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- 1. This permit authorizes the operation of surface coating of track and road wheel rebuilding facilities at the Red River Army Depot in Bowie County. This permit covers only those sources of emissions listed on the maximum allowable emission rates table (MAERT), and those sources are limited to the emission limits and other conditions specified in the MAERT. The annual emission limits are based on any consecutive 12-month period.
- 2. This permit does not include the facilities or maintenance, startup, or shutdown (MSS) activities at the site, except as noted in the MAERT. Instead, these facilities and/or activities are authorized by a permit-by-rule (PBR) under Title 30 Texas Administrative Code (30 TAC) Chapter 106, standard exemption, exemption from permitting, or are a de minimis source listed under 30 TAC § 116.119.
- 3. The facilities and/or activities listed in the following table operate per the criteria of the referenced Standard Exemption (SE)/Permit by Rule (PBR)/Standard Permit and are incorporated by reference: following PBR registration numbers are authorized at the site and are incorporated by reference. **(08/24)**

Facilities/Activities	SE No./PBR No./Standard Permit	Registration No.
Abrasive Cleaning Machine	SE No. 102	26729
Storage Tanks (Gasoline/Diesel/Residue Oil)	106.472 & 106.478	38638
Blast Cleaning Units	106.452	38639
Dust Collectors	106.262	39086
Dispose of Fluorescent Bulbs	106.261	46097
Dual-Phase Extraction System Pilot Test of Soil	106.533	56829
Heat Cleaning Devices	106.495	79467
Aerosol Can Crusher	106.261 & 106.262	100738
Emergency Generator	106.511	112136
Dual Flare	106.511	112141
Molten Salt Bath	106.183 & 106.261	155494

- 4. The facilities owned or leased by Red River Army Depot located near Hooks, Texas, have been designated a single property as of June 1, 2001, for purposes of demonstrating compliance with Texas Commission on Environmental Quality (TCEQ) regulations and the control of air emissions. If the owner of Permit Number 17973 seeks a change in emissions of an air contaminant that is or will be common to two or more of the single property designation parties, the owner will perform modeling of all sources for that air contaminant within the designated single property boundary when requested to do so by the Executive Director of the TCEQ.
- 5. Emissions from the facility shall comply with 30 TAC § 101.4 regarding odor nuisance as determined using the Frequency, Intensity, Duration, and Offensiveness (FIDO) Chart in the TCEQ's Odor Complaint Investigation Procedures (September 18, 2007, or as subsequently updated).

- A. If an odor nuisance condition is confirmed by personnel from the TCEQ or any air pollution control agency with jurisdiction, a permit amendment application shall be submitted within 60 days to control nuisance-causing emissions either through process controls or additional emission controls (e.g., thermal oxidizer).
- B. Complaints from affected persons of nuisance odors from the facility that are verified by personnel from the TCEQ or any air pollution control agency with jurisdiction shall be the basis for requiring prompt remedial action to eliminate such odors, regardless of whether or not the odors are judged to be of sufficient concentration and duration as to constitute a nuisance.
- 6. The following restrictions apply to the use of PBRs under 30 TAC Chapter 106.
 - A. The PBR of 30 TAC § 106.433 (Surface Coat Facility) may be used to authorize surface coating at the site provided that by February 1 of each year, a permit amendment application is submitted to the TCEQ Office of Air, Air Permits Division that requests incorporation into the permit of all surface coating facilities that were authorized by 30 TAC § 106.433 during the preceding calendar year.
 - B. The PBR of 30 TAC § 106.452 (Dry Abrasive Cleaning) may not be used to authorize any non-enclosed abrasive blast cleaning at the site.
- 7. A copy of this permit shall be kept at the site and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any other air pollution control agency with jurisdiction.
- 8. With the exception of fugitive sources, the holder of this permit shall clearly label all equipment at the property that has the potential of emitting air contaminants. Permitted emission points shall be clearly labeled corresponding to the emission point numbering on the MAERT.

Operating Limitations

- 9. Opacity shall not exceed five percent averaged over a six-minute period from each exhaust stack or vent emission point and the determination shall be made as follows:
 - A. Observing for visible emissions while each facility is in operation. Observations shall be made at least 15 feet and no more than 0.25 miles from the emission point(s). Up to three emissions points may be read concurrently, provided that all three emissions points are within a 70-degree viewing sector or angle in front of the observer such that the sun position is at the observer's back and can be maintained for all three emission points. Contributions from uncombined water shall not be included in determining compliance with this condition.
 - B. Observations shall be performed and recorded quarterly. If visible emissions are observed from an emission point, then the opacity shall be determined and documented within 24 hours for that emission point using Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9.
 - C. If the opacity exceeds five percent, corrective action to eliminate the cause of the excessive visible emissions shall be taken promptly. Corrective action shall be documented within one week of the first visible emission observation. After corrective action has been taken, another visible emissions observation shall be performed and recorded to ensure the visible emissions have been eliminated.

