



PART 70 OPERATING PERMIT TECHNICAL SUPPORT DOCUMENT (STATEMENT of BASIS)

**APPLICATION FOR:
Renewal**

**SUBMITTED BY:
Aquatic Co.**

**FOR:
Aquatic Co.
Source ID: 00075**

**LOCATION:
201 North Meadow Valley Road
Moapa, Nevada 89025**

**SIC code 3088, “Plastic Plumbing Fixtures”
NAICS code 326191, “Plastics Plumbing Fixture Manufacturing”**

Application Received: September 9, 2024

TSD Date: August 5, 2026

EXECUTIVE SUMMARY

Aquatic Co. is a bathware manufacturing operation located at 201 North Meadow Road in Moapa, Nevada, in the Hydrographic Area 218 (California Wash), which is currently designated as an attainment area for all regulated air pollutants. The source is not a categorical source as defined in AQR 12.2.2(j).

The source is a major stationary source for the hazardous air pollutant (HAP) styrene, and a minor source for all other regulated pollutants. The source is also a source of greenhouse gases.

The source consists of one production and warehouse building (168,000 sq. ft.) including an office building, two production lines, a resin mixing/storage area, four large aboveground tanks, and a propane fuel tank. All Aquatic Co. products are produced with thermosetting plastic resins modified with inert fillers and reinforced with glass fiber, wood strips, and other stiffening materials. Aquatic Co.'s operation is open molding with mechanical resin application. The finished products are often referred to as Fiber Reinforced Polyester (FRP).

The following table summarizes the source potential to emit for each regulated air pollutant from all emission units addressed by this Part 70 Operating Permit:

Table 1: Emission Units PTE Summary (TPY)

Pollutant	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs ¹	GHG ²
Source PTE	0.69	0.51	9.47	3.18	0.24	49.42	45.67	6,025.05
Major Source Thresholds (Title V)	100	100	100	100	100	100	10/25 ¹	-
Major Stationary Source Thresholds (PSD)	250	250	250	250	250	250	10/25 ¹	-

¹Ten tons for any individual hazardous air pollutant, or 25 tons for the combination of all hazardous air pollutants.

²Metric tons per year, CO₂e.

DAQ will continue to require the sources to estimate their GHG potential to emit in terms of each individual pollutant (CO₂, CH₄, N₂O, SF₆ etc). The TSD includes these PTEs for informational purposes.

The source is subject to 40 CFR Part 63, Subpart WWWW; 40 CFR Part 63, Subpart SS; and 40 CFR Part 63, Subpart ZZZZ.

DAQ has received delegated authority from the U.S. Environmental Protection Agency to implement the requirements of the Part 70 OP. Based on the information submitted by the applicant, supplemental information provided to the application, and a technical review performed by DAQ staff, the draft renewal Part 70 OP is proposed.

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I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulation
ATC	Authority to Construct
CF	control factor
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CD	control device
DAQ	Division of Air Quality
DES	Clark County Department of Environment and Sustainability
DOM	date of manufacture
EF	emissions factor
EPA	U.S. Environmental Protection Agency
EU	emission unit
g/dscm	gram per dry standard cubic meter
gr/dscf	grains per dry standard cubic feet
GHG	greenhouse gas
HA	Hydrographic Area
HAP	hazardous air pollutant
hp	horsepower
kW	kilowatts
MMBtu/hr	Million British Thermal Units per Hour
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NO _x	nitrogen oxide(s)
PM _{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
PM ₁₀	particulate matter less than 10 microns in aerodynamic diameter
PSD	prevention of significant deterioration
PTE	potential to emit
RACT	Reasonably Achievable Control Technology
SCC	Source Classification Code
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SOP	standard operating procedure
UTM	Universal Transverse Mercator
VOC	volatile organic compound

II. SOURCE DESCRIPTION

A. PROCESS DESCRIPTION

All Aquatic Co. products manufactured at this location are produced with thermosetting plastic resin, modified with inert fillers to obtain certain fire code ratings, shrink factors, and processing conditions. The resins are processed as liquids, which change to become permanent solids by chemical reaction initiated with a catalyst and finalized with ambient heating for a period of time.

The filled laminating resin is reinforced with glass fiber roving, wood strips and other stiffening materials. The finished unit is a structural entity with an impervious colored surface on the inside (bathing compartment) of the unit. Gel coats containing polyester thermoset resin, colorants and inert fillers are used to produce the inside surface. Polyester thermoset resin is combined with inert fillers and glass fiber to form a fiberglass laminate to provide load-bearing capability. The finished product is often referred to as a FRP bath fixture, with gel coat surface.

Aquatic Co. has two production lines: Line 1 and Line 2, with Line 2 differing from Line 1 in that the composite materials are applied to the molds by robotic applicators instead of by workers. In Line 1, all Aquatic Co. products are produced with thermosetting plastic resins modified with inert fillers and reinforced with glass fiber, wood strips, and other stiffening materials. Aquatic Co.'s operation is open molding with mechanical resin application. The resins are processed as liquids that are transformed into permanent solids through chemical reactions and heating. Gelcoat-containing polyester thermoset resin and colorants are used to produce the exposed surface. The finished products are often referred to as FRP.

In Production Line 2, Aquatic Co. uses thermosetting plastic resins to manufacture bathware using an operation similar to Line 1. In Line 2, the composite materials are applied to the molds by robotic applicators instead of manual application as in Line 1. Workers still perform those tasks that cannot be automated, such as rolling out the wet laminate and placing the various structural parts into the wet molds. The mold is coated once every 100 cycles with a VOC-containing polymer release agent to provide release of polymer resins from the mold. Frekote WOLO is applied as a release agent. Frekote PMC is used as a cleaning agent and Frekote FMS is used as a mold sealer.

HAP and VOC emissions from the coating operations at Aquatic Co. are controlled by two types of add-on control devices: two rotary preconcentrators and an RTO. All emissions from Line 1 are contained inside a building enclosure that surrounds Line 1. The spray booths and other process vents on Line 1 are connected to a preconcentrator unit where styrene and other VOCs are adsorbed before the exhaust is released to the atmosphere. A hot air stream of approximately 10,000 cubic feet per minute desorbs the adsorbed styrene and VOC in the preconcentrator and transports it to the existing RTO unit for thermal destruction to yield a 95 percent overall control efficiency. The building enclosure also surrounds all of Line 2, so that all of the emissions from Line 2 are captured and transferred to the control system. The spray booths and other process vents for Line 2 are connected to a second preconcentrator unit. The desorbed styrene and VOCs from this second preconcentrator are also sent to the existing RTO unit for thermal destruction to yield a 95 percent overall control efficiency.

All the emission units and the add-on control device(s) at Aquatic Co., except the process air heaters (EUs: A02, A06, A10, A12, A14 and A20), are permitted for unlimited operation (8,760 hours). Each of the process air heaters at the source (EUs: A02, A06, A10, A12, A14 and A20) are limited to 2,200 hours of operation. No alternate operating scenario was proposed by the applicant or included in the permit.

B. ALTERNATE OPERATING SCENARIO(S)

None proposed.

C. PERMITTING HISTORY

This is a Part 70 OP for an existing major source. The following represents permitting activities prior to this permitting action since the last renewal:

Table II-C-1: Permit History

Issue Date	Description
11/17/2021	Reopen for Cause to add Emission Statement to the permit.

D. CURRENT PERMITTING ACTION

This is a renewal of the Part 70 OP. DAQ received the Title V renewal application on September 9, 2025. The permittee did not request any changes to the permit.

1. DAQ made the following changes to the permit:
 - a. Update nonroad engine language.
 - b. Update standard visual emissions requirements, including a requirement for the permittee to sign and adhere to DAQ's Visible Emissions Check Guideline.
 - c. Add or update standard control requirements in accordance with AQRs 40, 41, 43, and 130.
 - d. Add standard performance testing conditions.
 - e. Removed emergency engine requirements related to peak shaving because the engine (EU: B01) is a fire pump and does not generate power.
 - f. Revisit the performance testing procedure to require simultaneous testing of both stacks on the VOC/HAP control device.
 - g. Clarify normal operations and startup, shutdown in emission limit table names

III. EMISSIONS INFORMATION

A. EMISSION UNITS LIST

Table III-A-1 lists the emission units covered by this Part 70 OP.

