



# MAJOR SOURCE OPERATING PERMIT

**PERMITTEE:** HB&G BUILDING PRODUCTS, INC.  
**FACILITY NAME:** HB&G BUILDING PRODUCTS, INC.  
**FACILITY/PERMIT NO.:** 210-0003  
**LOCATION:** TROY, ALABAMA

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

**Issuance Date:** Draft  
**Effective Date:** Draft  
**Expiration Date:** Draft

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## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>1.     <b><u>Transfer</u></b></p> <p>This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin Code r. 335-3-16-.13(1)(a)5.</p>	<p>ADEM Admin. Code r. 335-3-16-.02(6)</p>
<p>2.     <b><u>Renewals</u></b></p> <p>An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.</p> <p>The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.</p>	<p>ADEM Admin. Code r. 335-3-16-.12(2)</p>
<p>3.     <b><u>Severability Clause</u></b></p> <p>The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(e)</p>
<p>4.     <b><u>Compliance</u></b></p> <p>(a)    The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b)    The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(f)</p> <p>ADEM Admin. Code r. 335-3-16-.05(g)</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>5. <b><u>Termination for Cause</u></b></p> <p>This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(h)</p>
<p>6. <b><u>Property Rights</u></b></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(i)</p>
<p>7. <b><u>Submission of Information</u></b></p> <p>The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(j)</p>
<p>8. <b><u>Economic Incentives, Marketable Permits, and Emissions Trading</u></b></p> <p>No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(k)</p>
<p>9. <b><u>Certification of Truth, Accuracy, and Completeness:</u></b></p> <p>Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	<p>ADEM Admin. Code r. 335-3-16-.07(a)</p>
<p>10. <b><u>Inspection and Entry</u></b></p> <p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p>	<p>ADEM Admin. Code r. 335-3-16-.07(b)</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;</li> <li>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</li> <li>(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;</li> <li>(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.</li> </ul>	
<p>11. <b><u>Compliance Provisions</u></b></p> <ul style="list-style-type: none"> <li>(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</li> <li>(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.07(c)</p>
<p>12. <b><u>Compliance Certification</u></b></p> <p>A compliance certification shall be submitted annually within 60 days of the anniversary date of issuance of this permit, or within an alternative timeline approved by the Director.</p> <ul style="list-style-type: none"> <li>(a) The compliance certification shall include the following: <ul style="list-style-type: none"> <li>(1) The identification of each term or condition of this permit that is the basis of the certification;</li> <li>(2) The compliance status;</li> <li>(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code r. 335-3-16-.05(c) (Monitoring and Recording Keeping Requirements);</li> </ul> </li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.07(e)</p>

**General Permit Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p>(4) Whether compliance has been continuous or intermittent;</p> <p>(5) Such other facts as the Department may require to determine the compliance status of the source;</p> <p>(b) The compliance certification shall be submitted to:</p> <p align="center">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to:</p> <p align="center">EPA Region 4 via email at EPA_R4_CAA_Reports@epa.gov or through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI)</p>	
<p>13. <b><u>Reopening for Cause</u></b></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <p>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</p> <p>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</p> <p>(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</p>	<p>ADEM Admin. Code r. 335-3-16-.13(5)</p>

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<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</p>	
<p>14. <b><u>Additional Rules and Regulations</u></b></p>	
<p>This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
<p>15. <b><u>Equipment Maintenance or Breakdown</u></b></p>	
<p>(a) In the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:</p> <ol style="list-style-type: none"> <li>(1) Identification of the specific facility to be taken out of service as well as its location and permit number;</li> <li>(2) The expected length of time that the air pollution control equipment will be out of service;</li> <li>(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;</li> <li>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</li> <li>(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.</li> </ol> <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The</p>	<p>ADEM Admin. Code r. 335-3-1-.07(1),(2)</p>

