Permit

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
PIEDMONT REGIONAL OFFICE
4949A Cox Road, Glen Allen, Virginia 23060
(804) 527-5020 Fax (804) 527-5106
www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

Michael P. Murphy
Regional Director

June 1, 2011

Mr. David E. Dingman
Director of Operations - Richmond
Super Radiator Coils
451 Southlake Boulevard
Richmond, VA 23235

Registration No. 50906
Plant-County ID No. 149-0009

Dear Mr. Dingman:

Attached is a renewal permit to operate your facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all conditions carefully.

This approval to operate does not relieve Super Radiator Coils of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director
Department of Environmental Quality
P.O. Box 10009
Richmond, Virginia 23240-0009

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please call this office at (804) 527-5020.

Sincerely,

Kyle Ivar Winter, P.E.
Deputy Regional Director

JEK/BCP/50906_6 Title V

Attachment: Permit

cc: Director, OAPP (electronic file transmission)
Manager, Data Analysis (electronic file transmission)
Chief, Air Enforcement Branch (3AT13), U.S. EPA, Region III

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE
4949A Cox Road, Glen Allen, Virginia 23060
(804) 527-5020 Fax (804) 527-5106
www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

Michael P. Murphy
Regional Director

Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Super Radiator Coils
Facility Name:	Super Radiator Coils
Facility Location:	451 Southlake Boulevard Richmond, VA
Registration Number:	50906
Permit Number:	PRO50906

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act (Sections I through IX)

June 1, 2011
Effective Date

May 31, 2016
Expiration Date

Deputy Regional Director

June 1, 2011
Signature Date

Table of Contents, 2 pages
Permit Conditions, 21 pages

Table of Contents

I. FACILITY INFORMATION **4**

II. EMISSION UNITS **5**

III. PROCESS EQUIPMENT REQUIREMENTS – (EMISSION UNIT ID#E3&E4) **6**

A LIMITATIONS 6
B. MONITORING 8
C. RECORDKEEPING 10
D. TESTING 11
E. REPORTING 12

IV. FACILITY WIDE CONDITIONS **12**

A. LIMITATIONS 12

V. INSIGNIFICANT EMISSION UNITS **13**

VI. PERMIT SHIELD & INAPPLICABLE REQUIREMENTS **14**

VII. GENERAL CONDITIONS **15**

A. FEDERAL ENFORCEABILITY 15
B. PERMIT EXPIRATION 15
C. RECORDKEEPING AND REPORTING 15
D. ANNUAL COMPLIANCE CERTIFICATION 17
E. PERMIT DEVIATION REPORTING 17
F. FAILURE/MALFUNCTION REPORTING 18
G. SEVERABILITY 18
H. DUTY TO COMPLY 18
I. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE 18
J. PERMIT MODIFICATION 18
K. PROPERTY RIGHTS 18
L. DUTY TO SUBMIT INFORMATION 19
M. DUTY TO PAY PERMIT FEES 19
N. FUGITIVE DUST EMISSION STANDARDS 19
O. STARTUP, SHUTDOWN, AND MALFUNCTION 20
P. ALTERNATIVE OPERATING SCENARIOS 20
Q. INSPECTION AND ENTRY REQUIREMENTS 20
R. REOPENING FOR CAUSE 21
S. PERMIT AVAILABILITY 21
T. TRANSFER OF PERMITS 20
U. MALFUNCTION AS AN AFFIRMATIVE DEFENSE 22
V. PERMIT REVOCATION OR TERMINATION FOR CAUSE 22
W. DUTY TO SUPPLEMENT OR CORRECT APPLICATION 23
X. STRATOSPHERIC OZONE PROTECTION 23
Y. ASBESTOS REQUIREMENTS 22