Table III-A-1: List of Emission Units

EU	Description	Rating	Manufacturer	Model No.	Serial No.	Control Device	SCC
A01	Spray Booth; Line 1		Custom Design		A07501	Preconcentrator and RTO	30800724
A02	Air Heater; Line 1	6.3 MMBtu/hr	Hasting	SBD-233	47514-2		30890004

EU	Description	Rating	Manufacturer	Model No.	Serial No.	Control Device	SCC
A04	Spray Booth; Line 1		Custom Design		A07504	Preconcentrator and RTO	30800724
A05	Spray Booth; Line 1		Custom Design		A07505	Preconcentrator and RTO	30800724
A06	Air Heater; Line 1	4.8 MMBtu/hr	Hasting	SBD-227	47516-2		30890004
A07	Spray Booth; Line 1		Custom Design		A07507	Preconcentrator and RTO	30800724
A08	Grinding Booth; Line 1		Custom Design		A07508		30800701
A09	Spray Booth; Line 2		Custom Design		A07509	Preconcentrator and RTO	30800724
A10	Air Heater; Line 2	6.3 MMBtu/hr	Hasting	SBD-233	48647		30890004
A11	Spray Booth; Line 2		Custom Design		A07511	Preconcentrator and RTO	30800724
A12	Air Heater; Line 2	4.8 MMBtu/hr	Hasting	SBD-227	59325		30890004
A13	Spray Booth; Line 2		Custom Design		A07513	Preconcentrator and RTO	30800724
A14	Cure Tunnel Heaters (5); Line 2	0.99 MMBtu/hr (each)	Eclipse	RM-100			30890004
A15	Spray Booth; Line 2		Custom Design		A07515	Preconcentrator and RTO	30800724
A17 A	Trim Saws (2)				A07517	Dust Collector	30800701
A20	Air Heater; Line 1	0.36 MMBtu/hr	Hastings	SBD-112 (EC-40)			30890004
A21	Mixer		Autocon/Myer		Las3	Preconcentrator and RTO	30501223
A22	Mixer		Myer		800A-20-1180	Preconcentrator and RTO	30501223
A23	Storage Silo (CaSO ₄)					Binvent	30501222
A24	Holding Tank Room (LAM 2 and 3)					Preconcentrator and RTO	30800799
A25	Holding Tank Room (BC 2 and LAM 1)					Preconcentrator and RTO	30800799
A26	Gelcoat Room; Line 1					Preconcentrator and RTO	30800799
A27	Gelcoat Room; Line 2					Preconcentrator and RTO	30800799
A31	Mold Preparation; Line 1					Preconcentrator and RTO	30800799
A35	Mold Preparation; Line 2					Preconcentrator and RTO	30800799
A37	Part Repair						30800799
A38	Virgin Resin Storage						30501222
A39	Putty Mixer		Myer			Preconcentrator and RTO	30501223

EU	Description	Rating	Manufacturer	Model No.	Serial No.	Control Device	SCC
A40	Protective Coating Booth						30800703
A42	Preconcentrators and RTO Control Devices		AIREX Corporation		227825O RTO206 4		30800799
B01	Fire Pump	341 hp	Patterson	DDFPT6VT 7363F	94FP073 28-L8		20200102
	Diesel Engine – DOM: 1994		Detroit Diesel				

The following units or activities listed in in Table III-A-2 are present at this source, but are deemed insignificant.

Table III-A-2: Insignificant Activities

Rating	Description	Manufacturer	Model
	Parts Demolding; Lines 1 and 2		
0.236 MMBtu/hr	Hot Water Heaters (4)	Noritz	N-084M-DV
0.199 MMBtu/hr	Hot Water Heaters (2)	State	SBD100199PET
2,000 gallons	Propane Tanks (8)		

B. SOURCE-WIDE PTE

Aquatic Co. is a Title V source for HAPs, both for an individual (styrene) and total, and a minor source for all other air pollutants, including greenhouse gases (GHGs).

Table III-B-1: Source-wide PTE (tons per year)

PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOCs	HAPs	GHGs ¹
0.69	0.51	9.47	3.18	0.24	49.42	45.67	6,025.05

¹Metric tons per year.

C. EMISSIONS CALCULATIONS

This section describes the emission factors and methodology used to calculate the PTEs for various regulated air pollutants. There were no changes to the PTE.

The determinations of applicability are revised and PTE remains the same in this permitting action. 8,760 hours of operation of the equipment will not exceed 100 tpy for any regulated pollutant. HAP emissions exceed 10/25 tpy even with limitations and controls on some units. The source is a major source for HAPs and minor for all other criteria pollutants.

Applicability

Applicability was previously calculated using 300 days of operation per year, requested material usage, and mandatory controls. Evaporative sources are allowed to consider requested usage

instead of maximum rated capacity. At 300 days of operation per year, the process VOC including HAP emissions were 899.4 tpy under this outdated practice. Recalculating applicability using 365 days of operation, no controls, and requested material usage, the process VOC emissions, including HAP emissions, increased to 1,094.2 tpy using the current practice to calculate applicability. This calculation change of 194.8 tpy VOC/HAP does not impact the classification determination, but will be added to the estimated applicability in Table III-C-1. The source remains a major source of HAP for Total HAP and for Individual HAP (Styrene). Calculations for process VOC and HAP estimated applicability are shown in the Attachments. An increase in operation from 300 to 365 days per year will not make any other pollutant exceed a major source threshold, so they were not reevaluated.

Table III-C-1: Estimated Applicability (Source-Wide Except as Noted) (tpy)

	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC incl. HAP
Process at 365 days/year, uncontrolled, including B01	8.11	4.08	68.16	14.55	3.38	Process alone is 1,094.20

PTE

PTE is calculated to include any controls or limits, whether voluntarily proposed by the source or required. PTE does not include insignificant emission units and activities, but does include fugitive emissions.

VOC and HAP Emissions

The thermosetting polyester resins used at Aquatic Co. are complex polymers resulting from the cross-linking reaction of a liquid unsaturated polyester with a vinyl type monomer, styrene. Styrene is a colorless liquid that has a sweet smell. The odor threshold for styrene is 0.32 parts per million. The chemical formula for styrene is C₈H₈, and the molecular weight is 104.16 grams per mole. Styrene is a VOC as well as a HAP.

Gelcoat contains a maximum of 36 percent styrene. Barrier coat contains 42 percent styrene, and Laminate contains 49 percent styrene. When the resin is applied to the molds, some styrene is emitted and some styrene is bound up in the finished product. Most of the VOC emissions occur from the spray booths during the resin application. The quantity of styrene released to the atmosphere from the molds is dependent on the duration of the polymerization reaction.

It is assumed that the permanent total enclosures for Line 1 and Line 2 capture the VOC emissions from all spray booths, mixers, holding tanks, the gelcoat room, laminate roll, cure and trim areas, and mold preparation area. It is proposed to have 100 percent capture (compliance demonstration using Method 204) and a minimum of 95 percent overall control efficiency (97 percent efficiency for the preconcentrator and 98 percent efficiency for the RTO).

There are also small amounts of VOC emissions from fuel burning equipment, Part Repair (EU: A37) and Protective Coating Booth (EU: A40). VOC emissions from Part Repairs and Protective Coatings are calculated based on the estimated usage of the solvents.

PM₁₀ Emissions

The source emits small amounts of PM₁₀ from the grinding booths and from the operation of the fuel burning equipment. The total PM₁₀ emission estimated from the source is less than 0.50 tons per year.

CO, NO_x and SO₂

The gaseous emissions from the source are due to two process air heaters for Line 1 (EU: A02 - 6.3 MMBtu per hour and EU: A06 - 4.8 MMBtu per hour), two process air heaters for Line 2 (EU: A10 - 6.3 MMBtu per hour and EU: A12 - 4.8 MMBtu per hour), five cure tunnel air heaters (EU: A14) for Line 2 (total of 5 MMBtu/hr) and the RTO (EU: A42). The heaters use propane fuel. The emission calculations are based on AP-42 and equipment-specific emission factors for propane fuel. The conversion factors used for propane emission calculations are: 91.5 MMBtu per 1000 gallons of propane; 36.4 cubic foot per gallon of propane; 2552.5 Btu per cubic foot of propane; Sulfur = 0.20 grains per 100 cubic foot; HAP = 50 percent of VOC.

The PTE for RTO emissions is based on the propane usage and other operating parameters established in ATC/OP Modification 4. The PTE is due to the combustion of process air and emissions from the combustion of propane fuel used for start-up and make-up heat. Process air combustion emissions are based on estimation of the equivalent million cubic feet (MMft³) of natural gas. It is estimated that the thermal value of the process air is 3.6 Btu per cubic foot. Therefore, for a process airflow rate of 22,688 cubic feet per minute to the RTO, the equivalent amount of natural gas is 35.28 MMft³. (22,688 ft³/min * 60 min/hr * 7,200 hr/yr * 3.6 Btu/ft³ / 1,000 Btu/ft³ of natural gas = 35.28 MMft³). Propane usage for the RTO was estimated as 3.11 MMBtu per hour (equivalent to 34 gallons per hour) and 17,714 MMBtu per year (equivalent to 193,596 gallons per year). The hourly and annual NO_x emissions from RTO were calculated based on the performance test conducted in May 2006 (Annual PTE = 0.39 lb/hr * 8,760 hours divided by 2,000 lb/ton * 1.30 factor of safety). This test was used to establish the original emission factor and subsequent source testing is used for compliance demonstration. The emission factor remains the same for this renewal.

The May 2006, May 2010, May 2015, November 2020, source tests verified the VOC destruction efficiency and VOC actual emissions for RTO. The July 2025 source test identified a problem with the preconcentrator/RTO whereas the limit was exceeded. Permittee reduced operations to a single production line so that overall destruction efficiency and VOC emissions can meet current permit limits. Permittee is drafting a compliance plan and a settlement agreement in response to an NOV.