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- 10. The ventilation system for the automatic adhesive spray booths in Building 493 (EPN 493-16-STO) shall route the filtered emissions to a thermal control device (e.g., thermal oxidizer) which meets the following requirements: **(08/24)**
 - A. The thermal control device shall achieve a 98 percent or greater destruction efficiency for organic compounds emissions.
 - B. The thermal control device shall be equipped with a monitor (temperature sensor) that continuously measures and records the temperature of the thermal control device combustion chamber or in the duct immediately downstream of the combustion chamber before any substantial heat exchange occurs) and shall be accurate to within ± 5°F. The combustion chamber temperature shall be maintained at greater than or equal to 1500 °F based on a 3-hour average temperature over four equally spaced measurement points per hour.
 - C. Once every quarter an accuracy audit shall be conducted to determine if the temperature sensor is still functioning properly. Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices. The temperature sensor shall be replaced with a new sensor either if the sensor looks damaged and/or broken or the sensor is no longer accurate to within ± 5°F.
 - D. Conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used.
 - E. The operating instructions for the thermal control device shall be established and posted such that they are readily available to all of the thermal control device operators.
 - F. The thermal control device shall be operated and maintained in conformance with all of the manufacturer specifications and recommendations.
 - G. The thermal control device capture system's ductwork shall be operated under negative pressure. An audio, visual, and olfactory (AVO) inspection of the capture system shall be performed monthly to check for leaking components. The capture system shall be maintained free of holes, cracks, and other conditions that would reduce the collection efficiency of the capture system.
 - H. An inspection and maintenance log shall be kept for the thermal control device whereby the log shall note the date of each inspection, the name of the inspector, and any repairs and/or maintenance work performed on the thermal control device and its capture system.
 - I. Materials containing halogenated organic compounds shall not be used in the surface coating operations and vented to the thermal control device.
- 11. Planned maintenance on the thermal control device shall only be performed during periods when the facilities being controlled by the thermal control device are not in operation. **(08/24)**

Painting Facilities

- 12. Excluding EPNs 595-01-VAT, 595-05-VAT, and 595-10-VAT, the paint application systems associated with the emission points listed on the SPMUR shall be airless or high-volume, low-pressure (HVLP), except that airbrushes, aerosol cans, or brushes may be used for touchup.
- 13. All paint booth exhaust stacks associated with the emission points listed on the SPMUR shall be equipped with filters that achieve an arrestance of at least 99 percent for all particle sizes. These

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filters shall be maintained in good condition at all times and changed as necessary. Manufacturer's recommended replacement criteria shall be posted at each paint booth and followed. **(08/24)**

- A. The following requirements apply to EPNs 323-04-STP, 323-05-STP, 323A-01-STP, 323A-02-STP, 323A-03-STP, 323A-06-STP, 323A-08-STP, 345-01-STP, 345-02-STP, 357-01-STP, 360-01-STP, 378-01-STP, 407-01-STP, 412-01-STP, 412-02-STP, 412-03-STP, 412-04-STP, 412-05-STP, 412-06-STP, 412-07-STP, 412-08-STP, 412-09-STP, 443-01-STP, 493-01-STP, 493-01-STP, 591-01-STP, 591-02-STP, 591-03-STP, 591-04-STP, 939-01-STP, 1172-01-STP, 1184-01-STP, and 1184-02-STP:
 - (1) Each booth shall be equipped with a system to measure the pressure drop across the filter media in inches of water column.
 - (2) Differential pressure gauge readings shall be taken at least once per week.
 - (3) The filter media shall be changed whenever the pressure differential across the media exceeds the limits recommended by the filter media manufacturer.
- B. Differential pressure gauge devices shall be installed within 90 days of permit issuance.
- 14. Each Dip Coating Vat (EPNs 595-01-VAT, 595-05-VAT, and 595-10-VAT) shall be equipped with a cover that is kept closed except during dip coating activities.
- 15. All coating operations (including cleanup) shall be conducted only while the items remain within a paint booth with the respective exhaust fans and filter system operating properly. The paint booth exhaust fans shall operate during and for a minimum of one hour after any use of paint and/or cleanup solvents in that paint booth.
- 16. The table entitled "Table 2 Stack Parameters and Material Usage Rates" (SPMUR) indicates the minimum stack heights above ground-level and the maximum material usage rates for those emission points listed. The exhaust stacks that are indicated as "vertical" shall vent vertically and without any obstructions that might deflect the flow in a direction other than vertical.
- 17. Fuel for the ovens and booth heaters is limited to pipeline-quality, sweet natural gas as supplied by the gas distributor.

