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MAAX US Corp.
BELLINGHAM, WASHINGTON

STATEMENT OF BASIS

FINAL

December 4, 2008

STATEMENT OF BASIS INFORMATION

MAAX US Corp.
2150 Division Street, Bellingham, WA 98226

SIC: 3088 NAICS 326191
EPA AFS: 53-073-0041

NWCAA ID: 636-V-W

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SECTION 1 - INTRODUCTION

The MAAX US Corp. Bellingham facility (also identified herein as the permittee, MAAX US Corp., or the facility) is required to have an air operating permit because the facility has the potential to emit greater 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, application (layup) and subsequent curing of resins applied at the plant.

The Northwest Clean Air Agency (NWCAA) issued the original air operating permit for the facility on November 16, 1999. The current permit expired on November 16, 2004, and an application has been made for a new permit.

The purpose of this Statement of Basis is to set forth the legal and factual evidence for the conditions in the MAAX US Corp. air operating permit and to provide background information for permit review by interested parties. This Statement of Basis is not a legally enforceable document in accordance with WAC 173-401-700(8).

The renewed air operating permit will be different from the original permit in the following ways. These changes will be addressed in more detail in other sections of this Statement of Basis.

- Regulatory citations in the permit have been updated to reflect more recent revision/promulgation dates.
- General provisions from Title 40 Code of Federal Regulations (CFR) Part 63 have been added.
- Factual information has been revised to correct for current operation (rearrangement of process equipment).
- Some text has been rephrased to add clarification.
- Section 2 - Standard Terms and Conditions has been substantially revised to include recent regulatory changes and to allow standardization of permits issued by the Northwest Clean Air Agency.
- Applicable requirements resulting from enforceable Assurances of Discontinuance were added.
- Included requirements of NWCAA OAC 726 (3/1/2000).
- National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart WWWW requirements were added.

SECTION 2 – FACILITY DESCRIPTION

2.1 Facility History

MAAX US Corp. in Bellingham, Washington manufactures reinforced plastic bathware products. These activities are classified under SIC code 3088, "plastics plumbing fixtures" and 2002 NAICS code 326191, "plastics plumbing fixture manufacturing."

The facility began operation in 1985 as Hydroswirl. Privately held Hydroswirl was purchased by MAAX Inc., a Montreal based bath-ware company, in 1995 and began trading publicly. At that time, this facility was re-named MAAX US Corp.. MAAX Inc. was purchased in July of 2004 by JW CHILDS and Associates, an investment firm from Boston, Massachusetts, and is no longer publicly traded.

On June 12th, 2008, TRICAP Partners Ltd, a division of Brookfield Bridge Lending Fund has reached an Asset Purchase Agreement with MAAX Corporation. The new legal entity formed is called MAAX

US Corp. On September 15th, 2008, MAAX US Corp. has requested an administrative amendment to their permit, to reflect this change.

A plot plan of the facility is included as Figure 1 of this Statement of Basis. As shown on the plan, the primary buildings house the following activities: office work, warehouse storage, maintenance and repair, mold building, thermoforming, fiberglass spray application, part drilling and trimming, whirlpool installation, and packaging/shipping. The primary process equipment includes: a bulk resin storage tank, spray up resin application guns, trim saws, natural gas ovens, a natural gas makeup air heating furnace, and a solvent (acetone) distillation unit. MAAX US Corp. builds 40,000 acrylic bath units per year.

2.2 Emission Units and Control

Each unit produced begins as a sheet of acrylic thermoformed to the desired part's shape. A mixture of resin, fillers, fiberglass, and catalyst is sprayed onto the back of the shaped acrylic resulting in a cured laminate. The excess material is trimmed from the outer edges and drains are drilled. Shower bases and standard bathtubs continue through finishing processes, inspection, and packaging. Whirlpool bathtubs are further drilled and fitted with jets and a pump before these final processes. Additional products such as a skirt (a panel designed to fit under the bathtub's lip and finish at floor level) are also manufactured at MAAX US Corp.. The process is represented graphically in Figure 2.

Gaseous air contaminants may be released from resin storage, mixing, application and curing, and from solvent evaporation. Particulate is generated from resin application, and cutting and sanding the products and molds. Combustion emissions result from heating appliances. For purposes of organization, the operating permit program divides activities such as these into categories called emission units. Emission units are distinct activities or processes generating emissions that may be exhausted to the outside air. The air operating permit regulation, Washington Administrative Code (WAC) chapter 173-401, distinguishes small, generally inconsequential, emission units (insignificant) from emission units that generate notable amounts of air contaminants (significant). Table 1 lists the significant emission units at the facility. Table 2 includes the 2005 annual emissions from primary emission units at MAAX Hydroswhirl.

