of the original AOP

Ershigs fabricates reinforced plastic composites at 1001 C Street, Building J, in Bellingham. This facility is approximately 2.2 miles from the Ershigs main facility located at 742 Marine Drive and was permitted first as a temporary facility under OAC 932 on September 12, 2005, and subsequently as a permanent facility under OAC 1014 on March 18, 2008. Because there is significant overlap in management and

material flow both Ershigs facilities have been found to constitute a single source for the purposes of Title V permitting, and subject to the terms and conditions of this AOP. See Section 2.6 for more details on Orders of Approval to Construct.

**2.3.2 Insignificant emission units**

Other emission units or activities present at Ershigs are categorically insignificant or insignificant on the basis of size or production rate (see Table 5 of this document). There are no combustion units at the facility other than pipeline-supplied natural gas-fired heating equipment and portable propane heaters used to heat the buildings. These heating devices are insignificant emission units.

**2.4 Emissions**

Emissions from the fiberglass reinforced composites production process are shown in Table 1 and Table 2 below. VOC emissions from the facility during the last 6 years have averaged approximately 28.9 tons per year.

**2.4.1 Criteria pollutant emissions in tons per year**

Table 1 Criteria pollutant emissions in tons per year

	2002	2003	2004	2005	2006	2007
TSP	1	2	3	1	1.6	1.6
PM <sub>10</sub>	0	0	0	0	0	0.01
PM <sub>2.5</sub>	0	0	0	0	0	0
SO <sub>2</sub>	0	0	0	0	0	0
NO <sub>x</sub>	0	0	0	0	0	0
VOC	23.3	22.7	27.3	33.3	31.7	35.3
CO	0	0	0	0	0	0

**2.4.2 Toxic air pollutant emissions**

Table 2 Toxic air pollutant emissions in pounds per year

	2002	2003	2004	2005	2006	2007
Diacetone alcohol	1973	2,065	2,127	10,820	10,820	11,184
Methyl methacrylate					1,771	706
Styrene	44,641	43,325	52,391	55,734	50,827	58,771

**2.5 Compliance History**

NWCAA conducts unannounced annual inspections at all major sources at least annually, and will respond to citizen complaints when the facility is named as a potential source of undesirable air emissions. This response may involve a site visit as well as general surveillance around the plant. Table 3 lists the inspection activity at the Ershigs facilities. NOV and penalties levied by the NWCAA are discussed in section 2.5.2.

**2.5.1 Inspection Activity**

Table 3 Inspection Activities for Ershigs

Date	Notes	Inspector
9/18/2008	Annual inspection, with Uhrich	Christoforou
9/6/2007	Annual inspection, with Uhrich	Christoforou
5/25/2006	Annual inspection with Christoforou	Naismith
5/17/2006	Annual inspection with Uhrich and Christoforou	Naismith
12/2/2005	OAC 932 inspection of C Street facility	Uhrich
7/26/2005	Compliance inspection with Bob Uhrich, Kate Stenson.	Naismith
3/22/2005	Compliance inspection	Uhrich
1/6/2005	Compliance inspection	Uhrich
8/25/2004	Annual inspection, with Uhrich	Naismith
8/19/2003	Annual inspection, with Uhrich	Naismith

**2.5.2 NOV Activity**

Ershigs was initially registered by the NWCAA on October 30, 1971. There were no Notices of Violation (NOV) issued between that initial registration and August, 2000. Since that time, the following NOV have been issued:

Notice of Violation 3080, issued on August 29, 2005

Ershigs failed to submit a timely semi-annual compliance report for the September 17, 1999 to March 16, 2000 reporting period. A penalty of \$500 was levied and was collected on December 5, 2000.

Notice of Violation 3289, issued on November 24, 2002

Ershigs failed to maintain a 0.025 inches water column vacuum or greater (except during periods of ingress or egress of products, materials or personnel) in indoor lay-up areas during working hours. A fine of \$750 was levied, \$500 of which was suspended provided that Ershigs complied with the following terms in an Assurance of Discontinuance:

Wire the exhaust and make-up fans in the manufacturing buildings to the switch that controls the lighting in their respective buildings so when the lights are turned on the fans will automatically start operating, and

Train all personnel responsible for recording differential pressure readings, in the proper methods of reading and recording the differential pressure measured by the magnehelic gauges, and

Post signs in the manufacturing buildings stating that the exhaust system shall be running and the magnehelic differential pressure reading must be at least 0.025" before starting work, and

Sign the Consent Order and Assurance of Discontinuance and return it to the NWCAA within 10 days, and

Pay a reduced penalty in the amount of \$250 within 30 days of receipt of the AOD order.

Ershigs implemented the remedial actions 1 through 3 above and paid the penalty on January 21, 2003.

Notice of Violation 3501, issued on August 29, 2005

NWCAA inspectors observed several examples of a lapse in good housekeeping practices. All air contaminant sources (drums, containers, and the solvent distillation unit) were not kept in good operating condition and repair. A \$2,000 penalty was levied on October 31, 2005. Ershigs paid the subsequently reduced penalty of \$1,350 on November 22, 2005.

Notice of Violation Warning 3645, issued on October 16, 2007

During the annual 2007 inspection, NWCAA inspectors noticed two violations of OAC 932, which applied at the C Street facility. Note that at the time, the Ershigs AOP applied only to the Marine drive facilities.

The amount of daily allowable resin usage was not posted at the Ershigs C street facility as per OAC 932 condition 4.

