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

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

Michael P. Murphy
Regional Director

October 3, 2016

Mr. Matthew Holland
Vice President of Operations
Super Radiator Coils
P.O. Box 73450
Richmond, VA 23236

Location: Chesterfield County
Registration No.: 50906

Dear Mr. Holland:

Attached is a renewal Title V 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 1105
Richmond, Virginia 23218

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 the regional office at (804) 527-5020.

Sincerely,

Kyle Ivar Winter, P.E.
Deputy Regional Director

JEK/JH/50906_7 Title V renewal

Attachment: Permit

cc: Chris Burdette, Super Radiator Coils
Director, OAPP (electronic file transmission)
Manager, Data Analysis (electronic file transmission)
Chief, Air Enforcement Branch (3AT13), U.S. EPA, Region III
Manager/Inspector, Air Compliance

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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 (Pages 5 through 23)

October 3, 2016
Effective Date

Deputy Regional Director

October 2, 2021
Expiration Date

03 OCTOBER 2016
Signature Date

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Facility Information

Permittee
Super Radiator Coils
P.O. Box 73450
Richmond, VA 23236

Responsible Official
Matthew Holland
Vice President of Operations

Facility
Super Radiator Coils
451 Southlake Boulevard
Richmond, VA 23236

Contact Person
Chris Burdette
Director of Manufacturing
(804) 794-2887

County-Plant Identification Number: 51-041-00110

Facility Description: NAICS Codes: 333415 – Machinery Manufacturing and 335311– Power, Distribution, and Specialty Transformer Manufacturing. SIC Codes: 3585 – Refrigeration and Heating Equipment, 3548 – Welding Apparatus, and 2448 – Wood Pallets and Skids.

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 batch vapor solvent degreaser 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.

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	V4	Batch (Open Top) Vapor Solvent Cleaning Machine Baron Blakeslee Installed 2010	8' x 17' 4,000 lbs product/hour	AMCEC Inc, Solvent Recovery System with carbon bed adsorption Installed 2010	2-20-4	Perchloroethylene	N/A
E6	V6	Spray Booth	2.4 gal coating/hr	Fabric or Fiberglass Filter High Volume Low-Pressure Spray Gun	2-20-5	PM	February 25, 2016
E2	V7	Punch Press Lubrication	0.8 gal/hr	N/A	N/A	N/A	February 25, 2016

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

Process Equipment Requirements – (emission unit ID# E3)

1. **Process Equipment Requirements – (emission unit ID#E3) – Limitations –** Perchloroethylene emissions from each solvent cleaning machine are equal to or less than 150 kilograms/square meters/month measured as a 3-month rolling average.
(9 VAC 5-80-110 and 40 CFR 63.464(a)(1)(ii))

2. **Process Equipment Requirements – (emission unit ID#E3) – Limitations –**Visible emissions from the solvent cleaning machine shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60 Appendix A).
(9 VAC 5-80-110 and 9 VAC 5-40-80)

3. **Process Equipment Requirements – (emission unit ID#E3) – Limitations –** On the first operating day of every month the permittee shall ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill line each month, immediately prior to calculating monthly emissions as specified by 40 CFR 63.465(c). The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.
(9 VAC 5-80-110 and 40 CFR 63.465(b))

4. **Process Equipment Requirements – (emission unit ID#E3) – Monitoring –** The permittee shall maintain a log of solvent additions and deletions for each solvent cleaning machine.
(9 VAC 5-80-110 and 40 CFR 63.464(a)(1)(i))

5. **Process Equipment Requirements – (emission unit ID#E3) – Monitoring –** The permittee shall perform a visible emission observation (VEO) in accordance with 40 CFR 60, Appendix A, Method 22 on the exhaust stack of the solvent cleaning machine at least one time per month that the solvent cleaning machine is operated. If visible emissions are observed, the permittee shall take timely corrective actions such that the solvent cleaning machine resumes operation with no visible emissions, or perform a visible emission evaluation (VEE) in accordance with 40 CFR 60, Appendix A, Method 9 to assure visible emissions from the solvent cleaning machine do not exceed 20 percent opacity. The VEE shall be conducted for a minimum of six minutes. If compliance is not demonstrated by this VEE, timely corrective action shall be taken such that the solvent cleaning machine resumes operation with visible emissions of 20 percent or less. The permittee shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, any VEE recordings and any necessary actions.
(9 VAC 5-80-110 and 9 VAC 5-40-80)

