

**Washington State Department of Ecology  
Eastern Region Office  
4601 North Monroe  
Spokane, Washington 99205-1295**

In the matter of compliance by SGL COMPOSITES, ) Air Operating Permit: **DRAFT**  
LLC with Section 70A.15.2260 RCW, Operating )  
Permits for Air Contaminant Sources, and the )  
applicable rules and regulations of the )  
Department of Ecology )

To: SGL Composites, LLC  
8781 Randolph Road NE  
Moses Lake, WA 98837

Issuance Date: **DATE 2025**  
Effective Date: **DATE 2025**  
Expiration Date: **DATE 2030**

**Responsible Official:** Greg Pincelli  
**Facility Location:** 8781 Randolph Road NE, Moses Lake, WA 98837  
**AQPID Number:** A0250021

**Legal Authority:** This Air Operating Permit is issued under the authority and provisions of the Federal Clean Air Act (FCAA), (42 U.S.C. 7401, et seq.), the Washington Clean Air Act, Chapter 70A.15 Revised Code of Washington (RCW) and the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC).

Hereinafter, SGL Composites, LLC, Moses Lake facility is called the permittee. The permittee is required to comply with the provisions contained within this permit.

**This Air Operating Permit, DATED at Spokane, Washington, this XX day of XXXX, 2025.**

**Prepared By:**

\_\_\_\_\_  
Faye Bruno  
Air Quality Permit Engineering Specialist  
Eastern Region Air Quality Program

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Table of Contents

List of Abbreviations ..... 3

1. Standard Conditions..... 4

2. Applicable Requirements ..... 23

3. Monitoring, Recordkeeping, and Reporting Requirements (MRRR)..... 34

4. Inapplicable Requirements ..... 48

Appendix A: Federal and State Regulation Date Reference List ..... 51

**List of Abbreviations**

AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf	Dry Standard Cubic Foot
dscf/m	Dry Standard Cubic Foot per minute
Ecology	Washington State Department of Ecology
E.I.T.	Engineer in Training
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
FCAA	Federal Clean Air Act
FDCCP	Fugitive Dust Control Plan
ft <sup>3</sup>	Cubic foot
gr/dscf	Grain per dry standard cubic foot
hr	Hour
MMBtu	Million British Thermal Units
MRRR	Monitoring, Recordkeeping, and Reporting Requirement
MVAC	Motor Vehicle Air Conditioner
N <sub>2</sub>	Nitrogen gas
NOC	Notice of Construction
NOx	Oxides of Nitrogen
NSPS	New Source Performance Standard
O <sub>2</sub>	Oxygen
O&M	Operation and Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM-10	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million
PSD	Prevention of Significant Deterioration
QIP	Quality Improvement Plan
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
SERP	Source Emission Reduction Plan
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

All information required for submittal throughout this permit, is to be submitted to Ecology, EPA, or both as specified by the applicable requirement, at the following addresses:

Air Quality Program  
Department of Ecology  
4601 North Monroe  
Spokane, WA 99205-1295

U.S. EPA Region 10  
Office of Air, Waste and Toxics (AQT-150)  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3140

## 1. Standard Conditions

### 1.1 Permit Shield

- 1.1.1 Compliance with the terms and conditions of this permit will be deemed compliance with those applicable requirements that are specifically included and identified in this permit as of the date of permit issuance.
- 1.1.2 The permit shield will not apply to any insignificant emissions unit or activity designated under WAC 173-401-530.

[WAC 173-401-530(3)], [WAC 173-401-640(1)]

### 1.2 Enforceability

All terms and conditions of this permit are enforceable by the EPA and citizens unless specifically designated as state-only enforceable.

[WAC 173-401-625]

### 1.3 Permit Fees

The permittee must pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion will subject the permittee to civil and criminal penalties as prescribed in Chapter 70A.15 RCW. Ecology may revoke this operating permit if the permit fees are not paid, per WAC 173-401-930(3).

[WAC 173-401-620(2)(f), 930(3)], [RCW 70A.15.2270]

### 1.4 Permit Continuation

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, will not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) will remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

[WAC 173-401-620(2)(j)]

### **1.5 Property Rights**

This permit does not convey any property rights of any sort, or any exclusive privilege.

[WAC 173-401-620(2)(d)]

### **1.6 Inspection and Entry**

Upon presentation of credentials and other documents as may be required by law, the permittee must allow Ecology, EPA, or an authorized representative to perform the following:

- 1.6.1 Enter upon the permittee's premises where a Chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
- 1.6.2 Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- 1.6.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- 1.6.4 As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances, or parameters for the purpose of assuring compliance with this permit or other applicable requirements.
  - 1.6.4.1 Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.
  - 1.6.4.2 Ecology may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on February 20, 2001), or Ecology's Source Test Manual – Procedures for Compliance Testing. The permittee will be required to provide platform and sampling ports. Ecology must be allowed to obtain a sample from any emissions unit. The permittee will be given the opportunity to observe the sampling and to obtain a sample at the same time.
- 1.6.5 No person will obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.
- 1.6.6 Nothing in this condition will limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

[WAC 173-401-630(2)], [WAC 173-400-105(2),(4)], [RCW 70A.15.2500], [Order No. 20AQ-E032, Approval Condition 11.c]

### **1.7 Duty to Comply**

The permittee must comply with all conditions of this chapter 173-401 operating permit. Any permit noncompliance constitutes a violation of chapter 70A.15

RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.

[WAC 173-401-620(2)(a)], [Order No. 20AQ-E032, Approval Condition 11.i]

### **1.8 Duty to Provide Information**

The permittee must furnish to Ecology, within a reasonable time, any information that Ecology 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 must also furnish to Ecology copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to Ecology along with a claim of confidentiality. Ecology will maintain confidentiality of such information in accordance with RCW 70A.15.2510.

No person will make any false material statement, representation, or certification in any form, notice, or required report. No person will render inaccurate any required monitoring device or method.

[WAC 173-401-620(2)(e)], [WAC 173-400-105(7), (8)]

### **1.9 Duty to Supplement or Correct Application**

The permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, must promptly submit such supplementary facts or corrected information. The permittee must also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

[WAC 173-401-500(6)]

### **1.10 Need to Halt or Reduce Activity not a Defense**

It will 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.

[WAC 173-401-620(2)(b)]

### **1.11 Excess Emissions Due to an Emergency**

The permittee may seek to establish that noncompliance with a technology-based<sup>1</sup> emission limitation under this permit was due to an emergency.<sup>2</sup> To do so, the permittee must demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

- 1.11.1 An emergency occurred, and that the permittee can identify the cause(s) of the emergency,
- 1.11.2 The permitted facility was being properly operated at the time of the emergency,
- 1.11.3 During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit, and
- 1.11.4 The permittee submitted notice of the emergency to Ecology within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. The notice must be directed to appropriate air quality personnel at Ecology's Eastern Regional Office using the most recent contact information.

[WAC 173-401-645]

### **1.12 Excess Emissions Reporting**

- 1.12.1 WAC 173-400-108 (State-only requirement not federally enforceable)
  - 1.12.1.1 Notify the permitting authority.
    - 1.12.1.1.1 When excess emissions represent a potential threat to human health or safety, the owner or operator must notify the permitting authority by phone or electronic means as soon as possible, but not later than 12 hours after the excess emissions were discovered.

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<sup>1</sup> Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain a health-based air quality standard.

<sup>2</sup> An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of this source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes this source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency will not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 1.12.1.1.2 For all other excess emissions, the owner or operator must notify the permitting authority in a report as provided in 1.12.3.2.
- 1.12.1.2 Report – The owner or operator must report all excess emissions to the permitting authority.
  - 1.12.1.2.1 To claim emissions as unavoidable under WAC 173-400-109, the report must contain the information in 1.12.3.2.3.
  - 1.12.1.2.2 Chapter 173-401 WAC source: As provided in WAC 173-401-615(3) and 1.12.3.2.3.
  - 1.12.1.2.3 For an excess emission event that the owner or operator claims was unavoidable under WAC 173-400-109, the report must also include the following information:
    - 1.12.1.2.3.1 Properly signed contemporaneous records or other relevant evidence documenting the owner or operator’s actions in response to the excess emissions event.
    - 1.12.1.2.3.2 Information on whether installed emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage.
    - 1.12.1.2.3.3 All additional information required under WAC 173-400-109(5) supporting the claim that the excess emissions were unavoidable.

[WAC 173-400-108]

- 1.12.2 WAC 173-400-109 (State-only requirement not federally enforceable)
  - 1.12.2.1 Excess emissions determined to be unavoidable under the procedures and criteria in this section are violations of the applicable statute, rule, permit, or regulatory order.
    - 1.12.2.1.1 The permitting authority determines whether excess emissions are unavoidable based on the information supplied by the source and the criteria in 1.12.4.5.
    - 1.12.2.1.2 Excess emissions determined by the permitting authority to be unavoidable are:
      - 1.12.2.1.2.1 A violation subject to WAC 173-400-230 (3), (4) and (6).
      - 1.12.2.1.2.2 Not subject to civil penalty under WAC 173-400-230(2).



