

# Fact Sheet



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

Permit Number: **R30-06700025-2023**

Application Received: **June 3, 2022**

Plant Identification Number: **067-00025**

Permittee: **SMR Technologies, Inc**

Mailing Address: **93 Nettie-Fenwick Road, Fenwick, WV 26202-9718**

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Physical Location:	Fenwick, Nicholas County, West Virginia
UTM Coordinates:	536.20 km Easting • 4,230.90 km Northing • Zone 17
Directions:	From US19N in Summersville, turn right onto SR39E towards Richwood (Arbuckle Rd.). Travel approximately 11.3 miles until SR39 intersects with SR20 at Nettie and continue onto SR39E/SR20N (Nettie-Fenwick Rd) approximately 8.5 miles. The facility is on right just before the bridge and the intersection where SR39 and SR20 split.

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### **Facility Description**

SMR Technologies, Inc. owns and operates a rubber fabric and elastomers fabrication plant, which operates under Standard Industrial Classification (SIC) code 3069. In addition, the facility also produces carbon and graphite products used in aerospace and medical equipment and operates under secondary SIC code 3624. The facility produces a variety of rubber fabric products. Fabric, zippers, cements, and solvents are received from off site. Zippers are attached to some pieces with a heated press. Some fabric is buffed before it is assembled and glued. Solvents are used to clean the fabric and the adhesives are applied. The pieces are then air or heat cured. The facility has the potential to operate twenty-four (24) hours a day, seven (7) days per week, and fifty-two (52) weeks per year.

**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)	17.73	1.22
Nitrogen Oxides (NO <sub>x</sub> )	30.23	1.61
Particulate Matter (PM <sub>2.5</sub> )	4.06	0.28
Particulate Matter (PM <sub>10</sub> )	5.46	0.28
Total Particulate Matter (TSP)	5.46	0.36
Sulfur Dioxide (SO <sub>2</sub> )	38.52	0.07
Volatile Organic Compounds (VOC)	42.50	24.53

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2021 Actual Emissions</b>
Toluene	16.7	5.56
Hexane	7.2	1.83
Miscellaneous HAPs	9.3	0.79
Formaldehyde	<0.5	<0.01
Total HAPs	33.7	8.01

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

**Title V Program Applicability Basis**

This facility has the potential to emit 16.7 TPY of toluene and 33.7 TPY of total HAPs. Due to this facility's potential to emit over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, SMR Technologies, Inc. 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:

- 45CSR2 To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
- 45CSR6 Control Of Air Pollution From Combustion Of Refuse
- 45CSR7 To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations
- 45CSR10 To Prevent And Control Air Pollution From The Emission Of Sulfur Oxides

45CSR11	Prevention Of Air Pollution Emergency Episodes
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission To Commence Construction, And Procedures For Evaluation
45CSR16	Standards of Performance for New Stationary Sources
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
45CSR30	Requirements For Operating Permits
45CSR34	Emission Standards For Hazardous Air Pollutants
40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 C.F.R. Part 61 Subpart M	National Emission Standard for Asbestos
40 C.F.R. Part 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
40 C.F.R. Part 82 Subpart F	Ozone depleting substances

State Only:

45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or 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 (if any)
R13-0415B	12/11/2007	
G60-C058	11/18/2013	

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.

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## Determinations and Justifications

This is a renewal of the Title V permit which was issued on December 12, 2017. Substantial changes to the current Title V Permit consist of the following:

Note: COA in the following discussions means citation of authority.

- 1) **Table of Contents** – Removed Appendix F since the requirements of General Permit G60-C have been incorporated into the renewal permit in Section 7.0.
- 2) **Title V Boilerplate changes.**
  - **Condition 2.11.4.** – The COA has been corrected.
  - **Condition 2.22.1.** – The COA has been updated to remove 45CSR38 which has been repealed.
  - **Condition 3.5.3.** – This condition was revised to update the US EPA mailing address.
- 3) **Condition 1.1. - Emission Units Table.**
  - Added “Diesel” to the descriptions for Emission Units 500 and 501.
  - Removed Emission Unit 502 “Onan natural gas Emergency Generator” from the table. This unit has been decommissioned. (See the discussion in Item “9” below)
- 4) **Condition 3.7.2.** – Revised the non-applicable permit shield list based on a revised list submitted in the renewal application.
- 5) **Condition 4.1.9.** –
  - 40 CFR §63.7499 lists the subcategories of boilers and process heaters. Since it is not an applicable requirement it has not been included in the renewal permit.
  - 40 CFR §63.7500
    - §63.7500(a) - Streamlined the language to only include paragraphs (a)(1) and (a)(3) and Table 3 since the boilers are not subject to (a)(2) or the other Tables listed in the §63.7500(a)(1).
    - §63.7500(e) - has requirements for boilers or process heaters in the units designed to burn gas 1 fuels subcategory of less than 10 mmBtu/hr. The only portion of §63.7500(e) that pertains to boilers EP001 and EP007 is basically a statement that boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or Tables 11 through 15 to 40 CFR 63 Subpart DDDDD. Therefore, since there is no applicable requirement, §63.7500(e) has not been included in the renewal permit.
    - §63.7500(f) - states that the standards of 40 CFR §63.7500 apply at all times the affected unit is operating, except during periods of startup and shutdown during which time you must comply only with items 5 and 6 of Table 3 to 40 CFR 63 Subpart DDDDD. The two boilers are not subject to the requirements of items 5 and 6 of Table 3 to 40 CFR 63 Subpart DDDDD. Therefore, the two boilers are not subject to §63.7500(f) and thus, it has not been included in the renewal permit. Furthermore, §63.7500(a), which is included in condition 4.1.9., states that the §63.7500 requirements must be met at all times the affected unit is operating.
    - §63.7500(a)(3) - requirements have been added which were not previously included in the permit.
    - Revised the COA for §63.7500 to reflect the changes discussed above and to add “(a)(3)” and “Table 3 Items 3 and 4.”

