

SCAPCA CHAPTER 401 AIR OPERATING PERMIT  
ISSUED IN ACCORDANCE WITH :

40 CFR PART 70, Chapter 70.94 RCW, & CHAPTER 173-401 WAC

SPOKANE COUNTY AIR POLLUTION CONTROL AUTHORITY  
1101 W College, Suite 403  
Spokane, WA 99201  
(509) 477-4727

PERMIT NO: AOP-15 - RENEWAL #1

ISSUANCE DATE: May 18, 2004

DATE REVISED: January 5, 2007

EXPIRATION DATE: May 17, 2009

PERMITTEE: Melcher Manufacturing Company, Inc.  
P.O. Box 11857  
Spokane, WA 99211-1857

FACILITY LOCATIONS: 6017 E Mission Avenue  
Spokane, WA 99212

and

5318 E. Desmet  
Spokane, WA 99212

FACILITY DESCRIPTION: Manufacturer of Fiberglass Loading Ramps  
PRIMARY SIC: 3089  
AIRS AFS NO: WA-063-0091

RESPONSIBLE OFFICIAL WHO  
SUBMITTED APPLICATION: Wayne Hardan  
President

FACILITY CONTACT: Hugh Ebright  
Plant Manager  
(509) 535-7626

PREPARED BY: \_\_\_\_\_  
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April L. Westby, PE

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William Dameworth, Control Officer

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## LIST OF ABBREVIATIONS

BACT	Best available control technology
CEM	Continuous emission monitor
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
COMS	Continuous opacity monitoring system
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O2	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority
scf	Standard cubic foot
SO2	Sulfur dioxide
SOx	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

## DEFINITIONS OF WORDS & PHRASES

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(12), 10/4/93]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 10/4/93]
Emission Limitation	A requirement established under the FCAA or Chapter 70.94 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70.94 RCW [WAC 173-400-030(22), 9/13/96]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70.94 RCW, or 70.98 RCW [WAC 173-400-030(23), 9/13/96]
Federal Clean Air Act	Federal Clean Air Act, also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(13), 10/4/93]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(51), 9/13/96]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

The following note applies throughout this permit when indicated by the term “\* - see note on page 5.”

**NOTE:** For requirements which are federally enforceable because of inclusion in the State Implementation Plan (SIP), where the current filing date in the regulation is different from the filing date for SIP approved version, but the requirement itself has not changed, the most recent filing date is given, followed by the SIP version in parentheses.

Until this permit expires, is modified, or revoked, the permittee, Melcher Manufacturing Company, Inc., is authorized to operate subject to the terms and conditions listed herein.

## I. STANDARD TERMS & CONDITIONS

### A. PERMIT ADMINISTRATION

**1. Federal Enforceability.** All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA except those terms or conditions not required under the FCAA or under any of its applicable requirements and specifically so designated. All terms and conditions that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation. [WAC 173-401-625, 10/4/93]

**2. Duty to comply.** The permittee shall comply with all terms and conditions of this Chapter 401 permit. Any permit noncompliance shall constitute a violation of Chapter 70.94 RCW, and for federally enforceable provisions, a violation of the Federal Clean Air Act. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a), 10/4/93]

**3. Schedule of Compliance.** The permittee will continue to comply with all applicable requirements with which the source is in compliance. The permittee will meet, on a timely basis, any applicable requirements that become effective during the permit term. [WAC 173-401-630(3), 10/4/93]

**4. Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b), 10/4/93]

**5. Permit Actions.** 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 does not stay any permit condition. [WAC 173-401-620(2)(c), 10/4/93]

**6. Reopening for Cause.** The permit shall be reopened and revised under any of the following circumstances:

- a. Additional requirements become applicable to the facility and the remaining permit

term is three or more years. Such reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. Such reopening is not required if the effective date of the new requirement is later than the date on which this permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j). (See Condition 15- Permit Continuation below);

b. SCAPCA or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

c. SCAPCA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

[WAC 173-401-730, 10/4/93]

**7. Emissions Trading.** 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. [WAC 173-401-620(2)(g), 10/4/93]

**8. Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]

**9. Duty to provide information.** The permittee shall furnish within a reasonable time to SCAPCA, any information that SCAPCA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to SCAPCA copies of records required to be kept by the permit or, for information claimed confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. SCAPCA shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e), 10/4/93]

**10. Duty to Supplement or Correct Application.** The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. [WAC 173-401-500(6), 9/16/02]

**11. Permit Fees.** The permittee shall pay fees as a condition of this permit in accordance with SCAPCA's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f), 10/4/93]

**12. Severability.** If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h), 10/4/93]

**13. Permit Appeals.** This permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on SCAPCA within thirty days of

receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from, and additional to, any federal rights to petition and review under §505(b) of the FCAA, including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i), 10/4/93] [WAC 173-401-735(1), 10/4/93]

**14. Permit Renewal and Expiration.** This permit shall be in effect for five years from the date of issuance as indicated on the cover page. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete application for renewal is submitted to SCAPCA at least 12 months, but no more than 18 months, prior to the date of permit expiration. Upon SCAPCA's receipt of a timely and complete application, the facility may continue to operate subject to final action by SCAPCA on the application. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit, by the deadline specified in writing by SCAPCA, any additional information identified as necessary to process the application. The application shall be sent to :

Director  
SCAPCA  
1101 W College Suite 403  
Spokane WA 99201

[WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1) & (3), 9/16/02]

**15. Permit Continuation.** This permit and all terms and conditions contained herein, including any permit shield provided under Condition 16- Permit Shield and Section III. PERMIT SHIELD, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]

**16. Permit Shield.** Compliance with a permit condition is deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance.

This permit shield shall not alter or affect the following:

- a. the provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- b. the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- c. the ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;
- d. the ability of SCAPCA to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(1) & (4), 10/4/93]

(See III. PERMIT SHIELD for requirements that have been deemed inapplicable to this facility.)

