

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00300026-2023**  
Application Received: **May 26, 2022**  
Plant Identification Number: **03-54-003-00026**  
Permittee: **MAAX US Corp.**  
Facility Name: **Martinsburg Facility**  
Mailing Address: **718 Mid Atlantic Parkway, Martinsburg, WV 25404**

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Physical Location: Martinsburg, Berkeley County, West Virginia  
UTM Coordinates: 246.3687 km Easting • 4376.054 km Northing • Zone 18  
Directions: From I-81, take exit 16E, go to stop light make a left, make an immediate left onto Mid Atlantic Parkway. Plant is located ½ mile on right.

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### Facility Description

MAAX US Corp. Martinsburg Facility is a fiberglass bath unit manufacturing facility covered by Standard Industrial Classification (SIC) Code 3088. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility uses the open-mold technique to manufacture these units. The facility consists of four gel coat booths, two lamination areas, a UTILE wall panel line (and future second line), trim area, and finish area.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2021 Actual Emissions</b>
Carbon Monoxide (CO)	43.84	2.91
Nitrogen Oxides (NO <sub>x</sub> )	10.82	3.47
Particulate Matter (PM <sub>2.5</sub> )	0.66	0.29
Particulate Matter (PM <sub>10</sub> )	0.66	0.29
Total Particulate Matter (TSP)	0.66	0.29
Sulfur Dioxide (SO <sub>2</sub> )	0.03	0.02
Volatile Organic Compounds (VOC)	202.2*	14.49

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2021 Actual Emissions</b>
Styrene	202.2*	12.69
Methyl Methacrylate (MMA)	11.82	1.35

*Some of the above HAPs may be counted as PM or VOCs.*

\* The VOC and Styrene PTE are the R13-2006 permit limits during restoration of the Concentrator/RTO.

**Title V Program Applicability Basis**

This facility has the potential to emit 202 tpy of VOC, 202 tpy of Styrene and 12 tpy of MMA. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, MAAX US Corp. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

**Legal and Factual Basis for Permit Conditions**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

- |         |  |
|---------|--|
| 45CSR6  | Open burning prohibited.   |
| 45CSR7  | To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations   |
| 45CSR11 | Standby plans for emergency episodes.  |
| 45CSR13 | Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation |

WV Code § 22-5-4 (a) (14)  45CSR30 45CSR34 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F 40 C.F.R. Part 63, Subpart WWWW	The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Emission Standards for Hazardous Air Pollutants Asbestos inspection and removal Ozone depleting substances National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
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State Only:

45CSR4	No objectionable odors.
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Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2006E	January 25, 2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

This is a renewal of the Title V permit which was issued on December 12, 2017.

Significant changes to the most recent version of the Title V Permit consist of the following:

**1) General Revisions:**

- The UTM coordinates have been revised to match the more precise coordinates listed in the renewal application.

**2) Title V Boilerplate changes:**

- **Condition 2.1.3.** – This condition was updated to delete the word “such” which was removed from 45CSR30 effective March 31, 2023. The reference was changed from 45CSR§30-2.12 to 45CSR§30-2.39. because the definition of “Secretary” was renumbered in a previous version of 45CSR30.

- **Condition 2.11.4.** - The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.
- **Conditions 2.17., 3.5.7. and 3.5.8.a.1.** – These conditions were deleted and replaced with “Reserved” because the emergency provisions under 45CSR§30-5.7 were removed from 45CSR30 effective March 31, 2023.
- **Condition 2.22.1.** - The reference notation was changed to delete 45CSR38 because it was repealed.
- **Condition 3.5.3.** - The US EPA contact and address were updated.
- **Condition 3.5.4.** – This condition was updated because the requirement to submit a certified emissions statement was removed from 45CSR30 effective March 31, 2023.
- **Condition 3.5.8.a.2.** – This condition was updated to replace the word “telefax” with “email” according to the change in 45CSR30 effective March 31, 2023

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. **40 CFR 63 Subpart PPPP (*National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*)** – The facility meets the applicability criteria of 40 CFR 63 Subpart WWWW and therefore Subpart PPPP is not applicable per 40 CFR §63.4481(c)(6).
- b. **40 CFR Part 64 (Compliance Assurance Monitoring)** – Since the facility is Subject to 40 CFR 63 Subpart WWWW proposed after November 15, 1990, CAM is not applicable for HAPs per 40 CFR§64.2(b)(1)(i). For VOCs (mostly HAPS), the current Title V permit specifies a continuous compliance determination method (i.e., continuous measurement of the RTO combustion chamber temperature with a chart recorder). Therefore, CAM is not applicable for VOCs per 40 CFR§64.2(b)(1)(vi).

### Request for Variances or Alternatives

None.

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date: April 10, 2023  
Ending Date: May 10, 2023

### Point of Contact

All written comments should be addressed to the following individual and office:

Dan Roberts  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41902  
Daniel.p.roberts@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

On May 3, 2023, Justin Leary of the EPA sent an email which stated that the EPA had no comments on the draft permit. No comments were received from the company or public.