Special Conditions

Permit Number 23031

1. This permit authorizes the operation of facilities associated with the manufacturing of fiberglass kitchen and bath fixtures. These facilities are located at 1505 Industrial Drive, Henderson, Rusk 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 attached table. The annual rates 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 listed in Attachment I, except as noted in the MAERT. Instead, these facilities 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. The lists provided in Attachment I are not intended to be all-inclusive and can be altered at the site without modifications to this permit.

3. 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.

4. 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.

Emissions Limitations

5. 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. Observe 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 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.

6. The manufacturing of fiberglass kitchen and bath fixtures shall comply with the applicable requirements of Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63), Subpart WWWW, National Emission Standards for Reinforced Plastic Composites Manufacturing.

Operational Limitations

7. All doors and windows in the fiberglass application area shall be kept closed during normal working hours.

8. Each Fiberglass Application Booths 2-4 shall be equipped with a ventilation system that is designed to capture all emissions from the surface coating operations and shall be operated according to the following requirements.

   A. The ventilation system for the application booths shall be equipped with filter pads designed or warranted to achieve a filter efficiency of 99 percent or greater for particulate matter (PM).

   B. The filter system shall be operated and maintained in accordance with the manufacturer's recommendations to assure that the minimum control efficiency is met at all times when the coating booth is in operation.

   C. The holder of this permit shall install, calibrate (if applicable), and maintain a differential pressure gauge to monitor pressure drop across the filter pads. If a monitoring device requires calibration, it shall be calibrated at least annually in accordance with the manufacturer's specifications and shall be accurate to within a range of ± 0.5 inch water gauge pressure (± 125 pascals) or a span of ± 3 percent. If a monitoring device requires to be zeroed, it shall be zeroed at least once a week.

   D. The filter media differential pressure shall be maintained within the operating range specified by the manufacturer. Filters shall be replaced whenever the pressure drop reading across the filter media is outside the manufacturer's specified operating range.

   E. Pressure drop readings shall be recorded at least once per day that the system is required to be operated.

   F. Maintenance on the ventilation system, including filter replacement, shall be performed only when the facility being controlled is not in operation.

9. The exhaust fans corresponding to EPNs T1B, T1C, T1D, and MP1 shall be in operation during and at least one-half hour after any manufacturing operation in which methyl methacrylate (MMA), polyvinyl alcohol, or styrene-containing materials are utilized.

10. The exhaust stacks for EPNs T1B through T1D, and MP1 shall be at least 55 feet (ft) and 40 ft, respectively, above ground level. In addition, rain caps or other stack heads that would restrict or obstruct vertical discharge of air contaminants shall not be allowed.

11. The following procedures shall be used to control losses from Resin Tanks 1 and 2.

   A. To control breathing losses, a carbon adsorption system (CAS) shall be used. The CAS shall consist of at least two activated carbon canisters that are connected in series.

      (1) The breakthrough concentration shall be as specified by the manufacturer or 100 parts per million by volume, whichever is lower.

      (2) Weekly testing shall be performed to determine the saturation concentration of the carbon in the primary canisters. A colorimetric indicator shall be used to perform the testing.

      (3) When the primary carbon canister reaches the breakthrough concentration, the current finishing canister shall be changed to the primary position and a new canister will be installed immediately in the finishing position. A new indicator shall also be installed at this time. This process shall occur one week after breakthrough concentration.

      (4) Sufficient newly activated carbon canisters shall be maintained at the plant site to replace spent carbon canisters such that replacements can be made as required in paragraph (3) above.

B. To control vapor losses from filling operations, a vapor balanced system as defined in 30 TAC §115.10 shall be used. The CAS will be taken off-line (for a period of time not to exceed 30 minutes) prior to commencement of filling operations and shall be returned on-line (within a period of time not to exceed 30 minutes) once filling operations have been completed.

Recordkeeping Requirements

12. 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:

A. Environmental Data Sheet (EDS) or similar documentation (including material safety data sheets) for resins, gelcoats, and solvents used in the operations and all solvents used in the fiberglass application operations (FRP). The EDS or similar documentation for materials shall indicate the maximum composition of all constituents.