## B. INSPECTION & ENTRY

**17. Inspection and Entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow SCAPCA, or an authorized representative, to perform the following:

- a. enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- b. have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- d. as authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

[WAC 173-401-630(2), 10/4/93]

Nothing in this condition shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

**18. Obstruction of Access.** No person shall obstruct, hamper, or interfere with any authorized representative of SCAPCA who requests entry for the purpose of inspection, and who presents appropriate credentials; nor shall any person obstruct, hamper or interfere with any such inspection. [RCW 70.94.200, 1998 - STATE/LOCAL ONLY] [SCAPCA Regulation I, Section 2.02.E, 1/7/02 – STATE/LOCAL ONLY]

## C. EMERGENCY PROVISIONS

**19. Emergencies.** An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an enforcement action for non-compliance with a technology-based emission limitation if all the conditions of WAC 173-401-645(3) and (4) are met and the permittee submits notification of the emergency to SCAPCA according to the shortest time period which applies to the situation as follows (See Condition 28- Prompt Reporting of Deviations):

- a. as soon as possible, but no later than 12 hours after the emissions are discovered, if

the emissions represent a potential threat to human health or safety;

b. within two working days of the time that the emissions limits were exceeded due to the emergency; or

c. within a shorter period of time if specified in an applicable requirement.

This provision is in addition to the affirmative defense for unavoidable excess emissions found in Condition 20- Excess Emissions and Condition 21- Report of Breakdown below. [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

**20. Excess Emissions.** If excess emissions due to startup or shutdown conditions, scheduled maintenance, or upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-107, such emissions shall be excused and not subject to penalty. The permittee shall report excess emissions according to the shortest time period which applies to the situation as follows (See Condition 28- Prompt Reporting of Deviations):

a. as soon as possible, but no later than 12 hours after the excess emissions are discovered, if the excess emissions represent a potential threat to human health or safety;

b. as soon as possible, but no later than within two working days of the time when emission limitations were exceeded, if the permittee believes the excess emissions were unavoidable;

c. within a shorter period of time if specified in an applicable requirement; or

d. as part of the next routine monitoring report, or where this permit does not require routine reporting, within 30 days after the end of the month during which the excess emissions are discovered, if neither 20.a., 20.b., or 20.c. apply.

[WAC 173-400-107, 8/20/93] [WAC 173-401-615(3)(b), 9/16/02]

**21. Report of Breakdown.** If pollutants are emitted in excess of the limits established by SCAPCA Regulation I or II as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, SCAPCA may excuse the permittee from penalties if:

a. the upset or breakdown is reported to SCAPCA on the next regular working day; and

b. the permittee, upon request of SCAPCA's control officer, submits a report giving: the causes; the steps to be taken to repair the breakdown; and a time schedule for the completion of the repairs.

The control officer, upon receipt of a report from the permittee describing a breakdown, may:

a. allow operation exempt from penalties, but only for a limited time period, after which the permittee will be required to comply with SCAPCA Regulation I and II or be subject

to the penalties in SCAPCA Regulation I, Section 2.11. Such an exemption may be withdrawn if the exempt operation becomes a cause of complaints.

b. require that the permittee curtail or cease operations until repairs are completed if the quantity of pollutants or the nature of the pollutants could cause damage.

Note: This provision does not provide relief against federally enforceable applicable requirements. [SCAPCA Regulation I, Section 6.08, 1/13/99 - STATE/LOCAL ONLY ]  
[SCAPCA Regulation II, Section 5.01, 10/4/71 - STATE/LOCAL ONLY]

## D. GENERAL MONITORING, RECORDKEEPING, & REPORTING

**22. Records of Required Monitoring Information.** The permittee shall keep records of monitoring information including:

- a. the date, place as defined in this permit, and time of sampling and measurements;
- b. the date(s) analyses were performed;
- c. the company or entity that performed the analyses;
- d. the analytical techniques or methods used;
- e. the results of such analyses; and
- f. the operating conditions existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), 9/16/02]

**23. Permanent Shutdown of an Emission Unit.** If an emission unit is permanently shut down, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emission unit, once any residual requirements have been met. All records, relating to the shut down emission unit, generated while the emission unit was in operation, shall be kept in accordance with Conditions 22- Records of Required Monitoring Information and 26 – Retention of Records.

Contemporaneous with the shutdown of the emission unit, the permittee shall record the date that operation of the emission unit ceased, using a log or file on site. The shutdown date shall be reported to SCAPCA on the monitoring report, required under Condition 27 – Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

**24. Operational Flexibility.** In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

**25. Records of Changes.** The permittee shall keep records of changes made at the source

that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-615(2)(b), 9/16/02]

**26. Retention of Records.** The permittee shall keep records of all required monitoring data and support information for a period of five 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. [WAC 173-401-615(2)(c), 9/16/02]

**27. Monitoring Reports.** Unless a shorter time period is specified by this permit, reports of any required monitoring shall be submitted to SCAPCA at least once every six months. All instances of deviations from permit requirements shall be clearly identified in such reports. The reports shall be certified as required in Condition 31- Report Submittals. Provided, where this permit requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. [WAC 173-401-615(3)(a), 9/16/02]

**28. Prompt Reporting of Deviations.** The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Prompt means reporting according to the shortest time period listed below which applies to the situation:

- a. in the case where the deviation represents a potential threat to human health or safety, the deviation shall be reported by phone or facsimile as soon as possible, but no later than 12 hours after the deviation is discovered;
- b. in the case where an affirmative defense is sought under Condition 19- Emergencies above or under Condition 20- Excess Emissions, the deviation shall be reported by phone or facsimile within two working days of the time when emission limitations were exceeded; and
- c. for all other deviations, the deviation shall be reported as part of the next monitoring report, or no later than 30 days after the end of the month during which the deviation is discovered, whichever is sooner.