- 1.12.2.2 The permittee will have the burden of proving to the permitting authority in an enforcement action that excess emissions were unavoidable. This demonstration must be a condition to obtaining relief under 1.12.4.5.
- 1.12.2.3 This section does not apply to an exceedance of an emission standard in 40 CFR Parts 60, 61, 62, 63, and 72, or a permitting authority's adoption by reference of these federal standards.
- 1.12.2.4 Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under 1.12.4.5.
- 1.12.2.5 Excess emissions due to an upset or malfunction will be considered unavoidable provided the permittee reports as required by WAC 173-400-108 and adequately demonstrates to the permitting authority that:
  - 1.12.2.5.1 The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition.
  - 1.12.2.5.2 The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance.
  - 1.12.2.5.3 When the operator knew or should have known that an emission standard or other permit condition was being exceeded, the operator took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking in to account the total emissions impact of the corrective action. Actions taken could include slowing or shutting down the emission unit as necessary to minimize emissions.
  - 1.12.2.5.4 If the emitting equipment could not be shut down during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions, repairs were made in an expeditious fashion.
  - 1.12.2.5.5 All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage.
  - 1.12.2.5.6 The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible.
  - 1.12.2.5.7 All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.

[WAC 173-400-109]

### **1.13 Reporting**

#### **1.13.1 Monthly Deviation Reports**

The permittee must report all deviations from permit conditions and must include the following information: the time the deviation occurred, the duration of the deviation, the magnitude of the deviation in relation to the applicable limit, the probable cause of the deviation, and any corrective actions or preventive measures taken. Deviations must be reported to Ecology at the address included in this permit.

- 1.13.1.1 Deviations which represent a potential threat to human health or safety must be reported as soon as possible, but in no case later than 12 hours after the deviation is discovered.
- 1.13.1.2 Excess emissions due to emergency (1.11), and which do not meet the criteria 1.13.1.1, must be reported within two working days of the event.
- 1.13.1.3 All other deviations must be reported no later than 30 days after the end of the month during which the deviation is discovered.
- 1.13.1.4 For any month during which no permit deviations are discovered, the permittee must submit a report no later than 30 days following the end of the month stating that no deviations were observed during that period.
- 1.13.1.5 Upon request by Ecology, the permittee must submit a full written report including further details regarding the known causes, the corrective actions taken, and the preventative measures taken to minimize or eliminate the chance of recurrence. The source must maintain a contemporaneous record of all deviations. Responsible official certification in accordance with Condition 1.13.5 of monthly deviation reports must be included in each semi-annual monitoring report covering all deviations reported during the previous six-month period.

[WAC 173-401-615(3)(b)]

#### **1.13.2 Semi-Annual Monitoring Reports**

The permittee must submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting identified in Section 3) at least once every six months. Six-month periods will be from January 1st through June 30th, and from July 1st through December 31st.

- 1.13.2.1 Semi-annual monitoring reports will be due no later than 45 days following the end of each 6 month period.

- 1.13.2.2 All instances of deviations from permit requirements must be clearly identified in such reports.
- 1.13.2.3 The report must include identification of all months during which no deviations occurred.
- 1.13.2.4 All required reports must be certified by a responsible official consistent with Condition 1.13.6.

[WAC 173-401-615(3)(a)]

### 1.13.3 Compliance Certifications

The permittee must submit a certification of compliance with permit terms and conditions at least once per calendar year. Certifications must be submitted no later than 45 days following the end of the certification period (calendar year). Ecology may require that compliance certifications be submitted more frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement.

[WAC 173-401-630(5)(a)], [WAC 173-401-630(1)]

- 1.13.3.1 The certification must describe and include the following:
  - 1.13.3.1.1 The permit term or condition that is the basis of the certification,
  - 1.13.3.1.2 The current compliance status,
  - 1.13.3.1.3 Whether compliance was continuous or intermittent, and
  - 1.13.3.1.4 The methods used for determining compliance, currently and over the reporting period, consistent with WAC 173-401-615(3)(a).

[WAC 173-401-630(5)(c)]

- 1.13.3.2 All compliance certifications must be submitted to Ecology and EPA Region 10 at the respective addresses included in this permit.
- 1.13.3.3 [WAC 173-401-630(5)(d)]
- 1.13.3.4 The permittee need not certify compliance for insignificant emission units or activities if there is no permit requirement for testing, monitoring, recordkeeping or reporting.
- 1.13.3.5 [WAC 173-401-530(2)(d)]
- 1.13.3.6 All compliance certifications must include certification by a responsible official in accordance with Condition 1.13.6.
- 1.13.3.7 For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing will

preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test had been performed.

[40 CFR 52.33(a)], [40 CFR 60.11(g)]

#### 1.13.4 Emissions Inventory

The permittee must submit an inventory of actual emissions from the source for each calendar year. The inventory must include segmented stack and fugitive emissions of TSP, PM-10, SO<sub>2</sub>, CO, NO<sub>X</sub>, lead, and VOC's, and must be submitted no later than April 15th of the following year. The source must maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions inventories must be sent to Ecology at the address included in this permit.

[WAC 173-400-105(1)]

#### 1.13.5 Greenhouse Gas Reporting

If the permittee emits 10,000 metric tons of greenhouse gases (GHGs) or more per calendar year, GHGs are required to be reported to Ecology. (Note: WAC 173-441-030(5) details reporting requirements for facilities which are subject to the requirements but fall below reporting thresholds). All requests, notifications, and communications to Ecology regarding GHGs, other than submittal of the annual GHG report, must be submitted to:

Greenhouse Gas Report  
Air Quality Program  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

Annual GHG reports must be submitted through Ecology's GHG Reporting webpage.

Reports must meet the requirements of WAC 173-441-050 and include the annual emissions of the GHGs listed in WAC 173-441-040 from source categories listed in WAC 173-441-120. The annual GHG report must be submitted electronically in accordance with WAC 173-441-050 and WAC 173-441-060, in a format specified by Ecology. The GHG report is due to Ecology by March 31st of each year for the previous calendar year.

If the facility emits 10,000 metric tons of GHGs or more per calendar year, the permittee must develop a written GHG monitoring plan. The plan must be revised, as needed, to reflect changes in processes, monitoring

instruction, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.

[WAC 173-441]

#### 1.13.6 Submittals

Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) must be submitted to Ecology at the address included in this permit. Ecology may specify a different or additional submittal format in accordance with WAC 173-400-105(1), such as electronic submittal(s). Any application form, report, or compliance certification submitted to Ecology pursuant to this permit must contain certification of truth, accuracy, and completeness by a responsible official. All certifications must state that *“based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete”*. The permittee must promptly, upon discovery, report to Ecology any material error or omission in these records, reports, plans or other documents.

[WAC 173-401-520], [WAC 173-401-500(6)]

#### **1.14 Severability**

If any provision of this permit, or application of any provision of this permit, is held to be invalid, all unaffected provisions of the permit will remain in effect and be enforceable.

[WAC 173-401-620(2)(h)], [RCW 70A.15.9004]

#### **1.15 Administrative Permit Amendments**

1.15.1 An administrative permit amendment is a permit revision that:

- 1.15.1.1 Corrects typographical errors within the permit,
- 1.15.1.2 Identifies a change in the name, address, or phone number of any person identified in the permit, or provides for a similar minor administrative change at the source,
- 1.15.1.3 Requires more frequent monitoring or reporting by the permittee,
- 1.15.1.4 Allows for a change in ownership or operational control of a source where the permitting authority has determined that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to Ecology,
- 1.15.1.5 Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.

1.15.2 The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

1.15.3 The permitting authority will, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to condition 1.15.1.5 above.

[WAC 173-401-720]

### **1.16 Permit Actions**

This operating permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[WAC 173-401-620(2)(c)]

### **1.17 Reopening for Cause**

1.17.1 Ecology will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

1.17.1.1 Additional requirements under the FCAA become applicable to a major source three or more years prior to the expiration date of this permit. Such a reopening must 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 expiration date of this permit unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).

1.17.1.2 Ecology or the Administrator determines that this permit contains a material mistake, or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

1.17.1.3 Ecology or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

1.17.2 Proceedings to reopen and issue this permit will follow the same procedures as apply to initial permit issuance and will affect only those parts of this permit for which cause to re-open exists. Such reopening must be made as expeditiously as practicable.

1.17.3 Re-openings must not be initiated before a notice of intent to reopen is provided to the permittee by Ecology at least 30 days in advance of the date that this permit is to be reopened, except that Ecology may provide a shorter period of time in the case of an emergency.

1.17.4 All permit conditions remain in effect until such time as Ecology takes final action.

[WAC 173-401-730]

### **1.18 Off-Permit Changes**

The permittee is allowed to make certain changes that are not specifically addressed or prohibited by this permit without a permit revision. All such changes must meet the following conditions:

- 1.18.1 The proposed changes must not weaken the enforceability of any existing permit condition.
- 1.18.2 Each such change must meet all applicable requirements and must not violate any existing permit term or condition.
- 1.18.3 Before or contemporaneously with making the permit change, the permittee must provide written notice to Ecology and EPA Region 10 at the respective addresses included in this permit. Such written notice must describe each such change, including the date, any change in emissions or pollutants emitted, and any applicable requirements that would apply as a result of the change.
- 1.18.4 The change must not qualify for the permit shield under Condition 1.1.
- 1.18.5 The permittee must keep a record of all changes that result in emissions of any regulated air pollutant subject to any applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. The record must reside at the permitted facility.
- 1.18.6 A source making a change under this section must comply with the preconstruction review requirements established pursuant to Condition 1.20.