- 40 CFR §63.7540 – Since all the requirements of §63.7540(a)(10) are included in this section, the COA has been revised to remove the subsections of (a)(10).
- 6) **Condition 4.3.1.** – Streamlined the language in §63.7515(d) to include only the requirements for which the boilers are subject and deleted the language not applicable to the boilers.
- 7) **Condition 4.4.2.** – Added “(a)” to the COA for §63.7555.
- 8) **Condition 4.5.2.** –
- 40 CFR §63.7550
    - §63.7550(a) – Added Table 9 applicable requirements in the middle column that were previously omitted. Also streamlined the language in the third column to only include “annual” reports since the boilers are not subject to the other reporting frequencies.
    - §63.7550(b) – Streamlined the language to only include “annual” reports since the boilers are not subject to the other reporting frequencies.
    - §63.7550(b)(5) – Deleted the references to 40 CFR Part 71 since the facility is subject to 40 CFR Part 70.
    - §63.7550(d) – Added the applicable requirements of this section which were previously omitted.
    - §63.7550(h) – Added the applicable requirements of §63.7550(h)(3) which were previously omitted.
    - Since all the requirements of §63.7550(b) are included in this permit condition, the COA has been revised to remove the subsections of (b). The COA has also been revised to add “(d) and “(h)(3)” for the added requirements as described above.
- 9) **Section 7.0. Emergency Generators 500, 501, and 502** – The current permit incorporates by reference the requirements of General Permit G60-C applicable to the emergency generator engines 500 and 501 and includes G60-C in Appendix F. The individual requirements of G60-C for the emergency generators 500 and 501 have been incorporated into the renewal permit thereby eliminating the incorporation by reference and Appendix F. The current permit references permit conditions of G60-C for both engines 500 and 501 that contain requirements of 40 CFR 60 Subpart IIII. However, since engine 500 is not subject to Subpart IIII, any Subpart IIII requirements pertaining to engine 500 have not been included in the renewal permit. (see applicability discussion below) Additionally, G60-C did not have requirements for 40 CFR §60.4211(g) or §60.4214(d) which are applicable to engine 501. Therefore, these requirements have been added to the renewal permit in conditions 7.4.6. and 7.5.4. respectively.

Section 7 of the current permit also contains the requirements from 40 CFR 63 Subpart ZZZZ applicable to emergency generator 502 and minimal requirements applicable to engines 500 and 501. Pursuant to 40 CFR §63.6590(b)(1)(i), emergency generator engines 500 and 501 do not have to meet the requirements of Subpart ZZZZ except for the initial notification requirements of §63.6645(f). However, they must meet the emergency stationary RICE requirements of §63.6640(f) (condition 7.1.12. of the renewal permit and 7.1.5. of the current permit). Therefore, engines 500 and 501 have been included in condition 7.1.12. of the renewal permit. The Onan Emergency Generator 502 has been decommissioned. Via email correspondence on June 7, 2022 from the responsible official, the fuel lines have been disconnected and removed from the engine and the unit will be removed from the facility. Hence engine 502 has been removed from Condition 7.1.12. of the renewal permit. The only requirements applicable to engine 502 in the current permit are those of 40 CFR 63 Subpart ZZZZ. Therefore, in addition to removing engine 502 from condition 7.1.12. of the renewal permit, the other requirements from 40 CFR 63 Subpart ZZZZ that are contained in the current permit applicable to engine 502 have not been included in the renewal permit.

Other specific changes include the following:

- Section 7.0 Title – Removed EP502 from the “emission point ID(s)” since engine 502 has been decommissioned.
- 40 CFR §63.6604(c) (condition 7.1.4. of the current Permit) – The requirements in this section of Subpart ZZZZ have been removed and marked as “[Reserved]” in the latest version of Subpart ZZZZ. Furthermore, even if the requirements remained in Subpart ZZZZ, they would not apply to engine 500 or 501. For these reasons §63.6604(c) is not included in the renewal permit.
- 40 CFR §63.6605 (condition 7.1.5. of the current permit) – This section of Subpart ZZZZ is not applicable to engines 500 and 501 and since engine 502 has been decommissioned it has not been included in the renewal permit.
- 40 CFR §63.6650(h) (condition 7.5.3. of the current Permit) – This section of Subpart ZZZZ has been revised and is only applicable to emergency stationary RICE located at an area source of HAP emissions per 40 CFR §63.6640(f)(4). Therefore, it is not included in the renewal permit.