The permittee shall maintain a contemporaneous record of all deviations. [WAC 173-401-615(3)(b), 9/16/02]

**29. Emission Inventory.** The permittee shall submit an inventory of emissions from the source each year. The inventory shall include stack and fugitive emissions of particulate matter, PM10, sulfur dioxide, carbon monoxide, total reduced sulfur compounds, fluorides, lead, volatile organic compounds, and other contaminants, and shall be submitted no later than one hundred five days after the end of the calendar year. The permittee shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. [WAC 173-400-105(1), 8/15/01(8/20/93)\* - see note on page 5]

**30. WAC 173-401-530(1)(a) Insignificant Emission Units.** Emission units or activities which qualify as insignificant solely on the basis of WAC 173-401-530(1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725. Upon request from SCAPCA, the permittee shall demonstrate that the actual emissions of such a unit or activity are below the applicable emission thresholds. SCAPCA shall include in its request a deadline by which the permittee shall submit the emissions data. [WAC 173-401-530(6), 9/16/02]

**31. Report Submittals.** All application forms, reports, and compliance certifications required in this permit shall be submitted to:

Director  
SCAPCA  
1101 W College, Suite 403  
Spokane, WA 99201

All such application forms, reports, and compliance certifications must be certified by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the report are true, accurate and complete. [WAC 173-401-520, 10/4/93]

**32. Rendering Device or Method Inaccurate.** The permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(8), 8/15/01(8/20/93) – see note on page 5]

## **E. COMPLIANCE CERTIFICATION**

**33. Compliance Certification Submittals.** The permittee shall submit compliance certifications once per year to SCAPCA in accordance with Condition 31- Report Submittals. The compliance certification shall be submitted no later than one hundred and five days after the end of the calendar year for which certification is being made. For emission units not in compliance with terms and conditions of this permit, SCAPCA may require more frequent submission of compliance certifications. Additionally, where specified in an applicable requirement, more frequent compliance certifications shall be submitted. [WAC 173-401-630(5)(a), 10/4/93]

**34. Compliance Certification Contents.** The compliance certification shall include:

- a. the identification of each term or condition of the permit that is the basis of the certification;
- b. the compliance status;
- c. whether compliance was continuous or intermittent;
- d. the method(s) used for determining the compliance status of the source, currently and

over the reporting period consistent with WAC 173-401-615(3)(a) (see Condition 27-Monitoring Reports above); and

e. such other facts as SCAPCA may, in writing, require from the permittee to determine the compliance status of the source.

Where the permit does not require testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. Where the permit requires testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring, recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented, or known instances of noncompliance during the reporting period.

[WAC 173-401-630(5)(c), 10/4/93] [WAC 173-401-530(c), 9/16/02]

**35. Submittal to EPA.** The permittee shall submit a copy of all compliance certifications to the Administrator, no later than one hundred and five days after the end of the calendar year for which certification is being made, at the following address:

Administrator  
USEPA  
MS OAQ-107  
1200 Sixth Avenue  
Seattle, WA 98101

[WAC 173-401-630(5)(d), 10/4/93]

## **F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS & TREATMENT OF DOCUMENTS**

**36. False Information.** The permittee shall not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(7), 8/15/01(8/20/93) – see note on page 5] [SCAPCA Regulation I, 2.08.E, 1/3/02 - STATE/LOCAL ONLY]

**37. Falsification of Statements.** The permittee shall not willfully make a false or misleading statement to the Board of Directors of SCAPCA or their authorized representatives as to any matter within the jurisdiction of the Board. [SCAPCA Regulation I, 2.08.A, 1/3/02 - STATE/LOCAL ONLY] [SCAPCA Regulation II, 2.08.A, 10/4/71 - STATE/LOCAL ONLY]

**38. Alteration of Documents.** The permittee shall not reproduce or alter or cause to be reproduced or altered any order or other paper issued by SCAPCA if the purpose of such reproduction or alteration is to evade or violate any provision of SCAPCA Regulation I or II or any other law. [SCAPCA Regulation I, 2.08.B, 1/3/02- STATE/LOCAL ONLY] [SCAPCA

Regulation II, 2.08.B, 10/4/71 - STATE/LOCAL ONLY]

**39. Availability of Documents.** Any order required to be obtained by SCAPCA Regulation I or II shall be available on the premises designated on the order. [SCAPCA Regulation I, 2.08.C, 1/3/02- STATE/LOCAL ONLY] [SCAPCA Regulation II, 2.08.C, 10/4/71 - STATE/LOCAL ONLY]

**40. Posting of Notices.** In the event SCAPCA requires a notice to be displayed, it shall be posted. The permittee shall not mutilate, obstruct, or remove any notice unless authorized to do so by the SCAPCA Board of Directors. [SCAPCA Regulation I, 2.08.D, 1/3/02- STATE/LOCAL ONLY] [SCAPCA Regulation II, 2.08.D, 10/4/71 - STATE/LOCAL ONLY]

## **G. APPLICABLE WHEN TRIGGERED REQUIREMENTS**

The following conditions summarize requirements that apply if the permittee undertakes the activities specified in the requirement or proposes changes to the source that trigger the applicability of the requirement. The permit does not require monitoring for compliance with the requirements, but the compliance certification required by Condition 33- Compliance Certification Submittals shall describe the permittee's compliance with these requirements.

**41. New Source Review.** Prior to the establishment of a new source, including modifications, the permittee may be required to file for and obtain approval under SCAPCA's Notice of Construction program. [WAC 173-400-110, -112, -113, 8/15/01 – STATE/LOCAL ONLY] [WAC 173-400-110, -112, -113, 8/20/93] [Chapter 173-460 WAC, 7/21/98 - STATE/LOCAL ONLY] [SCAPCA Regulation I, Article V, 5/4/00 - STATE/LOCAL ONLY]

**42. Replacement or Substantial Alteration of Existing Control Equipment.** Prior to replacing or substantially altering existing control equipment, the permittee shall file for and obtain approval under SCAPCA's Notice of Construction program. [WAC 173-400-114, 8/15/01 - STATE/LOCAL ONLY] [SCAPCA Regulation I, Article V, 5/4/00 - STATE/LOCAL ONLY]