A 1-gallon tank of Interlux solvent, containing more than 50% by weight of HAP, was found at the Ershigs C Street facility, when only diacetone alcohol (DAA) or acetone solvent were permitted to be used at the facility, as per OAC 932 condition 7.

An NOV warning was issued for these two violations.

## **2.6 Northwest Clean Air Agency Orders of Approval to Construct**

Ershigs has received Orders of Approval to Construct from the NWCAA for specific equipment. Applicable requirements, reference test methods, and monitoring for continuing OAC requirements are addressed in Sections 3, 4 and 5 of the AOP.

OAC 932, issued on September 12, 2005

Ershigs submitted an application on June 15, 2005 for installation of a reinforced plastics composites manufacturing operation to be located at 1001 C Street, Building J, in Bellingham, Washington. The application was amended on August 5, 2005. The proposed facility would use closed molding (vacuum assisted resin infusion molding) technology and open molding (mechanical layup with vapor suppression) to manufacture reinforced plastic composite (RFP) parts for industrial applications. The C Street facility was to be leased for one project, to produce flat panels for five jet bubbler reactor flue gas scrubbers, which was expected to be completed within two years. The facility would emit volatile organic compounds and toxic air contaminants during the layup process due to off gassing from the resin and evaporation of cleanup solvents.

OAC 1014, issued on March 18, 2008 (supersedes OAC 932)

OAC 1014 superceded OAC 932, modifying the Ershigs C Street reinforced plastics composites manufacturing facility permit to allow permanent operation and to expand operations, and to include the following equipment and/or operations:

Closed (vacuum-assisted resin infusion) molding operations (existing under temporary OAC 932; revisited in this OAC to assure use of BACT);

Open (mechanical, spray layup with vapor suppression) molding operations (existing under temporary OAC 932; revisited in this OAC to assure use of BACT);

Open (manual, hand layup) molding operations; and

Use of an additional solvent (Interlux©) for spot cleaning of molds.

The C Street facility operates in conjunction with the Ershigs facility located at 742 Marine Drive in Bellingham and is considered subject to the Ershigs Air Operating Permit, as well as being applicable to Subpart WWWW of 40 CFR 63, the National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production.

### **3 GENERAL PERMIT ASSUMPTIONS**

#### **3.1 Federal Enforceability**

Federally enforceable requirements are terms and conditions required under the Federal Clean Air Act (FCAA) or under any of its applicable requirements. Local and state regulations may become federally enforceable by formal approval and incorporation into the State Implementation Plan or through other delegation mechanisms. Federally enforceable requirements are enforceable by the EPA and citizens. All applicable requirements in the permit including standard terms and conditions, generally applicable requirements, and specifically applicable requirements are federally enforceable unless they are identified in the permit as enforceable only by the state. Two different versions (identified by the date) of the same regulatory citation may apply to the source if federal approval/delegation lags behind changes made to the Washington Administrative Code (WAC) or to the NWCAA Regulation. For Washington Administrative Code (WAC) regulations, the date represents the State Effective date. For NWCAA regulations, the date represents the most recent Board of Directors adoption date, which is identified as the "Passed" or "Amended" date in the NWCAA Regulation. The date associated with an OAC or PSD permit represents the latest revision date of that order. For Federal rules, the date is the rule's most recent promulgation date.

Chapter 173-401 WAC is not federally enforceable although the requirements of this regulation are based on federal requirements for the air operating permit program. Upon issuance of the permit, the terms based on Chapter 173-401 WAC will become federally enforceable for the source.

#### **3.2 Future Requirements**

Promulgated applicable requirements with future effective compliance dates may be included as applicable requirements in the permit.

Some requirements that are not applicable until triggered by an action, such as the requirement to file an application prior to constructing a new source, are addressed within the standard terms and conditions section of the permit. There is presently no pending application to construct a new source at Ershigs. Ershigs has certified in the permit renewal application that the facility will meet any future applicable requirements on a timely basis.

#### **3.3 Compliance Options**

Ershigs did not request emissions trading provisions or specify more than one operating scenario in the operating permit application so the permit does not address these options. This operating permit does not condense overlapping applicable requirements (streamlining) nor does it provide any alternative emission limitations.

Ershigs is subject to 40 CFR Part 63 Subpart WWWW (National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production). 40 CFR 63.5810 allows affected sources to use one of the following methods for demonstrating compliance:

- (a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to subpart WWWW.
- (b) Demonstrate that, on average, the source meets the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.
- (c) Demonstrate compliance with a weighted average emission limit.
- (d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.

Ershigs has chosen to comply with the weighted average emission limit option (c) above, but other options may be chosen in the future. The permit allows Ershigs to use any of the options (a)-(d) shown above.

### **3.4 Gap Filling**

Many generally applicable requirements do not specify compliance determination or monitoring methods within the text of the regulation or statute. Chapter 173-401-615 WAC requires the permit to include monitoring, recordkeeping and reporting adequate to assure compliance with applicable requirements. In these cases, a site specific compliance monitoring method (called gap filling) was developed based on the characteristics of the Ershigs facilities, the nature of the underlying requirement, the requirements of Chapter 173-401-615 WAC and EPA guidance on compliance monitoring. The following describes the derivation of site specific compliance monitoring in the Ershigs AOP.

A Ventilation and Odor Control Plan was provided to the NWCAA by Ershigs in August, 1991 as part of an odor nuisance enforcement action. This plan, current plant operating and maintenance procedures, and EPA guidance on monitoring, recordkeeping and reporting were used to develop the monitoring, recordkeeping, and reporting sections of Table 2 of the permit. These sections include requirements for the facility to investigate nuisance emissions, precautions to be taken when the operators can grind or perform layup activities on parts out of doors, and ventilation and control equipment operation requirements during working hours.