Table 1: Significant Emission Units

Emission Unit Process Name	Process Area and Emission Point Description	Emission Abatement Device	Process Description
EU-1 Spray and hand layup of polyester resin or resin and glass fiber	<u>Building C Glass Shop</u> Enclosed work area. Floor-level wall mounted collection with fiber or paper filters. Combined flow of seven vertically exhausting unobstructed stacks equals 28,000 cfm.	Filters	Spray layup is an open mold fiberglass fabrication process that uses mechanical atomized spraying and chopping equipment for application of catalyzed resin and reinforcing material. 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. Both types of layup result in emissions of styrene and smaller quantities of volatile organic compounds. Spray layup also emits particulate from overspray. MAAX-Hydro Swirl uses conventional, non-vapor suppressed resins.
EU-2 Spray and hand layup of polyester resin or resin and glass fiber	<u>Building B Mold Shop</u> Enclosed work area. Floor-level wall mounted collection system with fiber or paper filters. One vertically exhausting unobstructed stack (9,500 cfm).	Filters	

Table 2: MAAX US Corp. 2005 Annual Emissions

Emission Source	Unit ID Number	2005 Annual Emissions, tons/year				
		NOx	CO	VOC	PM ₁₀	SO ₂
Resin Spray Layup	1	0	0	19	0	0
TOTAL*		0	0	19*	0	0

* includes 38,004 lb/yr of styrene and 375 lb/yr of methyl methacrylate

2.3 Compliance History

MAAX US Corp. was initially registered by the NWCAA on July 31, 1993. There were no Notices of Violation (NOV) issued between that initial registration and January, 2002. Since that time, the following NOVs have been issued:

- Notice of Violation # 3213 Issued January 10, 2002
 The facility was issued a Notice of Violation for failing to submit a semiannual report as required in the Air Operating Permit. This late report followed two other instances of late semiannual reports for which the NWCAA verbally warned MAAX US Corp., but did not issue a NOV. The NWCAA assessed a fine of \$500.
- Notice of Violation # 3267 Issued September 16, 2002
 The facility was issued a Notice of Violation for significant violations of requirements related to operation of the filters in the indoor layup areas. Eighteen violations were noted during an unannounced inspection. The NWCAA assessed a fine of \$20,000 and MAAX US Corp. entered into a Consent Order and Assurance of Discontinuance that included an Enhanced Monitoring and Recordkeeping Plan.
- Notice of Violation # 3298 Issued January 30, 2003
 The facility was issued a Notice of Violation after improper equipment operation resulted in a resin spill and accompanying emissions of styrene. The NWCAA assessed a fine of \$250 and MAAX US Corp. entered into a Consent Order and Assurance of Discontinuance that does not include additional requirements.
- Notice of Violation # 3313 Issued April 2, 2003
 The facility was issued a Notice of Violation after improper equipment operation resulted in a resin spill and accompanying emissions of styrene. The NWCAA assessed a fine of \$250 and MAAX US Corp. entered into a Consent Order and Assurance of Discontinuance that included a Corrective Action Plan which was amended on June 27, 2006.
- Notice of Violation # 3355 Issued October 1, 2003
 The facility was issued a Notice of Violation after violations of filter requirements were noted during an annual inspection. The NWCAA assessed a fine of \$2,000 and MAAX US Corp. entered into a Consent Order and Assurance of Discontinuance that does not include additional requirements.
- Notice of Violation # 3356 Issued October 1, 2003
 The facility was issued a Notice of Violation after a new dust collector was installed at the facility without undergoing NSR. Later, the unit was configured to exhaust indoors. The NWCAA assessed a fine of \$500 and MAAX US Corp. entered into a Consent Order and Assurance of Discontinuance that does not include additional requirements.

2.4 Monitoring History

In response to violations issued by the Northwest Clean Air Agency, MAAX US Corp. entered into several agreements to improve and enhance onsite monitoring. The requirements of these agreements are considered to be applicable requirements for the purposes of the Air Operating Permit.