Table III-C-2: Emission Units and PTE Including Normal Operations, Startup, Shutdown, and Malfunction (tons per year)

EU	Control ¹	Operation (hrs/yr)	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC incl. HAP	HAP
A01	Precon+RTO	8,760	Included in Emissions from RTO						
A02	None	2,200	0.03	0.03	1.06	0.14	0.01	0.04	0.02
A04	Precon+RTO	8,760	Included in Emissions from RTO						
A05	Precon+RTO	8,760	Included in Emissions from RTO						
A06	None	2,200	0.02	0.02	0.81	0.11	0.01	0.03	0.01
A07	Precon+RTO	8,760	Included in Emissions from RTO						
A08	None	8,760	0.15	0.00	0.00	0.00	0.00	0.00	0.00
A09	Precon+RTO	8,760	Included in Emissions from RTO						
A10	None	2,200	0.03	0.03	1.06	0.14	0.01	0.04	0.02
A11	Precon+RTO	8,760	Included in Emissions from RTO						
A12	None	2,200	0.02	0.02	0.81	0.11	0.01	0.03	0.01
A13	Precon+RTO	8,760	Included in Emissions from RTO						
A14	None	2,200	0.02	0.02	0.81	0.11	0.01	0.03	0.01
A15	Precon+RTO	8,760	Included in Emissions from RTO						

EU	Control ¹	Operation (hrs/yr)	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC incl. HAP	HAP
A17A	99 %	8,760	0.01	0.00	0.00	0.00	0.00	0.00	0.00
A20	None	2,200	0.01	0.00	0.06	0.01	0.01	0.01	0.01
A21	Precon+RTO	8,760	Included in Emissions from RTO						
A22	Precon+RTO	8,760	Included in Emissions from RTO						
A23	99 %	8,760	0.01	0.00	0.00	0.00	0.00	0.00	0.00
A24	Precon+RTO	8,760	Included in Emissions from RTO						
A25	Precon+RTO	8,760	Included in Emissions from RTO						
A26	Precon+RTO	8,760	Included in Emissions from RTO						
A27	Precon+RTO	8,760	Included in Emissions from RTO						
A30	None	8,760	0.00	0.00	0.00	0.00	0.00	0.00	0.00
A31	Precon+RTO	8,760	Included in Emissions from RTO						
A35	Precon+RTO	8,760	Included in Emissions from RTO						
A37	None	8,760	0.00	0.00	0.00	0.00	0.00	1.00	1.00
A38	None	8,760	0.00	0.00	0.00	0.00	0.00	0.10	0.10
A39	Precon+RTO	8,760	Included in Emissions from RTO						
A40	None	8,760	0.00	0.00	0.00	0.00	0.00	3.30	0.00
A42	RTO	8,760	0.20	0.20	2.22	1.98	0.01	44.63	44.48
B01		500	0.19	0.19	2.64	0.57	0.17	0.21	0.01
Totals			0.69	0.51	9.47	3.18	0.24	49.42	45.67

¹ Precon+RTO: 100% capture by permanent total enclosure and 95% overall control by preconcentrators and RTO.

Table III-C-3: Fuel Burning Equipment Potential to Emit for Normal Operations (pounds per hour)¹

EU	Rating (MMBtu/hr)	PM ₁₀	NO _x	CO	SO ₂	VOC incl. HAP	HAP
A02	6.30	0.03	0.96	0.13	0.01	0.03	0.02
A06	4.80	0.02	0.73	0.10	0.01	0.03	0.01
A10	6.30	0.03	0.96	0.13	0.01	0.03	0.02
A12	4.80	0.02	0.73	0.10	0.01	0.03	0.01
A14	5.00	0.02	0.77	0.10	0.01	0.03	0.01
A20	0.36	0.01	0.06	0.01	0.01	0.01	0.01
A42	(RTO) ²	0.05	0.78	0.47	0.01	14.84	14.83

¹ Emissions based on AP 42- Propane fuel, Commercial Boiler (<10 MMBtu/hr).

² RTO emissions are based on fuel usage, heat value of process air and overall capture and control efficiency of 95%. NO_x emissions are based on the May 2006 performance test.

Table III-C-4: PTE of Emission Units Not Controlled by RTO for Normal Operations (pounds per hour)

EU	Control	PM ₁₀	NO _x	CO	SO ₂	VOC incl. HAP	HAP
A08	None	0.82	0.00	0.00	0.00	0.00	0.00
A17A	99%	0.05	0.00	0.00	0.00	0.00	0.00
A23	99%	0.05	0.00	0.00	0.00	0.00	0.00
A30	None	0.00	0.00	0.00	0.00	0.00	0.00
A37	None	0.00	0.00	0.00	0.00	0.34	0.34
A38	None	0.00	0.00	0.00	0.00	0.03	0.03
A40	None	0.00	0.00	0.00	0.00	1.13	0.00

Table III-C-5: Combined PTE of Preconcentrators and RTO for Normal Operations (A42)¹

PM ₁₀	NO _x	CO	SO ₂	VOC incl HAP	HAP
lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr
0.05	0.78	0.47	0.01	14.84	14.83

¹ Emissions from two Preconcentrators and the RTO occur through two stacks.

Table III-C-6 lists the control devices covered by this Part 70 OP. As these control devices are listed as emissions units, they are included here as they contribute to the source's PTE.

Table III-C-6: Summary of Control Devices and Limitations

EU	Description	Control Technology	Limitations/Control Technology Requirements
A01, A04, A05, A07, A08, A26, and A31	Production Line 1	Preconcentrators and RTO	Minimum 95% overall destruction efficiency for VOC and HAP emissions. Styrene-containing resins are limited to a maximum styrene content less than or equal to 36 percent for gelcoat, 42 percent for barriercoat and 49 percent for laminate, by weight.
A09, A11, A13, A15, A27, and A35	Production Line 2	Preconcentrators and RTO	Minimum 95% overall destruction efficiency for VOC and HAP emissions. Styrene-containing resins are limited to a maximum styrene content less than or equal to 36 percent for gelcoat, 42 percent for barriercoat and 49 percent for laminate, by weight.
A02, A06, A10, A12, A14 and A20	Process Air Heaters (for both Line 1 and Line 2)	Sole use of propane fuel and good combustion practices	Each is limited to 2,200 hours of operation per year. Combined propane use limited to 662,645 gallons per year.
A17A	Trim Saw	Dust collector	A minimum 99.0 percent control efficiency for particulates.
A23	Storage Silo (CaCO ₃)	Binvent	A minimum 99.0 percent control efficiency for particulates.
A21, A22, A24, A25, A39	Myer Mixer, Holding Tank Rooms (Lam1, Lam2, Lam3, and BC), and Myer Putty Mixer	Preconcentrators and RTO	Minimum 95% overall destruction efficiency for VOC and HAP emissions. Styrene-containing resins are limited to a maximum styrene content less than or equal to 36 percent for gelcoat, 42 percent for barriercoat and 49 percent for laminate, by weight.
A42	Preconcentrators RTO	Sole use of propane as auxiliary fuel.	RTO operating temperature limitation between 1,600°F and 2,000°F (averaged over 10 minutes) Auxiliary fuel use limitation of 193,596 gallons (including startups and idling) of propane per year.

Table III-C-7: Emissions Increase (including fugitives)

	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAP	H ₂ S	Pb
Minor NSR Significance (12.4)	7.5	5.0	20	50	20	20	5		0.6
Significant 12.2(uu)	15	10	40	100	40	40		10	0.6
Existing Permit	0.69	0.51	9.47	3.18	0.24	49.42	45.67	0	0
New Permit	0.69	0.51	9.47	3.18	0.24	49.42	45.67	0	0
Total Δ PTE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Triggers	No	No	No	No	No	No	No	No	No

There is no emission increase with this renewal, so no controls analysis is required.

GHG emissions are 6,025 tons per year and remain unchanged. Requirements are not triggered.

D. OPERATIONAL LIMITS

The permit shall retain the operational limits on each air heater, the amount of styrene-containing materials, propane used by fuel burning equipment, propane used by the RTO, use of styrene-containing material only in Lines 1 and 2, and the testing and maintenance limit on the emergency engine.

Coatings

Use of styrene from the application of styrene-containing resins such as gelcoat, laminate, and barriercoat is limited to 1,290 lbs per hour, based on a daily average, and 4,645 tons per any consecutive 12-month period.

Use of styrene-containing resins (polyester resin, gelcoat, and barrier coat) for bathware manufacturing may only take place in the spray booths in production Lines 1 and 2 (EUs: A01, A04, A05, A07, A09, A11, A13, and A15), which are equipped with permanent total enclosures and add-on controls, and the part repair area (EU: A37).

RTO/Manufacturing

Operation of each air heater at the source to 2,200 hours per any consecutive 12-month period (EUs: A02, A06, A10, A12 and A20).

The use of propane fuel by all fuel burning equipment other than the RTO is limited to 662,645 gallons per any consecutive 12-month period.

The use of propane is limited to 193,596 gallons per any consecutive 12-month period, including startups and idling, for the RTO (EU: A42) for the oxidation of process air from the source.

Fire Pump

Operation of the fire pump (EU: B01) is limited to testing and maintenance purposes to 100 hours/year. The permittee may operate the fire pump up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance.

E. CONTROL TECHNOLOGY

There are no changes proposed with this renewal, so no new controls analysis is required.