Composite layup is conducted in buildings 1, 2 & 4 of the Marine Drive, as well as the C Street Ershigs facilities. These buildings are equipped with ventilation systems that maintain a slight building vacuum and release layup vapors to the atmosphere through elevated stacks. Monitoring these emission points for proper operation and maintenance and for best available odor control is accomplished by requiring Ershigs to monitor internal building vacuum. Keeping the buildings at negative pressure will likely insure that the ventilation systems are operating correctly and that styrene vapors are adequately collected and dispersed. Ershigs has installed a similar system at the C Street facility.

Compliance with opacity and particulate emission limitations is assured via monthly monitoring by visually observing and recording whether there are any emissions from stacks. The particulate emitted from grinding and sanding operations from the facility is of a size that emissions should be observed at an opacity reading of significantly less than the opacity standard of twenty percent. If any visible emissions are observed during the monthly check or at any other time, immediate corrective action is triggered or, if visible emissions cannot be eliminated, monitoring by the Washington Department of Ecology Method 9A must be performed. With regard to mass particulate emission rates, although particulate emission rate is only loosely related to opacity, a zero percent opacity action level will likely ensure that emissions are less than the 0.1 grains/dscf emission standard. This approach is taken because proper operation of the facility presently results in zero opacity. The monitoring period is once-per-month for plantwide emissions, however, there is a continuous obligation for compliance. If greater than zero percent opacity is observed from any emission point at any time and no corrective action is taken or Method 9A monitoring is not implemented, then there would be a violation of the permit monitoring terms.

Requirements related to fugitive particulate and fugitive gaseous emissions are monitored by limiting outdoor grinding and layup operations and keeping containers of volatile materials enclosed. The majority of the facility grounds are paved and traffic dust has not historically been a problem. Requirements related to nuisance emissions are monitored by responding to complaints received from the NWCAA or the public, by checking for mechanical or operational problems that may cause nuisance, taking actions to reduce emissions that may cause nuisance odors, and recording and reporting any actions taken. In any case, the facility is subject to a notice of violation if the NWCAA confirms the presence of a nuisance caused by Ershigs irrespective of the monitoring, recordingkeeping and reporting requirement.

All combustion units at Ershigs are insignificant emission units and burn only pipeline grade natural gas supplied via a commercial underground gas distribution system operated by Cascade Natural Gas, Inc or portable bottled liquid petroleum gas. All other emission units at the facility do not normally emit sulfur compounds. Because of the above reasons, no sulfur dioxide applicable requirements or monitoring, recordkeeping and reporting requirements are required by the permit.

## **4 PERMIT ELEMENTS AND BASIS FOR TERMS AND CONDITIONS**

The Ershigs AOP is divided into the following sections:

Permit Information

Attest

Emission Unit Identification

Standard Terms and Conditions

Standard Terms and Conditions for National Emission Standards for Hazardous Air Pollutants

Generally Applicable Requirements

Specifically Applicable Requirements

Inapplicable Requirements

Insignificant Emission Units

### **4.1 Permit Information, Attest, Emission Unit Identification**

The Permit Information section identifies the source and provides general information about the permit, the responsible corporate official, and the agency personnel responsible for permit preparation, review and issuance. The Attest section provides NWCAA authorization for the source to operate under the terms and conditions contained in the permit.

The Emission Unit Identification delineates applicability of the permit and describes the process. A listing of the emission unit process names, emission points and control devices in place at the time of permit issuance is presented in Table 1 of the AOP and is included in the Appendix A of this document. Only air emissions from the emission units in place at the time of permit issuance and air emissions from insignificant emission units are approved via the permit at this facility. Detailed information about the facility may be found in the operating permit application and in supplementary files.

### **4.2 Standard Terms and Conditions**

The Standard Terms and Conditions section of the permit specifies administrative and other requirements that apply to all air operating permit sources within the jurisdiction of the NWCAA. Standard Terms and Conditions have no ongoing compliance monitoring requirements. The legal authority for the Standard Terms and Conditions is provided in the citations in Section 2 of the AOP. Where there is a difference between the paraphrased term and the language of the cited regulation, the language of the cited regulation takes precedence. The terms and conditions have been grouped by function rather than numerically in an effort to make the section more readable. In some cases, similar requirements at the state and local authority level have been grouped together.

Applicable requirements that simply prohibit certain actions are included in the "Prohibitions" section of the Standard Terms and Conditions. A number of requirements that would not be applicable until triggered have also been included in this section. The requirement for a source to submit an application for New Source Review is an example of one such requirement. This section also includes references to broadly applicable prohibitions such as "Concealment and Masking," which are applicable requirements but have no ongoing compliance monitoring.

### **4.3 Standard Terms and Conditions for NESHP**

Each specific subpart of 40 CFR 63 has a section that describes which elements of Subpart A to 40 CFR 63 (the Standard Terms and Conditions) apply. Some elements of Subpart A apply only in special circumstances. For example, those elements of Subpart A that contain requirements for startup, shutdown, and malfunction plans, apply only if add-on controls are used to comply with the emission limits in Subpart WWWW.

Section 3 of the permit includes the standard terms and conditions that are contained in Subpart A of 40 CFR 63. Such standard terms and conditions are administrative, notification, and/or other requirements that typically have no ongoing compliance monitoring requirements.