Z. ACCIDENTAL RELEASE PREVENTION 23
AA. CHANGES TO PERMITS FOR EMISSIONS TRADING 23
BB. EMISSIONS TRADING 23

VII. STATE-ONLY ENFORCEABLE REQUIREMENT 24

I. Facility Information

Permittee
Super Radiator Coils
451 Southlake Boulevard
Richmond, VA 23236

Responsible Official
David E. Dingman
Director of Operations – Richmond

Facility
Super Radiator Coils
451 Southlake Boulevard
Richmond, VA 23236

Contact Person
David E. Dingman
Director of Operations – Richmond
(804) 794-2887

County-Plant Identification Number: 041-00110

Facility Description:
SIC Code 3585, 3548, 2448 – The facility manufactures finned tube heat transfer coils. Hairpin benders and punch presses are used, and operate independently, to make tubes and fins, respectively. Their outputs are then assembled and put through a hydro expanding process that joins tubing and fins. Then the product is placed in the solvent degreaser system for cleaning. Next the product goes through brazing or welding. Depending upon customer requirements, the product may be spray painted. The last operation is to crate the finished finned tube coil for shipment. Most of the facility was originally constructed in 1980, with the paint spray booth being added in 1989 and the vapor degreaser/solvent recovery system Ref. Nos. E-3, E-4 and E-9 were added in 2004 and improved in 2010.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
E3 - Existing	V1	Open Top Vapor Degreaser Autosonics Model 302 Installed 1980	7' x 14' 2,000 lbs product/hour	Condenser and freeboard refrigeration device	2-20-1	Perchloroethylene	July 15, 2004
E3 - New	V4	Open Top Vapor Degreaser Baron Blakeslee Installed 2010	8' x 17' 4,000 lbs product/hour	Condenser and freeboard refrigeration device	2-20-3	Perchloroethylene	April 30, 2010
E4	V2	Open Top Vapor Degreaser Ultra-Kool Model 160-30-40 Installed 2005	12,000 lbs product/hour	Condenser and freeboard refrigeration device	2-20-2	Perchloroethylene	July 15, 2004
E9	V3	AMCEC Inc, Solvent Recovery System Installed 2010	274 Lbs/Hr	Carbon adsorption beds	2-20-4	Perchloroethylene	April 30, 2010

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Process Equipment Requirements – (emission unit ID# E3-existing, E3 – new, and E4)

A. Limitations

1. VOC/HAP emissions from vapor degreasing process chambers shall be controlled by: primary condenser (device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils) and vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser. These control devices shall be provided with adequate access for inspection and shall be in operation when the vapor degreasing process is operating. (9 VAC 5-80-110, 40 CFR 63.463(a)(4-6), and Condition 3 of 4/30/2010 Permit)

2. VOC/HAP emissions from vapor degreasing process chambers shall be controlled by: a freeboard refrigeration device, reduced room draft, and a freeboard ratio of at least 1.0. The vapor degreasers and their control devices shall be provided with adequate access for inspection and shall be in operation when the vapor degreasing process is operating.
(9 VAC 5-80-110, 40 CFR 63.463(b)(2)(I)(option 6), and Condition 4 of 4/30/2010 Permit)

3. VOC/HAP emissions from the vapor degreasing process chambers shall each be controlled by a carbon bed adsorption system (E9). The concentration of organic solvent in the exhaust from this device shall not exceed 100 parts per million of any Halogenated (HAP) compound. The Solvent Recovery System (SRS) shall be provided with adequate access for inspection.
(9 VAC 5-80-110, 40 CFR 63.463(e)(vii), and Condition 5 of 4/30/2010 Permit)

4. The solvent recovery system adsorption devices shall be equipped with a hydrocarbon analyzer to continuously measure and record the adsorber outlet gas concentration of perchloroethylene. The analyzer shall be installed, calibrated, operated and maintained in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The analyzer shall be equipped with alarms at the units and in the facility to alert the permittee of any malfunction. The analyzer shall be in operation when the adsorbers are operating.
(9 VAC 5-80-110, 40 CFR 63.463(a - d), and Condition 7 of 4/30/2010 Permit)

5. The permittee shall meet the following work and operational practice standards:

   a. Employ a tight fitting cover that is closed at all times except during parts entry and removal and a freeboard ratio of 1.0 or greater.
   (40 CFR 63.462(a)(1); 9 VAC 5-80-110 and Condition 6(b) of 4/30/2010 Permit)

   b. Parts shall be introduced into the vapor degreasers at a speed of 11 feet per minute or less, shall be oriented so that the solvent drains from the parts freely (including tipping and rotating parts having cavities or blind holes), and shall not be removed

from the degreasers for 15 seconds or until dripping has stopped whichever is longer.
(40 CFR 63.463(a)(3); §(d)(4-5), 9 VAC 5-80-110 and Conditions 9 and 6(c) of 4/30/2010 Permit)

c. The owner or operator shall ensure that the solvent level does not exceed the fill line. Spills using solvent transfer shall be wiped up immediately. Wipe rags shall be stored in covered containers.
(40 CFR 63.462(c)(4), 9 VAC 5-80-110 Conditions 6 (d) and (e) of 4/30/2010 Permit)

d. The owner or operator shall ensure that, when the cover is open, the flow of air across the top of the freeboard area of the degreasers or within the degreaser enclosure shall not exceed 50 feet per minute at any time.
(40 CFR 63.462(c)(4), 9 VAC 5-80-110 Conditions 6 (f) and (g) of 4/30/2010 Permit)

e. The owner or operator shall ensure that, sponges, fabric, wood and paper products shall not be cleaned.
(40 CFR 63.462(d)(12), 9 VAC 5-80-110 Conditions 6 (g) of 4/30/2010 Permit)

f. During startup of the degreasers, the primary condenser shall be turned on before the sump heater. During shutdown of the degreasers, the sump heater shall be turned off and the solvent layer allowed to collapse before the primary condenser is turned off. When solvent is added or drained from the degreasers, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid surface.
(40 CFR 63.463(d)(6-8) and 9 VAC 5-80-110)