**43. Demolition and Renovation (Asbestos).** The permittee shall comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR 61 Subpart M, 2001] [WAC 173-400-075, 7/11/02] [SCAPCA Regulation I, Article IX, 2/5/98 - STATE/LOCAL ONLY]

**44. Source Testing.** To demonstrate compliance Ecology or SCAPCA may conduct or require that a test be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61 and 63 which are adopted by reference or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology, as of July 12, 1990, on file at Ecology. The permittee may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emission unit. Ecology or SCAPCA shall be allowed to obtain a sample from any emission unit. The permittee shall be given an opportunity to observe the sampling and to obtain a sample at the same time. Methods or procedures shall be considered approved if the source submits a source test plan to SCAPCA at least 30 days prior to the testing date, or a shorter time if designated in writing by SCAPCA, and SCAPCA approves the plan in writing. In order to maintain the approved status for the methods and/or procedures, any changes to the plan shall be approved by SCAPCA in

writing prior to implementation. [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 8/15/01 – STATE/LOCAL ONLY] [WAC 173-401-615(1), 9/16/02]

## II. EMISSION LIMITATIONS & MONITORING AND REPORTING REQUIREMENTS

This section contains emission limitations and emission related requirements including general requirements that apply facility-wide and requirements specific to individual, or groups of, emission units. Applicable requirements are listed in the third column in emission limitation tables. The basis for the applicable requirements is listed in the second column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, are listed in the fourth and fifth columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to determine compliance with the requirement are listed in the sixth column of the emission limitation tables. The MRRR are given at the end of this section.

### A. FACILITY-WIDE EMISSION LIMITATIONS

TABLE II.A-2 lists the applicable emission limitations that apply facility-wide. These facility-wide emission limitations apply to all significant and insignificant emissions units at Melcher Manufacturing (6017 E. Mission and 5318 E. Desmet). Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens under the FCAA.

The facility-wide emission limitations apply to insignificant emissions units. However, the monitoring, recordkeeping and reporting requirements given in II.C. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS and in I.D. GENERAL MONITORING, RECORDKEEPING, & REPORTING are not required for the insignificant emission units because SCAPCA has determined that they are not necessary to assure compliance with facility-wide emission limitations. The permittee is required to certify compliance with the facility-wide emission limitations for insignificant emission units (see Condition 34). [WAC 173-401-530(2)(c) & (d), 9/16/02]

The significant emission units identified in the permittee's application and contained at the former Aquarius Spa location at 5318 E. Desmet, Spokane, WA are listed in TABLE II.A.1 below.

TABLE II.A-1 – Significant Emission Units

Description	Air Pollution Control	Fuels Used
Resin and Gelcoat Application Room at 6017 E. Mission,	Particulate Matter Filtration System	None

Description	Air Pollution Control	Fuels Used
Spokane, WA		
Curing / Directional Dip Coat Room at 6017 E. Mission, Spokane, WA	Particulate Matter Filtration System	None
Resin and Gelcoat Application Room at 5318 E. Desmet, Spokane, WA	Particulate Matter Filtration System	None
Fiberglass Grinding Room at 5318 E. Desmet, Spokane, WA	Particulate Matter Filtration System	None

TABLE II.A-2 - Facility-wide Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
45	WAC 173-400-040, 8/20/93 WAC 173-400-040, 8/15/01 – STATE/LOCAL ONLY	All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040			No MRRR Required
46	WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 8/15/01 (8/20/93) – see note on page 5	Visible emissions shall not exceed 20%, as specified in WAC 173-400-040	ECOLOGY Method 9A (July 12, 1990)	3 minute aggregate in any 1 hour period	1M, 3M
47	SCAPCA Regulation I, 6.02, 1/13/99- STATE/LOCAL ONLY	Visible Emissions shall not equal or exceed 20%, as specified in SCAPCA Regulation I, 6.02 - STATE/LOCAL ONLY	ECOLOGY Method 9A (July 12, 1990)	3 minute aggregate in any 1 hour period	1M, 3M
48	WAC 173-400-040(2), 8/20/93 - STATE/LOCAL ONLY	No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited – STATE/LOCAL ONLY			2M
49	SCAPCA Regulation I, 6.05.A, 1/13/99(11/12/93)* - see note on page 5	No deposition of particulate matter in sufficient numbers to unreasonably cause annoyance			2M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		when deposited on the real property of others except as allowed in 6.05.A.1 & 6.05.A.2			
50	SCAPCA Regulation I, 6.05.C, 1/13/99(11/12/93)* - see note on page 5	Reasonable precautions must be taken to prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads.			2M
51	SCAPCA Regulation I, 6.05.D, 1/13/99(11/12/93)* - see note on page 5	No tracking of particulate matter onto paved roadways open to the public without taking every reasonable precaution to minimize deposition. Reasonable precautions shall include, but are not limited to, the removal of particulate matter from equipment prior to movement on paved streets and the prompt removal of any particulate matter deposited on paved streets.			2M
52	WAC 173-400-040(3)(a), 8/20/93	If located in an attainment area and not impacting a NAA, reasonable precautions must be taken to prevent the release of air contaminants, as specified in WAC 173-400-040(3)(a)			2M
53	SCAPCA Regulation I, 6.05.B, 1/13/99(11/12/93)* - see note on page 5	Reasonable precautions must be taken to prevent PM from becoming airborne when handling, transporting, and/or storing PM.			2M
54	WAC 173-400-040(8)(a), 8/15/01(8/20/93)* - see note on page 5	Reasonable precautions must be taken to prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.			2M
55	WAC 173-400-040(4), 8/15/01(8/20/93)* - see note on page 5	Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(4)			2M
56	SCAPCA Regulation I, 6.04, 1/13/99- STATE/LOCAL ONLY	Effective control apparatus and measures shall be installed and operated to reduce odor-bearing gases and particulate			2M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		matter to a reasonable minimum – STATE/LOCAL ONLY			
57	WAC 173-400-040(5), 8/15/01(8/20/93)* - see note on page 5  SCAPCA Regulation I, 6.06.A, 1/13/99- STATE/LOCAL ONLY	No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business			2M
58	WAC 173-400-040(7), 8/15/01(8/20/93)* - see note on page 5	No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC.			No MRRR Required
59	SCAPCA Regulation I, 6.07.A, 1/13/99- STATE/LOCAL ONLY	No concealment or masking of emissions which would otherwise violate SCAPCA Regulation I, 6.04, 6.05 or 6.06 – STATE/LOCAL ONLY			No MRRR Required
60	SCAPCA Regulation I, 6.07.B, 1/13/99- STATE/LOCAL ONLY	No use of any means designated to mask emissions which cause detriment to health, safety or welfare of any person – STATE/LOCAL ONLY			No MRRR Required
61	WAC 173-400-050(1) & WAC 173-400-050(3), 8/15/01(2/19/91)* - see note on page 5  NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY. This exception allows for an alternate correction to measured concentrations (other than 7% oxygen) if determined by SCAPCA to be representative of normal operations.	Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3)	RM 5 (1995) or procedures in WAC 173-400-050 approved per Condition 44- Source Testing	average of three one-hour tests	No MRRR Required because requirement only applies to insignificant emission units
62	SCAPCA Regulation II, Section 4.01.B,	Particulate matter emissions from combustion sources shall	RM 5 (1995) or	average of three one-	No MRRR Required