B. Data shall be recorded as follows:

(1) Daily pounds or gallons of each resin, gelcoat, and solvent used in the FRP operations;

(2) Daily hours and times of day of operation for the FRP operations;

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. Field records of visible emissions observation and/or opacity measurements. Records of any corrective action taken.

E. Records sufficient to demonstrate compliance with the applicable requirements of 40 CFR Part 63, Subparts WWWW.

F. Manufacturer's documentation on PM control efficiency for the filters used in the booths. Documentation which shows the manufacturer's specified operating range and the procedures recommended for replacement of the filters.

G. Records of the calibrations performed on each differential pressure gauge.

H. Records of the differential pressure readings across the filter pads.

I. Records of when filters were replaced.

J. Records of the weekly testing on the CAS.

13. 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, 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.

Pollution Prevention

14. All material spills shall be cleaned up immediately.

15. All volatile waste shall be stored in closed containers until removed from the site in accordance with applicable regulations.

16. Towels, rags, or other absorbent materials used for cleanup operations shall be placed into closed containers immediately after use and shall be kept in storage until removed from the plant site in accordance with applicable regulations.

Date: March 11, 2025

Attachment I

Permit Number 23031

Activities and Authorizations

Source or Activity – PBR	Authorization

Cleaning and stripping solvents greater than 50 gallons per year, site-wide	§ 106.261 and/or § 106.262
Water-based surfactants/detergents, greater than 2,500 gallons per year, site-wide	§ 106.261 and/or § 106.262
Usage of organic solvents for maintaining equipment	§ 106.261 and/or § 106.262
Blast cleaning operations with slurry as the cleaning media	§ 106.451
Enclosed abrasive blasting cleaning operations	§ 106.452(1)
Baghouse/dust collector/filter system for facilities authorized by PBR	§ 106.231, § 106.392, and/or § 106.452(1)
Baghouse/dust collector/filter system for facilities authorized in this permit	§ 106.263(c)(1)
Non-enclosed abrasive blasting for routine facility maintenance (500 feet to the nearest off-property receptor and less than one ton per day, 15 tons per month, and 150 tons per year)	§ 106.452(2)
Routine facility maintenance including painting and abrasive blasting on immovable structures	§ 106.263(c)(3)(A)
Remote reservoir and cold solvent cleaners for maintenance	§ 106.454
Parts cleaning equipment with cold solvent/remote reservoir, conveyorized, and open-top cleaners	§ 106.454
Maintenance, startup, and shutdown of degreasers/ solvent cleaning machines authorized by a PBR	§ 106.454
Cleanup of overspray on plenums, booth surfaces, and interior of stacks by mechanical means not covered in this permit	§ 106.263(c)(1)
Cleanup of overspray on plenums, booth surfaces, and interior of stacks by using solvents not covered in this permit	§ 106.263(c)(1)
Filter replacement not covered by this permit for facilities which are authorized by this permit	§ 106.263(c)(1)
Routine maintenance activities for carbon adsorption (e.g., carbon replacement) which are planned and predictable and ensure the continuous normal operation of the facility or control device or return a facility or control device to normal operating conditions	§ 106.263(c)(1)