The Source Plot Plan is provided in Attachment T-2 (Drawing # D-10-4424-3) of the ATC Modification 3 application (submitted to DAQ on June 10, 2004). The air emission source equipment and associated major equipment is listed below and shown on the Plot Plan. The source is configured into two (2) production lines: Line 1 and Line 2. In addition, common ancillary/support equipment such as resin mixing/storage area, above-ground tanks, a propane fuel tank, and a fire pump also exist at the source.

Production Line 1 (Line 1)

Line 1 consists of the following emission units:

Mold Preparation Station (EU: A31): In this process, bare molds are cleaned, repaired if necessary, and are waxed and polished prior to the next manufacturing cycle on the conveyor, which begins with the gel coating.

Spray booths: Production line contains 4 spray booths (EUs: A01, A04, A05, and A07). These spray booths are used for the application of gelcoats, fiberglass reinforced laminates, and barrier coats during various stages of the molding process.

Part Demolding Station (EU: A30): The cured bath fixture is loosened from the mold and transported to the grinding booth. This is common to both Lines 1 and 2.

Grinding Booth(s) (EU: A08): This is a three sided booth with a top and a catch basin below the grated floor. Finished bathtub/shower units are trimmed by air powered equipment (primarily grinders and drills). The booth maintains a negative pressure with respect to the surrounding area, thus essentially no dust escapes from the booth. The lighter ground dust is controlled by the use of dry filter media through which air passes before leaving the booth and exiting to the roof vent.

Process Air heaters: Production Line 1 also contains the following propane-fired process air heaters: One (1) 6.3 MMBtu/hr heater (EU: A02), one (1) 4.8 MMBtu/hr heater (EU: A06), and one (1) 0.36 MMBtu/hr heater. Process air heaters are used to keep the process air at optimum temperatures to facilitate the bonding and curing of resins and laminates during the manufacturing operations.

Gelcoat Room: The gelcoat storage room for Line 1 is identified as emission unit A26.

Production Line 2 (Line 2)

Similar to Line 1, Line 2 also contains 4 spray booths (EUs: A09, A11, A13, and A15) for the application of gelcoats, fiberglass reinforced laminates, and barrier coat during various stages of the molding process. Line 2 contains two similar process air heaters as Line 1: EU: A10 rated at 6.3 MMBtu/hr and EU: A12 rated at 4.8 MMBtu/hr. Line 2 also has five propane-fired cure tunnel air heaters (EU: A14) with a cumulative rating of 5 MMBtu/hr. The mold preparation station for Line 2 is identified as EU: A35 and EU: A27 is the Gelcoat storage room for Line 2.

Common Equipment

Mixers (EUs: A21 and A22): Virgin polyester resin is mixed with fillers (aluminum trihydrate and calcium carbonate) in a closed system 5 hp Autocon Hy-Solv disperser. The newly mixed high-filled resin is pumped directly to the holding tanks which are located inside the manufacturing building in a fire resistant room adjacent to the spray booth. The virgin resin is supplied to the disperser from a remote 7,000 gallon storage tank by gravity. The calcium carbonate is automatically loaded through a dust-free pneumatic conveying system. The aluminum trihydrate is manually loaded into the mixer. The source also has a putty mixer (EU: A39).

Part Repair (EU: A37): Parts are routed here for touch-up repair of minor defects and are then inspected and forwarded to the warehouse.

Storage Silo (CaCO_3) (EU: A23): Stores calcium carbonate filler material. The filler material is pneumatically conveyed to the mixer where it is mixed with polyester resins. Particulate emissions during loading and unloading of the silo are controlled by a binvent with at least 99.0 percent PM_{10} control efficiency.

Holding Tank Rooms (EUs: A24 and A25): These rooms contain tanks which store different types of fiberglass reinforced laminates (Lam 1, 2 and 3) and barrier coat.

In addition to the above, the permittee also has a Protective Coating booth (EU: A40), a virgin resin storage tank (EU: A38), and two (2) trim saws (EU: A17A) as common equipment.

Add-on Control Devices

These include the two (2) rotary preconcentrators and the RTO. Their operation is discussed in detail below.

Rotary Preconcentrators: The purpose of the preconcentrators is to concentrate the dilute gaseous VOC (process air) in a large air volume to a smaller air volume. The VOC in the smaller air volume is more efficiently destroyed in RTO.

The concentration of VOC in the process air is achieved as follows. The VOCs are collected by passing the VOC-laden process air through a rotary disk adsorber with zeolite as an active adsorbent media. As the process air passes through the disk adsorber, the VOCs are adsorbed on to the adsorbent media affixed to the rotor. The purified process air is then exhausted to the atmosphere. The VOCs adsorbed on the rotor are continuously desorbed by a high temperature-volume desorption air stream. The desorption air stream exits the concentrator containing the VOCs desorbed from the rotary disks. The desorption air stream is then directed into the RTO for VOC destruction by oxidation. A modular three stage filter, each stage with progressively higher levels of filtration for the removal of particulates prior to the concentrator inlet, is also part of the system.

Regenerative Thermal Oxidizer (RTO): The RTO unit is manufactured by Adwest Technologies, Inc., and is referred to as the Retox® oxidizer.

The Retox® oxidizer consists of a reinforced, insulated twin bed chamber filled with ceramic heat exchanger media. The gas flow is automatically controlled by a zero leakage poppet valve mechanism that changes the direction of the gas flow at regular intervals via an integral

programmable logic control (PLC) system. An external burner is used for initial cold startup, typically one hour, and for maintaining the RTO operating temperature between 1,600°F and 2,000°F. The external burner is fueled with liquid propane that is stored in a tank at Aquatic Co.'s facility.

Due to the abundant oxygen content of the process gas, complete combustion readily occurs when the ignition point is reached in the oxidizer (typically 1,600°F – 1,700°F). Styrene is converted to carbon dioxide and water vapor. With a sufficient concentration of styrene in the incoming process gas, the exotherm of the styrene will be enough so that the combustion will be self-sustaining and no auxiliary heat energy is required from the fuel source.

The high degree of heat recovery achieved is the result of regenerative heat transfer. The styrene-laden process air enters a porous bed filled with high temperature ceramic heat transfer media. The air is preheated by bed #1 to a maximum temperature, passes through a central combustion chamber where the styrene is oxidized to carbon dioxide and water vapor, and then exits a second bed where heat is transferred from the hot air back into the bed. In order to avoid an uneven temperature distribution throughout the oxidizer, the gas flow direction is changed at regular intervals by the automatic valve-switching mechanism to maintain an even temperature profile between the twin beds.

F. MONITORING

The permit shall retain the requirements to monitor visual emission (updated to current language), RTO operating conditions, materials used, 40 CFR Part 63.5805 compliance, emergency engine operation and baghouse functions.

The operating temperature of the RTO is continuously monitored (averaged over 10 minutes) to ensure that it is operating between 1,600°F and 2,000°F. The RTO is also equipped with a low temperature alarm (Allen Bradley PLC) whose set point is the minimum operating temperature. Controls are set to ignite propane fuel to recover the dropped temperature if the low temperature alarm goes off (below 1,600°F). An interlock with the air supply is installed to prevent operation of the spray guns if the RTO temperature drops below the 1,600°F.

The continuous temperature monitoring is performed based on the procedures in 40 CFR Part 63 Subpart SS. The fire box temperature of the RTO is continuously monitored according to § 63.988(c) of Subpart SS. Conditions are included in the Monitoring section of the Part 70 OP. Compliance demonstration is further ensured by recordkeeping requirements.

Other parameters monitored based on the requirements of 40 CFR Part 64 - Compliance Assurance Monitoring are discussed in Section IV-B of this document.

G. PERFORMANCE TESTING

After the modification in January 2006 (Modification 3), initial performance testing for compliance demonstration for the capture efficiency (the permanent total enclosure), VOC destruction efficiency, and VOC actual emissions for RTO was completed on May 2006 and repeated in 2010, 2015, and 2020.

Aquatic Co. is required to conduct the above tests every five years. Performance testing requirements are included in the Performance Testing section of the Part 70 OP.