[WAC 173-401-724]

### **1.19 Changes not Requiring Permit Revisions**

#### **1.19.1 Section 502(b)(10) changes**

The permittee is authorized to make section 502(b)(10) changes, as defined in WAC 173-401-200(30), without a permit revision, providing the conditions included below are met. The permit shield as described in Condition 1.1 will not apply to any change made pursuant to this paragraph.

- 1.19.1.1 The proposed changes are not Title I (FCAA) modifications.
- 1.19.1.2 The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions.
- 1.19.1.3 The proposed changes do not alter permit terms that are necessary to enforce limitation on emissions from units covered by the permit.
- 1.19.1.4 The facility provides Ecology and EPA with written notification at least seven days prior to making the proposed changes except that written notification of a change made in response



to an emergency must be provided as soon as possible after the event.

- 1.19.1.4.1 The written notification must include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

#### 1.19.2 Changes related to Emissions trading under an emissions cap

Pursuant to Condition 1.19.1, the permittee is authorized to trade increases and decreases in emission in the permitted facility, where the Washington state implementation plan provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading. Such changes will be subject to the following:

- 1.19.2.1 The written notification required under Condition 1.19.1.4 must include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice must also refer to the provisions with which the source will comply in the applicable implementation plan and that provide for the emissions trade. The notification must state how any increases or decreases in emissions will comply with the terms and conditions of the permit. (The permit shield described under Condition 1.1 will extend to terms and conditions that allow such increases and decreases.)
- 1.19.2.2 The permit shield described in Condition 1.1 will not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade will be determined according to requirements of the applicable implementation plan authorizing the emissions trade.
- 1.19.2.3 Upon the request of the permit applicant, Ecology will issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases and decreases in the chapter 173-401 WAC source solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit independent of otherwise applicable requirements. The permit

applicant must include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision will not be applied to any emissions units for which emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit will also require compliance with all applicable requirements.

1.19.2.4 A source making a change under this section must comply with applicable preconstruction review requirements established pursuant to Condition 1.20.

1.19.2.5 No permit revision will be required, under any approved economic incentives, marketable permits, and other similar programs or processes for changes that are provided for in this permit, such as emissions trading.

[WAC 173-401-722], [WAC 173-401-620(2)(g)]

## **1.20 New Source Review**

The permittee must not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-113, 173-400-720, or WAC 173-460 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-455-120, and pays the cost of public notice described in WAC 173-400-171.

[WAC 173-400-110], [WAC 173-400-113], [WAC 173-400-116], [WAC 173-400-171], [WAC 173-455-120], [WAC 173-400-720], [WAC 173-460], [RCW 70A.15.2210]

## **1.21 Replacement or Substantial Alteration of Emission Control Technology**

Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee must file for and obtain approval from Ecology according to that regulation. The permittee must pay the appropriate fees required by WAC 173-455-100(4)(a) prior to commencing construction.

[WAC 173-455-100], [WAC 173-400-114], [RCW 70A.15.2220]

## 1.22 Operational Flexibility

1.22.1 In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission unit was not operated.

1.22.2 The permittee did not propose any further alternative operating scenarios.

[WAC 173-401-650]

## 1.23 Permit Appeals

### Your right to appeal

You have a right to appeal this Air Operating Permit or any conditions in it to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. The appeal process is governed by RCW 43.21B and WAC 371-08. "Date of receipt" is defined in Chapter 43.21B.001(2) RC.

To appeal you must do all of the following within 30 days of the date of receipt of this permit:

- File your notice of appeal and a copy of this Air Operating Permit with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular business hours as defined in Chapter 371-08-305 WAC and -335. "Notice of appeal" is defined in Chapter 371-08-340 WA.
- Serve a copy of your notice of appeal and this Air Operating Permit on the Department of Ecology by mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and 371-08 WA.

### Address and Location Information

#### Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: <https://eluhwa.gov/> or call: 360-664-9160.

#### Service on Ecology

##### Street Address:

Department of Ecology  
Attn: Appeals Processing Desk  
300 Desmond Drive SE  
Lacey, WA 98503

##### Mailing Address:

Department of Ecology  
Attn: Appeals Processing Desk  
PO Box 47608  
Olympia, WA 98504-7608

**E-Mail Address:**

ecologyappeals@ecy.wa.gov

[WAC 173-401-620(2)(i)]

**1.24 Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA**

1.24.1 The permittee must comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in subpart B.

1.24.1.1 Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

1.24.1.2 Equipment used during the maintenance, service, repair, or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

1.24.1.3 Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

1.24.1.4 Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. (“MVAC-like appliance” is defined at 40 CFR 82.152.)

1.24.1.5 Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.

1.24.1.6 Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records must indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.

1.24.1.7 Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.

1.24.1.8 Person performing maintenance, service, repair, or disposal of appliances must certify to the Administrator that such person

has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.

- 1.24.2 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A – Production and Consumption Controls.
- 1.24.3 If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 1.24.4 The permittee will be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G – Significant New Alternative Policy Program.

[40 CFR 82], [RCW 70A.15.6410], [RCW 70A.15.6420]

### **1.25 Reasonably Available Control Technology (RACT)**

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal will be considered RACT for the purpose of permit issuance or renewal. RACT determinations under section 8, chapter 252, Laws of 1993 must be incorporated into an operating permit as provided in WAC 173-401-730.

[WAC 173-401-605(3)], [RCW 70A.15.2230]

### **1.26 Compliance Schedules**

The permittee shall continue to comply with applicable requirements with which it is currently in compliance. The permittee shall meet applicable requirements on a timely basis that become effective during the permit term. [WAC 173-401-510(2)(h)(ii)(A)], [WAC 173-401-510(2)(h)(ii)(B)]

The permittee shall meet the following remedial measures for those applicable requirements not currently in compliance [WAC 173-401-510(2)(h)(ii)(C)]:

- 1.26.1 Submit certified progress reports every month until performance and compliance testing is completed for failed parameters in accordance with Approval Condition 4.a of Approval Order 24AQ-E030,
- 1.26.2 Record facility startup and shutdown dates and times for Lines 3 and 4. Submit recordkeeping report within 30 days of startup and shutdown dates,
- 1.26.3 Complete performance and compliance testing for failed parameters in accordance with Approval Condition 4.a of Approval Order 24AQ-E030 by March 15, 2025.

### **1.27 Record Keeping**

1.27.1 The permittee must keep records of required monitoring information that includes, where applicable, the following:

1.27.1.1 The date, place, and time of the sampling or measurements.

1.27.1.2 The date(s) analyses were performed.

1.27.1.3 The company or entity that performed the analyses.

1.27.1.4 The analytical techniques or methods used.

1.27.1.5 The results of such analyses.

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

[WAC 173-401-615(2)(a)]

1.27.2 The permittee must keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

[WAC 173-401-615(2)(b)]

1.27.3 The permittee must retain records of all required monitoring data and support information for a period of 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 from continuous monitoring instrumentation, and copies of all reports required by this permit.

[WAC 173-401-615(2)(c)]

1.27.4 All required recordkeeping must be available to Ecology in accordance with Condition 1.6.

[WAC 173-401-630(2)(b)]

## **1.28 General Obligation**

Nothing in this permit will alter or affect the following:

1.28.1 The provisions of section 303 of the FCAA (emergency orders), including the authority of EPA under that section.

1.28.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.

1.28.3 The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA.

1.28.4 The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA.

1.28.5 The ability of Ecology to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[WAC 173-401-640(4)]

### **1.29 Permit Renewal and Expiration**

This permit is issued for a fixed term of five years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration.

A complete renewal application is due no later than DATE, 2029.

Upon receipt of a timely and complete application for renewal, this source may continue to operate subject to final action by Ecology on the renewal application. This allowance will cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by Ecology, any additional information identified as being needed to process the application. The application must be sent to Ecology at the address included in this permit.

[WAC 173-401-610; 173-401-710]

### **1.30 Demolition and Renovation (asbestos)**

Prior to, during and after conducting any activity to which 40 CFR 61, Subpart M – National Emission Standard for Asbestos, applies, the permittee must comply with the requirements of that rule. Such activities include notification, demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing of certain items, spraying of certain materials, constructing roadways of certain materials, or disposal.

[40 CFR 61, Subpart M], [WAC 173-400-075(1)]

## **2. Applicable Requirements**

Until this permit expires, is modified, or revoked, SGL Composites LLC is authorized to operate the Moses Lake, Washington carbon fiber plant in accordance with the terms and conditions listed in this permit. These emission units and processes are subject to the conditions included in Sections 2.1, through 2.4, to the Monitoring, Recordkeeping, and Reporting Requirements listed in Section 3, and to other terms and conditions specified in this permit.

The column entitled Description in each table contains only a summary/paraphrase of the applicable conditions, emission limitations or work practices. The cited condition, emission standard, or work practice itself is the enforceable requirement and must be referenced for actual language.

### **Testing Requirements**

Although there are many conditions with no on-going testing requirements, Ecology retains the authority to conduct or require that testing be conducted at the facility with respect to these conditions per WAC 173-400-105(4). Identification of the appropriate test method is necessary to make emission limits fully enforceable. Where the underlying applicable requirement does not specify the test method, Ecology has done so in this permit.