Subpart A of 40 CFR 63 and its inclusion in Section 3 of the AOP is discussed in more detail in section 5.8 of this document.

#### **4.4 Generally Applicable Requirements**

Requirements that limit current emissions and apply broadly to the facility are identified in the Generally Applicable Requirements section of the AOP. With some exceptions, each of these requirements applies non-specifically to sources. For example, NWCAA Regulation Section 455.1 broadly prohibits particulate emissions that exceed 0.10 gr/dscf from any emissions unit. However, some requirements apply to only certain types of emissions units. For example, NWCAA Regulation Section 455.11 applies only to combustion equipment and WAC 173-400-060 applies only to general process units. Despite these differences in applicability, these requirements have been listed together in the Generally Applicable Requirements section of the permit.

The first column of Table 2 of the AOP lists term numbers used to identify listed conditions. The requirements specified in the second column of Table 2 of the AOP are applicable plant-wide to all emission units at the source, including insignificant emission units. The third column of Table 2 of the AOP is a brief description of the applicable requirements for informational purposes only and is not enforceable. The fourth column identifies monitoring, recordkeeping, and reporting requirements (MR&R) the source must follow to assure compliance with the applicable requirement as required by the WAC 173-401-605(1) and WAC 173-401-615(1) and (2). This column is enforceable except that the NWCAA has determined that the MR&R requirements in Table 2 of the AOP are not necessary for the insignificant emission units.

#### **4.5 Specific Requirements for Emissions Units**

Section 5 of the AOP is formatted in a similar manner to Section 4, and it lists applicable requirements that apply uniquely to a process unit or to specific types of process units. The National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the reinforced plastics composites industry, first promulgated on April 21, 2003 and subsequently amended on August 25, 2005 and then on April 20, 2006, has given several options to sources such as Ershigs for complying with the standards for open molding (see 40 CFR 63.5810).

Ershigs has chosen to comply with the standards for open molding using the methods set forth in 40 CFR 63.5810(c). AOP terms 5.3 and 5.4 describe the procedure that must be followed. This option allows Ershigs to demonstrate compliance with a weighted average emissions limit for all open molding operations. The weighted averages are calculated on a rolling 12-month period average. The calculation is done in three steps:

1. First calculate the weighted average emissions limit. This is calculated as the sum of each emissions limit<sup>1</sup> multiplied by the amount of each corresponding material used divided by the total material used.
2. Calculate a weighted average emissions factor. The process is similar to step 1 above but uses the equations in Table 1 to Subpart WWWW of Part 63 to estimate actual emissions.
3. Compare the weighted average emissions limit to the weighted average emissions factor. If the emissions factor is less than or equal to the emission limit, Ershigs would be in compliance.

In addition, Table 4 to Subpart WWWW of Part 63 includes work practice standards with which Ershigs must comply. These work practice standards are included in AOP term 5.5.

All the applicable requirements of OAC 1014, specifically applying to the C Street facilities, also have been incorporated into Section 5 of the AOP.

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<sup>1</sup> The emissions limit is found on Table 3 to Subpart WWWW of Part 63, and depends on the operation type and the application method for the resin.

#### **4.6 Inapplicable Requirements**

Chapter 173-401-640 WAC requires the permitting authority to issue a determination regarding the applicability of requirements with which the source must comply. Table 4 in the AOP lists requirements deemed inapplicable to the facility and provides the basis for each determination.

## **5 SUMMARY OF CHANGES IN RENEWAL**

### **5.1 Changes throughout the AOP**

The document was completely reformatted for uniformity in paragraph headings and spacing.

Dates for all regulatory citations have been checked, and updated as necessary to show the most recent dates of adoption into the SIP by the EPA, and most recent dates of effectiveness for state/local only regulations.

### **5.2 Front page**

The front page of the AOP has been changed to show the new logo and name of the Northwest Clean Air Agency.

### **5.3 Information page**

The information page has been moved to immediately follow the front page. Previously it had been just after the Table of Contents. The name of the Agency has been changed to Northwest Clean Air Agency. The Air Operating Permit Number has been changed from "001R1" to "001R2," indicating that this is the second renewal. Various dates have been changed to reflect the fact that five years have gone by since the previous issuance of the AOP.

The current AOP now has only one Standard Industrial Classification (SIC) code: 3089, Plastics products. SIC code 3444, Sheet Metal Work, has been deleted.

Christos Christoforou has replaced Anne Naismith as the Agency Engineer for Ershigs.

### **5.4 Attest page**

The Attest page has been changed to reflect personnel changes within the Agency over the last five years. As stated previously, Christos Christoforou, P.E., has replaced Anne Naismith, P.E., as the permit engineer. Mark Buford, P.E., Assistant Director, Engineering, and Lynn Billington, P.E., Director of Engineering, review and sign all air operating permits.

### **5.5 Table of Contents**

The Table of Contents now shows only two levels of outline throughout the document. Some of the major sections have been reorganized.

### **5.6 SECTION 1: Emission Unit Descriptions**

The emissions units at Ershigs are now described in a table, which lists emission unit and process name, emission points (stacks), control device, and a process description.

The Marine Drive facility consists of Buildings 1, 2, and 4. The C Street facility consists of one building. Both of these facilities are under common ownership and control, they both have the same industrial classification numbers (NAICS and SIC), and they have been determined to be "adjacent" for air permitting purposes.