g. The degreasers and associated controls shall be maintained as recommended by the manufacturer. Each operator of the degreasers shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in Appendix A of 40 CFR 63.460 Subpart T if requested during an inspection by the Department. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but shall not allow liquid solvent to drain from the container.
(40 CFR 63.463(d)(9-11), 9 VAC 5-80-110 and Condition 18 of 4/30/2010 Permit)

h. At all times the disposal of perchloroethylene shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Perchloroethylene shall not be intentionally spilled, discarded in sewers, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(40 CFR 63.463 (h), 9 VAC 5-80-110 and Condition 6(a) of 4/30/2010 Permit)

6. The permittee shall determine for each monitoring period, as defined in Condition III.B.1., whether the following requirements are met:

   a. The chilled air blanket temperature (in degrees °F), measured at the center of the air blanket, shall be no greater than 30 percent of the solvent's boiling point. This condition applies to E3-new and E4 but not E-3 existing.
   (40 CFR 63.463(a)(1)(i) and 9 VAC 5-80-110)

   b. The flow of air across the top of the freeboard area of the degreasers or within the degreaser enclosure shall not exceed 50 feet per minute at any time as measured using the procedures of Condition III.B.1.
   (40 CFR 63.466(e)(2)(ii)(A)), (40CFR63.466(d)(1)(i-ii)) and 9 VAC 5-80-110)

   c. The operating conditions under which the wind speed was demonstrated to be 50 feet per minute or less shall be established and maintained as described in Condition III.B.1.
   (40 CFR 63.463(e)(2)(ii)(B) and 9 VAC 5-80-110)

7. If any of the above requirements are not met, the permittee shall determine whether an exceedance has occurred using the following criteria:

   a. An exceedance has occurred if the requirements of Condition III.A.6.c. have not been met.

   b. An exceedance has occurred if the requirements of Condition III.A.6.a. or Condition III.A.6.b. have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

   The permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in Condition III.E.2.
   (40 CFR 63.463(e)(2)(ii) and 9 VAC 5-80-110)

8. The facility wide emissions from the vapor degreasing equipment (Ref No. E-3 Existing) shall not exceed the limits specified below:

Perchloroethylene	1.21	lbs/hr	5.28	tons/yr

(40 CFR 63.471 (a)(2), 9 VAC 5-80-110 and Condition 11 of 4/30/2010 Permit)

B. Monitoring

1. The permitee shall conduct the following monitoring:

   a. The permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode on a weekly basis. Where

installed, the permittee can determine the temperature of the air blanket during operation by measurement of the closed loop air circulation over the air blanket. (40 CFR 63.466(a)(1) and 9 VAC 5-80-110)

b. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute). The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
(40 CFR 63.466(c)(1-3) and 9 VAC 5-80-110)

c. For the E3 Existing open top vapor degreaser, the permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters as specified below:

(1) Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the procedure specified below:

- Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
- Orient a velometer in the direction of the wind current at each of the four corners of the machine.
- Record the reading for each corner.
- Average the values obtained at each corner and record the average wind speed.

(2) Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

d. For the E3 New open top vapor degreaser (with integrated carbon adsorption system), alternative monitoring procedures may be approved by the Department.

e. To ensure good performance, the hydrocarbon analyzer shall be observed by the permittee with a frequency of not less than once per degreasing cleaning cycle, or as recommended by the process control equipment manufacturer. The permittee shall keep a log of the observations, or continuously record measurements from process/control monitoring device.

(40 CFR 63.466(d)(1)(i-ii), 40 CFR 63.466(g), 9 VAC 5-80-110 and Condition 8 of 4/30/2010 Permit)

C. Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

   a. The monthly operating time of the degreasers.

   b. The monthly, and annual throughput of perchloroethylene. The annual throughput of perchloroethylene shall be calculated monthly as the sum of each consecutive 12 month period. The hourly throughput of perchloroethylene shall be calculated monthly as an average of the monthly throughput divided by the monthly operating time.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
   (9 VAC 5-80-110 and Condition 12 of 4/30/2010 Permit)

2. The permittee shall maintain records in written or electronic form as follows for the lifetime of the degreasers:

   a. Owner's manuals, or if not available, written maintenance and operating procedures, for the degreaser and control equipment.

   b. The date of installation for the degreasers and all of the control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control device were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

   c. Records of the halogenated HAP solvent content for each solvent used in the degreasers.
   (40 CFR 63.467(a)(1-2,5) and 9 VAC 5-80-110)

3. The permittee shall maintain records as specified below either in electronic or written form for a period of 5 years:

   a. The results of control device monitoring required by Condition III.B.1.

   b. Information on the actions taken to comply with Condition III.A.5. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

   c. Estimates of annual solvent consumption for the degreasers.
   (40 CFR 63.467(b)(1-3) and 9 VAC 5-80-110)

4. The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit pollutant affected, cause), corrective action, preventative measures taken and name of the person generating the record.
(9 VAC 5-80-110 and Condition 19 of 4/30/2010 Permit)

D. Testing

1. The permittee shall determine the potential to emit from the degreasers using the procedures described below:

   PTE = H x W x SAI

   Where:

   PTE = the potential to emit for the degreaser (kilograms of solvent per year).