- Consent Order and Assurance of Discontinuance, NOV # 3267 signed December 24, 2002
The facility signed this agreement in response to NOV # 3267. The agreement included an Enhanced Monitoring and Record Keeping Plan as detailed below:
 - 1) Training:
 - a) All employees who work in the glass shop and mold shop (emission unit-1) will go through scheduled, quarterly training on how to read a manometer, properly install filters, and inspect ductwork.
 - b) All supervisors of these areas will be in this training and also instructed on how to check that the emission unit is in proper operation – including how to fill out the logs.
 - c) All training sessions will be documented regarding the date, employees present, and material covered.
 - d) Every new employee, who is assigned to regularly work in one of these shops, will receive proper training prior to starting.
 - e) Training to be conducted by the Environmental Officer and shop supervisor.
 - 2) Dust Escape Check:
 - a) Once a week, each filter bank will be measured for the amount of dust inside.
 - b) New filter mediums will be explored and tested until one is found that sufficiently prevents dust (0.1 grain/dscf) from being exhausted out of the building.
 - c) (currently experimenting with two different mediums. Differential pressure ranges will be adjusted as necessary.)
 - 3) Daily Logs:
 - a) The weekly logs changed to daily, emphasizing the importance of permit compliance to everyone.
 - b) Double-checks of the accuracy of the logs done by Environmental Officer weekly and signed off.
 - c) Copies of the logs kept by the Environmental Officer.
 - d) Additional log sheets recording when filters are changed and banks cleaned.
 - 4) Internal System of Checks:
 - a) Two unannounced inspections of the emission unit per quarter by each of the following management members, totaling 6 separate inspections: Environmental Officer, Production Supervisor, and General Manager.
 - b) Monthly report of the status of the Air Operating Permit to the Production Supervisor and General Manager by the Environmental Officer. (The summation of this data will then comprise the 6-month reports required by the permit.)

- Consent Order and Assurance of Discontinuance, NOV # 3313 signed May 22, 2003
The facility signed this agreement in response to NOV # 3313. The agreement included a Corrective Action Plan that was amended in June, 2006 as the result of installing a new resin bulk tank with advanced safety features. The amended plan is detailed below:
 - 1) Improve communication between truck driver and MAAX employees:
 - a) Prior to unloading, the driver will be issued a radio for instant communication. He and the MAAX employee will have a dedicated channel.
 - b) MAAX will review and revise, if necessary, procedures for receiving bulk resin. MAAX will train employees on an annual basis to the procedure. Also, newly hired employees will be trained prior to interacting with the truck driver. Records shall be kept.
 - 2) Set the maximum allowable residual resin in the tank prior to refilling at 2,000 gallons. This amount, plus the one full truckload (5,325 gal) is less than the tank capacity (7,570 gal).
 - 3) Install an overflow container. The new resin bulk tank incorporates a secondary containment tank that is larger in volume than the primary containment tank. MAAX US Corp. will install an overflow alarm that will indicate when the primary tank is approaching an overfull level.

2.5 National Emission Standards for Hazardous Air Pollutants (NESHAP)

MAAX US Corp. is subject to 40 CFR Part 63 Subpart WWWW- National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Reinforced plastic composites facilities produce a variety of reinforced plastic products, including fiberglass bath tubs and showers, automobile and recreational vehicle parts, storage tanks, and engine and tool covers. Subpart WWWW requires most existing major sources to incorporate pollution-prevention techniques in their production processes. These techniques include: using raw materials containing low amounts of air toxics; non-atomized resin application; and covering open resin baths and tanks. Compliance assurance is described in Section 5 of the permit.

2.6 Northwest Clean Air Agency Orders of Approval to Construct

MAAX US Corp. has received Orders of Approval to Construct (OAC) 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 permit.