**General Permit Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p align="center">Director shall be notified when the breakdown has been corrected.</p>	
<p>16. <b><u>Operation of Capture and Control Devices</u></b></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
<p>17. <b><u>Obnoxious Odors</u></b></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.</p>	<p>ADEM Admin. Code r. 335-3-1-.08</p>
<p>18. <b><u>Fugitive Dust</u></b></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:</p> <p>(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;</p> <p>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;</p> <p>(3) By paving; or</p> <p>(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;</p> <p>Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and</p>	<p>ADEM Admin. Code r. 335-3-4-.02</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Air Division prior to utilization.</p> <p>19. <b><u>Additions and Revisions</u></b></p> <p>Any modifications to this source shall comply with the modification procedures in ADEM Admin. Code r. 335-3-16-.13 or 335-3-16-.14.</p> <p>20. <b><u>Recordkeeping Requirements</u></b></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <ol style="list-style-type: none"> <li>(1) The date, place, and time of all sampling or measurements;</li> <li>(2) The date analyses were performed;</li> <li>(3) The company or entity that performed the analyses;</li> <li>(4) The analytical techniques or methods used;</li> <li>(5) The results of all analyses; and</li> <li>(6) The operating conditions that existed at the time of sampling or measurement.</li> </ol> <p>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit</p> <p>21. <b><u>Reporting Requirements</u></b></p> <p>(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be</p>	<p>ADEM Admin. Code r. 335-3-16-.13 and .14</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)(2).</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)(3).</p>

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<p>certified by a responsible official consistent with ADEM Admin. Code r. 335-3-16-.04(9).</p> <p>(b) Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p> <p><b>22. <u>Emission Testing Requirements</u></b></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department’s air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <p>(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, hoe many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.</p> <p>(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).</p> <p>(c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.</p> <p>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p>	<p>ADEM Admin. Code r. 335-3-1-.05(3) and 335-3-1-.04(1)</p> <p>ADEM Admin. Code r. 335-3-1-.04</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p> <p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	<p>ADEM Admin. Code r. 335-3-1-.04</p>
<p>23. <b><u>Payment of Emission Fees</u></b></p> <p>(a) The permittee shall remit the annual Operating Permit Fees required by ADEM Admin. Code R. 335-1-7-.04 according to the schedule in ADEM Admin. Code r. 335-1-7-.05.</p> <p>(b) The permittee shall submit its estimate of actual emissions for the previous calendar year according to the schedule in ADEM Admin. Code r. 335-1-7-.05.</p>	<p>ADEM Admin. Code r. 335-1-7-.04</p> <p>ADEM Admin. Code r. 335-1-7-.05</p>
<p>24. <b><u>Other Reporting and Testing Requirements</u></b></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	<p>ADEM Admin. Code r. 335-3-1-.04(1)</p>
<p>25. <b><u>Title VI Requirements (Refrigerants)</u></b></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(a)</p>
<p>26. <b><u>Chemical Accidental Prevention Provisions</u></b></p> <p>If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p>	<p>40 CFR Part 68</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</p> <p>(b) The owner or operator shall submit one of the following:</p> <p style="padding-left: 40px;">(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,</p> <p style="padding-left: 40px;">(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.</p> <p>27. <b><u>Display of Permit</u></b></p> <p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will be made readily available for inspection by any or all persons who may request to see it.</p> <p>28. <b><u>Circumvention</u></b></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p> <p>29. <b><u>Visible Emissions</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p> <p>30. <b><u>Fuel-Burning Equipment</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.</p>	<p></p> <p></p> <p></p> <p></p> <p>ADEM Admin. Code r. 335-3-16-.02(2)</p> <p></p> <p>ADEM Admin. Code r. 335-3-1-.10</p> <p></p> <p>ADEM Admin. Code r. 335-3-4-.01(1)</p> <p></p> <p>ADEM Admin. Code r. 335-3-4-.03</p>