Track and Road Wheel Rebuild Facility

18. Rubber dust and smoke from the mechanical denuding system shall exhaust into a multiple venturi water scrubber. This scrubber shall maintain a pressure drop of at least 14 inches of water. In addition, the scrubber shall maintain a capture efficiency of at least 97 percent for particles greater than 1 micron in size.

Fluidized Bed Rubber Denuding System (RDS) (EPN 495M-01-STO)

- 19. An operator, maintainer training, and certification program shall be established at this facility. This program shall be based on materials provided by the equipment vendors. A list of all trained and certified operators shall be maintained on-site and available for inspection. Only trained and certified personnel shall be allowed to operate or maintain the RDS.
- 20. Auxiliary fuel for the RDS shall be limited to pipeline-quality, sweet natural gas as supplied by the gas distributor.

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- 21. The RDS shall not be charged with rubber material unless the primary and secondary chambers have been preheated. In addition, the lime injection system and the baghouse must be operational before charging.
- 22. The feed rate of combustible material to the RDS shall not exceed 1106.4 lbs/hr total for the two independent lines, or a total of 8,093,843 pounds per consecutive 12-month period.
- 23. Either Material Safety Data Sheets (MSDS) or sampling results for sulfur content shall be provided for all rubber materials to be combusted. Previously sampled sources shall be monitored for sulfur content on an annual basis.
- 24. If the sulfur content as indicated by the MSDS or sampling results is greater than 1.92 percent, then the feed rate of dry lime to the fluidized bed of the RDS shall be at a minimum ratio of 0.55 pound of lime for each 4 pounds of rubber material to be combusted.
- 25. The RDS shall be equipped with an afterburner automatically controlled to operate with a minimum temperature of 1500°F and a gas retention time of 1.0 second or longer.
- 26. An on-site inventory of key thermocouples shall be maintained to replace these components on a periodic basis as recommended by the vendor.
- 27. Manufacturer's recommended operating instructions shall be posted in close proximity to the RDS unit, and the unit shall be operated in accordance with those instructions.
- 28. Within 90 days of a request from the TCEQ Tyler Regional Office, stack sampling and other testing of the RDS shall be performed to establish hourly emissions rates of nitrogen oxide (NO_x), carbon monoxide (CO), hydrogen chloride (HCI), sulfur dioxide (SO₂), particulate matter (PM) equal to or less than 10 microns in diameter (PM₁₀), and volatile organic compounds (VOC) to demonstrate compliance with the limits specified in the MAERT. In addition, the sampling shall show that the instack concentration of CO shall not exceed 150 parts per million by volume (ppmv) [corrected to 7 percent O₂ averaged over a one-hour period] and the in-stack concentration of O₂ shall be maintained at or above 110,00 ppmv dry (11 percent), averaged over a one-hour period. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with 40 CFR Part 60, Appendix A, Test Method 9 for opacity, Test Method 10 for CO, Test Method 7E for NO_x, and Test Method 3 for O₂ or equivalent methods. The permittee is responsible for providing sampling and testing facilities and conducting the sampling and testing operation, and associated expenses.
 - A. As soon as testing is scheduled but no more than 30 days after the date of the TCEQ Tyler Regional Office's stack sampling request, the TCEQ Tyler Regional Office shall be contacted to schedule a pretest meeting at least 30 days in advance of sampling. The notice shall include:
 - (1) Date for pretest meeting.
 - (2) Date sampling will occur.
 - (3) Name of firm conducting sampling.
 - (4) Type of sampling equipment to be used.
 - (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or the EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant emitted from the RDS (EPN 495M-01 STO) shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standards testing which must have the EPA approval shall be submitted to the TCEQ Office of Air, Air Permits Division in Austin.

- B. The air contaminants emitted from the RDS to be tested for include (but are not limited to) NO_x, CO, HCl, SO₂, PM₁₀, VOC, and opacity. If the RDS is unable to reach the maximum firing rate during testing, then future firing may be limited to the highest firing rate achieved during testing. Furthermore, if the RDS is unable to comply with the emission limits of this permit for any or all of the pollutants of this permit while operating at maximum firing during the test, then future firing will be limited to the maximum emissions-complying firing tested. Additional stack testing may be required for higher firing outside the emissions-complying maximum achieved during the test to be authorized.
- C. For test purposes only, the RDS may be operated outside its proposed firing rates during the stack test. This shall be solely for the purpose of determining the compliance firing rates of the RDS. Exceedances of the MAERT and Special Condition Nos. 20 and 23 which may occur during this testing shall not be a violation of this permit. The emission limitations of the MAERT and Special Condition Nos. 20 and 23 are applicable at all other times.
- D. Requests for additional time to perform stack sampling shall be submitted to the TCEQ Tyler Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 requires EPA approval, and requests shall be submitted to the TCEQ Office of Air, Air Permits Division in Austin.
- E. Two copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Tyler Regional Office.