### **5.7 SECTION 2: Standard Terms and Conditions**

The pertinent regulatory citations have been added to all the terms and conditions. Dates were checked and updated wherever necessary for all regulations cited. The dates shown are either the effective date of the regulation that has been adopted into the State Implementation Plan (SIP), or the effective date of the most recent version of the regulation for regulations that have not been adopted into the SIP<sup>2</sup>. In the

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<sup>2</sup> EPA Region X maintains a web site that contains SIP approval dates for all Agency regulations. As of the date of this renewal that web site is located at <http://yosemite.epa.gov/r10/airpage.nsf/webpage/state+implementation+plans?OpenDocument>. The Northwest

instances where there are significant differences between the SIP-approved and the State Only versions, both versions are shown in Section 2.

Wording in Section 2 for insignificant emissions units was changed from:

“Where a permit does not require testing, monitoring, recordkeeping and reporting for insignificant emissions units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period.”

To:

“This permit does not require testing, monitoring, reporting or recordkeeping for insignificant emission units or activities unless required in an underlying permit, such as an OAC condition.

The permittee shall use good industrial practice to maintain insignificant emission units. For such equipment, the permittee shall also promptly repair defective equipment or shut down the related unit until defective equipment can be repaired. Compliance with this requirement shall be deemed to satisfy requirements of WAC 173-401-615 and 173-401-630(1).

The permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance of an insignificant emission unit during the reporting period. Where an underlying OAC requires testing, monitoring, recordkeeping and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring and recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented or known instances of noncompliance during the reporting period.”

**5.8 SECTION 3: Standard Terms and Conditions for NESHAP Sources**

Whenever a NESHAP applies to a facility, that NESHAP provides a table that specifies which parts of Subpart A (General Provisions) to 40 CFR 63 also apply. Specified parts of Subpart A to 40 CFR 63 apply to Ershigs, as indicated in Table 4 below. Section 3 in the AOP is a new section, designed to summarize Subpart A to 40 CFR 63. The NWCAA has attempted to provide the essence of the applicable portions of Subpart A by way of paraphrasing in Section 3. In the event of a conflict between Section 3 of the AOP and 40 CFR 63 Subpart A, the latter rules. The applicability table (Table 15 to Subpart WWWW to 40 CFR 63) is presented in full below.

Table 4 Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.1(a)(1)	General applicability of the general provisions	Yes	Additional terms defined in subpart WWWW of Part 63, when overlap between subparts A and WWWW of Part 63 of this part, subpart WWWW of Part 63 takes precedence.
§63.1(a)(2) through (4)	General applicability of the general provisions	Yes	
§63.1(a)(5)	Reserved	No	