NWCAA Order of Approval to Construct No. 726

Version Date: March 1, 2000

Permitted Equipment: One additional resin application gun at existing facility

Figure 1: MAAX US Corp. Plot Plan

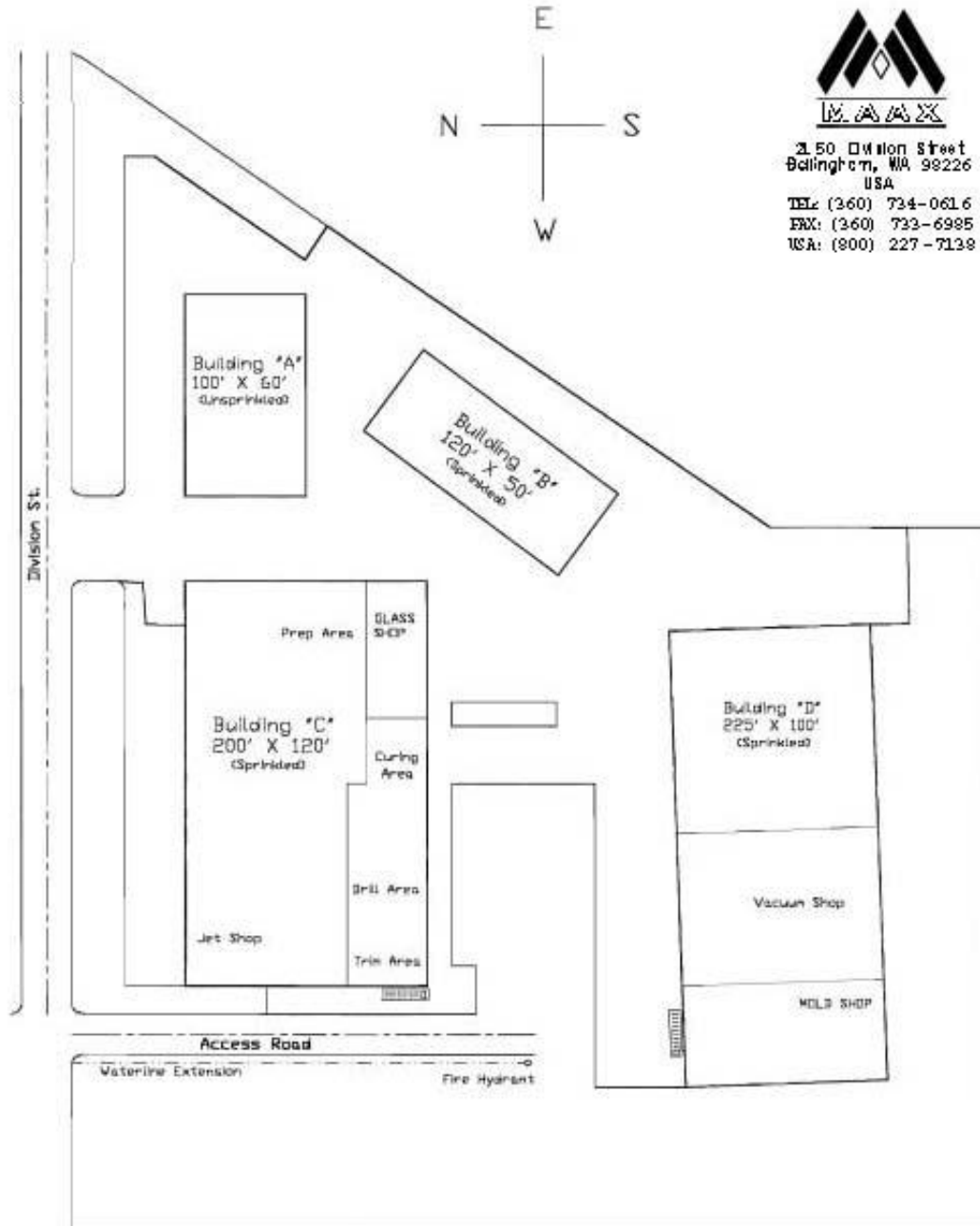
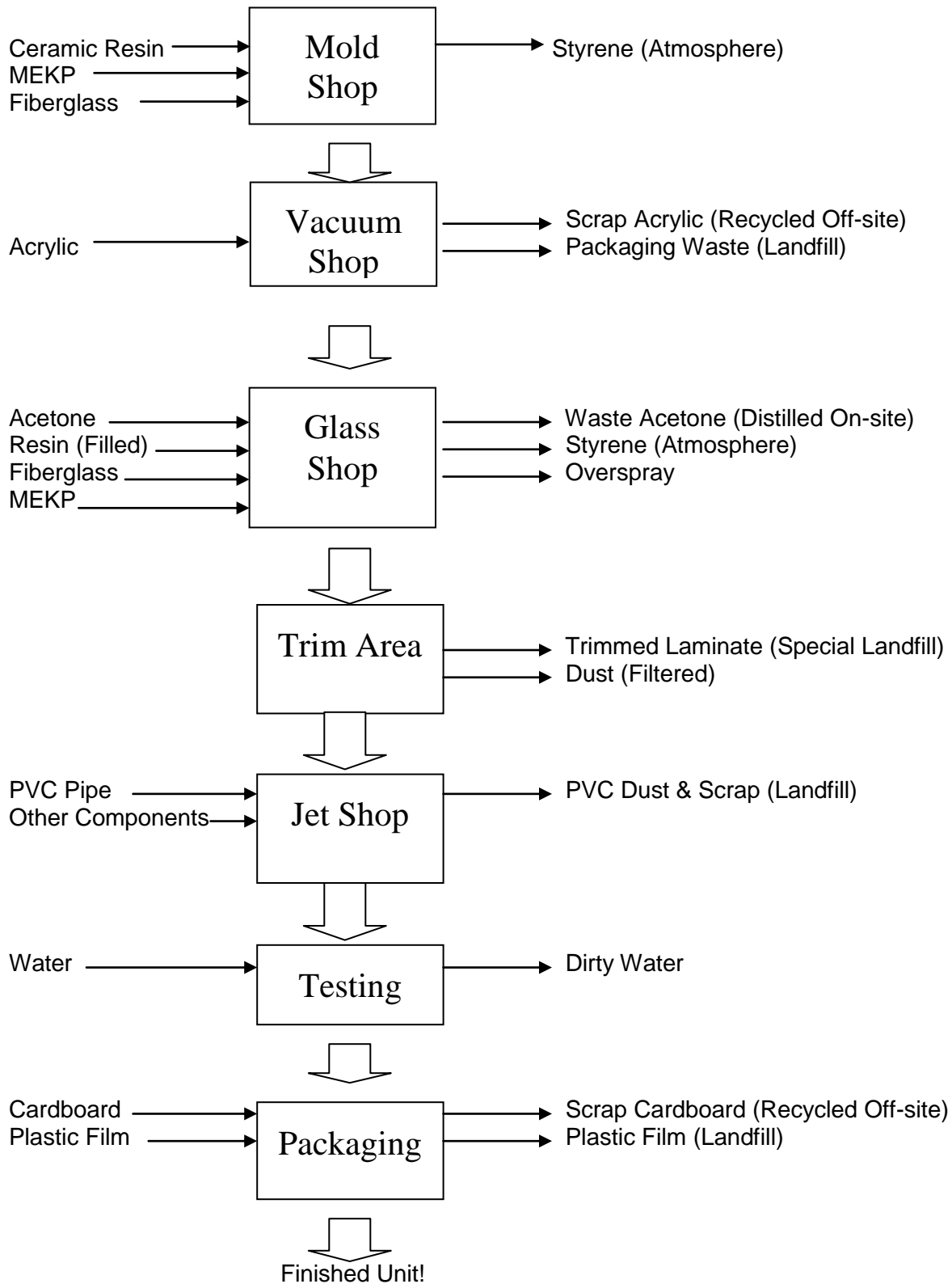