[WAC 173-401-615(1)(a)], [WAC 173-401-630(1)], [WAC 173-400-105(4)]

**2.1 Facility Wide**

This section is applicable and enforceable with respect to all emission units source wide, including those emission units in Sections 2.2 through 2.4. Monitoring, recordkeeping, and reporting requirements in this section do not apply to insignificant emission units.

**Table 2.1 Applicable and Enforceable Requirements for All Emission Units**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.1	WAC 173-400-040(2), (2)(a), and (2)(b)	F	Visible emissions must not exceed 20 percent opacity for more than three minutes in any one hour	RM 9	4M
2.1.2	WAC 173-400-060	F	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation must not exceed 0.1 grain/dscf of exhaust gas	RM 5	4M
2.1.3	WAC 173-400-040(3)	F	Particulate matter must not be deposited beyond the property line in sufficient quantity to interfere unreasonably with the use and enjoyment of other's property	None	3M
2.1.4	WAC 173-400-040(9)(a)	F	The source must perform maintenance to minimize emissions	None	3M



<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal = F) (State = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
			and take reasonable precautions to prevent fugitive dust from becoming airborne		
2.1.5	WAC 173-400-040(4)(a)	F	Fugitive dust control measures must be taken to prevent fugitive emissions	None	2M
2.1.6	WAC 173-400-040(5)	F	Any producer of an odor which may unreasonably interfere with any other property owner's use and enjoyment of his property must reduce these odors to a reasonable minimum	None	3M
2.1.7	WAC 173-400-040(6)	F	No person must cause or allow the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business	None	3M
2.1.8	WAC 173-400-040(8)	F	No person must conceal or mask an emission of an air contaminant	None	1M
2.1.9	WAC 173-400-200(2)	F	No source must use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations	None	1M
2.1.10	WAC 173-400-205	F	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to	None	1M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			air pollution episode regulations		
2.1.11	RCW 70A.15.1070	F	Causing air pollution in violation of Chapter 70A.15 RCW is unlawful	None	1M
2.1.12	WAC 173-425	F	Open burning is not allowed on site	None	2M
2.1.13	WAC 173-400-040(1)(c)	F	All emissions units are required to use RACT	None	2M
2.1.14	Order No. 24AQ-E030, Approval Condition 1.a	F	All pollution control and monitoring equipment, including the RTO, TO with water injection, as well as the CERMS NOx monitoring system must be installed and operational upon start-up of each line.	None	12M
2.1.15	Order No. 24AQ-E030, Approval Condition 1.b	F	Lines 1-6 must have SCR units installed and operational upon start-up of each line.	None	12M
2.1.16	Order No. 24AQ-E030, Approval Condition 1.c	F	Pollution control equipment such as RTOs, TOs, and SCR units must be operated at all times the associated line is running except as identified in Approval Condition 3.	None	12M
2.1.17	Order No. 24AQ-E030, Approval Condition 1.d	F	Lines 1-6 are limited to 128 tons of raw polyacrylonitrile material per line.	None	12M
2.1.18	Order No. 24AQ-E030, Approval Condition 4.h	F	Facility-wide emissions from Lines 1-6 and support equipment must not exceed the following: NOx – 90 tons per 12-month	None	13M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			rolling period CO – 37 tons per 12-month rolling period SO <sub>2</sub> – 19 tons per 12-month rolling period Particulate Matter (Filterable & Condensable) including fugitives, PM <sub>10</sub> – 91 tons per 12-month rolling period Particulate Matter (Filterable & Condensable) including fugitives, PM <sub>2.5</sub> – 88 tons per 12-month rolling period Particulate Matter (Filterable Only) including fugitives, PM – 60 tons per 12-month rolling period Volatile Organic Compounds – 45 tons per 12-month rolling period Acrylonitrile (C <sub>3</sub> H <sub>3</sub> N) – 306.2 pounds per 12-month rolling period Ammonia (NH <sub>3</sub> ) – 458 pounds per day Hydrogen Cyanide (HCN) – 287 pounds per day		

**2.2 Lines 1 & 2 Emergency Generator Engines (Natural Gas-Fired)**

**Table 2.3 Applicable and Enforceable Requirements for Lines 1 and 2 Emergency Generator Engines**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.1	Order No. 24AQ-E030, Approval Condition 3.b	F	Operation of the 10 natural gas-fueled emergency power generators (L1EG1, L1EG2, L1EG3, L1EG4, L1EG5, L2EG1, L2EG2, L2EG3, L2EG4, and L2EG5) is limited to an aggregate of 340 hours per 12-month rolling period for maintenance, testing, and emergency operation.	None	<b>14M</b>
2.2.2	Order No. 24AQ-E030, Approval Condition 3.c	F	Operation of the two natural gas-fueled fire water pump engines (FWP1 and FWP2) is limited to an aggregate of 76 hours per 12-month rolling period for maintenance, testing, and emergency operation. Records of operation hours must be kept for each fire water pump in accordance with Approval Condition 7.	None	<b>14M</b>
2.2.3	Order No. 24AQ-E030, Approval Condition 3.d	F	A non-resettable hour meter must be installed on each emergency power generator and emergency fire water pump engine.	None	<b>14M</b>
2.2.4	Order No. 24AQ-E030, Approval Condition 4.e	F	Each of the 10 natural gas-fired emergency engines and the two fire water pumps must use the emission limits below to quantify emissions (lb/hour, one hour average): NO <sub>x</sub> – 2.00 CO – 4.00 SO <sub>2</sub> – 0.003 PM <sub>10</sub> /PM <sub>2.5</sub> – 0.08 PM (Filterable Only) – 0.04 VOC – 1.00	None	<b>14M</b>
2.2.5	40 CFR 60.4233(e)	F	Emission standards for emergency engines greater than 130 hp manufactured after 1/1/2009 in Table 1 of 40 CFR part 60 subpart JJJJ.	None	<b>14M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.6	40 CFR 60.4243(d)	F	Operation and maintenance requirements in 40 CFR 60.4243(d)	None	14M

**2.3 Lines 3-6 Emergency Generator Engines (Diesel-Fired)**

**Table 2.3 Applicable and Enforceable Requirements for Lines 3-6 Emergency Generator Engines**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal = F) (State = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.3.1	Order No. 24AQ-E030, Approval Condition 3.a	F	The four diesel-fueled emergency power generators (L3EG, L4EG, L5EG, and L6EG) are limited to an aggregate of 72 hours of operation in any 12-month rolling period. During reliability and performance testing, no more than one generator engine may operate at one time.	None	<b>15M</b>
2.3.2	Order No. 24AQ-E030, Approval Condition 3.d	F	A non-resettable hour meter must be installed on each emergency power generator.	None	<b>15M</b>
2.3.3	Order No. 24AQ-E030, Approval Condition 3.e	F	All diesel-fueled engines must be fueled with ultra-low sulfur diesel fuel with a sulfur content of no more than 0.0015 percent by weight.	None	<b>15M</b>
2.3.4	Order No. 24AQ-E030, Approval Condition 4.f	F	Emissions from each of the diesel engines must not exceed the emission limits below unless in engine Start-up Mode. The following lists the limits to use when quantifying diesel engine in Normal Operation Mode (g/hp-hour): NO <sub>x</sub> – 0.75 CO – 0.54 SO <sub>2</sub> – 1.2 x 10 <sup>-5</sup> lb/hp-hr PM <sub>10</sub> /PM <sub>2.5</sub> – 0.34 PM (Filterable Only) – 0.34 VOC – 0.18	None	<b>15M</b>
2.3.5	Order No. 24AQ-E030, Approval Condition 4.g	F	Diesel engine Start-up Mode is defined as and limited to the first 10	None	<b>15M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			minutes of operation. The following lists the emission factors to use when quantifying diesel engine Start-up Mode emissions (g/hp-hour): NOx – 6.8 CO – 3.3 SO <sub>2</sub> – 1.2 x 10 <sup>-5</sup> PM <sub>10</sub> /PM <sub>2.5</sub> – 0.34 PM (Filterable Only) – 0.34 VOC – 0.18		
2.3.6	Order No. 24AQ-E030, Approval Condition 5.b	F	Within 12 months of the first diesel engine’s installation, May 23, 2014, and every 60 months thereafter, The Permittee must measure emissions of Diesel Engine Exhaust Particulate (DEEP) from at least one representative engine’s exhaust stack. The selection of the engine(s) to test must be subject to prior approval of Ecology and must be defined in the source test protocol submitted to Ecology no less than 30 days prior to any compliance test.	None	<b>15M</b>
2.3.7	Order No. 24AQ-E030, Approval Condition 5.c	F	The following testing is required to demonstrate compliance with the emission limits for each diesel engine: Test Method: 40 CFR 60 Appendix A Method 5; All testing must be performed in excess of 70 percent engine load. Initial Test: One representative engine within 12 months of the first engine commissioning.	RM5	<b>15M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			Ongoing Frequency: One engine every five years thereafter. (A different engine must be tested until each of the engines have been compliance tested.)		