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Federally Enforceable Provisos	Regulations
<p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.</p> <p>31. <b><u>Process Industries – General</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.04.</p> <p>32. <b><u>Averaging Time for Emission Limits</u></b></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p> <p>33. <b><u>Open Burning</u></b></p> <p>Precautions should be taken to ensure that no person shall ignite, cause to ignite, permit to be ignited, or maintain any open fire in such a manner as to cause the Department’s rules and regulations applicable to open burning to be violated.</p>	<p>ADEM Admin. Code r. 335-3-5-.01</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-3-.01</p>

## Operating Permit Summary No. 1

**Emission Unit(s):** 150 Fiberglass Column Spinning Molders

**Designation No(s). in Application:** 001

**Company:** HB&G Building Products, Inc.

**Description:** Fiberglass Columns Operation with associated equipment

**Permitted Operating Schedule:** 24 hr/day X 365 days/yr = 8760 hr/yr

**Type and quantity of fuel used:**

Primary: None

Secondary: None

### Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCS	FACILITY WIDE 245 TONS PER ROLLING 12 MONTH PERIOD	PSD SYNTHETIC MINOR
HAPS	25 LB/TON	NESHAP SUBPART WWWW

## Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. This source is subject to the applicable requirements of 40CFR Part 63 Subpart WWWW, “National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production.”	ADEM Admin. Code R. 335-3-11-.06(100)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the plant-wide operations shall not exceed 245 tons in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This source is subject to the applicable organic HAP emission limits in 40 CFR Part 63 Subpart (WWWW) Reinforced Plastics Composites Production as listed in Table 3 and Table 7 to subpart WWWW.	ADEM Admin. Code R. 335-3-11-.06(100)
3. Emissions of Hazardous Air Pollutants (HAPs) from this source shall not exceed 25 lb/ton as specified in 40 CFR Part 63.5805 subpart WWWW Reinforced Plastics Composites Production. Organic HAP emission factors shall be determined using the appropriate formula from Table 1 of 40 CFR Part 63, Subpart WWWW.	ADEM Admin. Code R. 335-3-11-.06(100)
4. The owner or operator shall demonstrate compliance with the organic HAP emission limits in Table 3 using one of the methods in 40 CFR 63.5810, (a) through (d).	ADEM Admin. Code R. 335-3-11-.06(100)
<i>Section 3--Compliance and Performance Test Methods and Procedures</i>	
1. This source is subject to the applicable compliance requirements of 40 CFR Part 63 Subpart WWWW”National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production”, per 63.5835, and Table 4 Work Practice Standards.	ADEM Admin. Code R. 335-3-11-.06(100)
2. The organic HAP content of resins and gelcoats shall be determined in accordance with 40 CFR 63.5797. Organic HAP emissions and compliance with the 100 ton per year organic HAP emission threshold for add-on controls shall be determined in accordance with 63.5799. Applicable Subpart WWWW compliance requirements shall be determined in accordance with 63.5805.	ADEM Admin. Code R. 335-3-11-.06(100)
3. The owner or operator shall keep a certified statement of compliance with the work practice requirements in Table 4 of Subpart WWWW.	ADEM Admin. Code R. 335-3-11-.06(100)

**Federally Enforceable Provisos**

**Regulations**

*Section 4—Emission Monitoring*

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| 1. The owner or operator shall maintain the records of total mass of each VOC and organic HAP containing material used in the plant manufacturing for five years and submit them to the Administrator upon request. | ADEM Admin. CODE R. 335-3-11-.06(100) |
| 2. The owner or operator shall maintain records of the total weight and organic HAP content of each resin and gelcoat material applied during the plant manufacturing for each month.                               | ADEM ADMIN. Code R. 335-3-11-.06(100) |
| 3. Organic HAP emissions shall be calculated based on Table 1 from 40 CFR Part 63 Subpart (WWWW) Reinforced Plastics Composites Production, or other models as approved by the Administrator.                       | ADEM ADMIN. Code R. 335-3-11-.06(100) |