One copy to the Office of Air, Air Permits Division, Combustion and Coatings Section, in Austin.

Abrasive Blasting Facilities

- 29. Abrasive blasting operations have the following operating restrictions: (08/24)
 - A. Authorized dry abrasive blast media include steel shot, garnet, and plastic. Blast media other than steel shot, garnet, and plastic may be used provided that it does not contain:
 - (1) asbestos;
 - (2) crystalline silica equal to or greater than 1.0 percent by weight; or
 - (3) metal(s) having a short-term ESL less than 50 µg/m₃ as published in the TCEQ's most current ESL list.
 - B. For EPNs 412-01-STF, 412-02-STF, 412-03-STF, 412-04-STF, 412-05-STF, and 561-01-STF, emissions shall be routed to a cartridge filter unit with a control efficiency of at least 99.99 percent for PM of sizes 0.5 micron and greater.

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- C. For EPNs 493-02-STF, 493-03-STF. 493-04-STF, 493-05-STF and 493-16-STF emissions shall be routed to a cartridge filter unit with a control efficiency of at least 97 percent for PM of sizes 0.5 micron to 1.0 micron and at least 99.9 percent for PM of sizes greater than 1.0 micron.
- D. Each abrasive blast unit shall be equipped with a system to measure the pressure drop across the filter media in inches of water column.
- E. Differential pressure gauge readings shall be taken at least once per week.
- F. The cartridge filter media shall be changed whenever the pressure differential across the media exceeds the limits recommended by the filter media manufacturer.

Material Usage Flexibility

- 30. In addition to the approved materials, the use of new materials or products that meet all of the following sub-conditions are allowed. Pollutants from categories of air pollutants not currently authorized on the MAERT cannot be authorized using this special condition.
 - A. All the ingredients of the new material are known; i.e., the weight percentages of the ingredients add to 100 percent or more.
 - B. The maximum hourly (short-term) or annual emission rates from new or existing air contaminant ingredients (aka air contaminants) shall not cause any increases in the short-term or annual emission rates as listed on the MAERT.
 - C. Emissions from the new material shall only be from the emission points represented in the table provided in paragraph G(2) of this special condition.
 - D. Any air contaminant in the new material is exempt from paragraphs E through H of this special condition if the air contaminant is currently authorized under this permit and the proposed emission rate from each EPN is less than or equal to the authorized emission rate from the same EPN.
 - E. Any air contaminant in the new material is exempt from paragraphs F through H of this special condition if:
 - (1) The air contaminant is a particulate and no specific short-term effects screening level (ESL) is included in the most current set of ESLs available through the TCEQ Toxicity Factor Database (must meet NAAQS); or
 - (2) The air contaminant is not included in the most current set of effects screening levels (ESLs) available through the TCEQ Toxicity Factor Database.

If the compound is not on the current ESL list and does not belong to a category of compounds on the list, the permit holder shall request confirmation from the Toxicology Division that an ESL need not be created for authorization through this condition. If the Toxicology Division determines that an ESL is not required under this condition, confirmation that no ESL is required shall be kept on file by the applicant.

- F. Any air contaminant in the new material is exempt from paragraphs G and H of this special condition if:
 - (1) it is emitted at a rate and has a short-term ESL and an annual ESL as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL (µg/m₃)	Annual ESL (µg/m₃)	
≤ 0.04	\geq 2 and < 500	\geq 0.2 and < 50	

≤ 0.10	≥ 500 and < 3,500	≥ 50 and < 350
≤ 0.40	≥ 3,500	≥ 350

- (2) it is not sprayed and it has at least one of the following physical characteristics:
 - a vapor pressure less than 0.01 mm Hg (0.0002 psi) at 68°F (20°C). (a)
 - a boiling point at atmospheric pressure that is above 400°F (204°C), provided (b) the compound is not heated above room temperature in the process; or
 - a molecular weight that is above 200 g/g-mol, provided the compound is not (C) heated above room temperature in the process.
- For all other new air contaminants or increases in existing air contaminants, the following G. procedure shall be completed to determine if the short-term impacts are acceptable:
 - Determine the emission rate of each air contaminant including emissions of the same (1) air contaminant (if an existing air contaminant) from the currently authorized materials that may be emitted at the same time from each emission point.
 - Multiply the emission rate of the air contaminant by the unit impact multiplier for each (2) emission point from the following the attached table entitled "Table 1 - Site-Wide Generic Modeling Results for Health Effects" to determine the off-property impact Ground Level Concentration (GLC)_{MAX} for each emission point.
 - Sum the impacts from each emission point/emission point group to determine a total (3) short-term off-property impact (Total GLC_{MAX}) for the new or existing air contaminant.
 - Compare the total short-term off-property impact to the short-term ESL for the air (4) contaminant as shown below to determine if it is less than or equal to the ESL. If the total off-property impact exceeds the short-term ESL, then a permit amendment is required to authorize the emission rate for the air contaminant.