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	5/1/79(1/6/75)* - see note on page 5	not exceed 0.1 grains per cubic foot corrected to 12% carbon dioxide at standard conditions.	procedures in WAC 173-400-105(4) approved per Condition 44- Source Testing	hour tests	because requirement only applies to insignificant emission units
63	SCAPCA Regulation II, Section 4.04, 5/1/79 - STATE/LOCAL ONLY	Particulate matter emissions from each emission unit shall not exceed 40 pounds per hour – STATE/LOCAL ONLY	RM 5 (1995) or procedures in WAC 173-400-105(4) approved per Condition 44- Source Testing	average of three one-hour tests	1M, 3M
64	WAC 173-400-060, 2/19/91 WAC 173-400-060, 8/15/01 – STATE/LOCAL ONLY	Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060	RM 5 (1995) or procedures in WAC 173-400-060 approved per Condition 44- Source Testing	average of three one-hour tests	1M, 3M
65	SCAPCA Regulation II, Section 4.01.A, 5/1/79(1/6/75)* - see note on page 5	Particulate matter emissions from non-combustion sources shall not exceed 0.1 grains per cubic foot at standard conditions (i.e., a temperature of 20°C (68°F) and a pressure of 29.92 inches (760 mm) of mercury)	RM 5 (1995) or procedures in WAC 173-400-105(4) approved per Condition 44- Source Testing	average of three one-hour tests	1M, 3M
66	SCAPCA Regulation II, Section 4.02, 5/1/79 - STATE/LOCAL ONLY	No concealment or masking of emissions which would otherwise violate Conditions 62 & 65 – STATE/LOCAL ONLY	Testing in accord with SCAPCA Regulation		No MRRR Required

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
			II, Section 4.03.A, 5/1/79		
67	WAC 173-400-040(6), 8/15/01(8/20/93)* - see note on page 5  NOTE: The second paragraph of WAC 173-400-040(6) is STATE/LOCAL ONLY	SO2 emissions from each unit shall not exceed 1000 ppm on a dry basis corrected to 7% oxygen, as specified in WAC 173-400-040(6)	Procedures in WAC 173-400-105(4) approved per Condition 44- Source Testing	any period of 60 consecutive minutes	No MRRR Required because requirement only applies to insignificant emission units
68	WAC 173-400-200, 2/19/91	No use of excess stack height to meet ambient air quality standards or PSD increments, as specified in WAC 173-400-200, except as allowed under WAC 173-400-200			No MRRR Required
69	WAC 173-400-200, 2/19/91	No dispersion techniques shall be used to meet ambient air quality standards or PSD increments, except as allowed under WAC 173-400-200			No MRRR Required
70	WAC 173-400-205, 2/19/91	No varying of emissions according to atmospheric conditions or ambient concentrations, except as allowed under WAC 173-400-205			No MRRR Required
71	Chapter 173-425 WAC, 3/13/00 - STATE/LOCAL ONLY  SCAPCA Regulation I, 6.01, 1/13/99 - STATE/LOCAL ONLY	No outdoor burning, except as allowed under Chapter 173-425 WAC and/or SCAPCA Regulation I, 6.01			No MRRR Required
72	40 CFR Part 82, 2003	Handling and use of chlorofluorocarbons (CFCs) must be in accord with 40 CFR Part 82			No MRRR Required

**B. REINFORCED PLASTIC COMPOSITES PRODUCTION EMISSION LIMITATIONS**

Table II.B-1 of the permit contains the requirements given in 40 CFR Part 63, Subpart WWWW, "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites

Production” that apply to the Melcher Manufacturing operations located at 6017 E. Mission and 5318 E. Desmet. Subpart WWWW applies to the open molding process, mixing, cleaning of equipment used in the reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts manufactured at the Melcher Manufacturing operations located at 6017 E. Mission and 5318 E. Desmet. Table II.B-1 also contains the requirements from 40 CFR 63, Subpart A, “General Provisions” that apply to the Melcher Manufacturing operations located at 6017 E. Mission and 5318 E. Desmet.