Figure 2: Flow Diagram for the MAAX US Corp. Process



SECTION 3 - GENERAL PERMIT ASSUMPTIONS

3.1 Permit Content

The permit contains (1) standard terms; (2) generally applicable conditions for the type of facility permitted; and (3) specifically applicable conditions. Applicable requirements that were satisfied by a single past action on the part of the source are not included in the permit but are discussed in the Statement of Basis. Regulations that require action by a regulatory agency, but not of the regulated source, are not included as permit conditions.

3.2 One Time Requirements

- NWCAA OAC 726 requires that the control efficiency of the subject gun be equal or greater than that of non-atomized application technologies. This is inherent to the design of the spray gun and there are no ongoing compliance requirements related to the spray gun.
- NWCAA OAC 726 required notification upon completion of installation of the affected resin application gun. No such notice was located in NWCAA files, but it is likely that the notice was provided via telephone.
- Pursuant to 40 CFR 63.9(b)(2), initial notification that facility is subject to 40 CFR 63 Subpart WWWW. Letter submitted to NWCAA on August 8, 2003.
- Pursuant to 40 CFR 60.9(h), notification of compliance status with respect to 40 CFR 63 Subpart WWWW. Electronic submission to NWCAA on March 17, 2006.

3.3 Federal Enforceability

Federally enforceable requirements are terms and conditions required under the Federal Clean Air Act or under any of its applicable requirements. Local and state regulations may become federally enforceable by formal approval into the State Implementation Plan or through other delegation mechanisms. Federally enforceable requirements are enforceable by the EPA and United States 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. If two different versions of the same regulatory citation apply to the source and one version is federally enforceable and the other version is enforceable only by the state, both are listed as separate applicable requirements. If a regulation has both federally enforceable and state-only enforceable versions and the text is the same, the citation is the most current version and is considered federally enforceable. The citation for each applicable requirement includes a date. This date may be the filing date (in the case of WACs) or it may be the approval date or the publication date for the NWCAA Regulation sections and federal regulations, respectively.

3.4 Future Requirements

There are no pending applicable requirements that apply to MAAX US Corp.. 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 Section 3 of the permit. There is presently no pending application to construct a new source at the facility. MAAX US Corp. officials have certified in their permit application that the facility will meet any future applicable requirements on a timely basis.

3.5 Compliance Options

MAAX- Hydroswhirl 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.

SECTION 4 - PERMIT ELEMENTS AND BASIS FOR TERMS AND CONDITIONS

The MAAX US Corp. permit is divided into the following sections:

- General Information
- Attest
- Table of contents
- Emissions Unit Identification
- Standard Terms and Conditions for National Emission Standards for Hazardous Air Pollutants
- Generally Applicable Requirements
- Specific Requirements for Emission Units
- Inapplicable Requirements
- Air Emissions Monitoring Plan

4.1 General Information, Attest, and Permit Applicability

The General Information page of the permit 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 page documents the NWCAA's authorization for the source to operate under the terms and conditions contained in the permit. The Emission Unit section lists emission units, emission points and air pollution control methods present at MAAX US Corp.. Additional information about the facility may be found in the operating permit application and in associated files found at www.nwcleanair.org.

4.2 Standard Terms and Conditions

The Standard Terms and Conditions sections of the permit specify administrative requirements or prohibitions without ongoing compliance monitoring requirements. The legal authority for the Standard Terms and Conditions is provided in Section 2 and Section 3 (for New Sources) citations. Where there is a difference between the paraphrased term and the language of the cited regulation, the language of the cited regulation takes precedence. In an effort to make the sections more readable, the terms and conditions have been grouped by function. In some cases, similar requirements at the state and local authority level have been grouped together.