**2.4 Production Lines Operating Modes and Limitations**

**Table 2.4 Applicable and Enforceable Requirements for Production Lines Operating Modes and Limitations**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.4.1	Order No. 24AQ-E030, Approval Condition 1.e	F	No more than 50 portable pre-oxidation splicing ovens are allowed on-site.	None	<b>16M</b>
2.4.2	Order No. 24AQ-E030, Approval Condition 2.a	F	There are no limitations of operation in Start-up Mode. Start-up Mode will be recorded as Normal Operation Mode	None	<b>16M</b>
2.4.3	Order No. 24AQ-E030, Approval Condition 2.b	F	There are no limitations of operation in Normal Operation Mode.	None	<b>16M</b>
2.4.4	Order No. 24AQ-E030, Approval Condition 4.a	F	Normal Operation Mode Emissions Limits (lb/hour, One hour average): NO <sub>x</sub> – 8.5 CO – 1.3 SO <sub>2</sub> – 0.7 PM <sub>10</sub> – 3.5 PM <sub>2.5</sub> – 3.4 PM (Filterable Only) – 2.3 VOC – 1.7 C <sub>3</sub> H <sub>3</sub> N (acrylonitrile) – 0.0056 NH <sub>3</sub> (ammonia) – 3.0 HCN (hydrogen cyanide) – 1.4	None	<b>16M</b>
2.4.5	Order No. 24AQ-E030, Approval Condition 2.d	F	RTO Bypass Mode is limited to a combined total from Lines 1 and 2 of	None	<b>16M</b>



Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			1½ hours per calendar day and for each line, a total of 4½ hours per 12-month rolling period. RTO Bypass Mode is limited to a combined total from Lines 3-6 of 1½ hours per calendar day and for each line, a total of 4½ hours per 12-month rolling period.		
2.4.6	Order No. 24AQ-E030, Approval Condition 4.d	F	RTO Bypass Mode Emissions Limits (lb/hour, One hour average): NOx – 8.5 CO – 1.3 SO <sub>2</sub> – 0.7 PM <sub>10</sub> – 3.5 PM <sub>2.5</sub> – 3.4 PM (Filterable Only) – 2.3 VOC – 8.6 C <sub>3</sub> H <sub>3</sub> N – 0.17 NH <sub>3</sub> – 9.6 HCN – 30.0	None	<b>16M</b>
2.4.7	Order No. 24AQ-E030, Approval Condition 2.e	F	SCR Bypass Mode is limited to 100 hours in any 12-month rolling period. No more than one line may operate in SCR Bypass Mode at any time.	None	<b>16M</b>
2.4.8	Order No. 24AQ-E030, Approval Condition 4.b	F	SCR Bypass Mode Emissions Limits (lb/hour, One hour average): NOx – 17.9 CO – 1.3 SO <sub>2</sub> – 0.7 PM <sub>10</sub> – 3.5 PM <sub>2.5</sub> – 3.4 PM (Filterable Only) – 2.3 VOC – 1.7 C <sub>3</sub> H <sub>3</sub> N – 0.0056	None	<b>16M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			NH <sub>3</sub> – 3.0 HCN – 1.4		
2.4.9	Order No. 24AQ-E030, Approval Condition 2.c	F	Shutdown Mode is limited to 90 seconds per occurrence and 9.13 hours per 12-month rolling period for each line.	None	<b>16M</b>
2.4.10	Order No. 24AQ-E030, Approval Condition 4.c	F	Shutdown Mode Emissions Limits (lb/hour, One hour average): NO <sub>x</sub> – 8.5 CO – 1.3 SO <sub>2</sub> – 0.7 PM <sub>10</sub> – 3.5 PM <sub>2.5</sub> – 3.4 PM (Filterable Only) – 2.3 VOC – 5.7 for Line 1, 7.1 for Lines 2-6 C <sub>3</sub> H <sub>3</sub> N – 0.10 for Line 1, 0.14 for Lines 2-6 NH <sub>3</sub> – 8.3 for Line 1, 10.0 for Lines 2-6 HCN – 18.0 for Line 1, 23.6 for Lines 2-6	None	<b>16M</b>
2.4.11	Order No. 24AQ-E030, Approval Condition 2.f	F	There are no limitations of operation in Standby Mode. (Emissions during Standby Mode are from the TO and RTO natural gas-fired heaters which are operated at a low firing rate to keep the TO and RTO warm. The oxidation ovens and Lines 1-6 SCRs are not operational.)	None	<b>16M</b>

**3. Monitoring, Recordkeeping, and Reporting Requirements (MRRR)**

[WAC 173-401-630(1)], [WAC 173-401-615(1)(a), (b)]

**GENERAL**

No MRRR Required. No specific monitoring can reasonably be required for these requirements. The nature of the requirements makes it necessary to rely on the good faith of the permittee to conscientiously monitor site operations and to promptly report any deviations. No specific monitoring can reasonably be required for these conditions. The permittee is required to certify compliance with these conditions annually. Determination of compliance may be based on a reasonable and good faith effort to identify any deviations during the reporting period.

- 1M.** The permittee must conscientiously monitor site operations and promptly report any deviations.

[WAC 173-401-615(1)(b)] (This MRRR includes gap filling)

- 2M.** At least once every 12 months, the permittee must review actual operations and any other relevant information to determine if facility operations are being conducted in accordance with each specific requirement.

The permittee must maintain records that include the date such reviews occur, the name of the person conducting the review, the information reviewed, summary information on any deviations identified and date and time when corrective action was initiated and completed.

[WAC 173-401-615(1)(b)]

- 3M.** The permittee must maintain records of all complaints received. Ecology must be notified within three working days of receipt of any complaints. The permittee must address and respond to all complaints within three working days of receipt of the complaint. The recordkeeping must include the following with regard to the complaint and the associated deviation:

- 1) A record of all written complaints, complaints received by telephone or complaints received in person,
- 2) Time, date, and duration of the deviation,
- 3) Cause of the deviation,
- 4) Estimate of excess emissions and magnitude of deviation, and
- 5) Corrective action taken, and the results of such action.

[WAC 173-401-615(1)(b)]

- 4M.** At least once every 12 months, the permittee must perform a complete review of the Operation and Maintenance manuals, permit application materials (Notice of Construction) and other relevant documents (Fugitive Dust Control Plan) for the referenced unit and associated equipment. The purpose of this review will be to verify that the emission unit and associated equipment is being operated in accordance with the documents stated above and with good air pollution control practices in mind.

The permittee must maintain records that include the date such reviews occur as well as the name of the person conducting the review. Upon discovery that any equipment is being operated in a manner inconsistent with any of the above-

mentioned documents, the permittee must initiate corrective action within two business days. All such discoveries must be reported to Ecology as required by Standard Condition 1.13.1 of this permit.

[WAC 173-401-615(1)(b)]

**5M.** The following will apply generally, facility wide:

**Monitoring** – At least once per month, as well as any time visible emissions are observed, the permittee must perform complete walk-around surveys for the purpose of determining the presence of visible emissions throughout the facility site. The surveys must be conducted while the facility is in operation, and must include observation for any visible emissions, including fugitive emissions, regardless of the source.

**Recordkeeping** – Information for each survey indicating the date the survey was performed, the name of the person performing the survey, the weather at the time of the survey, an indication of whether any visible emissions were observed, a description of the cause of the visible emissions, the corrective action taken, and the results of such action.

**Reporting** – Monthly reporting of deviations must be performed as described in Standard Condition 1.13.1, as well as annual certification of compliance as described in Standard Condition 1.13.3. Any monthly deviation reports documenting visible emissions observed must include the time, date and duration of the deviation, a description of the cause of the visible emissions, the corrective action taken, and the results of the corrective action.

[WAC 173-401-615(1)(b)]

**6M. Semi-Annually** – As part of the semi-annual monitoring report, the permittee must submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual fuel usage, actual hours of operation, actual steam production, etc. All hourly emissions reporting must be calculated and expressed as the daily average hourly rate.

**Annually** – As part of the annual emissions inventory submittal required under Standard Condition 1.13.4, emissions must be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc.) by an emission factor derived from the most recent source testing. All hourly emissions reporting must be calculated and expressed as the daily average hourly rate. If test-derived factors are unavailable, use the most recent emission factor published by USEPA. If the most recent published data provides a range of emission factors, the calculation must be performed using the most conservative factor within the provided range. Use of less conservative emission factors may be used only upon written approval by Ecology. If USEPA emission factors are either inappropriate or unavailable, the permittee must

propose an alternative emission factor (or emission estimation method) that may be used upon written approval by Ecology.

Calculations must be adjusted for percent oxygen or carbon dioxide (if not already done as part of the source test) as required by the applicable requirement and must indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emissions inventory submittal must include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculation method, and an example of the calculation method used.

[WAC 173-401-615(1)(b)]

**7M.** Source testing as referenced must be conducted at least once every five years.

**Semi-Annually** – As part of the semi-annual monitoring report, the permittee must submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual fuel usage, actual hours of operation, actual steam production, etc. All hourly emissions reporting must be calculated and expressed as the daily average hourly rate.

**Annually** – As part of the annual emissions inventory submittal required under Standard Condition 1.13.4, emissions must be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc.) by an emission factor derived from the most recent source testing. All hourly emissions reporting must be calculated and expressed as the daily average hourly rate.

Calculations must be adjusted for percent oxygen or percent carbon dioxide as required by the applicable requirement and must indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal must include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculation method, and an example of the calculation method used.

[WAC 173-401-615(1)(b)]

**8M.** Performance and Compliance Testing:

- 1) Within 180 days of start-up of Line 6, the Permittee must performance test each main line stack in accordance with 40 CFR 60.8 (except that Administrator shall mean Director of Ecology) to demonstrate compliance with the emission limits.
- 2) Testing for Acrylonitrile must be performed semi-annually until four tests have shown compliance with the emission limit, then the testing frequency may be reduced to annually. A failed test will result in source

testing frequency increase to semi-annually again until four passing source test results and then testing may go back to annually.