IV. REGULATORY REVIEW

A. LOCAL REGULATORY REQUIREMENTS

DAQ has determined that the following public laws, statutes, and associated regulations are applicable:

Table IV-A-1: SIP Applicability of Rules

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
0. Definitions	applicable definitions	yes	entire source
1. Definitions	“Existing Gasoline Station”, “New Gasoline Stations”, “Single Source”, “Standard Conditions”.	Yes	entire source
4. Control Officer	all subsections 4.7.3 and 4.12.1 through 4.12.3 in SIP	partial	entire source
5. Interference with Control Officer	all subsections	yes	entire source
6. Injunctive Relief	all subsections	yes	entire source
7. Hearing Board and Hearing Officer	all subsections	no	entire source
8. Persons Liable for Penalties - Punishment: Defense	all subsections	yes	entire source
9. Civil Penalties	all subsections	no	entire source
10. Compliance Schedule	when applicable; applicable subsections	yes	entire source
12.0. Applicability, General Requirements and Transition Procedures	all subsections	yes	entire source
12.2 Prevention of Significant Deterioration in Attainment Areas	all subsections	yes	entire source
12.3 Permit Requirements for Major Sources in Nonattainment Areas	all subsections	yes	entire source
12.4 Authority to Construct Permit Requirements for Part 70 Sources	all subsections	yes	entire source
12.5 Part 70 Operating Permit Requirements	all subsections	no	entire source
12.6 Confidentiality	all subsections	no	entire source

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
12.7 Emission Reduction Credits	all subsections	yes	entire source
12.9 Annual Emission Inventory Requirements	all subsections	no	entire source
12.10 Continuous Monitoring Requirements for Stationary Sources	all subsections	yes	entire source
18. Permit and Technical Service Fees	all subsections 18.1 through 18.5.2 and 18.6 through 18.12 in SIP	partial	entire source
21. Acid Rain Permits	all subsections	no	entire source
22. Acid Rain Continuous Emission Monitoring	all subsections	no	entire source
24. Sampling and Testing - Records and Reports	§ 24.1 Requirements for installation and maintenance of sampling and testing facilities § 24.2 Requirements for emissions record keeping § 24.3 Requirements for the record format § 24.4 Requirements for the retention of records by the emission sources (Note: Repealed from SIP on Oct 17, 2014)	no	entire source
25.1 Upset/Breakdown, Malfunctions (1981)	§ 25.1 Requirements for the excess emissions caused by upset/breakdown and malfunctions	no	entire source
25.2 Upset/Breakdown, Malfunctions (1981)	§ 25.2 Reporting and Consultation	yes	entire source
26. Emission of Visible Air Contaminants (1981)	§ 26.1 Limit on opacity ($\leq$ an average of 20 percent for a period of more than 6 consecutive minutes)	yes	entire source
27. Particulate Matter from Process Weight Rate	all subsections	yes	entire source
28. Fuel Burning Equipment	Emission Limitations for PM	yes	entire source
29. Sulfur Contents of Fuel Oil	Repealed by County	no	entire source
30. Incinerators	Repealed by County	no	entire source
40. Prohibitions of Nuisance Conditions	§ 40.1 Prohibitions	no	entire source
41. Fugitive Dust	§ 41.1.2 Prohibitions	yes	entire source
42. Open Burning	§ 42.1, 42.3, 42.4	yes	entire source

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
43. Odors In the Ambient Air	§ 43.1	no	entire source
52. Gasoline Dispensing Facilities	Repealed by County	yes	entire source
60. Evaporation and Leakage	Only 60.4.3	yes	entire source
70. Emergency Procedures	all subsections	yes	entire source
80. Circumvention	all subsections	yes	entire source
81: Provisions of Regulations Severable	all subsections	yes	entire source
90. Fugitive Dust, Open Areas and Vacant Lots	all subsections	yes	entire source
91. Fugitive Dust, Unpaved Roads, Unpaved Alleys and Unpaved Easement Roads	all subsections	yes	entire source
92. Fugitive Dust, Unpaved Parking Lots	all subsections	yes	entire source
93. Fugitive Dust, Paved Roads and Street Sweeping Equipment	all subsections	yes	entire source
94. Permitting and Dust Control for Construction Activities	all subsections	yes	entire source

- Clean Air Act, as amended (CAAA), Authority: 42 U.S.C. § 7401, et seq.;
- Title 40 of the Code of Federal Regulations (CFR);
- Nevada Revised Statutes (NRS), Chapter 445B;
- Portions of the AQR that are included in the State Implementation Plan (SIP) for Clark County, Nevada. SIP requirements are federally enforceable. All requirements from Authority to Construct permits Part 70 Operating Permits issued by DAQ are federally enforceable because these permits were issued pursuant to SIP-included sections of the AQR; and
- Portions of the AQR that are not included in the SIP. These locally applicable requirements are locally enforceable only.
- The new CTGs (AQRs 101-130) were reviewed and only AQR 130 applies.

The Nevada Revised Statutes (NRS) and the Clean Air Act Amendments (CAAA) are public laws that establish the general authority for the Regulations mentioned.

The DAQ Part 70 Operating Permit (Title V) Program received Final Approval on November 30, 2001 with publication of that approval appearing in the Federal Register December 5, 2001 Vol. 66, No. 234. AQR Section 12.5 - Part 70 Operating Permit Requirements details the Clark County Part 70 Operating Permit Program. These regulations may be accessed on the Internet at:

https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/division_of_air_quality/rules_regulations/current-aq-rules

Local regulations contain sections that are federally enforceable and sections that are locally enforceable only. Locally enforceable only rules have not been approved by EPA for inclusion into the State Implementation Plan (SIP). Requirements and conditions that appear in the Part 70 OP which are related only to non-SIP rules are notated as locally enforceable only.

Table IV-A-1: AQR Summary Table for Aquatic Co.

	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAP
Hydrographic Area 218	Attainment	Attainment	Attainment	Attainment	Attainment	Attainment	N/A
Source PTE (tpy)	0.69	0.51	9.47	3.18	0.24	49.42	45.67
Major Source	≥ 100 tpy	≥ 100 tpy	≥ 100 tpy	≥ 100 tpy	≥ 100 tpy	≥ 100 tpy	≥ 10 tpy for each HAP, or ≥ 25 tpy for combined HAPs

Aquatic Co. is a major source of HAPS and minor for all the other regulated pollutants.

B. FEDERALLY APPLICABLE REGULATIONS

Based on a letter dated August 31, 1988 by EPA Region 5, facilities that use glass fibers to manufacture other products, such as fiberglass-reinforced composites, were not intended to be included in the "glass fiber processing" category. Therefore, the source is not a categorical stationary source as defined in AQR 12.2.2(j).

DAQ has determined that the following federal regulations are applicable:

1. Clean Air Act, as amended (CAAA), Authority: 42 U.S.C. § 7401, et seq.
2. Title 40 of the Code of Federal Regulations (CFR).

40 CFR Part 63 - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES:

Subpart A - General Provisions

40 CFR § 63.5 - Preconstruction review and notification requirements

Discussion: Since the source underwent a major modification (Modification 3) after the effective date of the relevant standard promulgated under 40 CFR Part 63 Subpart WWWW, Aquatic Co. is subject to this section. DAQ preconstruction requirements under AQR Section 12 have been met for these modifications. The SIP-approved preconstruction requirements are identical or more stringent than those outlined in § 63.5.

40 CFR § 63.7 - Performance tests

Discussion: These requirements are found in the Performance Testing section of the Part 70 OP. Notice of intent to test, the applicable test methods, acceptable test method operating conditions, and the requirement for three runs are outlined in this regulation. DAQ requirements for initial performance testing are identical to § 63.7. DAQ also requires periodic performance testing on emission units based upon throughput or usage. Specifically, conditions for performance tests, performance evaluations, design evaluations, capture efficiency testing and other initial compliance demonstrations required by 40 CFR Part 63, Subpart WWWW, in accordance with 40 CFR Part 63, Subpart SS, are included in the Part 70 OP. More discussion is provided in this document under the compliance section.

40 CFR § 63.10 - Recordkeeping and Reporting Requirements

Discussion: This regulation requires notification to DAQ of modifications, opacity testing, records of excess emissions, malfunctions of process equipment; air pollution control equipment; and monitoring equipment, and performance test data. These requirements are found in the Recordkeeping and Reporting sections of the Part 70 OP. DAQ requires records to be maintained on-site for five years, a more stringent requirement than the two (2) years required by § 63.10.

40 CFR § 63.6 - Compliance with standards and maintenance requirements

Discussion: Aquatic Co. shall demonstrate continuous compliance with all organic HAP emission limits in Subpart WWWW that the facility meets using add-on controls, except during start-up, shut-down and malfunction. Aquatic Co. has developed and implemented a written start-up, shut-down and malfunction plan according to the provisions in 40 CFR § 63.6(e)(3). The spray guns cannot operate until the RTO temperature reaches 1,600 degrees.

In addition to the sections discussed above, the parts of the general provisions in § 63.1 through 63.15 presented in Table 15 of 40 CFR Part 63 Subpart WWWW, are also applicable to the facility.

40 CFR Part 63 Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

40 CFR § 63.5785 - Applicability

Discussion: Subpart WWWW applies to the entire source.

40 CFR § 63.5799 - Calculation of facility's organic HAP emissions on a TPY basis for purposes of determining which paragraphs of § 63.5805 apply

Discussion: The uncontrolled HAP emissions from the source operations were calculated using factors from Table 1 of the subpart.

40 CFR § 63.5800 - Compliance Dates

Discussion: Facility is currently subject to the MACT standards. Subpart WWWW became effective on April 21, 2003. All existing sources were required to comply with the standard by April 21, 2006.

40 CFR § 63.5805 - Standards to meet to comply with this subpart

Discussion: The permittee is required to meet the organic HAP emissions limits in Table 3 to 40 CFR Part 63 Subpart WWWW for all the open molding operations at the source, regardless of the quantity of HAP emitted. The applicable emission limits from Table 3 based on the operation types at the source is provided in Table IV-B-1.