Total GLC_{MAX} ≤ ESL_{SHORT}

Where:

Total GLC_{MAX} = The sum of the short-term GLCs from each emission point.

ESLSHORT

- = The short-term ESL of the new or existing air contaminant from the most current set of ESLs available through the TCEO Toxicity Factor Database and the date of the database retrieval or as specifically derived by the TCEO Toxicology Division. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.
- For all other new air contaminants or increases in existing air contaminants, the following Η. procedure shall be completed to determine if the annual impacts are acceptable.
 - Determine the annual emission rate (tpy) of each air contaminant including emissions (1)of the same air contaminant (if an existing air contaminant) from the currently authorized materials that may be emitted at the same time from each emission point.
 - Convert the annual emission rate to an hourly emission rate using 8760 hours per year (2) and 2000 pounds per ton.
 - Multiply the hourly emission rate (lb/hr) of the air contaminant determined in paragraph (3) H(2) of this special condition by the unit impact multiplier for each emission point from the table provided in paragraph G(2) of this special condition to determine the offproperty impact GLC_{MAX} for each emission point.

- (4) Sum the impacts from each emission point to determine a total off-property impact (Total GLC_{MAX}) for the new or existing air contaminant.
- (5) Multiply the total off-property impact (Total GLC_{MAX}) determined in paragraph H(4) of this special condition by 0.08 to determine the annual off-property impact (Annual GLC_{MAX}) for the new or existing air contaminant.
- (6) Compare the annual off-property impact to the annual ESL for the air contaminant as shown below to determine if it is less than or equal to the ESL. If the annual off-property impact exceeds the annual ESL, then a permit amendment is required to authorize the emission rates for the air contaminant.

Annual GLC_{MAX} < ESL_{ANNUAL}

Where:

- ESL_{ANNUAL} = The annual ESL of the new or existing air contaminant from the most current set of ESLs available through the TCEQ Toxicity Factor Database or as specifically derived by the TCEQ Toxicology Division.
- I. Calculation of emission rates shall be based upon the methodology used to develop the hourly emission rates in the MAERT, except that the revised transfer efficiencies, PM fallout factors, and flashoff shall be used in calculating the emission rates for the specific EPNs shown in the revised calculations dated February 29, 2008.

Initial Determination of Compliance

- 31. One-time testing and sampling of the thermal control device shall be performed in order to do the following: **(08/24)**
 - A. Verify the destruction efficiency of the thermal control device; and
 - B. Determine the minimum operating temperature needed to meet the minimum required destruction efficiency. The operating temperature shall be based on a 3-hour rolling average.
- 32. Specific requirements of the testing are as follows: (08/24)
 - A. Submit a proposed test plan to accomplish the required testing for approval to the appropriate TCEQ regional **o**ffice. The proposed test plan must be submitted within 60 days after reaching normal operating conditions of the thermal control device under this permit. The testing should be performed as follows:
 - (1) The testing shall be performed during maximum operating conditions for the facilities that are controlled by the thermal control device; and
 - (2) The thermal control device shall operate at a temperature high enough to ensure compliance with the minimum required destruction efficiency.
 - B. Schedule a pretest meeting with the appropriate TCEQ regional office staff at least 45 days in advance of testing. The purpose of the meeting is to review the test details which include sampling and measuring procedures to be used, the forms required for recording the pertinent data, and the format and content of the test report as outlined in Chapter 14 of the TCEQ Sampling Procedures Manual;
 - C. Testing shall be completed no later than 90 days after regional approval of the test plan and no later than 180 days after reaching normal operating conditions; and

- D. Submit a test report to the appropriate TCEQ regional office and TCEQ Austin Office of Air, Air Permits Division, no later than 60 days after the testing has been completed. The report shall provide documentation including calculations which demonstrate compliance with the required destruction efficiency.
- 33. Submit an alteration request to the TCEQ within 6 months of the testing to incorporate into the permit the minimum operating temperature needed to meet the minimum required destruction efficiency.