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Clean Air Agency keeps the most recent versions of all applicable regulations at the website: <http://www.nwcleanair.org/formsRegs/regulations.htm>. The Washington Department of Ecology maintains a similar web site at <http://www.ecy.wa.gov/laws-rules/ecywac.html>. Please be advised that while these websites will always be available, the web addresses for the sites could change at any time.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.1(a)(6)	General applicability of the general provisions	Yes	
§63.1(a)(7) through (9)	Reserved	No	
§63.1(a)(10) through (14)	General applicability of the general provisions	Yes	
§63.1(b)(1)	Initial applicability determination	Yes	Subpart WWWW of Part 63 clarifies the applicability in §§63.5780 and 63.5785.
§63.1(b)(2)	Reserved	No.	
§63.1(b)(3)	Record of the applicability determination	Yes	
§63.1(c)(1)	Applicability of this part after a relevant standard has been set under this part	Yes	Subpart WWWW of Part 63 clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
§63.1(c)(2)	Title V operating permit requirement	Yes	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
§63.1(c)(3) and (4)	Reserved	No	
§63.1(c)(5)	Notification requirements for an area source that increases HAP emissions to major source levels	Yes	
§63.1(d)	Reserved	No	
§63.1(e)	Applicability of permit program before a relevant standard has been set under this part	Yes	
§63.2	Definitions	Yes	Subpart WWWW of Part 63 defines terms in §63.5935. When overlap between subparts A and WWWW of Part 63 occurs, you must comply with the subpart WWWW of Part 63 definitions, which take precedence over the subpart A definitions.
§63.3	Units and abbreviations	Yes	Other units and abbreviations used in subpart WWWW of Part 63 are defined in subpart WWWW of Part 63.
§63.4	Prohibited activities and circumvention	Yes	§63.4(a)(3) through (5) is reserved and does not apply.
§63.5(a)(1) and (2)	Applicability of construction and reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.5(b)(1)	Relevant standards for new sources upon construction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(2)	Reserved	No	
§63.5(b)(3)	New construction/reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(4)	Construction/reconstruction notification	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(5)	Reserved	No	
§63.5(b)(6)	Equipment addition or process change	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(c)	Reserved	No	
§63.5(d)(1)	General application for approval of construction or reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(d)(2)	Application for approval of construction	Yes	
§63.5(d)(3)	Application for approval of reconstruction	No	
§63.5(d)(4)	Additional information	Yes	
§63.5(e)(1) through (5)	Approval of construction or reconstruction	Yes	
§63.5(f)(1) and (2)	Approval of construction or reconstruction based on prior State preconstruction review	Yes	
§63.6(a)(1)	Applicability of compliance with standards and maintenance requirements	Yes	
§63.6(a)(2)	Applicability of area sources that increase HAP emissions to become major sources	Yes	
§63.6(b)(1) through (5)	Compliance dates for new and reconstructed sources	Yes	Subpart WWWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(b)(6)	Reserved	No	
§63.6(b)(7)	Compliance dates for new operations or equipment that cause an area source to become a major source	Yes	New operations at an existing facility are not subject to new source standards.
§63.6(c)(1) and (2)	Compliance dates for existing sources	Yes	Subpart WWWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(c)(3) and (4)	Reserved	No	
§63.6(c)(5)	Compliance dates for existing area sources that become major	Yes	Subpart WWWW of Part 63 clarifies compliance dates in §63.5800.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.6(d)	Reserved	No	
§63.6(e)(1) and (2)	Operation & maintenance requirements	Yes	
§63.6(e)(3)	Startup, shutdown, and malfunction plan and recordkeeping	Yes	Subpart WWWW of Part 63 requires a startup, shutdown, and malfunction plan only for sources using add-on controls.
§63.6(f)(1)	Compliance except during periods of startup, shutdown, and malfunction	No	Subpart WWWW of Part 63 requires compliance during periods of startup, shutdown, and malfunction, except startup, shutdown, and malfunctions for sources using add-on controls.
§63.6(f)(2) and (3)	Methods for determining compliance	Yes	
§63.6(g)(1) through (3)	Alternative standard	Yes	
§63.6(h)	Opacity and visible emission Standards	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§63.6(i)(1) through (14)	Compliance extensions	Yes	
§63.6(i)(15)	Reserved	No	
§63.6(i)(16)	Compliance extensions	Yes	
§63.6(j)	Presidential compliance exemption	Yes	
§63.7(a)(1)	Applicability of performance testing requirements	Yes	
§63.7(a)(2)	Performance test dates	No	Subpart WWWW of Part 63 initial compliance requirements are in §63.5840.
§63.7(a)(3)	CAA Section 114 authority	Yes	
§63.7(b)(1)	Notification of performance test	Yes	
§63.7(b)(2)	Notification rescheduled performance test	Yes	
§63.7(c)	Quality assurance program, including test plan	Yes	Except that the test plan must be submitted with the notification of the performance test.
§63.7(d)	Performance testing facilities	Yes	
§63.7(e)	Conditions for conducting performance tests	Yes	Performance test requirements are contained in §63.5850. Additional requirements for conducting performance tests for continuous lamination/casting are included in §63.5870.
§63.7(f)	Use of alternative test method	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes	
§63.7(h)	Waiver of performance tests	Yes	
§63.8(a)(1) and (2)	Applicability of monitoring requirements	Yes	
§63.8(a)(3)	Reserved	No	
§63.8(a)(4)	Monitoring requirements when using flares	Yes	
§63.8(b)(1)	Conduct of monitoring exceptions	Yes	
§63.8(b)(2) and (3)	Multiple effluents and multiple monitoring systems	Yes	
§63.8(c)(1)	Compliance with CMS operation and maintenance requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(2) and (3)	Monitoring system installation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(4)	CMS requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(5)	Continuous Opacity Monitoring System (COMS) minimum procedures	No	Subpart WWWW of Part 63 does not contain opacity standards.
§63.8(c)(6) through (8)	CMS calibration and periods CMS is out of control	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(d)	CMS quality control program, including test plan and all previous versions	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(1)	Performance evaluation of CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(2)	Notification of performance evaluation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.8(e)(3) and (4)	CMS requirements/alternatives	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(5)(i)	Reporting performance evaluation results	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(5)(ii)	Results of COMS performance evaluation	No	Subpart WWWW of Part 63 does not contain opacity standards.
§63.8(f)(1) through (3)	Use of an alternative monitoring method	Yes	
§63.8(f)(4)	Request to use an alternative monitoring method	Yes	
§63.8(f)(5)	Approval of request to use an alternative monitoring method	Yes	
§63.8(f)(6)	Request for alternative to relative accuracy test and associated records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(g)(1) through (5)	Data reduction	Yes	
§63.9(a)(1) through (4)	Notification requirements and general information	Yes	
§63.9(b)(1)	Initial notification applicability	Yes	
§63.9(b)(2)	Notification for affected source with initial startup before effective date of standard	Yes	
§63.9(b)(3)	Reserved	No	
§63.9(b)(4)(i)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Yes	
§63.9(b)(4)(ii) through (iv)	Reserved	No	
§63.9(b)(4)(v)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.9(b)(5)	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is not required	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.9(c)	Request for compliance extension	Yes	
§63.9(d)	Notification of special compliance requirements for new source	Yes	
§63.9(e)	Notification of performance test	Yes	
§63.9(f)	Notification of opacity and visible emissions observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§63.9(g)(1)	Additional notification requirements for sources using CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(g)(2)	Notification of compliance with opacity emission standard	No	Subpart WWWW of Part 63 does not contain opacity emission standards.
§63.9(g)(3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(h)(1) through (3)	Notification of compliance status	Yes	
§63.9(h)(4)	Reserved	No	
§63.9(h)(5) and (6)	Notification of compliance status	Yes	
§63.9(i)	Adjustment of submittal deadlines	Yes	
§63.9(j)	Change in information provided	Yes	
§63.10(a)	Applicability of recordkeeping and reporting	Yes	
§63.10(b)(1)	Records retention	Yes	
§63.10(b)(2)(i) through (v)	Records related to startup, shutdown, and malfunction	Yes	Only applies to facilities that use an add-on control device.
§63.10(b)(2)(vi) through (xi)	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations	Yes	
§63.10(b)(2)(xii)	Record of waiver of recordkeeping and reporting	Yes	
§63.10(b)(2)(xiii)	Record for alternative to the relative accuracy test	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.10(b)(2)(xiv)	Records supporting initial notification and notification of compliance status	Yes	
§63.10(b)(3)	Records for applicability determinations	Yes	
§63.10(c)(1)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(2) through (4)	Reserved	No	
§63.10(c)(5) through (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(9)	Reserved	No	
§63.10(c)(10) through (15)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(d)(1)	General reporting requirements	Yes	
§63.10(d)(2)	Report of performance test results	Yes	
§63.10(d)(3)	Reporting results of opacity or visible emission observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§63.10(d)(4)	Progress reports as part of extension of compliance	Yes	
§63.10(d)(5)	Startup, shutdown, and malfunction reports	Yes	Only applies if you use an add-on control device.
§63.10(e)(1) through (3)	Additional reporting requirements for CMS	Yes	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
§63.10(e)(4)	Reporting COMS data	No	Subpart WWWW of Part 63 does not contain opacity standards.
§63.10(f)	Waiver for recordkeeping or reporting	Yes	
§63.11	Control device requirements	Yes	Only applies if you elect to use a flare as a control device.
§63.12	State authority and delegations	Yes	
§63.13	Addresses of State air pollution control agencies and EPA Regional Offices	Yes	
§63.14	Incorporations by reference	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63	Subject to the following additional information . . .
§63.15	Availability of information and confidentiality	Yes	