**Table II.B-1 – Reinforced Plastic Composites Production Emission Limitations**

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
73	40 CFR § 63.4(b), 2003	The permittee shall not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise be in noncompliance with a relevant standard under 40 CFR Part 63			No MRRR Required
74	40 CFR § 63.5835(c), 2003 40 CFR § 63.6(e), 2003	At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source under 40 CFR 63, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions, according to the provisions of 40 CFR § 63.6(e), 2003			6M, 7M
75	40 CFR § 63.5805(a), 2003 40 CFR § 63.5805(g), 2003 40 CFR § 63.5835(a), 2003 40 CFR § 63.5900(c), 2003	The open molding and repair operations shall meet the applicable annual average organic HAP emissions limits in Table 3 to Subpart WWWW of Part 63 at all times, including periods of startup, shutdown, or malfunction			4M, 5M, 6M, 7M, 8M
76	40 CFR § 63.5805(a) & (g), 2003 40 CFR § 63.5835(a), 2003 40 CFR § 63.5900(c), 2003	The permittee may not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly			6M, 7M, 8M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		contacts resin			
77	40 CFR § 63.5805(a), 2003 40 CFR § 63.5805(g), 2003 40 CFR § 63.5835(a), 2003 40 CFR § 63.5900(c), 2003	The permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing storage tanks may be vented as necessary for safety			6M, 7M, 8M
78	40 CFR § 63.5805(b), 2005 40 CFR § 63.5805(g), 2005 40 CFR § 63.5835(a), 2005 40 CFR § 63.5900(c), 2005	The permittee must use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. This requirement must be met at all times, including periods of startup, shutdown, or malfunction.			7M, 8M
79	40 CFR § 63.5805(b), 2005 40 CFR § 63.5805(g), 2005 40 CFR § 63.5835(a), 2005 40 CFR § 63.5900(c), 2005	The permittee must close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. This requirement must be met at all times, including periods of startup, shutdown, or malfunction.			7M, 8M
80	40 CFR § 63.5805(b), 2005 40 CFR § 63.5805(g), 2005 40 CFR § 63.5835(a), 2005 40 CFR § 63.5900(c), 2005	The permittee must keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels. This requirement must be met at all times, including periods of startup, shutdown, or malfunction.			7M, 8M

**C. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS**

**1M.** The permittee shall perform weekly inspections during daylight hours while the facility is

operating for the purpose of observing points of potential visible emissions and PM emissions from all significant emission units listed in Tables II.A-1 of this permit.

If an emission unit is not operating during the inspections, the weekly inspection is not required for that emission unit, provided that the operational status is documented as part of the inspection records. If visible emissions are observed, one of the three following actions, **1M.a.**, **1M.b.**, or **1M.c.**, shall be taken as appropriate for the type of emissions unit:

- a. The permittee shall determine and record whether:
  - i. the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
  - ii. the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
  - iii. if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If **1M.a.i.**, **1M.a.ii.**, and/or, **1M.a.iii.** are not being met, corrective action will be taken as soon as possible, but no later than three days from discovery, to correct the problem. After corrective action is taken, if required, and if **1M.a.i.**, **1M.a.ii.**, and **1M.a.iii.** are being met but visible emissions potentially in excess of allowable limits are still observed, the permittee shall take further action according to **1M.b.** and, if a particulate matter standard applies, further action according to **1M.c.**

- b. The permittee shall perform, or have performed, RM 9 (1995) or Ecology Method 9A (July 12, 1990), whichever is applicable, on the source of the emissions. The test shall occur within a reasonable timeframe but no later than three days after discovery of the emissions. If the visible emissions exceed the applicable standard, the permittee shall take timely and appropriate corrective action to address the problem. Action shall be considered timely and appropriate if the exceedance is corrected as soon as possible, but no later than within three days of the source test. The results of the RM 9 or Ecology Method 9A test shall be submitted to SCAPCA within two working days of the test.
- c. The permittee shall perform, or have performed, RM 5 (1995) on the source of the emissions. The test shall occur within a reasonable timeframe but no later than fourteen days after discovery of the emissions. The results of the RM 5 test shall be submitted to SCAPCA as soon as possible but no later than 45 days after the testing. If measured emissions exceed the applicable standard, the permittee shall take appropriate and timely corrective action to address the exceedance.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28-Prompt Reporting of Deviations.

The permittee shall maintain records of each inspection. Records shall include the date and time of the inspection, observations made, any verifications made regarding **1M.a.i.**, **1M.a.ii.**, and/or **1M.a.iii.**, the results of any RM 9, Ecology Method 9A, and RM 5 tests, a description of

any corrective action taken, and any other information as required in Condition 22- Records of Required Monitoring Information. Records shall be kept in accordance with Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SCAPCA staff or other authorized representatives.

If the permittee is unable to perform a weekly inspection, due to unavoidable circumstances, the inspection may be waived, provided that records are kept documenting the missed inspection and reason(s) the inspection was not performed.

The permittee shall have a monitoring plan detailing how the above inspections will be performed and how records will be kept. [WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 8/15/01 (2/19/91)] [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 8/15/01 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 8/15/01 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

**2M.** The permittee, or an appointee, shall perform weekly inspections of the facility during daylight hours while the facility is in operation to verify that each requirement for which this MRRR is specified in the “MRRR Reference” column in the above tables is being met and shall record and investigate complaints received regarding air quality problems. All inspections shall be conducted in accordance with 2M.a. For permit conditions requiring that reasonable precautions be taken or requiring the use of recognized good practices or procedures or effective control apparatus and measures, 2M.b. below shall apply.

- a. Inspections and investigations shall meet the following:
  - i. Weekly inspections shall be performed during daylight hours while the facility is in operation.
  - ii. Complaints shall be investigated as soon as possible, but no later than 8 hours after receipt or by the end of the first regular business day during which the complaint was received, whichever is later. Receipt of a complaint does not, in and of itself, establish a violation.
  - iii. If violations of the requirement(s) are observed during the weekly inspections and/or as part of the complaint investigation, the permittee shall take timely and appropriate corrective action. Action shall be considered timely and appropriate if any violations discovered are corrected as soon as possible, but no later than three working days of first observing the problem.
  - iv. Taking corrective action does not relieve the permittee from complying with the underlying emission limitation, nor does it relieve the permittee from the requirement to report any permit deviations as required in Condition 28 – Prompt Reporting of Deviations.
  - v. The permittee shall maintain records of each inspection performed and complaint received. Records shall be kept in accordance with Condition 26 – Retention of Records, and upon request, such records must be made available for inspection by SCAPCA staff or other authorized representatives. Records shall include the following:
    - A. For inspections, the date and time of the inspection, observations made, and a

description of any corrective action taken.