A number of requirements that would not be applicable until triggered have also been included in Section 3. An example of one such requirement is the requirement for a source to submit an application for new source review.

4.3 Generally Applicable Requirements

The Generally Applicable Requirements section of the permit identifies requirements that apply broadly to the facility. 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 0.1 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 Generally Applicable Requirements are organized in Table 4 in the permit. The first column of Table 4 provides permit term numbers used to identify listed elements. The requirements specified in the second column are applicable plant-wide to all emission units at the source including insignificant emission units. The third column describes the applicable requirements for informational purposes only, and is not enforceable. The fourth column identifies monitoring the

permittee must perform to assure compliance with the applicable requirement as required by WAC 173-401-605(1) and 615(1) and (2). The fourth column is enforceable except that insignificant emission units are exempt from all monitoring, recordkeeping and reporting requirements.

Chapter 173-401 WAC requires the permit to include both a reference test method and a monitoring method. The Monitoring Recordkeeping and Reporting (MR&R) requirements in the fourth column indicate official methods that the NWCAA, the EPA, or the WDOE may use to determine compliance with applicable requirements. Where the applicable requirement fails to specifically state a test method, a method is added to the permit, as required by WAC 173-401-615(1)(a). The facility has no immediate obligation to perform these tests. If the NWCAA determines via the stated reference test method or other methods that the facility is not complying with the associated applicable requirement, then a violation of the applicable requirement has occurred.

4.4 Specifically Applicable Requirements

This section lists applicable requirements that apply uniquely to a process unit or to a specific category of process unit. Typically, these requirements originate from an Order of Approval to Construct issued by NWCAA or from a federal regulation.

The most recent revision to the permit was addition of new terms required by promulgation of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Reinforced Plastics Composites Industry. This rule is contained in Subpart WWWW of 40 CFR Part 63. The facility has chosen to meet the HAP (hazardous air pollutant) limit by reducing the amount of HAPs in their resin, in this case by limiting the styrene content in their resin to 38% and by using non-atomized mechanical spray resin application.

In addition, new terms were added in Section 5 to describe Assurances of Discontinuance resulting from Notice of Violation 3355 and Notice of Violation 3313 that require the facility to conduct regular inspections of external exhaust systems in the layup areas of the facility (NOV 3355) and to employ work practices to prevent overflows of the resin bulk tank (NOV 3313).

Finally, a requirement from OAC 726 (dated March 1, 2000) was added as a permit term in Section 5 that requires styrene emissions from a new FIT (Fluid Impingement Technology) resin application gun to be equal to or less than control technologies provided by non-atomization resin technology.

4.5 Gap Filling

Some generally applicable requirements do not specify reference test methods or monitoring methods within the text of the regulation or statute. Chapter 173-401-615 WAC requires the permit to feature monitoring, recordkeeping and reporting adequate to demonstrate compliance with applicable requirements. In these cases, a site specific monitoring method (gap filling) was developed based on the characteristics of the MAAX US Corp. Bellingham Facility, the nature of the underlying requirement, the requirements of Chapter 173-401-615 WAC and EPA guidance on monitoring. Since many of the generally applicable requirements overlap, or may be monitored by similar approaches, the monitoring requirements are compiled in a monitoring plan in section 7 of the permit. The following describes the derivation of site specific monitoring in the MAAX US Corp. operating permit.

Buildings containing layup operations 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 via part A of the Emission Monitoring Plan. In accordance with accepted approaches to dry-filter ventilation system maintenance, this part of the plan requires MAAX US Corp. to monitor pressure differential across the filter banks, filter quality and fit, and ductwork integrity. If these items are within design limits then the exhaust system is likely operating properly. A review of pressure

measurements conducted by MAAX staff indicates that, when the exhaust system is operating properly, the static pressure in the layup area in building C is negative with respect to outside the building, thereby indicating collection of styrene vapors.

Fiberglass spray layup, grinding and sanding of cured composites, and combustion all generate particulate emissions that may be visible at the emission point. State and local regulations limit visible emissions to below 20% opacity. Opacity is the degree to which an emission reduces the transmission of light and obscures the view of any object in the background. Opacity may be caused by gaseous or particulate emissions, but, in the case of MAAX US Corp., particulate emissions would be the most relevant cause of visible emissions.