**5.9 SECTION 4: Generally Applicable Requirements**

Promulgation dates for State and Agency regulations have been checked and updated where necessary. The fact that the federally approved NWCAA 365, 366 and the “Guidelines for Industrial Monitoring Equipment and Data Handling” have been replaced by NWCAA 367 and Appendix A - "Ambient Monitoring, Emission Testing and Continuous Emission and Opacity Monitoring" was discussed in the paragraphs preceding the table of requirements. NWCAA 367 and Appendix A have been updated to include current monitoring technology and methods but are not materially different from the previous rule and guideline.

**5.10 SECTION 5: Specifically Applicable Requirements**

This is a new section because Ershigs has never had specifically applicable requirements. Subpart WWWW—National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production of 40 CFR 63, promulgated on April 21, 2003, and amended on August 25, 2005 and April 20, 2006, applies to Ershigs. The emission limits, work practice standards, monitoring, recordkeeping and reporting requirements required under Subpart WWWW are now in Section 5 of the AOP.

Conditions from OAC 1014, which has superseded OAC 932, and applies specifically to the C Street Ershigs facilities, are also now contained in Section 5 of the AOP.

**5.11 SECTION 6: Inapplicable Requirements**

No changes.

**5.12 SECTION 7: Insignificant Emissions Units**

Several insignificant emissions units identified in the previous version of the permit (AOP 001R1) have been deleted from the current version. The deleted units fall in two categories:

Units that are used in sheet metal fabrication (cylinders for gases used in sheet metal fabrication, welding operations used in sheet metal fabrication, and lubricants used in sheet metal fabrication). These were deleted because these units belong to the Ershigs Sheet Metal Shop which is subject to a separate OAC permit and not subject to Title V permitting.

Units that are no longer exempt because Ershigs is subject to a federal regulation. These units (Assorted storage vessels which include fifty-five gallon drums, Resin storage tank with five thousand three hundred gallon capacity, and two Solvent distillation units with fifty to fifty-two gallon capacity) were categorically exempt under WAC 173-401-533. However, WAC 173-401-530(2)(a) states that “Notwithstanding any other provision of this chapter, no emissions unit or activity subject to a federally enforceable applicable requirement (other than generally applicable requirements of the state implementation plan) shall qualify as an insignificant emissions unit or activity.” The units are subject to work standard provisions in Table 4 of 40 CFR 63 Subpart WWWW, and therefore they are no longer insignificant.

## 6 INSIGNIFICANT EMISSIONS UNITS

Some categorically exempt insignificant emissions units listed in Chapter 173-401-532 WAC are present at the Ershigs facilities. Because these categorically exempt emissions units normally have low emissions they are considered insignificant by the WAC regulation.

Certain other emissions units are present at the facility that are insignificant on the basis of size or production rate (WAC 173-401-533). Other equipment and activities listed in Table 5 may occur in the future on the site and qualify as insignificant emissions units on the basis of size or production rate.

The insignificant emission units are listed in Section 7 of the AOP. The Generally Applicable requirements in Section 4 of the AOP apply to these units, although the monitoring, recordkeeping, and reporting requirements have been determined not to apply.

Emission units at the Ershigs facilities that have been determined to be categorically exempt as allowed in WAC 173-401-532 and those found to be insignificant on the basis of size or production rate as defined in WAC 173-401-530 and WAC 173-401-533 are listed below. Insignificant emission units are still subject to all general requirements.

Table 5 Insignificant Activities and Emission Units

Exempt Unit	WAC Citation	Comment
Room vents	WAC 173-401-532(9)	Vents from rooms, buildings and enclosures that contain permitted emissions units or activities from which local ventilation, controls and separate exhaust are provided.
Facility vehicles	WAC 173-401-532(10)	Internal combustion engines for propelling or powering a vehicle.
General plant upkeep	WAC 173-401-532(33)	Plant upkeep including routine housekeeping, preparation for and painting of structures or equipment, retarring roofs, applying insulation to buildings in accordance with applicable environmental and health and safety requirements and paving or stripping parking lots.
Propane storage tank with two hundred and fifty gallon capacity	WAC 173-401-533(d)	Operation, loading and unloading storage of butane, propane, or liquified petroleum gas (LPG), storage tanks, vessel cuapcity under forty thousand gallons.
Space heaters and hot water heaters	WAC 173-401-533(r)	Space heaters and hot water heaters using natural gas, propane, or kerosene and generating less than five million Btu per hour

## **7 ONE-TIME REQUIREMENTS**

Requirements that are only required once, and that have already been completed are removed from the requirements in the AOP and are placed in this section of the Statement of Basis.