Recordkeeping

- 34. General Condition No. 7 regarding information and data to be maintained on file is supplemented as follows and shall be used to demonstrate compliance with the special conditions and the MAERT: **(08/24)**
 - A. Environmental Data Sheet (EDS) or similar documentation (including material safety data sheets) for all paints, primers, solvents, thinners, reducers, road wheel, track rubber compounds, adhesives, and other coating materials currently in use. The EDS or similar documentation for materials shall indicate the maximum composition of all constituents.
 - B. Data shall be recorded as follows:
 - (1) Daily and year-to-date usage of all coatings, solvents, reducers, and adhesives in gallons on an emission point-by-emission point basis.
 - (2) Hours of actual operation on a daily basis of each process associated with the emission points listed on the SPMUR including (but not limited to) paint and adhesive booths, abrasive, solvent, and chemical parts cleaning operations as well as the associated rubber operations.
 - (3) As-applied coating VOC and exempt solvent content for each paint, primer, solvent, thinner, and reducer used in each coating booth.
 - C. The data recorded in paragraph [B] of this special condition shall be used to produce a monthly summary that reflects:
 - (1) The VOC, exempt solvent, and PM emissions in lbs/hr as daily averages for each day; and
 - (2) The VOC, exempt solvent, and PM emissions in tons per year (tpy) over the previous 12 months.
 - D. Records shall be maintained of the following data regarding the RDS (EPN 495M-01-STO):
 - (1) All hours of RDS operation while combusting rubber.
 - (2) The amount of dry lime injected on an hourly basis.
 - (3) Daily quantity of supplemental fuel used by the RDS.
 - (4) The amount by weight of rubber fed to the RDS on an hourly basis.
 - (5) Data collected in Special Condition No. 34D(1) through (4) shall be summarized monthly.
 - (6) Logs of all unplanned maintenance, startup, or shutdown activities.
 - (7) The continuously recorded secondary chamber temperature.

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- E. For abrasive blasting (EPNs 412-01-STF, 412-02-STF, 412-03-STF, 412-04-STF, 412-05-STF, 493-02-STF, 493-03-STF, 493-04-STF, 493-05-STF, 493-16-STF, and 561-01-STF), records shall be maintained of the following.
 - (1) Daily pounds of each blast media used at each EPN.
 - (2) Daily hours of operation of each EPN.
 - (3) Data collected in Special Condition No. 34E(1) and (2) shall be used to produce a monthly report that reflects abrasive blast media usage rate in lbs/hr as a monthly average, emissions in lbs/hr as a monthly average, and emissions in tons per year over the previous 12 months.
- F. Manufacturer's documentation on particulate matter control efficiency for all filters and procedures for following the manufacturer's recommended filter replacement.
- G. Field records of visible emissions observation and/or opacity measurements. Records of any corrective action taken.
- H. Records of the differential pressure readings across the filter pads.
- I. Records of the filter inspections and replacement.
- J. Records of the combustion chamber temperature for the thermal control device.
- K. Records of the thermal control device temperature sensor accuracy audit and visual inspection (if appliable). Records of temperature sensor replacement.
- L. Records of AVO inspections and a maintenance log for the thermal control device capture system.
- M. Records of the inspections and maintenance performed on the thermal control device.
- N. Records and calculations demonstrating compliance with Material Usage Flexibility condition for the introduction of any new materials.
- O. A copy of initial test reports and any records of subsequent testing performed shall be kept for the life of the permit.
- P. A copy of each test report documenting the hourly emissions rates of NO_x, CO, HCI, SO₂, PM₁₀, and VOC from the RDS. These test reports shall be retained on-site for the life of the RDS.
- 35. The records required by the special conditions shall be maintained in hard copy or electronic format and shall be maintained for at least five years rather than the two-year period specified in General Condition No. 7. The recordkeeping summary required shall contain examples of the calculations performed (including units, conversion factors, transfer efficiency, PM fallout factors, flashoff, and emission factors), any assumptions made in the calculations, and the basis for those assumptions. These records shall be kept on-site and made available for review upon request by representatives of the TCEQ or any air pollution control agency with appropriate jurisdiction. **(08/24)**

Pollution Prevention

- 36. A routine program shall be established and performed to ensure minimization of fugitive emissions from the emission points authorized by this permit. The program shall include (but not be limited to) the following:
 - A. The abrasive blast cleaning areas and the weld and scarf areas shall be swept and cleaned daily to minimize particulate emissions.