Startup and shutdown activities not included in the conditions of this permit for combustion units used as control devices	§ 106.263(c)(2)
Natural gas-fired comfort heating	§ 106.102
Maintenance, startup, and shutdown of boilers, heaters, and other combustion devices emitting only products of combustion of the fuel and authorized by a PBR	§ 106.183
Maintenance, startup, and shutdown of heat cleaning devices	§ 106.495
Purging of natural gas or other organic compounds to atmosphere from ovens and dryers before startup	§ 106.263(c)(2)
Startup and shutdown of ovens and dryers authorized by a permit	§ 106.263(c)(2)
Maintenance of ovens and dryers authorized by a permit	§ 106.263(c)(1)
Emergency diesel fire water pumps, electric generators, and portable engines	§ 106.511
Maintenance, startup, and shutdown of portable and emergency engines and turbines authorized by a PBR	§ 106.511
Maintenance, startup, and shutdown of stationary engines and turbines authorized by a PBR	§ 106.512
Startup and shutdown of engines and turbines authorized by a permit	§ 106.263(c)(2)
Maintenance of engines and turbines authorized by a permit	§ 106.263(c)(1)
Fugitive component repair, replacement; leaks – piping, pumps, valves, flanges, etc. for facilities not authorized by a permit	§ 106.261 and/or § 106.262
Fugitive component repair, replacement; leaks – piping, pumps, valves, flanges, etc. for facilities authorized by a permit	§ 106.261, § 106.262, and/or § 106.263(c)(1)
Maintenance, startup, and shutdown of refrigeration equipment used in support of manufacturing operations	§ 106.373
Maintenance of sewage treatment facility	§ 106.531
Maintenance of water and wastewater treatment facility	§ 106.532
Welding, soldering, and brazing equipment	§ 106.227
Manually operated and hand-held equipment	§ 106.265

Routine maintenance activities which are planned and predictable and ensure the continuous normal operation of a facility or control device or return a facility or control device to normal operating conditions	§ 106.263(c)(1)
Routine maintenance, startup, and shutdown of facilities and temporary maintenance facilities	§ 106.263(c)(3)
Equipment fueling	§ 106.412
Diesel fuel storage tanks, gasoline storage tanks, lube oil storage tanks, and loading and unloading	§ 106.472 and/or § 106.473
Maintenance, startup, and shutdown of storage tanks authorized by a PBR	§ 106.472, § 106.473, and/or § 106.474
Abrasive blasting, painting, and surface preparation of storage tanks	§ 106.263(c)(3)

Source or Activity – De Minimis	**Authorization**
Equipment used exclusively for steam cleaning of fabrics, plastics, rubber, wood, or vehicle engines or drive trains.	§ 116.119(a)(1)
Cleaning and stripping solvents, less than or equal to 50 gallons per year, site-wide	§ 116.119(a)(2)(A)
Water-base surfactants/detergents less than or equal to 2,500 gallons per year, site-wide	§ 116.119(a)(2)(F)
Application of aqueous detergents, surfactants, and other cleaning solutions containing less than 1% of any organic compound by weight	§ 116.119(a)(1)
Application of aqueous detergents, surfactants, and other cleaning solutions containing not more than one percent of any organic compound by weight or containing not more than five percent of any organic compound with a vapor pressure less than 0.002 pounds per square inch absolute.	§ 116.119(a)(1)
Manual application of cleaning or stripping solutions or coatings for maintenance	§ 116.119(a)(1)
Glove box/self-contained abrasive blasting and associated filter replacement	§ 116.119(a)(1)
Blast cleaning operations with water as the cleaning media	§ 116.119(a)(1)
Usage of organic chemicals including lubricants, greases, and oils without propellants other than air or nitrogen for maintaining equipment	§ 116.119(a)(1)

Application of lubricants for maintaining equipment	§ 116.119(a)(1)
Office equipment maintenance and cleaning (printers, copiers, etc.)	§ 116.119(a)(1)
Maintenance and cleaning of in-situ computer and office equipment	§ 116.119(a)(1)
Janitorial and maid services	§ 116.119(a)(1)
Grounds maintenance and landscaping	§ 116.119(a)(1)
Maintenance of heating and cooling equipment for personal use	§ 116.119(a)(1)
Comfort air conditioning or comfort ventilation systems which are not used to remove air contaminants generated by or released from specific units or equipment	§ 116.119(a)(1)
Maintenance of equipment by hydraulic or hydrostatic testing	§ 116.119(a)(1)
Application of argon, ethane, helium, hydrogen, methane, neon, nitrogen, and propane for testing, purging, and leak checking of equipment.	§ 116.119(a)(1)
Aerosol product use – no more than 4 cans (64 oz) per day based on a 12 month rolling average	§ 116.119(a)(1)
Aerosol can puncturing, recycling, and disposal – less than 40 cans per 24-hour period	§ 116.119(a)(1)
Pesticide and insecticide use and fumigation	§ 116.119(a)(1)

Date: March 11, 2025