6. **Process Equipment Requirements – (emission unit ID#E3) – Recordkeeping –** 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 dates and amounts of solvent that are added to the solvent cleaning machine. (40 CFR 63.467)(c)(1))

b. The solvent composition of wastes removed from cleaning machines (as determined using the procedure specified in §63.465(c)(2)). (40 CFR 63.467)(c)(2))

c. The calculation sheets showing how monthly emissions and the rolling 3-month average emissions from the solvent cleaning machine were determined, and the results of all calculations. (40 CFR 63.465(c) and 40 CFR 63.467)(c)(3))

d. Records of the results for the solvent cleaning machines opacity observations for visible emissions.

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)

7. **Process Equipment Requirements – (emission unit ID#E3) – Reporting –** The permittee shall submit an annual solvent emission report by February 1 of the year following the one for which the reporting is being made. This report shall include the following:

   a. The size and type of each unit subject to 40 CFR Subpart T (solvent/air interface area or cleaning capacity.

   b. The average monthly solvent consumption for the solvent cleaning machine in kilograms per month.

   c. The 3-month monthly rolling average solvent emission estimates calculated each month using the method as specified in §63.465(c).

   (9 VAC 5-80-110 and 40 CFR 63.468(g)(1-3))

8. **Process Equipment Requirements – (emission unit ID#E3) – Reporting –** 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 (40 CFR 63.468(i)(1-3)) 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. 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)

Process Equipment Requirements – (emission unit ID# E6)

9. **Process Equipment Requirements- (emission unit ID# E6) - Limitations -** Particulate emissions from the spray booth shall be controlled by enclosure and venting and fiberglass filter or fabric filter. The fiberglass filter or fabric filter shall be provided with adequate access for inspection and shall be in operation when the spray booth is operating.
(9 VAC 5-80-110 and Condition 1 of 2/25/2016 permit)

10. **Process Equipment Requirements- (emission unit ID# E6) - Limitations -** Particulate emissions from the spray booth shall be controlled by using a high volume low-pressure spray gun and good operating procedures. Spray gun operators shall be trained to minimize overspray and maximize transfer efficiency. Written operating procedures shall specify this. The spray guns shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 2 of 2/25/2016 permit)

11. **Process Equipment Requirements- (emission unit ID# E6) - Limitations -** Volatile organic compound (VOC) emissions from the spray booth shall be controlled by use of electrodeposited waterborne coatings or use of waterborne coatings or use of high-solids coatings or use of powder coatings. Waterborne coatings are defined as coatings whose volatile portion consists of 91% or more by volume of water and 9% or less by volume of volatile organic compounds. High-solids coatings are defined as coatings which contain 60 percent or more nonvolatile compounds by volume.
(9 VAC 5-80-110 and Condition 3 of 2/25/2016 permit)

12. **Process Equipment Requirements- (emission unit ID# E6) - Limitations -** Application rate for the sprayer associated with the spray booth shall not exceed 2.4 gals coating/hr.
(9 VAC 5-80-110 and Condition 7 of 2/25/2016 permit)

13. **Process Equipment Requirements- (emission unit ID# E6) - Limitations -** The VOC content of the coatings delivered to the spray booth shall not exceed 3.5 lbs VOC/gal coating, excluding water.
(9 VAC 5-80-110 and Condition 11 of 2/25/2016 permit)

14. **Process Equipment Requirements- (emission unit ID# E6) - Limitations -** The throughput of VOC coatings to the spray booth shall not exceed 240 gallons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-110 and Condition 12 of 2/25/2016 permit)