Table IV-B-1: Emission Standards from Subpart WWWW

Line Item # From Table 3 to 40 CFR 63 Subpart WWWW	Operation Type	Application Type	Organic HAP Emissions Limit
2.a	open molding—non-corrosion-resistant and/or high strength (CR/HS)	mechanical resin application	88 lb/ton
3.a	open molding—tooling	mechanical resin application	254 lb/ton
6.a	open molding—gel coat	tooling gel coating	440 lb/ton
6.b	open molding—gel coat	white/off white pigmented gel	267 lb/ton
6.c	open molding—gel coat	all other pigmented gel coating	377 lb/ton

The permittee is also required to meet the applicable work practice standards in Table 4 to the subpart. The applicable work practice standards based on the operation types at Aquatic Co. are listed in line items 2, 3, 6, 7, and 8 of Table 4 to the subpart and are described in detail in the Part 70 OP.

40 CFR § 63.5810 - Options for meeting the standards for open molding and centrifugal casting operations at new and existing sources

Discussion: Aquatic Co. selected the option described in § 5810(c) of the subpart - Demonstrate compliance with a weighted average emission limit, for meeting the standards in Table 3 to the subpart. The procedural details calculation of HAP emission limits and actual emissions are provided in the Part 70 OP.

40 CFR § 63.5850 - Conduct performance tests, performance evaluations, and design evaluations

Discussion: Aquatic Co. demonstrates compliance with the permanent total enclosure requirements by performing an analysis based on Method 204 of Appendix M of 40 CFR Part 51. Meeting Method 204 requirements demonstrates 100 percent capture efficiency for HAP and VOC emissions. Aquatic Co. also demonstrates compliance with the 95 percent overall destruction efficiency of the preconcentrators/RTO units by testing the inlet and outlet of the preconcentrator-RTO system in accordance with 40 CFR Part 63 Subpart SS, and §63.5850. Aquatic Co. is required to conduct the abovementioned tests annually. These requirements are found in the conditions for performance testing in the Part 70 OP.

40 CFR § 63.5900 - Demonstration of continuous compliance with the standards

Discussion: Aquatic Co. demonstrates continuous compliance based on the procedures in 40 CFR Part 63 Subpart SS. The fire box temperature of the RTO is continuously monitored according to § 63.988(c) of Subpart SS. Conditions are included in the Part 70 OP.

40 CFR § 63.5905 - Notifications

Discussion: Aquatic Co. is required to submit all of the applicable notifications in Table 13 to the subpart that by the dates specified in Table 13 to this subpart. The notifications are described in detail in 40 CFR Part 63 Subpart A, referenced in Table 13 to the subpart.

40 CFR § 63.5905 - Recordkeeping

Discussion: The records required by the subpart and 40 CFR Part 63 Subpart SS are listed in the Part 70 OP.

40 CFR §§ 60.49a, 5910 - Reporting Requirements

Discussion: Under the subpart, the permittee is required to submit each applicable report in Table 14 to the subpart. These are discussed in Section 4.3 of the Part 70 OP.

40 CFR Part 63 Subpart SS - National Emissions Standards for Hazardous Air Pollutants for Source Categories (NESHAP) - National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process

40 CFR § 63.980 - Applicability

Discussion: The provisions of this subpart apply when another subpart references the use of this subpart for such air emission control. Here, 40 CFR Part 63 Subpart WWW references Subpart SS for operational and monitoring requirements of the add-on control device.

40 CFR § 63.988 - Incinerators, boilers, and process heaters

Discussion: The requirements for operation, performance tests, and a temperature monitoring device for the incinerator are specified in this section. Conditions are included in the Part 70 OP.

40 CFR § 63.996 - General monitoring requirements

Discussion: The general installation, operation and maintenance requirements for the CPMS are specified in this section. Associated conditions can be found in Section 2.2 of the Part 70 OP.

40 CFR § 63.997 - Performance test and compliance assessment requirements for control devices

Discussion: These requirements are referenced in the Section 4.2 of the Part 70 OP.

40 CFR § 63.998 - Recordkeeping requirements

Discussion: Recordkeeping of the continuous data collected by CPMS, data averaging for records, data exclusions, recordkeeping during performance tests etc are discussed in this section. Section 4.3 of the Part 70 OP includes the associated recordkeeping requirements.

40 CFR Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Source Categories (NESHAP) - National Emission Standards for Stationary Reciprocating Internal Combustion Engines

40 CFR Part 63.6585 - Applicability

Discussion: Subpart ZZZZ applies to the diesel fire pump (EU: B01) and the permittee shall limit the hours of testing and maintenance to 100 hours per year.

40 CFR Part 63.6602 – Operating Limitations

Discussion: The permittee shall follow the operation requirements in Table 2c of the Subpart. These requirements are in the Part 70 OP.

40 CFR Part 64 - Compliance Assurance Monitoring

40 CFR § 64.2 - Applicability

Discussion: The CAM Rule is not applicable for a Pollutant-Specific Emission Unit (PSEU) for HAPs based on the applicability statement outlined in 40 CFR Part 64.2(b)(i), i.e., the source is subject to emissions limitations or standards proposed by the administrator after November 15, 1990, pursuant to section 111 or 112 of the CAA. The source is subject to 40 CFR Part 63 Subpart WWW, which was promulgated in 2003.

However, the CAM rule is applicable to a PSEU at Aquatic Co. (here, the PSEU refers to the units contained within the permanent total enclosure) for VOCs due to the fact that Aquatic Co. is a major source that is required to obtain a Part 70 OP. The unit uses a control device and the potential pre-control VOC emissions are above the major source threshold of 100 tons.

The permittee submitted supplemental information to the previously submitted CAM plan on 11/19/2008. The permittee selected RTO operating temperature, preconcentrators desorption temperature, and Inlet air pressure to the concentrators as CAM indicators. The monitoring approach is summarized in Table IV-B-2:

Table IV-B-2: Compliance Assurance Monitoring Approach

Criteria	Indicator
Indicator and Measurement Approach	RTO operating temperature and rotary preconcentrator (Rotary Continuous Zeolite Adsorber) desorption temperature are continuously monitored as the indicators of VOC emissions compliance. An interlock is provided to stop the spray gun operation if the RTO temperature falls below 1600 °F. Inlet pressure to the concentrators is also monitored to assure the 100 percent capture of the permanent total enclosure (the building).
Indicator Range	Excursions trigger an investigation, corrective actions and a reporting requirement. More than 5 excursions within a 6-month period require a quality improvement plan (QIP).
Verification of Operational Status	The data recorder is checked on a daily basis for proper operation. The air inlet pressure to the preconcentrators is monitored and recorded once every 8-hour shifts.
QA/QC Practices and Criteria	Annual calibration of the monitoring device including the data chart recorder. The data recorder is checked on a daily basis for proper operation. The inlet pressure monitor to the preconcentrators is calibrated annually.
Monitoring Frequency	RTO operating temperature, and rotary preconcentrators (Rotary Continuous Zeolite Adsorber) desorption temperature are measured continuously and recorded using data chart recorders on a 10-minute average basis. The air inlet pressure to the preconcentrators is monitored and recorded once every 8-hour shifts.

Criteria	Indicator
Data Collection Procedures	Data chart recorders record RTO operating temperature and rotary preconcentrators (Rotary Continuous Zeolite Adsorber) desorption temperature measured by the temperature monitoring devices. The data recorder is checked on a daily basis for proper operation.
Averaging Period	A 10-minute fixed block averaging period is used for temperature recording.

40 CFR PART 72 - ACID RAIN PERMITS REGULATION

Discussion: Aquatic Co. is not subject to the acid rain permit regulation.

V. COMPLIANCE

A. COMPLIANCE HISTORY

Compliance Issue Since Last Renewal	How Resolved/Proposed	Status
NOV 9888 Noticed 8/9/23	Adjudicated 9/21/23	Compliant
NOV 9475 Noticed 10/29/20	Adjudicated 11/19/20	Compliant
NOV 010276	Failed performance test. Reduced operations to one production line. Conducting engineering study to determine best course of action.	Noncompliant

B. COMPLIANCE CERTIFICATION

- (a) Regardless of the date of issuance of this Part 70 OP, the schedule for the submittal of reports to the Control Officer shall be as follows:

Required Report	Applicable Period	Due Date ¹
Semiannual Report for 1st half of the year.	January, February, March, April, May, June	July 30 each year
Semiannual Report for 2nd half of the year. Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Semiannual 40 CFR Part 63 Subpart WWWW Compliance Report for 1st half of the year	January, February, March, April, May, June	July 31 each year
Semiannual 40 CFR Part 63 Subpart WWWW Compliance Report for 2nd half of the year	July, August, September, October, November, December	January 31 each year
Annual Compliance Certification Report	Calendar Year	January 30 each year
Annual Emission Inventory Report	Calendar Year	March 31 each year
Excess Emission Notification	As Required	Within 24 hours of the time the permittee first learns of the excess emissions
Excess Emission Report	As Required	Within 72 hours of the notification
Deviation Report	As Required	Along with semiannual reports

Required Report	Applicable Period	Due Date ¹
Excess Emissions that Pose a Potential Imminent and Substantial Danger	As required	Within 12 hours of the permittee learns of the event
Performance Testing Protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date ¹
Performance Testing	As Required	Within 60 days from the end of the test

¹If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal are due on the next regularly scheduled business day.

- (b) A statement of methods used for determining compliance, including a description of monitoring, recordkeeping, and reporting requirements and test methods.
- (c) A schedule for submission of compliance certifications during the permit term.
- (d) A statement indicating the permittee's compliance status with any applicable enhanced monitoring and compliance certification requirements of the Act.