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- B. The PM trapped in the dust collectors, spray booth filters, and the RDS baghouse shall be contained in such a way that, when removed from the collector, filters, or baghouse or stored awaiting disposal or upon disposal, it shall not be allowed to escape into the atmosphere.
- C. When the spray booth floors are scraped and cleaned, the overspray shall be stored and disposed of in such a manner that it shall not be allowed to escape into the atmosphere.
- D. All VOC and exempt solvent spills shall be cleaned up immediately and the waste materials, rags, and other absorbent materials shall be stored in sealed containers until removed from the site by a licensed disposal service.
- E. All waste solvents shall be stored in sealed containers until removed from the site by a licensed disposal service.
- F. All paint gun cleanup shall be performed by discharging the cleaning thinner into closed containers.

Date: August 21, 2024

EPN*	AERMOD Source ID	Emission Point Name Averaging Time		GLC _{max} (µg/m₃ per lb/hr)	
323-04-STP	32304P	Paint Booth	1-hr	19.7	
323-05-STP	32305P	Paint Booth	1-hr	14.8	
323A-01-STP	323A01P	Paint Booth	1-hr	6.5	
323A-01-STP(F)	323A01PF	Paint Booth Fugitives	1-hr	32.2	
323A-02-STP	323A02P	Paint Booth	1-hr	6.9	
323A-02-STP(F)	323A02PF	Paint Booth Fugitives	1-hr	32.2	
323A-03-STP	323A03P	Paint Booth	1-hr	18.3	
323A-03-STO	323A03O	Drying Oven (2 Stacks)	1-hr	110.8	
323A-06-STP	323A06P	Paint Booth	1-hr	25.3	
323A-08-STP	323A08P	Paint Booth	1-hr	19.3	
345-01-STP	34501P	Paint Booth	1-hr	12.1	
345-02-STP	34502P	Paint Booth	1-hr	12.3	
357-01-STP	35701P	Paint Booth	1-hr	11.6	
360-01-STP	36001P	Paint Booth	1-hr	10.8	
378-01-STP		Paint Booth	1-hr	10.5	
378-01-STO		Drying Oven	1-hr	6.1	
378-02-STP		Paint Booth	1-hr	10.5	
378-02-STO		Drying Oven	1-hr	6.1	
407-01-STP	40701P	Paint Booth	1-hr	27.8	
412-01-STF	41201F	Blast Booth/Heater Routed to a Dust Collector	1-hr	50.2	
412-01-STP	41201P	Paint Booth/Heater 1-hr		8.7	
412-01-STO	412010	Drying Oven	1-hr	14.0	
412-02-STF	41202F	Blast Booth/Heater Routed to a Dust Collector	1-hr	50.6	
412-02-STP	41202P	Paint Booth/Heater	1-hr	8.7	
412-02-STO	41202O	Drying Oven	1-hr	13.4	
412-03-STF	41203F	Blast Booth/Heater Routed to a Dust 1-hr Collector		62.3	
412-03-STP	41203P	Paint Booth/Heater	1-hr	8.7	
412-03-STO	412030	Drying Oven	1-hr	17.6	
412-04-STF	41204F	Blast Booth/Heater Routed to a Dust Collector	1-hr	55.3	

 Table 1

 Site-Wide Generic Modeling Results for Health Effects

412-04- STP	41204P	Paint Booth/Heater	1-hr	8.7
412-04-STO	412040	Drying Oven	1-hr	16.9
412-05-STF	41205F	Blast Booth/Heater Routed to a Dust 1-hr Collector		55.3
412-05-STP	41205P	Paint Booth / Heater	1-hr	8.8
412-05-STO	412050	Drying Oven	1-hr	15.8
412-06-STP	41206P	Paint Booth / Heater	1-hr	9.5
412-06-STO	412060	Drying Oven	1-hr	37.3
412-07-STP	41207P	Paint Booth / Heater	1-hr	9.4
412-07-STO	412070	Drying Oven	1-hr	41.3
412-08-STP	41208P	Paint Booth / Heater	1-hr	9.3
412-09-STP	41209P	Drying Oven	1-hr	9.6
443-01-STP		Paint Booth	1-hr	9.3
493-01-STP	49301P	Paint Booth	1-hr	12.9
493-01-STO	493010	Drying Oven and Flashoff (2 Stacks)	Drying Oven and Flashoff (2 Stacks)	
493-03-STO	49303O	Adhesive Booth	1-hr	13.6
561-01-STP	56101P	Paint Booth/Heater	1-hr	16.2
561-01-STO	561010	Drying Oven	1-hr	14.8
561-01-STF	56101F	Blast Booth/Heater Routed to a Dust Collector	1-hr	25.4
591-01-STP	59101P	Paint Booth	1-hr	16.5
591-02-STP	59102P	Paint Booth	1-hr	19.3
591-03-STP	59103P	Paint Booth	1-hr	17.9
591-04-STP	59104P	Paint Booth	1-hr	15.6
591-04-STP(F)	59104PF	Paint Booth Fugitives	1-hr	155.1
595-01-VAT	59501VAT	Dip Coating Vat	1-hr	22.6
595-05-STO1	59505O1	Cure Oven	1-hr	11.0
595-05-VAT	59505VAT	Dip Coating Vat	1-hr	7.9
595-05-FUG	59505FUG	Dip Coating Vat Fugitives	1-hr	47.9
595-10-VAT	59510VAT	Dip Coating Vat	1-hr	16.1
939-01-STP	93901P	Paint Booth	1-hr	14.2
1172-01-STP	117201P	Paint Booth	1-hr	14.1
1172-01-STP(F)	117201PF	Paint Booth Fugitives	1-hr	21.8
1184-01-STP	118401P	Paint Booth/Heater	1-hr	15.1
1184-02-STP	118402P	Paint Booth/Heater	1-hr	15.2