*Section 5--Recordkeeping and Reporting Requirements*

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| 1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information: <ul style="list-style-type: none"><li>a. The type and quantity in pounds of each VOC containing material used during each calendar month.</li><li>b. The percent by weight of VOCs and organic HAPs content shall of each material used each calendar month.</li><li>c. Compliance with VOC and organic HAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.</li><li>d. Complete inventories of the VOC and organic HAP containing materials (their usage, VOC content and organic HAP content) shall be made at the end of each calendar month. Records shall be retained for 5 years and made available upon request by a representative of this Department.</li><li>e. The amount of VOCs and organic HAPs emitted per calendar month from fiberglass operations expressed in units of pounds and tons.</li><li>f. The rolling 12-month total of VOCs and HAPs emitted in units of pounds and tons to demonstrate compliance with the PSD synthetic minor limitation.</li></ul> | ADEM ADMIN. Code R. 335-3-11-.04 |
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**Federally Enforceable Provisos**

**Regulations**

<p>g. Within the first 30 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.</p>	
<p>2. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the last day of the month following the end of the quarter, in a format approved by the Department in advance.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>
<p>3. This source is subject to the applicable reporting and in 40 CFR Part 63 Subpart WWWW (Reinforced Plastics Composites Production) as listed in 63.5910. As allowed in 63.5910(b)(5), the semi-annual report may be submitted in conjunction with the Title V semi-annual deviation report required by General Proviso 21(a) of this permit. The reports will contain the information required by Table 14 to Subpart WWWW.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(100)</p>
<p>4. Records of resin and gel coat organic HAP content must be retained. The list of resins and gel coats and their application methods must be included in the semiannual compliance reports.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(100)</p>

## Operating Permit Summary No. 2

**Emission Unit(s):** A M Primer Booths – 3 Lines

**Designation No(s). in Application:** 002

**Company:** HB&G Building Products, Inc.

**Description:** Architectural Masterworks – Polyurethane Molding Operations

**Permitted Operating Schedule:** 24 hr/day X 365 days/yr = 8760 hr/yr

**Type and quantity of fuel used:**

Primary: None

Secondary: None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	245 TONS FACILITY-WIDE PER ROLLING 12-MONTH PERIOD	PSD SYNTHETIC MINOR

## Unit Specific Provisos

### Federally Enforceable Provisos

### Regulations

*Section 1--Applicability*

1. This source is subject to a PSD synthetic minor emission limitation.

ADEM Admin. Code R.  
335-3-14-.04

*Section 2--Emission Standards*

1. Emission of Volatile Organic Compounds (VOCs) from the plant-wide operations shall not exceed 245 tons in any consecutive rolling 12-month period.

ADEM Admin. Code R.  
335-3-14-.04(8)

*Section 3--Compliance and Performance Test Methods and Procedures*

1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.

ADEM Admin. Code R.  
335-3-10-.03

*Section 4--Emission Monitoring*

1. The owner or operator shall maintain the records of total mass of each material used in the plant manufacturing for five years and submit them to the Administrator upon request.
2. The owner or operator shall maintain records of the total volume and organic HAP content of each material applied during the plant manufacturing for each month.

ADEM Admin. Code R.  
335-3-11-.06(100)

ADEM Admin. Code R.  
335-3-11-.06(36)

*Section 5--Recordkeeping and Reporting Requirements*

1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:
  - (a) All materials associated in the polyurethane molding manufacturing operation shall be calculated using the material safety data sheets VOC (%) by weight values.
  - (b) The type, quantity of each VOC containing material used in the plant manufacturing.
  - (c) The VOC, HAP and water content shall be determined from the evaluation data supplied by the resin manufacturer with each shipment of purchased resin and related material used.