- 3) Testing must be performed at the times and frequencies specified. A request to change compliance test frequency may be submitted by the Permittee once they have demonstrated compliance in previous tests with stable emissions below all authorized limits. Requests to change compliance test frequency must be submitted in writing and approved in writing by Ecology.
- 4) Testing Logistics: The permittee must provide testable emission points, sampling ports, safe access to sampling points and ports, and utilities for sampling and testing.
- 5) Throughput during Testing: During testing, the process must be operated at a minimum of 90 percent except as noted in Approval Condition 5.c above, of rated line capacity for process lines with less than 12 months operating history, or 90 to 110 percent of the maximum daily process rate recorded during the preceding 12-month period for lines operated for 12 months or more. Operation of the process during testing outside of the specified range may be proposed but may result in an operational restriction that will be amended to this Approval Order. Records of operating history must be kept in accordance with Approval Condition 7.
- 6) Submittal of Test Plan: A written test protocol that includes a description of the equipment to test, the process and control device operating information to collect during the test, and the sampling and analytical method(s) proposed, must be submitted to Ecology at least 30 calendar days prior to the start of any required performance or compliance test.
- 7) Notification of Inability to Conduct Test: If the permittee is unable to conduct any test as scheduled, Ecology must be notified at least 24 hours before the test at the address listed in Approval Condition 8.b, or by calling Ecology.
- 8) Plant Operator during Testing: The plant process equipment must be operated and controlled by normal plant operators during the period when the testers are on-site to conduct testing, and during actual testing.
- 9) Testing Results: The results of all initial performance testing and all other periodic testing must be sent to Ecology at the address listed in 9M Recordkeeping – Records Retention. One copy of the completed test report must be submitted to Ecology no later than 60 days after the last day of the testing, 75 days for EPA Reference Method 202 PM test reports:  
[Order No. 24AQ-E030, Approval Condition 5], [WAC 173-401-630(1)].  
(This MRRR includes gap filling)

#### **9M. Monitoring**

The Permittee must install and operate a CERMS on Lines 1-6 that measures actual NOx emission concentrations, emission rates, and stack flow rates during

all operational modes (Normal Operations, RTO Bypass, SCR Bypass, Standby, and Shutdown). Note: Shutdown Mode for Line 2-6 is different than Line 1. See Approval Condition 7.c for the differences. The CERMS must meet the requirements of Performance Specifications 2 and 6 contained in 40 CFR Part 60, Appendix B, and quality control/quality assurance requirements of 40 CFR Part 60, Appendix F as in effect on March 10, 2015.

- 1) The calibration drift test procedure must be performed prior to any automatic or manual adjustments made to the CERMS calibration or zero settings in accordance with Performance Specification 2, Section 6, 40 CFR Part 60, Appendix B.
- 2) The CERMS on each line must meet the continuous emission monitoring system operating requirements contained in WAC 173-400-105(7) as in effect on March 10, 2015.
- 3) Relative Accuracy Test Audits (RATA) must be performed once every four calendar quarters, and cylinder gas audits (CGA) must be conducted in three of four calendar quarters on the CERMS for each line. The RATA and CGA must be conducted in accordance with 40 CFR Part 60, Appendix B and Appendix F. The RATA must meet the testing requirements in Approval Conditions 5.e through 5.i. Data assessment reports as contained in Appendix F must be submitted to Ecology quarterly.
- 4) CERMS must be installed and operational upon start-up. CERMS must meet all applicable performance specifications within 45 days of start-up of each line as identified in Appendix B and Appendix F (see Approval Condition 6.c).
- 5) The facility must monitor, calculate as needed, and record actual instantaneous emission concentrations, and stack gas flow and actual instantaneous, hourly, monthly, and 12-month rolling mass emissions for each production line.

[Order No. 24AQ-E030, Approval Condition 7] (This MRRR includes gap filling)

#### **10M. Recordkeeping**

- 1) All required records must be kept on-site and made available for inspection by Ecology upon request. The records must be organized in a readily accessible manner and cover a minimum of the most recent 60-month period. The records to keep must include the following:
- 2) Hourly, monthly, and 12-month rolling total records of Lines 1-6 NO<sub>x</sub> emissions in accordance with Approval Conditions 4.a and 4.h.
- 3) NO<sub>x</sub> emissions during periods of CERMS non-operation for Lines 1-6 must be calculated and included in monthly and 12-month rolling facility-wide totals.
- 4) NO<sub>x</sub> emissions during Shutdown Mode for production Line 2-6 must be the total of the calculated NO<sub>x</sub> value from the bypass stacks using an

emission factor of 8.5 lb/hour (0.00236 lb/sec) plus the NO<sub>x</sub> as measured by the CERMS. For Line 1, all Shutdown Mode emissions must be measured by the CERMS.

- 5) Normal Operation Mode: Monthly and 12-month rolling records of operation in Normal Operation Mode must be kept for each line. Records of operation hours in Start-up Mode will be recorded as Normal Operation Mode.
- 6) Shutdown Mode: Daily records of the date and duration (in seconds) of operation in Shutdown Mode must be kept for each line. Daily records must be used to calculate monthly and 12-month rolling time in Shutdown Mode for each line.
- 7) RTO Bypass Mode: Daily records of the date, time, cause, and duration (in minutes) of operation in RTO Bypass Mode must be kept for each line. Daily records must be used to calculate monthly and 12-month rolling total time in RTO Bypass Mode for each production line.
- 8) SCR Bypass Mode: Daily records of the date, time, cause, and duration (in hours) of Lines 1-6 operating in SCR Bypass Mode must be kept for each line. Daily records must be used to calculate monthly and 12-month rolling total time in SCR Bypass Mode for Lines 1-6. These records must also identify if more than one line is in SCR Bypass Mode at a time.
- 9) Standby Mode: 12-month rolling records of operation in Standby Mode must be kept for each production line.
- 10) Records of CERMS operations must be kept demonstrating compliance with Approval Condition 6.d.
- 11) The following recordkeeping specific to the hogged fuel boiler must be retained for a period of five years, and kept in an organized, legible manner readily available for inspection by Ecology personnel:  
  
[Order No. 20AQ-E032, Approval Conditions 1, 3, 4)m), 5)b), 8)a)i, 8)a)iii through 8)a)vi] [40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8], [WAC 173-401-615(1)(b)], [WAC 173-401-630(1)] (This MRRR includes gap filling)

#### **11M. Reporting**

- 1) The Permittee must submit semi-annual reports of facility-wide emissions for Lines 1-6 to demonstrate compliance with emission limits identified in Approval Condition 4.h. The reports must be submitted to Ecology every six months, by July 31, for the January through June reports and by January 31 for the July through December reports. These reports must include parameters used for calculating emissions, including duration for each line in operating modes other than Normal Operation Mode. The report must include:
  - a) The number of hours that each line operated during each month of the reporting period and the 12-month rolling emissions for each pollutant,



- b) The number of valid hours of monitoring data that each CERMS recovered during facility operation,
  - c) The date, time period, and cause of each failure to meet the data recovery requirements of Approval Condition 6.b and any actions taken to ensure adequate collection of such data,
  - d) The date, time period, and cause of each failure to recover valid hourly monitoring data for at least 90 percent of the hours that each line operated each day,
  - e) The date, time period, and cause of each failure to recover valid hourly monitoring data for at least 95 percent of the hours that the equipment (required to monitor) is operated during each calendar month except for periods of monitoring system downtime, provided that the owner or operator demonstrated that the downtime was not a result of inadequate design, operation, or maintenance, or any other reasonable preventable condition, and any necessary repairs to the monitoring system are conducted in a timely manner,
  - f) The results of all cylinder gas audits conducted during the reporting period, and
  - g) A certification of truth, accuracy, and completeness signed by a responsible official of the Permittee.
- 2) Other reports must be submitted within 30 days following the end of the calendar year, unless otherwise specified by Ecology, to the following address:
- Washington State Department of Ecology  
Air Quality Program  
4601 N. Monroe St.  
Spokane, WA 99205-1295
- OR AS DIRECTED.*
- 3) The Permittee must notify Ecology within 30 days of the following events:
- a) Commencement of construction of the project,
  - b) Completion of the construction of the project,
  - c) If construction or operation has been discontinued for more than 18 months.
- 4) The Permittee must notify Ecology within 60 days (or longer as approved by Ecology) of the following events:
- a) Changes in operation contrary to information submitted in the NOC application.
  - b) Discontinued operations of more than 18-months. This notification must include a shutdown status maintenance plan containing the following information, at a minimum:

1. Maintenance that will be performed during the shutdown to allow startup in a timely manner with minimum amount of work and emissions, (allowable emission levels as of the date of shutdown cannot increase upon reopening).
- c) Reactivating the facility following discontinued operations of 18-months or more. This notification must include a start-up plan containing the following information, at a minimum:
  1. Documentation that the shutdown maintenance was performed during shutdown to allow startup in a timely manner with minimum amount of work and emissions (allowable emission levels as of the date of shutdown cannot increase upon reopening).
  2. Documentation of testing performed which demonstrates that units are still able to meet the parameters of this approval order after being inactive, or other documentation which demonstrates why testing is not necessary.