C. SUMMARY OF MONITORING FOR COMPLIANCE

Aquatic Company certified, through its renewal application and annual compliance certification, that the permittee is in compliance with all permit conditions and applicable requirements.

Applicable Section - Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 0 - Definitions.	Applicable – Aquatic Co. will comply with all applicable definitions.	Aquatic Co. will meet all applicable test methods should new definitions apply.	Aquatic Co. complies with applicable requirements.
AQR Section 4 - Control Officer	Applicable – The Control Officer or his representative may enter into Aquatic Co. property, with or without prior notice, at any reasonable time for purpose of establishing compliance.	Aquatic Co. will allow Control Officer to enter property as required.	Aquatic Co. complies with applicable requirements.
AQR Section 12.5 - Part 70 Operating Permits	Applicable – Aquatic Co. is a major stationary source and under Part 70. Renewal applications are due between 6 and 18 months prior to expiration. Revision applications will be submitted within 12 months of commencing operation of the new emission unit.	Aquatic Co. submitted the initial Part 70 OP application within 12 months of startup.	Aquatic Co. complies with applicable requirements.
AQR Section 13.2(b)(1) - NESHAP - Subpart A - General Provisions	Applicable – Aquatic Co. is an affected facility under the regulations. Table 15 to 40 CFR Part 63 Subpart WWW specifies which parts of the General Provisions in	Applicable monitoring, recordkeeping and reporting requirements.	Aquatic Co. complies with applicable requirements.

Applicable Section - Title	Applicability	Applicable Test Method	Compliance Status
	§§63.1 through 63.15 apply to the source		
AQR Section 13.2(b)(34) - NESHAP - Subpart SS	Applicable- Overall destruction efficiency of the preconcentrators-RTO units by testing the inlet and outlet of the preconcentrator-RTO system in accordance with 40 CFR Part 63, Subpart SS. Continuous Parameter Monitoring is also required under the subpart.	Aquatic Co. demonstrate compliance with the 95 percent overall destruction efficiency of the preconcentrators-RTO units by testing the inlet and outlet of the preconcentrator-RTO system in accordance with 40 CFR Part 63, Subpart SS, and §63.5850. Aquatic Co. performs continuous operating temperature monitoring for the RTO and collects data in accordance with the subpart. Applicable monitoring, recordkeeping and reporting requirements	Aquatic Co. complies with applicable requirements.
AQR Section 13.3 (b)(79) - NESHAP - Subpart WWWW	Applicable – Aquatic Co. is an affected facility under the regulations. Compliance date for the subpart was March 21, 2006.	Aquatic Co. uses add-on controls to comply with the emission limits in Table 3 of the subpart. Aquatic Co. selected 63.5810 option c (compliance with a weighted average HAP limit) in demonstrating compliance with the applicable HAP limits. Aquatic Co. demonstrates compliance with the permanent total enclosure requirements by performing an analysis based on Method 204 of Appendix M of 40 CFR Part 51. Meeting Method 204 requirements demonstrates 100 percent capture efficiency for HAP and VOC emissions. Aquatic Co. also demonstrate compliance with the 95 percent overall destruction efficiency of the preconcentrators-RTO units by testing the inlet and outlet of the preconcentrator-RTO system in accordance	Aquatic Co. complies with applicable requirements.

Applicable Section - Title	Applicability	Applicable Test Method	Compliance Status
		with 40 CFR Part 63, Subpart SS, and §63.5850.	
AQR Section 18 - Permit and Technical Service Fees	Applicable – Aquatic Co. will be required to pay all required/applicable permit and technical service fees.	Aquatic Co. is required to pay all required/applicable permit and technical service fees.	Aquatic Co. complies with applicable requirements.
AQR Section 25 - Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown	Applicable – Any upset, breakdown, emergency condition, or malfunction which causes emissions of regulated air pollutants in excess of any permit limits shall be reported to Control Officer. Section 25.1 is locally and federally enforceable.	Any upset, breakdown, emergency condition, or malfunction in which emissions exceed any permit limit shall be reported to the Control Officer within 24 hours of onset of such event.	Aquatic Co. currently complies with applicable requirements.
AQR Section 26 - Emissions of Visible Air Contaminants	Applicable – Opacity must not exceed 20 percent for a period of more than 6 consecutive minutes.	Compliance determined by EPA Method 9.	Aquatic Co. complies with applicable requirements.
AQR Section 27 - Particulate Matter from Process Weight Rate	Applicable – Aquatic Co. emission units are required to meet the maximum weight based on maximum design rate of equipment.	Compliance determined by meeting maximum particulate matter discharge rate based on process rate from AQR Table 27-1.	Aquatic Co. complies with applicable requirements.
AQR Section 28 - Fuel Burning Equipment	Applicable – The PM emission rate for the combustion turbines and duct burners are well below those established based on Section 28 requirements.	Maximum allowable PM emission rate determined from equation in Section 28.	Aquatic Co. complies with applicable requirements.
AQR Section 40 - Prohibition of Nuisance Conditions	Applicable – No person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance. Section 40 is locally enforceable only.	Aquatic Co. air contaminant emissions controlled by pollution control devices or good combustion in order not to cause a nuisance.	Aquatic Co. complies with applicable requirements.
AQR Section 41.1.2 - Fugitive Dust	Applicable – Aquatic Co. shall take necessary actions to abate fugitive dust from becoming airborne.	Aquatic Co. utilizes appropriate best practices to not allow airborne fugitive dust.	Aquatic Co. complies with applicable requirements.

Applicable Section - Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 42 - Open Burning	Applicable – In event Aquatic Co. burns combustible material in any open areas, such burning activity will have been approved by Control Officer in advance. Section 42 is a locally enforceable rule only.	Aquatic Co. will contact DAQ and obtain approval in advance for applicable burning activities as identified in the rule.	Aquatic Co. complies with applicable requirements.
AQR Section 43 - Odors in the Ambient Air	Applicable – Aquatic Co. shall take necessary actions to abate fugitive dust from becoming airborne.	Aquatic Co. utilizes appropriate best practices to not allow airborne fugitive dust.	Aquatic Co. complies with applicable requirements.
AQR Section 70.4 - Emergency Procedures	Applicable – Aquatic Co. submitted an emergency standby plan for reducing or eliminating air pollutant emissions in the Operating Permit Application.	Aquatic Co. submitted an emergency standby plan and received Operating Permit.	Aquatic Co. complies with applicable requirements.
AQR Section 130 – Architectural and Industrial Maintenance Coatings	Applicable – Aquatic Co. shall comply with this regulation when architectural coatings are manufactured, sold, or applied.	Aquatic Co. shall comply with the test methods if required.	Aquatic Co. shall comply with applicable requirements.
40 CFR Part 52.1470 - SIP Rules	Applicable – Aquatic Co. is classified as a Title V source, and SIP rules apply.	Applicable monitoring and recordkeeping of emissions data.	Aquatic Co. is in compliance with applicable state SIP requirements including monitoring and recordkeeping of emissions data.
40 CFR Part 60 - Appendix A, Method 9 or equivalent, (Opacity)	Applicable – Emissions from stacks are subject to opacity standards.	Opacity determined by EPA Method 9.	Aquatic Co. complies with applicable requirements.
40 CFR Part 51 - Appendix M Method 204 or equivalent	Applicable - Aquatic Co. demonstrate compliance with the permanent total enclosure requirements by performing an analysis based on Method 204	100 percent capture efficiency for HAP and VOC emissions from coating operations is demonstrated by Method 204.	Aquatic Co. complies with applicable requirements.

Applicable Section - Title	Applicability	Applicable Test Method	Compliance Status
40 CFR Part 64 - Compliance Assurance Monitoring	Applicable for VOCs – Aquatic Co. is a major source that is required to obtain a Part 70 OP. The PSEU at Aquatic Co. is subject an emission limitation for VOCs which is not proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act. The unit uses a control device and the potential pre-control VOC emissions are above the major source threshold of 100 tons.	RTO operating temperature and rotary preconcentrator (Rotary Continuous Zeolite Adsorber) desorption temperature are continuously monitored and recorded as the indicators of VOC emissions compliance. An interlock is provided to stop the spray gun operation if the RTO temperature falls below 1600 °F. Inlet pressure to the concentrators is also monitored to assure the 100 percent capture of the permanent total enclosure. Excursions are defined; tracked and corrective actions are taken to avoid possible permit deviations. Annual calibration and daily check of the monitoring device are performed for QA/QC purposes. Applicable recordkeeping and reporting requirements are also included.	Aquatic Co. complies with applicable requirements.
40 CFR Part 68 - Chemical Accident Prevention Provisions	Not Applicable – Aquatic Co. does not store or handle more than the threshold quantity of any chemicals listed in § 68.130	Recordkeeping of the type of materials used at Aquatic Co.	Aquatic Co. complies with applicable requirements.