ADEM Admin. Code R.  
335-3-1-.16

**Federally Enforceable Provisos**

**Regulations**

- (d) The VOC content of material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60. Appendix A or equivalent vendor data approved by the Department in advance.
  - (e) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
  - (f) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month. Records shall be retained for 5 years and made available upon request by a representative of this Department.
  - (g) The amount of VOCs and HAPs emitted per calendar month expressed in units of pounds and tons.
  - (h) The rolling 12-month total of VOCs and HAPs emitted in units of pounds and tons.
  - (i) Within the first 30 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.
2. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the last day of the month following the end of the quarter, in a format approved by the Department in advance.

ADEM Admin. Code R.  
335-3-1-.04

## Operating Permit Summary No. 4

**Emission Unit(s):** 2 Pultrusion Machines  
**Designation No(s). in Application:** 004  
**Company:** HB&G Building Products, Inc.  
**Description:**  
**Permitted Operating Schedule:** 24 hr/day X 365 days/yr = 8760 hr/yr

**Type and quantity of fuel used:**

Primary: None

Secondary: None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCS	FACILITY WIDE 245 TONS PER ROLLING 12 MONTH PERIOD	PSD SYNTHETIC MINOR
HAPS	REDUCE TOTAL ORGANIC HAP EMISSIONS BY AT LEAST 60 WEIGHT PERCENT	NESHAP SUBPART WWWW

## Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. This source is subject to the applicable requirements of 40CFR Part 63 Subpart WWWW, "National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production."	ADEM Admin. Code R. 335-3-11-.06(100)
3. This source is subject to the applicable requirements of National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63 Subpart A, General Provisions.	ADEM Admin. Code R. 335-3-11-.06(1)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the plant wide operations shall not exceed 245 tons in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This source is subject to the applicable organic HAP emission limits in 40 CFR Part 63 Subpart (WWW) Reinforced Plastics Composites Production as listed in Table 3 and the work practice standards as listed in Table 4.	ADEM Admin. Code R. 335-3-11-.06(100)
3. Emissions of organic Hazardous Air Pollutants (HAPs) from this source shall be reduced by at least 60 weight percent as specified in 40 CFR Part 63.5805 Subpart WWWW Reinforced Plastics Composites Production Table 3.	ADEM Admin. Code R. 335-3-11-.06(100)
4. The owner or operator shall demonstrate compliance with the Table 3 requirement to reduce total organic HAP emissions from pultrusion by at least 60 weight percent operating wet area enclosures and resin drip collection systems on each pultrusion machine that meet the following criteria:	ADEM Admin. Code R. 335-3-11-.06(100)
(a) Enclosures must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die(s). The surfaces of the enclosures must be closed except for openings to allow material to enter and exit the enclosure.	
(b) Enclosures must extend from the beginning of resin baths to within 0.5 inches or less of the die entrance.	

**Federally Enforceable Provisos****Regulations**

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- (c) The total open area of the enclosure must not exceed two times the cross sectional area of the puller window(s) and must comply with the requirements listed below:
- i. All areas that are open need to be included in the total open area calculation with the exception of access panels, doors, and/or hatches that are part of the enclosure.
  - ii. The area that is displaced by entering reinforcement or exiting product is considered open.
  - iii. Areas that are covered by brush covers are considered closed.
- (d) Open areas for level control devices, monitoring devices, agitation shafts, and fill hoses must have no more than 1.0 inch clearance.
- (e) The access panels, doors, and/or hatches that are part of the enclosure must close tightly. Damaged access panels, doors, and/or hatches that do not close tightly must be replaced.
- (f) The enclosure may not be removed from the pultrusion line, and access panels, doors, and/or hatches that are part of the enclosure must remain closed whenever resin is in the bath, except for the time period discussed in below.
- (g) The maximum length of time the enclosure may be removed from the pultrusion line or the access panels, doors, and/or hatches and may be open, is 30 minutes per 8 hour shift, 45 minutes per 12 hour shift, or 90 minutes per day if the machine is operated for 24 hours in a day. The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded. Times that access panels, doors, and/or hatches are open may be averaged across all operating lines, but the times must not exceed the previously mentioned times. All lines included in the average must have operated the entire time period being averaged.
- (h) No fans, blowers, and/or air lines may be allowed within the enclosure. The enclosure must not be ventilated.