[Order No. 24AQ-E030, Approval Condition 8]

**12M.** The following conditions will apply to Lines 1 – 6:

- 1) All pollution control and monitoring equipment, including the RTO, TO with water injection, as well as the CERMS NOx monitoring system must be installed and operational upon start-up of each line. Start-up is defined as the first day that carbon fiber is produced for qualification testing. If qualification testing is not performed, start-up is defined as the first day carbon fiber is produced. Ecology must be notified in writing in advance of the start-up of each production line and of the commissioning period of each emergency engine.
- 2) Lines 1-6 must have SCR units installed and operational upon start-up of each line.
- 3) Pollution control equipment such as RTOs, TOs, and SCR units must be operated at all times the associated line is running.
- 4) Lines 1-6 are limited to 128 tows of raw polyacrylonitrile material per line.
- 5) No more than 50 portable pre-oxidation splicing ovens are allowed on-site.

[Order No. 24AQ-E030, Approval Condition 1]

**13M.** Aggregate emissions from Lines 1-6 and support equipment must not exceed the following:

- 1) Nitrogen Oxides, NOx: 90 tons per 12-month rolling period
- 2) Nitrogen Oxides, NOx: 90 tons per 12-month rolling period

- 3) Carbon Monoxide, CO: 37 tons per 12-month rolling period
- 4) Sulfur Dioxide, SO<sub>2</sub>: 19 tons per 12-month rolling period
- 5) Particulate Matter (Filterable & Condensable) including fugitives, PM<sub>10</sub>: 91 tons per 12-month rolling period
- 6) Particulate Matter (Filterable & Condensable) including fugitives, PM<sub>2.5</sub>: 88 tons per 12-month rolling period
- 7) Particulate Matter (Filterable Only) including fugitives: 60 tons per 12-month rolling period
- 8) Volatile Organic Compounds, VOC: 45 tons per 12-month rolling period
- 9) Acrylonitrile, C<sub>3</sub>H<sub>3</sub>N: 306.2 pounds per 12-month rolling period
- 10) Ammonia, NH<sub>3</sub>: 458 pounds per day
- 11) Hydrogen Cyanide, HCN: 287 pounds per day

[Order No. 24AQ-E030, Approval Condition 4.h]

#### Lines 1 and 2 Emergency Generator Engines

**14M.** The following conditions will apply to the 10 natural gas-fueled emergency power generators (L1EG1, L1EG2, L1EG3, L1EG4, L1EG5, L2EG1, L2EG2, L2EG3, L2EG4, and L2EG5):

- 1) Operation of Lines 1 and 2 Emergency generator engines s limited to an aggregate of 340 hours per 12-month rolling period for maintenance, testing, and emergency operation. Records of operation hours must be kept for each generator.
- 2) Operation of the two natural gas-fueled fire water pump engines (FWP1 and FWP2) is limited to an aggregate of 76 hours per 12-month rolling period for maintenance, testing, and emergency operation. Records of operation hours must be kept for each fire water pump.
- 3) A non-resettable hour meter must be installed on each emergency power generator, and emergency fire water pump engine.
- 4) Each of the ten 454 bhp internal combustion natural gas-fired emergency engines and two fire water pumps must use the emission limits below to quantify emissions (lb/hour, One hour average):
  - a) Nitrogen Oxides, NO<sub>x</sub>: 2.00
  - b) Carbon Monoxide, CO: 4.00
  - c) Sulfur Dioxide, SO<sub>2</sub>: 0.003
  - d) Particulate Matter (PM<sub>10</sub>/PM<sub>2.5</sub>): 0.08
  - e) Particulate Matter (Filterable Only), PM: 0.04
  - f) Volatile Organic Compounds, VOC: 1.00
- 5) Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn

engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified.

- 6) In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited.

### Lines 3 – 6 Emergency Generator Engines

**15M.** The following conditions will apply to the four diesel-fueled emergency power generators (L3EG, L4EG, L5EG, and L6EG):

- 1) During reliability and performance testing, no more than one generator engine may operate concurrently. Records of operation hours must be kept for each generator.
- 2) A non-resettable hour meter must be installed on each emergency power generator.
- 3) All diesel-fueled compression ignition engines must be fueled by ultra-low sulfur diesel fuel with a sulfur content of no more than 0.0015 percent by weight. Records must be kept for each diesel-fueled compression ignition engine.
- 4) Each of the four 2,937 bhp compression ignition diesel-fueled emergency engines must not exceed the emission limits listed below unless in engine Start-up Mode. The following lists the limits to use when quantifying diesel engine in Normal Operation Mode (g/hp-hour):
  - a) Nitrogen Oxides, NOx: 0.75
  - b) Carbon Monoxide, CO: 0.54
  - c) Sulfur Dioxide, SO<sub>2</sub>: 1.2x10<sup>-5</sup> lb/hp-hour
  - d) Particulate Matter (PM<sub>10</sub>/PM<sub>2.5</sub>): 0.034
  - e) Particulate Matter (Filterable Only), PM: 0.034
  - f) Volatile Organic Compounds, VOC: 0.18
- 5) Diesel engine Start-up Mode is defined as and limited to the first 10 minutes of operation. The following lists the emission factors to use when quantifying diesel engine Start-up Mode (g/hp-hour):
  - a) Nitrogen Oxides, NOx: 6.8

- b) Carbon Monoxide, CO: 3.3
  - c) Sulfur Dioxide, SO<sub>2</sub>: 1.2x10<sup>-5</sup> lb/hp-hour
  - d) Particulate Matter (PM<sub>10</sub>/PM<sub>2.5</sub>): 0.034
  - e) Particulate Matter (Filterable Only), PM: 0.034
  - f) Volatile Organic Compounds, VOC: 0.18
- 6) Within 12 months of the first diesel engine's installation, May 23, 2014, and every 60 months thereafter, The Permittee must measure emissions of Diesel Engine Exhaust Particulate (DEEP) from at least one representative engine's exhaust stack. The testing will serve to demonstrate compliance with the emission limit contained in Approval Condition 4.f and as an indicator of proper operation of the engines. The selection of the engine(s) to test must be subject to prior approval of Ecology and must be defined in the source test protocol submitted to Ecology no less than 30 days in advance of any compliance-related stack sampling conducted by the Permittee.
- 7) The following testing is required to demonstrate compliance with the emission limits for each diesel engine:
- a) Test Method: 40 CFR 60 Appendix A, Method 5; All testing must be performed in excess of 70 percent engine load.
  - b) One representative engine within 12 months of the first engine commissioning.
  - c) One engine every five years thereafter. (A different engine must be tested until each of the engines have been compliance tested.)

### Production Lines Operating Modes and Limitations

#### 16M. The following conditions apply to Lines 1 – 6 :

- 1) No more than 50 portable pre-oxidation splicing ovens are allowed on-site.
- 2) There are no limitations of operation in Start-up Mode. Records of operation hours in Start-up Mode will be recorded as Normal Operation Mode.
- 3) There are no limitations of operation in Normal Operation Mode. Records of operation hours must be kept.
- 4) Emissions from each main line stack are limited to the following when operating in Normal Operation Mode (lb/hour, One hour average):
  - a) Nitrogen Oxides, NO<sub>x</sub>: 8.5
  - b) Carbon Monoxide, CO: 1.3
  - c) Sulfur Dioxide, SO<sub>2</sub>: 0.7
  - d) Particulate Matter (PM<sub>10</sub>): 3.5
  - e) Particulate Matter (PM<sub>2.5</sub>): 3.4
  - f) Particulate Matter (Filterable Only), PM: 2.3
  - g) Volatile Organic Compounds, VOC (as propane): 1.7
  - h) Acrylonitrile, C<sub>3</sub>H<sub>3</sub>N: 0.0056
  - i) Ammonia, NH<sub>3</sub>: 3.0
  - j) Hydrogen Cyanide, HCN: 1.4
- 5) RTO Bypass Mode is limited to a combined total from Lines 1-2 of 1½ hours per calendar day and for each line, a total of 4½ hours per 12-month rolling period. RTO Bypass Mode is limited to a combined total from Lines 3-6 of 1½ hours per calendar day and for each line, a total of 4½ hours per 12-month rolling period. Records of daily, monthly, and 12-month rolling period must be kept
- 6) Emissions from each main stack are limited to the following when operating in RTO Bypass Mode (lb/hour, One hour average):
  - a) Nitrogen Oxides, NO<sub>x</sub>: 8.5
  - b) Carbon Monoxide, CO: 1.3
  - c) Sulfur Dioxide, SO<sub>2</sub>: 0.7
  - d) Particulate Matter (PM<sub>10</sub>): 3.5
  - e) Particulate Matter (PM<sub>2.5</sub>): 3.4
  - f) Particulate Matter (Filterable Only), PM: 2.3
  - g) Volatile Organic Compounds, VOC (as propane): 8.6
  - h) Acrylonitrile, C<sub>3</sub>H<sub>3</sub>N: 0.17