Grinding and sanding operations at MAAX US Corp. are conducted inside buildings in areas that are served by recirculating (internal exhaust) air cleaners. Grinding and sanding emissions are not exhausted directly to the outside air making visible emissions caused by grinding and sanding to be very unlikely. Composite layup is performed in dedicated areas that are served by exhaust systems equipped with dry filters. The small quantities and large-size of the particulate generated by fiberglass chop guns simplifies abatement. Properly installed conventional dry filters designed for fibreglassing or surface coating operations effectively capture particulate emissions and reduce visible emissions to typically 0% opacity. Visible emissions from properly operating natural gas-fired ovens used to thermoform acrylic sheets are also essentially 0% opacity.

Section 7 of the operating permit requires MAAX US Corp. to perform monthly investigations of all particulate emissions points for visible emissions. Although particulate emission rate is only loosely related to opacity, a 0% opacity action level will likely ensure that emissions are less than the 0.1 gr/dscf emission standard. This approach is taken because proper operation of the facility presently results in 0% opacity. The monitoring period is once-per-month for plantwide emission, however, there is a continuous obligation for compliance. If greater than 0% 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.

This monitoring approach is less stringent than the approach taken by the NWCAA for facilities that routinely have visible emissions. This less stringent approach is justified because the processes in operation at the MAAX US Corp. facility have very little potential to exceed the 20% opacity limit and visible emissions are typically at 0% opacity. Visible emissions have not been observed during NWCAA inspections of the facility, and facility staff have indicated that visible emissions are not generated during normal operation of the plant. Method 9A was chosen as the opacity measurement approach because Method 9A is approved by the Washington State Department of Ecology and it is a standardized method.

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. Routine grinding and sanding emissions are not exhausted directly to the outside air. 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 adhering to part E of the plan. This part requires facility personnel to respond to complaints received from the NWCAA by checking for mechanical or operational problems that may cause nuisance and correcting problems within four hours or curtailing operation if the identified problem(s) cannot be resolved sooner. It is important to note that the monitoring plan requires response to nuisances identified by the NWCAA and that plant activities need not be curtailed if the nuisance is not due to a mechanical or operational failure. In any case, the facility is subject to nuisance violation if the NWCAA confirms the presence of a nuisance irrespective of the monitoring plan. There are no nuisance complaint entries for MAAX US Corp. in the NWCAA database.

SECTION 5 – SUMMARY OF CHANGES IN MODIFICATION 1

The following changes on the MAAX AOP for the October 2008 Modification were made:

1. The name MAAX-Hydroswirl has been replaced with MAAX US Corp. throughout, including, but not limited, the title page, headers, and elsewhere in the text using search-and-replace.
2. The name, address, and telephone number of the Responsible Official has been changed.
3. “Prepared by Mark Buford” has been replaced with “Prepared by Christos Christoforou”
4. The source address on the Permit Information page has been corrected.
5. The AOP Permit number has been changed, “Permit Modifications” field has been filled, the “Modification Date” field has been filled, and the “Supersedes Permit Number” field has been updated.

SECTION 6 - INSIGNIFICANT EMISSIONS UNITS AND INAPPLICABLE REQUIREMENTS

6.1 Insignificant Emission Units

Washington Administrative Code 173-401-640 allows a determination regarding the applicability of requirements with which the source must comply. Section 6 of the permit lists requirements deemed inapplicable based on the applicability of the cited regulation.

Categorically exempt insignificant emissions units listed in WAC 173-401-532 are present at the MAAX US Corp.. These categorically exempt emissions units normally have extremely low emissions and are considered insignificant by regulation and not of sufficient importance to list in the permit. Other emission units or activities generate only fugitive emissions for which there are no specifically applicable requirements. These activities are categorized as insignificant by Chapter 173-401-530(1)(d) WAC. Categorically insignificant and fugitive emission units and activities are listed in Table 3.

Table 3: Insignificant Emission Units

Citation	Description	Process Area
WAC 173-401-533 (2)(a)	Operation, loading and unloading of storage tanks and storage vessels with lids or other appropriate closure and less than two hundred sixty gallon capacity.	Drums of resin
WAC 173-401-533 (2)(i)	Welding using not more than one ton per day of welding rod.	Maintenance shop
WAC 173-401-533 (2)(r)	Space heaters and hot water heaters using natural gas and generating less than five million Btu/hr.	Warehouse heaters
WAC 173-401-533 (2)(s)	Tanks, vessels and pumping equipment, with lids or other appropriate closure for storage or dispensing of aqueous solution of inorganic salts, bases and acids	Resin emulsifier stations
WAC 173-401-533 (2)(d)	Operation, loading and unloading storage of butane, propane, or liquefied petroleum gas (LPG), storage tanks, vessel capacity under forty thousand gallons.	Propane fueled equipment: fork-lifts, shrink-wrap guns, etc.
WAC 173-401-532(10)	Internal combustion engines for propelling or powering a vehicle.	Trucks, forklifts