   H = hours of operation for the degreaser (hours per year). H = 8760 hours per year, unless otherwise restricted by a Federally enforceable requirement.

   W = the working mode uncontrolled emission rate (kilograms per square meter per hour). W = 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

   SAI = solvent/air interface area of the degreaser (square meters).
   (40 CFR 63.465(e) and 9 VAC 5-80-110)

2. The permitted facility shall be constructed or modified so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided
(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 2 of 4/30/2010 permit)

3. If testing is conducted to demonstrate compliance in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ, or alternate EPA approved test methods as approved by DEQ.

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC/HAPs	EPA Method 18
Visible Emissions	EPA Methods 9

(9 VAC 5-80-110)

E. Reporting

1. The permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the following:

   a. A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10).

   b. An estimate of solvent consumption for the degreasers during the reporting period.
   (40 CFR 63.468(f)(1-2) and 9 VAC 5-80-110)

2. The permittee shall submit an exceedance report to the Administrator semiannually except when an exceedance occurs. Once an exceedance has occurred the permittee shall follow a quarterly reporting format until a request to reduce reporting frequency is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the following information:

   a. Information on the actions taken to comply with Condition III.A.7.b. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

   b. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

   c. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
   (40 CFR 63.468(h)(1-3) and 9 VAC 5-80-110)

IV. Facility Wide Conditions

A. Limitations

1. Except as specified in this permit, all applicable 40 CFR 63, Subpart T equipment shall be operated in accordance with Federal requirements under 40 CFR 63, Subpart T and 40 CFR 63, Subpart A (as identified in Table 1 of 40 CFR 63, Subpart T).
   (9 VAC 5-80-110 and Condition 10 of 4/30/2010 permit)

2. Unless specified otherwise in this part, on or after the date on which the performance test required to be conducted by 9 VAC 5-50-30 is completed, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater that 20% opacity, except for one six-minute period in any one hour of not more than 30% opacity. Failure to meet the

requirements of this section because of the presence of water vapor shall not be a violation of this section.
(9 VAC 5-80-110 and 9 VAC 5-50-80)

3. In order to minimize the duration and frequency of excess emissions, including visible emissions, due to malfunctions to process equipment or air pollution control equipment, the permittee shall:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.

   b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

   c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

   d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
   (9 VAC 5-80-110 and Condition 18(a - d) of 4/30/2010 Permit)

   e. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning procedures in the attachment to the NSR permit if requested during an inspection.
   (40 CFR 63.468(e), 9 VAC5-80-110 and Condition 18(e) of 4/30/2010 Permit)

V. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation (9 VAC)	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
B2	Parker Natural Gas Fired Boiler	5-80-720 C.2.	N/A	0.97 MMBtu/hr
B3	Parker Natural Gas Fired Boiler	5-80-720 C.2.	N/A	3.0 MMBtu/hr
E1	Hairpin Bender Lubrication	5-80-720 B.2.	VOC	N/A
E2	Punch Press Lubrication	5-80-720 B.2.	VOC	N/A

E4	Brazing	5-80-720 B.1.	PM-10	N/A
E5	Welding	5-80-720 B.1.	PM-10/HAP	N/A
E6	Paint Spray Booth (water based paints)	5-80-720 B.2.	VOC	N/A
E7	Crafting Saws	5-80-720 B.1.	PM-10	N/A

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

VI. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed in compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
None identified	N/A	N/A

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

VII. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or 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.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least 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.
(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

   a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

   b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

      (1) Exceedance of emissions limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

      (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

   c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

   (9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

7. One copy of the annual compliance certification shall be sent to EPA at the following address:

   Clean Air Act Title V Compliance Certification (3AP00)
   U. S. Environmental Protection Agency, Region III
   1650 Arch Street
   Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Piedmont Region within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition VII.C.3. of this permit. (9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or

malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Region.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a 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.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board 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 the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the

permittee shall furnish such records to the Board along with a claim of confidentiality. (9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.
(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board 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.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.
(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

Attachment 10

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

b. The permitted facility was at the time being properly operated.

c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant 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.

(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
(9 VAC 5-80-110 I)

VIII. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements

of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. Odor (9 VAC 5 Chapter 40, Article 2)
2. State toxics rule (9 VAC 5 Chapter 60)