- B. For complaints, the date and time that the complaint was received, the date and time of the complaint investigation, observations made during the investigation, and a description of any corrective action taken.
- C. For both inspections and complaints, any other information required in Condition 22-Records of Required Monitoring Information.

vi. If the permittee is unable to perform a weekly inspection, due to unavoidable circumstances, the inspection may be waived, provided that records are kept, documenting the missed inspection and reason(s) the inspection was not performed.

The permittee shall develop a monitoring plan, detailing how the above inspections will be performed; how inspection records will be kept; and establishing a system for recording and investigating complaints received. The plan shall be in place and being implemented within thirty days of issuance of this permit.

- b. The following are considered to be reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures. Depending on the air quality problem being addressed, it may be necessary to implement one, several, or all of the precautions, practices, and procedures.
  - i. Reasonable precautions to prevent PM or fugitive dust from becoming airborne include, but are not limited to:
    - A. Using water or chemical dust suppressants on PM containing materials prior to and during activities that may release PM into the air. Re-application may be required periodically to maintain effectiveness;
    - B. Minimizing activity during high winds, if the winds are likely to cause the release of PM into the air;
    - C. Using covered chutes, covered containers, and/or PM collection and control equipment when handling, transferring, and/or storing PM containing materials;
    - D. Minimizing the free fall distance, i.e., drop height, of PM containing materials at transfer points such as the end of conveyors, front end loader buckets, loading spouts, etc...
    - E. Maintaining adequate freeboard and/or covering loads when transporting PM containing material;
    - F. Minimizing exposed areas of PM containing materials such as storage piles, graded surfaces, etc... and/or using tarps, chemical dust suppressants, vegetation, etc.. to minimize releases to air;
    - G. Keeping paved surfaces clean to minimize re-entrainment of PM into the ambient air; and/or
    - H. Limit vehicle speed to less than 15 miles per hour on unpaved areas.

- ii. Reasonable precautions to prevent tracking of PM onto paved public roadways include, but are not limited to:
  - A. Paving unpaved traveled surfaces;
  - B. Graveling unpaved traveled surfaces. Gravel may need to be reapplied periodically to maintain effectiveness;
  - C. Paving or installing quarry spalls<sup>1</sup> at exit aprons;
  - D. Cleaning vehicle tires and undercarriages before exiting to paved public roadways; and/or
  - E. Promptly cleaning material that has been tracked out onto paved public roadways.
- iii. Reasonable precautions to prevent release of air contaminants, other than PM, include, but are not limited to:
  - A. Using materials that decrease air contaminant emissions to the air, e.g., low-VOC materials and/or water based materials;
  - B. Using solvent containing materials with lower vapor pressures;
  - C. Keeping unused or partially used containers of organic solvent containing materials closed, except when in use;
  - D. Cleaning up all spills of organic solvent containing materials upon discovery and keeping the waste materials in closed containers; and/or
  - E. Keeping all disposable materials which contain organic solvents in closed containers.
- iv. Recognized good practices and procedures and effective control apparatus and measures to reduce odors include, but are not limited to:
  - A. Keeping odorous materials in closed containers or confined within a building;
  - B. Using ventilation systems which direct odor bearing gases away from neighboring residences and businesses;
  - C. Using scrubbers or other add-on control equipment to control odors;
  - D. Using materials which release less odorous compounds;
  - E. Disposing of odorous, or potentially odorous, materials promptly; and/or
  - F. Operating and maintaining equipment and processes in a manner that minimizes odors.

[WAC 173-401-615(1) & (2), 9/16/02] - NOTE: This is a gapfilling MRRR.

**3M.** The particulate matter filtration systems for the resin and gelcoat application booth and

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<sup>1</sup> A quarry spall, aka rock entrance, is a buffer area consisting of very large aggregate, usually 4 to 8 inch crushed rock, which jars material free from tires and undercarriages.

curing / directional dip coat booth shall be properly maintained and operated at all times that particulate matter emissions from the booths can occur. Proper operation and maintenance shall include, but is not limited to:

- a. Daily checks, before the booths are used, to ensure that filters are in place and in good condition with no gaps where unfiltered air may pass through; and
- b. Following manufacturer recommended maintenance schedule for filtration system components.

The permittee shall follow an operation and maintenance plan for the filtration systems that shall include, at a minimum, items a. and b. above.

Monitoring shall include daily checks of each booth's filtration system prior to operating the booth to ensure that the filters are in place and in good condition to ensure that unfiltered air does not pass through to the ambient air. If a booth's filters are not in place, in good condition, or if gaps exist, corrective action shall be taken prior to spraying in the booth.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28- Prompt Reporting of Deviations.

Records shall be kept of each day's inspections, maintenance performed on each booth's filtration system, and any corrective actions taken as a result of inspections, in accordance with Condition 22- Records of Required Monitoring Information and Condition 26- Retention of Records and, upon request, shall be made available to SCAPCA staff or other authorized representatives. [WAC 173-401-615(1) & (2), 9/16/02] - NOTE: This is a gapfilling MRRR.

**4M.** On and after April 21, 2006, the permittee must use one of the following methods in paragraphs (a) through (d) below to meet the HAP emissions limits given in Condition 75. To comply with the emission limits given in Condition 75, the permittee may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, and covered curing techniques.

- (a) Meet the individual organic HAP emissions limit for each operation, given in Table 3 to Subpart WWWW of Part 63, according to the procedure given in 40 CFR §63.5810(a);
- (b) Demonstrate compliance using the HAP emissions factor averaging option, according to the procedure given in 40 CFR §63.5810(b);
- (c) Meet the organic HAP emissions limits for one operation type, and use the same resin(s) for all operations of that resin type, according to the procedure given in 40 CFR §63.5810(c); or
- (d) Use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 3 to Subpart WWWW of Part 63.