Citation	Description	Process Area
WAC 173-401-532(11)	Recreational fireplaces including the use of barbecues, campfires and ceremonial fires.	Company barbecues
WAC 173-401-532(25)	Presses and vacuum forming, for curing rubber and plastic products or for laminating plastics.	Thermoforming press
WAC 173-401-533(2)(e)	Combustion source less than 5 MMBtu/hr exclusively using natural gas.	Thermoforming press oven: 970,200 Btu/hr input heat capacity. Glass shop makeup air heater 1,268,000 Btu/hr heat input capacity
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.	General plant maintenance
WAC 173-401-532(35)	Cleaning and sweeping of streets and paved surfaces.	All paved and concrete surfaces
WAC 173-401-532(38)	Laundering, dryers, extractors, tumblers for fabrics, using water solutions of bleach or detergents.	Clothes dryer
WAC 173-401-533 (2)(o)	Batch solvent distillation, not being greater than fifty-five gallons batch capacity.	Solvent distillation unit (15 gal.)
WAC 173-401-532(41)	Food preparing for human consumption including cafeterias, kitchen facilities and barbecues located at a source for providing food service on the premises.	Lunchrooms
WAC 173-401-533 (3)(c)	Chemical or physical analytical laboratory operations or equipment including fume hoods and vacuum pumps.	Resin testing laboratory
WAC 173-401-532(42)	Portable drums and totes.	Resin, solvent drums
WAC 173-401-532(43)	Lawn and landscaping activities.	Facility grounds
WAC 173-401-532(45)	General vehicle maintenance including vehicle exhaust from repair facilities.	Maintenance shop
WAC 173-401-532(48)	Natural and forced air vents and stacks for bathroom/toilet facilities.	All lavatories
WAC 173-401-532(49)	Office activities.	Buildings A, C, and D
WAC 173-401-532(54)	Fuel and exhaust emissions from vehicles in parking lots.	Entire facility
WAC 173-401-532(55)	Grinding, sawing, drilling, sanding or buffing either: metals, plastics, or wood.	Trim area exhaust routed to interior of Bldg. C
WAC 173-401-532(70)	Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy, e.g., blueprint activity, photocopiers, mimeograph, telefax, photographic developing, and microfiche.	Copy machines

Citation	Description	Process Area
WAC 173-401-532(74)	Repair and maintenance activities, not involving installation of an emission unit and not increasing potential emissions of a regulated air pollutant.	Entire facility
WAC 173-401-532(79)	Solid waste (as defined in the WAC) containers.	Waste compactors
WAC 173-401-532(87)	Steam vents and safety relief valves.	Facility equipment
WAC 173-401-532(88)	Air compressors, pneumatically operated equipment, systems and hand tools.	Entire facility
WAC 173-401-533(2)(c)	Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less with lids or other appropriate closure, VP not greater than 80mm Hg at 21°C.	Bulk resin storage tank <8,000 gallons & VP<80 mm Hg @21°C
WAC 173-401-532(94)	Process water and white water storage tanks.	Resin emulsifier containers
WAC 173-401-532(5)	Pressurized storage of oxygen, nitrogen, carbon dioxide, air, or inert gases.	Pressurized air
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.	Vents, doors, and the like
WAC 173-401-532(51)	Sampling connections used exclusively to withdraw materials for laboratory analysis and testing.	Sample points

6.2 Inapplicable Requirements

Chapter 173-401-640 WAC allows the permitting authority to issue a determination regarding the applicability of requirements with which the source must comply. Table 6 in the permit lists requirements deemed inapplicable to the emission units identified in Table 1 in the permit and provides the basis for each determination.

PUBLIC DOCKET

Copies of this permit as well as the permit application and any technical support documents are available online at www.nwcleanair.org and at the following location:

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

DEFINITIONS AND ACRONYMS

Definitions are assumed to be those found in the underlying regulation. A short list of definitions has been included to cover those not previously defined.

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

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

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.

"Technology-Based Emission Standard" means a standard, the stringency of which is based on determinations of what is technologically feasible considering relevant factors.

"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
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CO	carbon monoxide
dscf	dry standard cubic foot
EPA	The United States Environmental Protection Agency
FCAA	Federal Clean Air Act
ISO	International Standards Organization
MR&R	monitoring, recordkeeping and reporting
NOC	Notice of Construction
NOx	nitrogen oxides
NSPS	New Source Performance Standards

NSR	New Source Review
NWCAA	Northwest Clean Air Agency
OAC	Order of Approval to Construct
PEMS	Parametric Emissions Monitoring System
PM	particulate matter
PM ₁₀	particulate matter less than 10 microns in diameter
ppmvd	parts per million by volume (dry basis)
RCW	Revised Code of Washington
SIP	State Implementation Plan
STP	Standard temperature and pressure
SO ₂	sulfur dioxide
VP	vapor pressure
WAC	Washington Administration Code