**Federally Enforceable Provisos**

**Regulations**

*Section 3--Compliance and Performance Test Methods and Procedures*

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| 1. This source is subject to the applicable compliance requirements of 40 CFR Part 63 Subpart WWWW "National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production", per 63.5835, and Table 4 Work Practice Standards. | ADEM Admin. Code R. 335-3-11-.06(100) |
| 2. The organic HAP content of resins and gelcoats shall be determined in accordance with 40 CFR 63.5797. Organic HAP emissions shall be determined in accordance with 63.5799.                                                                                 | ADEM Admin. Code R. 335-3-11-.06(100) |
| 3. Applicable Subpart WWWW compliance requirements shall be determined in accordance with 40 CFR 63.5805.                                                                                                                                                      | ADEM Admin. Code R. 335-3-11-.06(100) |
| 4. Capture efficiency of enclosures on wet-out areas shall be determined according to 40 CFR 63.5875(a).                                                                                                                                                       | ADEM Admin. Code R. 335-3-11-.06(100) |
| 5. The owner or operator shall keep a certified statement of compliance with the work practice requirements in Table 4 of Subpart WWWW.                                                                                                                        | ADEM Admin. Code R. 335-3-11-.06(100) |

*Section 4—Emission Monitoring*

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| 1. The owner or operator shall collect and maintain the records of total mass of each VOC and organic HAP containing material used in the plant manufacturing for five years and submit them to the Administrator upon request. | ADEM Admin. CODE R. 335-3-11-.06(100) |
| 2. The owner or operator shall collect and keep records of resin use, organic HAP content, and the operation where the resin is used.                                                                                           | ADEM ADMIN. Code R. 335-3-11-.06(100) |
| 3. Organic HAP emissions shall be calculated based on Table 1 from 40 CFR Part 63 Subpart (WWWW) Reinforced Plastics Composites Production, or other models as approved by the Administrator.                                   | ADEM ADMIN. Code R. 335-3-11-.06(100) |
| 4. For each pultrusion machine record all times that wet area enclosure doors or covers are open and there is resin present in the resin bath.                                                                                  | ADEM ADMIN. Code R. 335-3-11-.06(100) |

*Section 5--Recordkeeping and Reporting Requirements*

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| 1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:<br><br>(a) The type and quantity in pounds of each VOC containing material used in the plant manufacturing during each calendar month. | ADEM ADMIN. Code R. 335-3-1-.04 |
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**Federally Enforceable Provisos****Regulations**

<p>(b) The percent by weight of VOCs and organic HAPs content shall of each VOC containing material used each calendar month.</p> <p>(c) Compliance with VOC and organic HAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.</p> <p>(d) Complete inventories of the VOC and organic HAP containing materials (their usage, VOC content and organic HAP content) shall be made at the end of each calendar month. Records shall be retained for 5 years and made available upon request by a representative of this Department.</p> <p>(e) The amount of VOCs and organic HAPs emitted per calendar month from fiberglass operations expressed in units of pounds and tons</p> <p>(f) The rolling 12-month total of VOCs and HAPs emitted in units of pounds and tons.</p> <p>(g) Within the first 30 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.</p>	
<p>5. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the last day of the month following the end of the quarter, in a format approved by the Department in advance.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>
<p>6. This source is subject to the applicable semiannual compliance reporting and Startup, shutdown, or malfunction reporting in 40 CFR Part 63 Subpart (WWWW) Reinforced Plastics Composites Production as listed in Table 14 to Subpart WWWW of Part 63-Requirements for Reports, within the time required.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(100)</p>
<p>7. Records of resin and gel coat organic HAP content must be retained. The list of resins and gel coats and their application methods must be included in the semiannual compliance reports.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(100)</p>