All monthly calculations required under options (b) and (c) must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in (a) through (d) above. If the permittee changes to a compliance option based on a 12-month rolling

average, the average must be based on the previous 12 months of data calculated using the compliance option that was being used, unless the compliant materials option in paragraph (d) was being used. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

[40 CFR §63.5810, 5840, & 5860, 2003]

**5M.** On and after April 21, 2006, the permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used, if the permittee is averaging organic HAP contents (i.e., using options (b) or (c) in Condition 4M) to demonstrate compliance with the organic HAP emissions limits given in Condition 75. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on Material Safety Data Sheets (MSDS) or on resin specifications supplied by the resin supplier. If the permittee can demonstrate that all resins and gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, (i.e., using options (a) or (d) in Condition 4M) then resin and gel coat use records are not required.

[40 CFR §63.5895, 2003]

**6M.** A Notification of Compliance Status, incorporating the information specified in 40 CFR §63.9(h), must be submitted to EPA Region 10 and SCAPCA, according to the following:

- a. If the permittee is complying with the organic HAP emissions limit, using averaging methods (based on 12-month rolling average), the Notification of Compliance Status is due no later than May 21, 2007;
- b. If the permittee is complying with the organic HAP content limits, application equipment requirements, or organic HAP emissions limits, by demonstrating compliance for each individual product, the Notification of Compliance Status is due no later than May 21, 2006.

[40 CFR §63.9(h) & 5905, 2003]

**7M.** On and after April 21, 2006, the permittee must submit a compliance report to EPA Region 10 and SCAPCA by July 30 every year to cover the period from January 1 – June 30 (initial report will only cover from April 21 – June 30) and April 15 every year to cover the period from July 1 – December 31. Each compliance report must contain the following:

- a. Company name and address;
- b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. Date of the report and beginning and ending dates of the reporting period;
- d. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards given in Conditions 76 – 80, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period; and

- e. For each deviation from an organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs, the compliance report must contain the total operating time of each affected source during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR §63.5910 & 5900(b), 2003]

**8M.** On and after April 21, 2006, the following records shall be kept in accordance with Condition 26 - Retention of Records and 40 CFR § 63.10(b)(1), as applicable, and, upon request, shall be made available for inspection by SCAPCA staff or other authorized representatives:

- a. A copy of each notification and report that the permittee submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv);
- b. All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents, including the information required in Condition 5M; and
- c. A certified statement that the permittee is in compliance with the work practice requirements given in Conditions 76 - 80.

As specified in 40 CFR § 63.10(b)(1), each record must be kept for 5 years following the date of each occurrence, measurement, corrective action, report, or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept off-site for the remaining 3 years. Records may be kept in hard copy or computer readable form, including but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

[40 CFR §63.10(b)(1) and (b)(2)(xiv), 2003] [40 CFR §63.5915 & 5920, 2003]

### **III. PERMIT SHIELD**

#### **A. INAPPLICABLE REQUIREMENTS**

The requirements listed in this section do not apply to the source, or to the specific emission units specified below. The permit shield applies to all requirements so identified. Citations to requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation. [WAC 173-401-640(2), 10/4/93]

**1PS. Registration.** SCAPCA Regulation I, Article IV requires that certain air contaminant

sources register with SCAPCA. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. [SCAPCA Regulation I, Section 4.01 & 4.02, 5/4/00 - STATE/LOCAL ONLY]

**2PS. Registration.** WAC 173-400-100 [8/20/93] requires certain air contaminant sources to register with the appropriate air pollution control authority. This registration requirement, while no longer a part of the state regulation, is in the State Implementation Plan and is still a federal requirement. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. [WAC 173-400-100, 8/15/01]

**3PS. Registration Program.** WAC 173-400-099 [3/22/95] presents the purpose and components of registration programs established under RCW 70.94.151. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section does not contain any specific requirements for sources, it merely explains the registration program. [WAC 173-400-100, 8/15/01]

**4PS. Registration Program.** WAC 173-400-100 [8/15/01] lists source categories that, if located in a county without an activated local air pollution control authority, must register with Ecology. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section would not apply within Spokane County anyway because there is a local air pollution control authority, SCAPCA. [WAC 173-400-100, 8/15/01 - STATE/LOCAL ONLY]

**5PS. Registration issuance.** WAC 173-400-101 [3/22/95] requires certain air contaminant sources to register with the appropriate air pollution control authority. This section specifically exempts air operating permit sources from the requirement to register in WAC 173-400-101(7). Because the permittee is an air operating permit source, the rule does not apply. [WAC 173-400-101, 3/22/95 - STATE/LOCAL ONLY]

**6PS. Scope of Registration and Reporting Requirements.** WAC 173-400-102 [3/22/95] establishes reporting requirements for registered sources that are located in a county without an activated local air pollution control authority. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section would not apply within Spokane County anyway because there is a local air pollution control authority, SCAPCA. [WAC 173-400-102, 8/15/01 - STATE/LOCAL ONLY]

**7PS. Emission Estimates.** WAC 173-400-103 [3/22/95] establishes reporting procedures for estimating emissions from registered sources that are located in a county without an activated

local air pollution control authority. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section would not apply within Spokane County anyway because there is a local air pollution control authority, SCAPCA. [WAC 173-400-103, 3/22/95 - STATE/LOCAL ONLY]

**8PS. Registration Fees.** WAC 173-400-104 [11/22/00] establishes registration fees for registered sources that are located in a county without an activated local air pollution control authority. This section is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. It should also be noted that this section would not apply within Spokane County anyway because there is a local air pollution control authority, SCAPCA. [WAC 173-400-104, 11/22/00 - STATE/LOCAL ONLY]

**9PS. General Surface Coating.** SCAPCA Regulation I, Section 6.13 establishes requirements for sources that perform surface coating. In Section 6.13.F.2.b, fiberglass resin application operations are exempted from the rule. Because the permittee is a fiberglass resin application operation, the source is exempt from the surface coating regulation. [SCAPCA Regulation I, Section 6.13, 1/13/99 - STATE/LOCAL ONLY]