* (F) denotes fugitive emissions.

Date: October 30, 2023

Table 2Stack Parameters and Material Usage Rates Table

EPN	Maximum Hourly Coating Usage (gallons/hour)	Maximum Daily Hours of Operation* (hours/day)	Stack Height (feet)	Vertical Discharge?
323-04-ST		24.00	65.00	Yes
323-05-STP		24.00	65.00	Yes
323-04-STP and 323-05-STP	4.00			
323A-01-STP		9.00*	38.00	Yes
323A-02-STP		9.00*	38.00	Yes
323A-01-STP and 323A-02-STP	8.00			
323A-03-STP		24.00	43.00	Yes
323A-03-STO		24.00	16.00 (2 stacks)	No
323A-03-STP and 323A-03-STO	2.30			
323A-06-STP	2.30	24.00	42.00	Yes
323A-08-STP	4.00	24.00	42.00	Yes
345-01-STP	2.30	11.00	52.00	Yes
345-02-STP	2.30	24.00	52.00	Yes
357-01-STP		24.00	37.00	Yes
360-01-STP		24.00	37.00	Yes
357-01-STP and 360-01-STP	8.00			
378-01-STP	5.00	24.00	27.00	Yes
378-01-STO		24.00	27.00	Yes
378-02-STP	5.00	24.00	27.00	Yes
378-02-STO		24.00	27.00	Yes
407-01-STP	1.30	11.00	27.00	Yes
412-01-STP		24.00	55.50	Yes
412-01-STO		24.00	40.00	Yes
412-01-STP and 412-01-STO	4.00			
412-02-STP		24.00	55.50	Yes
412-02-STP		24.00	40.00	Yes
412-02-STP and 412-02-STO	4.00			
412-03-STP		24.00	55.50	Yes
412-03-STO		24.00	40.00	Yes
412-03-STP and 412-03-STO	4.00			
412-04-STP		24.00	55.50	Yes
412-04-STO		24.00	40.00	Yes
412-04-STP and 412-04-STO	4.00			

412-05-STP		24.00	55.50	Yes
412-05-STO		24.00	40.00	Yes
412-05-STP and 412-05-STO	4.00			
412-06-STP	2.30	24.00	55.50	Yes
412-06-STO		24.00	16.00	No
412-07-STP	2.30	24.00	55.50	Yes
412-07-STO		24.00	16.00	No
412-08-STP	2.30	24.00	55.50	Yes
412-09-STP	2.30	24.00	55.50	Yes
443-01-STP	5.00	24.00	27.00	Yes
493-01-STP		24.00	56.00	Yes
493-01-STO		24.00	45.00 (2 stacks)	Yes
493-01-STP and 493-01-STO	4.40			
493-03-STO	3.00	24.00	54.00	Yes
493-12-STO and 493-13-STO	3.00			
493-16-STO	2.51	24.00	24.00	Yes
561-01-STP		24.00	25.50	Yes
561-01-STO		24.00	25.50	Yes
561-01-STP and 561-01-STO	4.00			
591-01-STP	3.00	24.00	34.00	Yes
591-02-STP	3.00	11.00	32.00	Yes
591-03-STP	1.83	24.00	34.00	Yes
591-04-STP	2.13	11.00	34.00	Yes
595-05-STO1		24.00	35.00	Yes
595-05-VAT		24.00	43.00	Yes
595-05-STO1 and 595-05-VAT	2.00			
939-01-STP	1.30	11.00	22.00	Yes
1172-01-STP	1.30	24.00	30.00	Yes
1184-01-STP	2.00	24.00	25.50	Yes
1184-02-STP	2.00	24.00	25.50	Yes

- * 9 hours per day means 8:00 a.m. until 5:00 p.m., and 11 hours per day means 6:00 a.m. until 5:00 p.m.
- ** EPNs 323A-01-STP and 323A-02-STP are allowed to operate 24 hours per day.

Date: August 21, 2024