The language from 40 CFR 60 Subpart IIII and/or 40 CFR 63 Subpart ZZZZ requirements included in the renewal permit, where applicable, has been revised to the updated language in the latest versions of these subparts.

- 10) Appendix F** – This appendix which contained the general permit (G60-C) has been deleted since the individual applicable requirements of the general permit have been incorporated into the renewal permit in Section 7.0.

#### **Federal Regulatory Applicability Discussion**

##### **40 CFR 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

- Emergency Generator engine 500 is a diesel compression engine rated at 519 HP and was installed at the facility in 2005. The engine was manufactured in 2004 and pre-dates the applicability dates in §60.4200(a)(2)(i) therefore, the engine is not subject to this subpart.
- Emergency Generator engine 501 is a diesel compression engine rated at 670 HP and was installed at the facility in 2013. The engine is a certified engine manufactured in 2013 subject to the requirements of this subpart.

##### **40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

- Pursuant to 40 CFR §63.6590(a)(2)(i), engines 500 and 501 are defined as “New Stationary RICE” with a site rating of more than 500HP located at a major source of HAP emissions since they were both constructed after December 19, 2002. As mentioned in the discussion above, pursuant to 40 CFR §63.6590(b)(1)(i), emergency generators 500 and 501 do not have to meet the requirements of Subpart ZZZZ except for the initial notification requirements of §63.6645(f). They must meet the emergency stationary RICE requirements of §63.6640(f) (condition 7.1.12.) and therefore the engines have been included in condition 7.1.12. of the renewal permit.

#### **Non-Applicability Determinations**

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

- a. **40 C.F.R. 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels.** The fuel oil storage tank has a capacity of less than 75 m<sup>3</sup>.
- b. **40 C.F.R. 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Unit.** The 16.8 MMBtu/hr boiler (001) was constructed prior to June 9, 1989; therefore, it is not subject to the requirements of 40 C.F.R. 60 Subpart Dc. However, 40 C.F.R. 60 Subpart Dc is applicable to the 24.5 MMBtu/hr boiler (007).

- c. **40 CFR 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.** Emergency Generator engine 500 is a diesel compression engine rated at 519 HP and was installed at the facility in 2005. The engine was manufactured in 2004 and pre-dates the applicability dates in §60.4200(a)(2)(i) therefore, the engine is not subject to this subpart.
- d. **40 C.F.R. 63, Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities.** The parts assembled at this facility are not critical to a vehicle's structural integrity or flight performance per 40 CFR §63.741(f).
- e. **40 C.F.R. 63, Subpart OOOO - National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles.** The facility is not subject to this MACT because the fabric is not coated on a continuous web.
- f. **40 C.F.R. 64 - Compliance Assurance Monitoring (CAM).** This facility is not subject to CAM. The boilers (001 and 007), assembly tables, heat cure presses, generators (500 and 501), and autoclaves are not equipped with control devices; for CAM to apply, an emission unit must have a control device, as specified in 40 CFR §64.2(a)(2). The buffing booths (002 and 005) and paint booths (006 and 008) have control devices installed, but their pre-control device PTE for all regulated air pollutants is below the corresponding major source threshold; for CAM to apply, the PTE for the emission unit must be above the major source threshold, as specified in 40 C.F.R. §64.2(a)(3).

### **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: March 30, 2023

Ending Date: May 1, 2023

### **Point of Contact**

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

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41910  
frederick.tipane@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)**

Although there were no comments received during the "Draft" public comment period or during the "Proposed" EPA comment period, a revised version of WV Rule 30 (45CSR30) became effective on March 31, 2023. Due to the Rule 30 revisions, the Title V boilerplate has been revised. Consequently, the revisions have been made to the final permit. The revisions to the permit are as follows:

**Condition 2.1.3** – Updated the Rule 30 citation in parenthesis from "45CSR§30-2.12" to "45CSR§30-2.39" and removed the word "such" in the definition.

**Conditions 2.17., 3.5.7., and 3.5.8.a.1.** – Section 5.7. "Emergency provision" has been removed and replaced with "[Reserved]" in the revised Rule 30. Therefore, the requirements of these permit conditions have likewise been removed and replaced with "reserved."

**Condition 3.5.4** - Under the revised Rule 30, certified emissions statements are no longer required to be submitted. Facilities submit their emissions data in the State & Local Emissions Inventory System (SLEIS) and pay fees based on their SLEIS submittal. Therefore, this condition has been revised to reflect these changes.

**Condition 3.5.8.a.2** – Replaced "telefax" with "email" as revised in Rule 30.