15. **Process Equipment Requirements- (emission unit ID# E6) - Limitations -** The throughput of VOC cleaning solutions used at the spray booth shall not exceed 24 gallons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-110 and Condition 13 of 2/25/2016 permit)

16. **Process Equipment Requirements- (emission unit ID# E6) - Limitations -** Visible emissions from the spray booth shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110 and Condition 16 of 2/25/2016 permit)

17. **Process Equipment Requirements – (emission unit ID#E6) – Monitoring –** The permittee shall perform a VEO in accordance with 40 CFR 60, Appendix A, Method 22 on the exhaust stack of the spray booth at least one time per month that the spray booth is operated. If visible emissions are observed, the permittee shall take timely corrective actions such that the spray booth resumes operation with no visible emissions, or perform a visible emission evaluation (VEE) in accordance with 40 CFR 60, Appendix A, Method 9 to assure visible emissions from the spray booth do not exceed 5 percent opacity. The VEE shall be conducted for a minimum of six minutes. If compliance is not demonstrated by this VEE, timely corrective action shall be taken such that the spray booth resumes operation with visible emissions of 5 percent or less. The permittee shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, any VEE recordings and any necessary actions.
(9 VAC 5-80-110)

18. **Process Equipment Requirements – (emission unit ID#E6) – Monitoring –** The fiberglass filter or fabric filter shall be equipped with devices to continuously measure the differential pressure drop across the fiberglass filter or fabric filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the spray booth is operating.
(9 VAC 5-80-110 and Condition 8 of 2/25/2016 permit)

19. **Process Equipment Requirements – (emission unit ID#E6) – Monitoring –** To ensure good performance, the differential pressure drop shall be observed by the permittee with a frequency of not less than once per day that coatings are applied. The permittee shall keep a log of the observations, or continuously record measurements from the differential pressure drop.
(9 VAC 5-80-110 and Condition 9 of 2/25/2016 permit)

20. **Process Equipment Requirements – (emission unit ID#E6) – Recordkeeping –** The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be

arranged with the Piedmont Regional Office. These records shall include, but are not limited to:

a. The permittee shall maintain the following information at all times:
   i. Coating application system number
   ii. Method of application
   iii. Number and types of coats applied to the substrate
   iv. Drying method
   v. Substrate type

b. The permittee shall maintain the following information on a daily basis:
   i. Coating application system number
   ii. Time period of each application run
   iii. Coating identification number
   iv. Diluent and clean up solvent identification numbers

c. The permittee shall maintain the following information for each coating at all times:
   i. Supplier name, coating name, and identification number
   ii. Coating density (lb/gal)
   iii. Volatile content of coating as supplied (percent by weight)
   iv. Water content of coating as supplied (percent by weight)
   v. Exempt solvent content of coating as supplied (percent by weight)
   vi. Solids content of coating as supplied (percent by volume)
   vii. Name of diluent added, if any
   viii. Identification number of diluent
   ix. Diluent VOC density (lbs/gal)
   x. VOC content of diluent (percent by weight)
   xi. Exempt solvent content of diluent (percent by weight)
   xii. Diluent/coating ratio (gal diluent/gal coating)

d. Daily and annual hours of operation of the spray booth. Annual hours of operation shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

e. Monthly and annual throughput of VOC coatings to the spray booth in gallons. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

f. Monthly and annual throughput (in gallons) of each VOC coating, VOC cleaning solution, and VOC diluent used in the spray booth. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months

g. Average daily and monthly VOC content in lbs VOC/gal coating, excluding water or in lbs VOC/gal coating solids or in lbs VOC/gal coating solids applied from the spray booth.

h. Log of observations or records of measurements from the pressure-monitoring device on the fiberglass filter or fabric filter.

i. Records of the results for the solvent cleaning machines opacity observations for visible emissions.