Emission Unit	Process Description	Monitored Pollutants/Parameter	Applicable Subsection Title	Requirements	Compliance Monitoring
A01, A04, A05, A07, A08, A26, A31, A09, A11, A13, A15, A27, A35, A21, A22, A24, A25, and A39	Production Line 1, Production Line 2, Myer Mixer, Holding Tank Rooms (Lam1, Lam2, Lam3 & BC), & Myer Putty Mixer	VOC, HAPs	Section 12.5 40 CFR Part 63 Subpart WWWW	Annual and short-term emission limits.	Stack testing for VOC and HAPs by EPA Methods as outlined in the Part 70 OP. Recording is required for compliance demonstration. The operating temperature of the RTO is continuously monitored (averaged over 10 minutes) to ensure that it is operating between 1,600 °F and 2,000 °F.
A42	Preconcentrators and RTO		Section 12.5 40 CFR Part 63 Subpart WWWW	Annual and short-term emission limits.	Compliance for PM ₁₀ , NO _x , CO, SO ₂ , VOC and HAPs shall be based on sole use of propane as fuel and emission factors. Recording of fuel usage is required for compliance demonstration. The operating temperature of the RTO is continuously monitored (averaged over 10 minutes) to ensure that it is operating between 1,600 °F and 2,000 °F.
A42	Preconcentrators and RTO	Opacity	AQR Section 26	Less than twenty percent opacity except for three (3) minutes in any 60-minute period.	Sole use of Propane as the auxiliary fuel and daily visual emissions inspection by an individual trained in Method 9 to verify compliance with the opacity limit.
A02, A06, A10, A12, A14, A20	Process heaters	air CO, NO _x , SO ₂ , PM ₁₀ , VOC, HAPs	Section 12.5	Annual and short-term emission limits.	Compliance for PM ₁₀ , NO _x , CO, SO ₂ , VOC and HAPs shall be based on sole use of propane as fuel and emission factors. Recording of fuel usage and hours of operation is required for compliance demonstration.
A02, A06, A10, A12, A14, A20	Process heaters	air Opacity	AQR Section 26	Less than twenty percent opacity except for three (3) minutes in any 60-minute period.	Sole use of propane as fuel and EPA Method 9 performance testing upon the request of the Control Officer.
A17A	Trim Saw	PM ₁₀	Section 12.5	Annual and short term limits	Daily observation of the dust collector. Recording is required for compliance demonstration.

Emission Unit	Process Description	Monitored Pollutants/Parameter	Applicable Subsection Title	Requirements	Compliance Monitoring
A23	Storage Silo (CaCO ₃)	PM ₁₀	Section 12.5	Annual and short term limits	Daily observation of the dust collector. Recording is required for compliance demonstration.
A23	Storage Silo (CaCO ₃)	Opacity	AQR Section 26	Less than twenty percent opacity except for three (3) minutes in any 60-minute period.	Daily visual emissions inspection by an individual trained in Method 9 to verify compliance with the opacity limit. Monthly leak inspections. Recording is required for compliance demonstration.

VI. EMISSION REDUCTION CREDITS (OFFSETS)

The source is subject to offset requirements in accordance with AQR 12.7. Offset requirements and associated mitigation are pollutant-specific. No offset requirements are identified for this source.

VII. MODELING

A. INCREMENT ANALYSIS

Aquatic Co is a major source in Hydrographic Area 218 (California Wash). Permitted emission units include air heaters, core tunnel heaters, one RTO, one fire pump and other bathware manufacturing operations. Since minor source baseline dates for PM₁₀ (May 21, 1979), NO₂ (February 01, 2001) and SO₂ (May 21, 1979) have been triggered, Prevention of Significant Deterioration (PSD) increment analysis is required.

DAQ modeled the source using AERMOD to track the increment consumption. Stack data submitted by the applicant was supplemented with information available for similar emission units. Four years (2012 to 2015) of meteorological data collected at the Reid Gardner Power Station were used in the model. U.S. Geological Survey National Elevation Dataset terrain data were used to calculate elevations. Table VII-A-1 shows the location of the maximum impact and the potential PSD increment consumed by the source at that location. The impacts are below the PSD increment limits.

Table VII-A-1: PSD Increment Consumption

Pollutant	Averaging Period	Source's PSD Increment Consumption ($\mu\text{g}/\text{m}^3$)	Location of Maximum Impact	
			UTM X (m)	UTM Y (m)
SO ₂	3-hour	58.28 ¹	712523	4062746
SO ₂	24-hour	18.91 ¹	712523	4062746
SO ₂	Annual	0.80	712523	4062746
NO _x	Annual	1.66	712493	4063030
PM ₁₀	24-hour	20.64 ¹	712523	4062746
PM ₁₀	Annual	1.20	712523	4062746

¹ Highest Second High Concentration.

B. PRECONSTRUCTION MODELING

No construction is taking place in this action, therefore preconstruction modeling is not needed.

VIII. ENVIRONMENTAL JUSTICE

There is no emission increase, therefore an environmental justice review is not needed.

IX. PERMIT SHIELD

A permit shield has not been requested.

X. STREAMLINING

Table X-1: Streamlining

EU	Description	Control Device	Regulatory Citation	Regulatory Limit/Requirement	Permit Limit/Requirement	Streamlining Statement
A23	Storage Silo (CaCO ₃)	Binvent	AQR 26.1.1	20% opacity for no more than 6 consecutive minutes.	Less than 20% opacity except for 3 minutes in any 60-minute period.	The permit limit is equal to the regulatory limit.
A42	Preconcentrators and RTO	Precon + RTO	AQR 26.1.1	20% opacity for no more than 6 consecutive minutes.	Less than 20% opacity except for 3 minutes in any 60-minute period.	The permit limit is equal to the regulatory limit.
A42	Preconcentrators and RTO	Precon + RTO	40 CFR 63.5805(d)(1) (Subpart WWWW)	Capture and reduce total organic HAP emissions by at least 95% by weight. Operating parameters monitored.	All emissions must be captured and directed to the preconcentrators. Minimum 95% overall destruction efficiency for VOC and HAP. Operating parameters monitored.	The permit requirement and limit is equal to the regulatory limit.

EU	Description	Control Device	Regulatory Citation	Regulatory Limit/Requirement	Permit Limit/Requirement	Streamlining Statement
A42	Preconcentrators and RTO	Precon + RTO	40 CFR 63.998(b)(1) (Subpart SS)	Operating parameters monitored. Continuous record (measured at least once every 15 minutes).	Operating parameters monitored. Continuous record (10-minute block average).	The permit monitoring frequency is more stringent than the regulatory requirement.
A42	Preconcentrators and RTO	Precon + RTO	40 CFR 63.985(b)(1)(i) (Subpart SS)	Pre and post control HAP emissions calculated using method in 63.985 [provided by permittee and calculated per 63.997(e)(2)(iv)(C)]	Minimum 95% control is required.	The permit limit is equal to the regulatory limit.

XI. PUBLIC PARTICIPATION

Under AQR 12.5.2.17, the public participation requirement is triggered for OP renewals.

XII. ADMINISTRATIVE REQUIREMENTS

AQR Section 12.5 requires that DAQ identify the original authority for each term or condition in the Part 70 OP. Such reference of origin or citation is denoted by *[italic text in brackets]* after each Part 70 OP condition.

DAQ proposes to issue the Part 70 OP conditions on the following basis:

Legal:

On December 5, 2001, in Federal Register Volume 66, Number 234, the EPA fully approved the Title V Operating Permit Program submitted for the purpose of complying with the Title V requirements of the 1990 Clean Air Act Amendments and implementing Part 70 of Title 40 Code of Federal Regulations.

Factual:

Aquatic Co. has supplied all the necessary information for DAQ to draft Part 70 OP conditions encompassing all applicable requirements and corresponding compliance.

Conclusion:

DAQ has determined that Aquatic Co. will continue to determine compliance through the use of CEMS, performance testing, reporting, recordkeeping, coupled with annual certifications of compliance. DAQ proceeds with the preliminary decision that a Part 70 OP should be issued as drafted to Aquatic Co. for a period not to exceed five (5) years.

XIII. ATTACHMENTS

**Applicability – Process Only (what is sent to the preconcentrators and RTO)
Uncontrolled Emission Estimations for VOC Including
HAP (uncontrolled, 8,760 hours/yr (365 days))**

Parameter	Value	Unit
HAP Content - Gelcoat (GC)	36%	%
HAP Content - Barrier Coat (BC)	42%	%
HAP Content - Laminate	49%	%
40 CFR Part 63, Subpart WWWW (Table 1)		
Emission Factor for GC	356	lb/ton
Emission Factor for BC	240	lb/ton
Emission Factor for Laminate	121	lb/ton
Average GC per Bathware Unit	11.05	lb
Average GC per Bathware Unit	5.17	lb
Average GC per Bathware Unit	40.55	lb
Total Resin per Bathware Unit	56.77	lb
Weighted Avg. EF	177.5059	lb/ton
Avg. Units/Day	1190	units
GC/day	13150	lb
BC/day	6152.3	lb
Laminate/day	48,255	lb
Total Resin per Day	67,556	lb
Total Resin per Day	33.78	ton
Work Days/yr	365	days
Total Resin/yr	12,329	ton
Uncontrolled Annual	1094.2	ton
Uncontrolled/day	3.00	ton
Uncontrolled/hr	249.83	lb
PTE HAP (Styrene)	54.71	tons/yr

PTE

[illegible]