- i) Ammonia, NH<sub>3</sub>: 9.6
  - j) Hydrogen Cyanide, HCN: 30.0
- 7) Operation of Lines 1-6 in SCR Bypass Mode is limited to 100 hours in any 12-month rolling period. No more than one line may operate in SCR Bypass Mode at the same time. Records of operation hours in SCR Bypass Mode must be kept.
- 8) Emissions from each main line stack are limited to the following when operating in SCR Bypass Mode (lb/hour, One hour average):
- a) Nitrogen Oxides, NO<sub>x</sub>: 17.9
  - b) Carbon Monoxide, CO: 1.3
  - c) Sulfur Dioxide, SO<sub>2</sub>: 0.7
  - d) Particulate Matter (PM<sub>10</sub>): 3.5
  - e) Particulate Matter (PM<sub>2.5</sub>): 3.4
  - f) Particulate Matter (Filterable Only), PM: 2.3
  - g) Volatile Organic Compounds, VOC (as propane): 1.7
  - h) Acrylonitrile, C<sub>3</sub>H<sub>3</sub>N: 0.0056
  - i) Ammonia, NH<sub>3</sub>: 0.60
  - j) Hydrogen Cyanide, HCN: 1.4
- 9) Shutdown Mode from Lines 1-6 is limited to 90 seconds per occurrence and 9.13 hours per 12-month rolling period for each line. Records of operation hours in Shutdown Mode must be kept.
- 10) Emissions from each line stack are limited to the following when operating in Shutdown Mode (lb/hour, One hour average):
- a) Nitrogen Oxides, NO<sub>x</sub>: 8.5
  - b) Carbon Monoxide, CO: 1.3
  - c) Sulfur Dioxide, SO<sub>2</sub>: 0.7
  - d) Particulate Matter (PM<sub>10</sub>): 3.5
  - e) Particulate Matter (PM<sub>2.5</sub>): 3.4
  - f) Particulate Matter (Filterable Only), PM: 2.3
  - g) Volatile Organic Compounds, VOC (as propane): 5.7 for Line 1, 7.1 for Lines 2-6
  - h) Acrylonitrile, C<sub>3</sub>H<sub>3</sub>N: 0.10 for Line 1, 0.14 for Lines 2-6
  - i) Ammonia, NH<sub>3</sub>: 8.3 for Line 1, 10.0 for Lines 2-6
  - j) Hydrogen Cyanide, HCN: 18.0 for Line 1, 23.6 for Lines 2-6
- 11) There are no limitations of operation in Standby Mode. Records of operation hours in Standby Mode must be kept.

**4. Inapplicable Requirements**

Ecology has determined that the entire source, including all emission units, is not subject to the following requirements at the time of permit issuance. Some of the requirements listed below may become applicable during the permit term due to an invoking event, even though the requirement is deemed inapplicable at the time of permit issuance. Such requirements must therefore be met on a timely basis by the permittee through submittal of a compliance schedule, per WAC 173-401-510(2)(h)(iii)(B).

<b>Inapplicable Requirement</b>	<b>Emission Unit</b>	<b>Description of Requirement</b>	<b>Explanation</b>
40 CFR 60 Subpart Kb	Facility-Wide	New Source Performance Standards for Volatile Organic Liquid Storage Vessels	No volatile organic storage vessels with a capacity greater than or equal to 75 cubic meters (19,800 gallons) at the facility.
40 CFR 60 Subpart IIII	L1 and 2EG FWP 1 and 2	New Source Performance Standards for stationary compression ignition internal combustion engines	These engines are natural gas-fueled engines and not compression ignition engines (i.e. diesel-fueled), therefore, this Subpart does not apply to these engines.
40 CFR 60 Subpart IIII	L3-10EG	New Source Performance Standards for stationary compression ignition internal combustion engines	The diesel fueled emergency generators are subject to certain portions of NSPS Subpart IIII, but not all portions.
40 CFR 60 Subpart JJJJ	L1 and 2EG	New Source Performance Standards for stationary spark ignition internal combustion engines	The diesel fueled emergency generators are subject to certain portions of NSPS Subpart JJJJ, but not all portions.
40CFR63 Subpart ZZZZ (except for 40 CFR 63.6590(c)(6))	L1 and 2EG, FWP 1 and 2	Stationary Reciprocating Internal Combustion Engine NESHAP	Lines 1-2 emergency engines and firewater pump engines are considered new emergency CI ICE located at a major source of HAP



Inapplicable Requirement	Emission Unit	Description of Requirement	Explanation
			emissions because they were manufactured after June 12, 2006.
40CFR63 Subpart ZZZZ (except for 40 CFR 63.6590(b)(1)(i) and 63.6645(f))	L3-10EG	Stationary Reciprocating Internal Combustion Engine NESHAP	Lines 3-10 emergency engines are considered new emergency CI ICE located at a major source of HAP emissions because they were manufactured after December 19, 2002.
40 CFR 60, 60.7 only applies as specified in §60.4245, 60.8 only applies to owners and operators who are subject to performance testing in subpart JJJ, 60.13, 60.18	L1 and 2EG, FWP 1 and 2	General Provisions for NSPS	Table 3 to NSPS Subpart JJJJ.
40 CFR 60, 60.7 only applies as specified in §60.4214(a), 60.8, 60.11, 60.18	L3-10EG	General Provisions for NSPS	Table 8 to NSPS Subpart IIII.
40CFR63 Subpart FFFF	Facility Wide	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing	The provisions of Subpart FFFF apply to MCPU. SGL performed a Total Resource Effectiveness (TRE) analysis of the total organic HAPs from the ovens and furnaces. The lowest calculated TRE index values for the two continuous process vents are above the NESHAP Subpart FFFF threshold value of five. Therefore, there are no requirements

Inapplicable Requirement	Emission Unit	Description of Requirement	Explanation
			in this NESHAP that apply to this project.
40 CFR 72 – 78	Facility Wide	Acid Rain Program	Applies only to certain electric generation and incineration facilities. The facility does not generate electricity or incinerate waste.
WAC 173-400-099	Facility Wide	Registration Program	As a Title V source, the facility is not subject to the registration program.
40 CFR 98	Facility Wide	Federal Mandatory Greenhouse Gas Reporting Rule	The federal GHG reporting requirements given in 40 CFR Part 98 are not considered “applicable requirements,” as defined in 40 CFR 70.2, under the Title V operating permit program. Therefore, the Federal GHG reporting rule is not an applicable requirement for this Title V permit.

**Appendix A: Federal and State Regulation Date Reference List**

WAC	F	S	CFR	F	RCW	S
425	X	3/13/2000	52.33	7/1/2024	70A.15.1070	2024
441	X	3/12/2022	60.11	7/1/2024	70A.15.2210	2024
460	X	11/22/2019	60.12	7/1/2024	70A.15.2220	2024
400-035	X	9/16/2018	60.332	7/1/2024	70A.15.2230	2024
400-040	2/24/2020	9/16/2018	60.334	7/1/2024	70A.15.2270	2024
400-050	2/24/2020	1/19/2023	60.335	7/1/2024	70A.15.2500	2024
400-060	2/24/2020	11/25/2018	60.4	7/1/2024	70A.15.2530	2024
400-070	10/6/2016	1/19/2023	60.43	7/1/2024	70A.15.6410	2024
400-075	X	7/1/2016	60.46	7/1/2024	70A.15.6420	2024
400-105	2/24/2020	11/25/2018	60.48	7/1/2024		
400-107	6/2/1995	9/16/2018	60.49	7/1/2024		
400-110	9/29/2016	12/29/2012	60.7	7/1/2024		
400-113	4/29/2015	12/29/2012	60.8	7/1/2024		
400-114	X	12/29/2012	61, subpart M	7/1/2024		
400-171	2/24/2020	9/16/2018	63.6	7/1/2024		
400-200	10/3/2014	2/10/2005	63.7	7/1/2024		
400-205	6/2/1995	3/22/1991	63.8	7/1/2024		
400-560	4/29/2015	12/29/2012	63.9	7/1/2024		
400-720	10/6/2016	1/19/2023	63.10	7/1/2024		
400-820	11/7/2014	12/29/2012	63.455	7/1/2024		
401-200	1/2/2003	3/5/2016	63.7500	7/1/2024		
401-500	1/2/2003	10/17/2002	63.7510	7/1/2024		
401-510	1/2/2003	3/5/2016	63.7515	7/1/2024		
401-520	1/2/2003	11/4/1993	63.7520	7/1/2024		
401-530	1/2/2003	10/17/2002	63.7525	7/1/2024		
401-605	1/2/2003	11/4/1993	63.7540	7/1/2024		
401-610	1/2/2003	11/4/1993	63.7545	7/1/2024		
401-615	1/2/2003	10/17/2002	63.7550	7/1/2024		
401-620	1/2/2003	11/4/1993	64.3	7/1/2024		
401-625	1/2/2003	11/4/1993	64.4	7/1/2024		
401-630	1/2/2003	3/5/2016	64.6	7/1/2024		
401-640	1/2/2003	11/4/1993	64.7	7/1/2024		
401-645	1/2/2003	11/4/1993	64.8	7/1/2024		
401-650	1/2/2003	11/4/1993	64.9	7/1/2024		
401-705	1/2/2003	11/4/1993	68.36	7/1/2024		
401-710	1/2/2003	10/17/2002	70.6	7/1/2024		
401-720	1/2/2003	11/4/1993	82	7/1/2024		
401-722	1/2/2003	10/17/2002				
401-724	1/2/2003	3/5/2016				
401-730	1/2/2003	11/4/1993				
401-930	1/2/2003	1/30/1994				
455-100	X	11/25/2018				
455-120	X	12/31/2012				