(9 VAC 5-80-110 and Condition 17.a-f, h, and j of 2/25/2016 permit)

Process Equipment Requirements – (emission unit ID# E2)

21. **Process Equipment Requirements- (emission unit ID# E2) - Limitations -** VOC emissions from the punch press lubrication process shall be controlled by good operating practices. The punch press lubrication process shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 4 of 2/25/2016 permit)

22. **Process Equipment Requirements- (emission unit ID# E2) - Limitations -** The punch press lubrication process shall not operate more than 8760 hours per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-110 and Condition 14 of 2/25/2016 permit)

23. **Process Equipment Requirements- (emission unit ID# E2) - Limitations -** Emissions from the operation of the punch press lubrication process shall not exceed the limits specified below:

Volatile Organic Compounds	4.4 lbs/hour	19.3	tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition 22.
(9 VAC 5-80-110 and Condition 15 of 2/25/2016 permit)

24. **Process Equipment Requirements- (emission unit ID# E2) – Recordkeeping -** The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:

a. Annual hours of operation of the punch press lubrication process (when emitting VOCs), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110 and Condition 17.g of 2/25/2016 permit)

Facility Wide Conditions

25. **Facility Wide Conditions – Limitations –** VOC emissions from cleaning or purging operations shall be minimized by use of detergents or use of high pressure water or use of non-volatile compounds or reduced use of volatile organic compounds or adjustment of production schedules to minimize coating changes.
(9 VAC 5-80-110 and Condition 5 of 2/25/2016 permit)

26. **Facility Wide Conditions – Limitations –** At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, 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.
(9 VAC 5-80-110 and Condition 6 of 2/25/2016 permit)

27. **Facility Wide Conditions – Limitations –** The facility wide perchloroethylene emissions from the solvent cleaning machines shall not exceed 4,800 kg/yr (5.28 tons/yr) measured as a 12-month rolling total.
(9 VAC 5-80-110 and 40 CFR 63.471(b)(2))

28. **Facility Wide Conditions – Limitations -** At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

    The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the spray booth and/or control equipment and process equipment which affect such emissions.

    a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

    b. Maintain an inventory of spare parts.

    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, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request
(9 VAC 5-80-110 and Condition 21 of 2/25/2016 Permit)

29. **Facility Wide Conditions – Recordkeeping -** The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:

    a. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, toxic compound content, water content, solids content, and density for each coating, thinner, and cleaning solution used.

    b. Scheduled and unscheduled maintenance and operator training.

    c. The calculation sheets showing how monthly emissions and the rolling 12-month total emissions from the solvent cleaning machine were determined, and the results of all calculations. (40 CFR 63.471(c) and 40 CFR 63.471(e)(3))

    d. The calculation sheets showing how the potential to emit from all solvent cleaning operations were determined, and the results of the calculations.

    These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
    (9 VAC 5-80-110 and Condition 17. i and k of 2/25/2016 permit)

30. **Facility Wide Conditions – Testing-** If there are any changes in the solvent cleaning operations, the permittee shall determine the potential to emit from all solvent cleaning operations, using the procedures described in 40 CFR 63.465(e)(1) through 40 CFR 63.465(e)(3).
    (9 VAC 5-80-110 and 40 CFR 63.471(b)(2))

31. **Facility Wide Conditions – Testing-** The permitted facility shall be constructed or modified so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. This includes constructing the facility/equipment such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and providing a stack or duct that is free from cyclonic flow. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided.
    (9 VAC 5-80-110 and Condition 10 of 2/25/2016 Permit)

32. **Facility Wide Conditions – Testing-** If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.
    (9 VAC 5-80-110)

33. **Facility Wide Conditions – Reporting –** The permittee shall submit an annual solvent emission report by February 1 of the year following the one for which the reporting is being made. This report shall include the following:

    a. The 12-month rolling total solvent emission estimates calculated each month using the method as specified in §63.471(c).

    b. This report can be combined with the annual report required in §63.468(g) into a single report.

    (9 VAC 5-80-110 and 40 CFR 63.471(h)(2 & 3))

Insignificant Emission Units

34. **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	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
B3	Parker Natural Gas Fired Boiler	5-80-720 C.2.	PM, PM-10, CO, NO_x, SO_2, and VOC	3.0 MMBtu/hr
E1	Hairpin Bender 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
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.