Open molding operations such as Ershigs that elect to meet an organic HAP emissions limit on a 12-month rolling average are required by 63.5840 of 40 CFR 63 Subpart WWWW to initiate collection of the required data on the compliance date of April 21, 2006, and to demonstrate compliance 1 year after the compliance date. A notification of compliance status was submitted to the NWCAA on May 7, 2007.

Ershigs was required under 63.5905 of the same NESHAP to submit the applicable notifications in Table 13 to Subpart WWWW. The two notifications in Table 13 that were applicable to Ershigs were the compliance notification detailed above and an initial applicability notification. The initial notification was submitted to the NWCAA on April 14, 2004.

## **8 PUBLIC DOCKET**

Copies of Ershig Incorporated's Air Operating Permit, permit application, and technical support documents are available at the following location:

Northwest Clean Air Agency  
1600 South Second Street  
Mount Vernon, WA 98273-5202

## 9 DEFINITIONS AND ACRONYMS

Definitions are assumed to be those found in the underlying regulation. A short list of definitions has been included below:

An "applicable requirement" is a provision, standard, condition or requirement in any of the listed regulations or statutes as it applies to an emission unit or facility at a stationary source.

An "emission unit" is any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant.

A "permit" means, for the purposes of the air operating permit program, an air operating permit issued pursuant to Title 5 of the 1990 Federal Clean Air Act.

"State" means, for the purposes of the air operating permit program, the NWCAA or the Washington State Department of Ecology.

The following is a list of Acronyms used in the Air Operating Permit and/or Statement of Basis:

AOP	Air Operating Permit
CFR	Code of Federal Regulations
dscf	Dry Standard Cubic Foot
EPA	Environmental Protection Agency
EU	Emissions Unit
FCAA	Federal Clean Air Act
HAP	Hazardous Air Pollutant
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOC	Notice of Construction
NSR	New Source Review
NWCAA	Northwest Clean Air Agency
OAC	Order of Approval to Construct
PM	Particulate Matter
RCW	Revised Code of Washington
SOB	Statement of Basis
WAC	Washington Administrative Code
WDOE	Washington Department of Ecology

## APPENDIX A

Table 6 Emission Units and Operations at Ershigs Inc.

Emission Unit Process Name	Emission Points	Control Device	Process Description
Hand layup including resin mixing	<i>Marine Drive:</i> Building 1 - Stack 1 Building 2 – Stacks 2,3,4 Building 2 – Wall Fan Building 4 – Wall Fans Building 4 – Stacks 5 & 6  <i>C Street:</i> Stack	None None None None None  None	Hand layup is a fiberglass fabrication process in which reinforcing fibers are manually applied to a mold wetted with catalyzed resin mix. Reinforcing material and resin mix are layered to build laminate thickness. Squeegees, brushes, and rollers are used to smooth, compact, and shape the product. Hand layup activities emit styrene and smaller quantities of volatile organic compounds released from the resin mixture and cleanup solvent.
Spray layup including resin mixing	<i>Marine Drive:</i> Building 1 – Stack 1 Building 2 – Stacks 2,3,4 Building 2 – Wall Fan Building 4 – Wall Fans Outside Areas  <i>C Street:</i> Stack	None None None None None  None	Spray layup is an open mold fiberglass fabrication process which uses mechanical spraying and chopping equipment for application of resin and reinforcing material. Spray layup activities emit styrene and smaller quantities of volatile organic compounds released from the resin mixture and from cleanup solvents.
Filament winding layup including resin mixing	<i>Marine Drive:</i> Building 1 – Stack 1	None	Filament winding is the process of applying resin-impregnated fibers onto a rotating mandrel surface. Filament winding layup activities emit styrene and smaller quantities of volatile organic compounds released from the resin mixture and from cleanup solvents.
Closed molding operations	<i>C-Street:</i> Stack	None	Infusion molding involves the use of a vacuum system to pull resin through voids in a specialized mold. Reinforcement material (fiberglass) is placed in the voids before the resin enters the mold. Plastic sheeting is used to seal the mold and compose part of the mold itself (bagging).

Emission Unit Process Name	Emission Points	Control Device	Process Description
Cleanup solvent use	<i>Marine Drive:</i> Building 1 - Stack 1 Building 2 – Stacks 2,3,4 Building 2 – Wall Fan Building 4 – Wall Fans Building 4 – Stacks 5 & 6  <i>C-Street:</i> Stack	None None None None None  None	Diacetone alcohol (DAA, CAS# 123-42-2) is used in small quantities throughout the layup areas of the facility to wipe parts and to clean tools. Tool cleaning is conducted in unheated non-aerated basins that are equipped with lids. DAA does not contain any HAPs. In addition, for spot-cleaning of molds, limited amounts of Interlux© solvent may be used at the C-Street facility.
Composite grinding/sanding	<i>Marine Drive:</i> Building 1 – Bag Filter Building 2 – Wall Fans Building 3 – Bag Filter Building 4 – Wall Fans Outside Areas  <i>C-Street:</i> Stack	Bag Filter None Bag Filter None None  None	Semi-finished products are ground and sanded as they are prepared for final assembly. Polymer and glass fiber dusts are emitted from these grinding and sanding operations.