Permit Shield & Inapplicable Requirements

35. **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
9 VAC 5-40-4760 (Rule 4-34)	Emission Standards for Miscellaneous Metal Parts/Products Coating Application Systems	This standard does not apply to the punch press lubrication process because lubricants are not included in coatings.
9 VAC 5-40-3260 (Rule 4-24)	Emission Standard for Solvent Metal Cleaning Operations using Non-Halogenated Solvents	This standard does not apply to the solvent cleaning machine because it is subject to MACT Subpart T, which has more stringent requirements.
40 CFR 63, Subpart JJJJJJ	National Emission Standards for Hazardous Air Pollutants Standards for Industrial, Commercial, & Institutional Boilers at Area Sources	This Subpart is not applicable to the boiler because it is a gas-fired boiler (40 CFR 63.11195(e)) as defined by the Subpart.
40 CFR 63, Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants for Paint Stripping & Miscellaneous Surface Coating Operations at Area Sources	This Subpart is not applicable because the coatings used do not contain any of the target HAPs.
40 CFR 63, Subpart MMMM	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.	This Subpart is not applicable because the facility is not a major source.

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)

General Conditions

36. **General Conditions - 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)

37. **General Conditions - 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.
(9 VAC 5-80-80 B, C, F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

38. **General Conditions - Permit Expiration -** 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.
(9 VAC 5-80-80 B, C, F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

39. **General Conditions - Permit Expiration -** 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.
(9 VAC 5-80-80 B, C, F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

40. **General Conditions - Permit Expiration -** 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.
(9 VAC 5-80-80 B, C, F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

41. **General Conditions - Permit Expiration -** 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.
(9 VAC 5-80-80 B, C, F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

42. **General Conditions - Permit Expiration -** 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)

43. **General Conditions – Recordkeeping and Reporting -** 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)

44. **General Conditions – Recordkeeping and Reporting -** 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)

45. **General Conditions – Recordkeeping and Reporting -** 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:

        i. Exceedance of emissions limitations or operational restrictions;

        ii. 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,

        iii. 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)

46. **General Conditions – 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:

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

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

c. The compliance status.

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

e. 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.

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

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

R3_APD_Permits@epa.gov
(9 VAC 5-80-110 K.5)

47. **General Conditions – 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 45 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

48. **General Conditions – 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)

49. **General Conditions – 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)

50. **General Conditions – 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)

51. **General Conditions – 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)

52. **General Conditions – 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 5-80-1605, 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)

53. **General Conditions – Property Rights -** The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

54. **General Conditions – Duty to Submit Information -** 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)

55. **General Conditions – Duty to Submit Information -** 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)

56. **General Conditions – 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)

57. **General Conditions – 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:

    a. 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;

    b. 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;

    c. 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;

    d. 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,

    e. 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)

58. **General Conditions – 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)

59. **General Conditions – 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)

60. **General Conditions – 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:
    a. 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.

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

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

    d. 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)

61. **General Conditions – 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. The conditions for reopening a permit are as follows:

    a. 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.

b. 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.

c. 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)

62. **General Conditions - 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)

63. **General Conditions - Transfer of Permits -** 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)

64. **General Conditions - Transfer of Permits -** 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)

65. **General Conditions - Transfer of Permits -** 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)

66. **General Conditions – Malfunction as an Affirmative Defense -** A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of Condition 67 are met.
(9VAC 5-80-250)

67. **General Conditions – Malfunction as an Affirmative Defense -** 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.

(9 VAC 5-80-250)

68. **General Conditions – Malfunction as an Affirmative Defense -** In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
(9VAC 5-80-250)

69. **General Conditions – Malfunction as an Affirmative Defense -** 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)

70. **General Conditions – 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)

71. **General Conditions – 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)

72. **General Conditions – 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)

73. **General Conditions – 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)

74. **General Conditions – 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)

75. **General Conditions – 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)

76. **General Conditions – 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:

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

    b. 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.

    c. 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)