

ASHEVILLE-BUNCOMBE AIR QUALITY AGENCY
PERMIT TO OPERATE

Permission is hereby granted for **XSYS North America** to construct and operate their facility located at **95 Glenn Bridge Road, Arden, NC**, as requested by **Mr. Casper Miller**.

This permit is issued in accordance with the Asheville-Buncombe Air Quality Agency Code (AB Air Quality Code) and is subject to all requirements therein. This permit covers the following equipment:

- ES-Base-01: One (1) fiberglass base building and filament winding operation consisting of four (4) base building machines, two (2) filament winding machines, six (6) electric curing ovens and two (2) electric vented warming ovens.
- ES-BlueLT-01: One (1) Blue Light coating operation consisting of two (2) urethane coating machines.
- ES-Grind-01: One (1) wet and dry grinding, cutting, notching and scribing operation controlled by two 6,280 acfm dust collectors (CD-DUST-06 and CD-DUST-07).
- ES-PrintPro-01: One (1) spray painting operation.
- ES-Pack-01: One (1) packaging operation.

This permit is issued with both general and specific conditions. The entire facility is subject to the general conditions and each piece of equipment is subject to the specific conditions listed herein.

This permit is issued **March 8, 2022** and expires **March 31, 2030**.

Ashley J. Featherstone, Director

A. GENERAL CONDITIONS AND LIMITATIONS

1. **Regulatory Applicability.** This facility shall be operated in accordance with the Asheville-Buncombe Air Quality Agency Code (AB Air Quality Code), including but not limited to the conditions specified herein and any other applicable Local, State, and Federal regulations.
2. **Application.** This permit is subject to revocation or modification by AB Air Quality Board in the event that any alterations are made to the process from those submitted in the approved application, plans, specifications, and other supporting data. The Permittee shall retain for the duration of the permit term a copy of the application package and any information submitted to AB Air Quality in support of the application package. Any changes in the permit application specifications or any existing equipment which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.
3. **Reporting Requirement.** Any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Director of the AB Air Quality:
 - a. changes in the information submitted in the application regarding facility emissions;
 - b. changes that modify equipment or processes of existing permitted facilities; or
 - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be approved by the AB Air Quality Board to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

4. **Change of Ownership and/or Name.** In the event there is a change of ownership and/or name of the permitted facility, notification shall be made to AB Air Quality in accordance with AB Air Quality Code 17.0304(d) and (g).
5. **Equipment Relocation.** A new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
6. **Violations.** The issuance of this permit in no way absolves the Permittee of liability for any potential civil and/or criminal penalties which may be assessed for violations of AB Air Quality Code which have occurred prior to the effective date of this permit. The Permittee shall be subject to enforcement action, including assessment of civil and/or criminal penalties, if any term or condition of this permit is violated.

7. **Operation and Maintenance.** This permit shall become void if the facility is not operated and maintained at all times so that the overall reduction in air pollutants, in accordance with applicable standards, is achieved. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s). The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control and process equipment which affect such emissions:
- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to AB Air Quality personnel upon request.

8. **Malfunctions.** The Permittee shall furnish notification to the AB Air Quality of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions pursuant to AB Air Quality Code 4.0535. In no event shall poor maintenance, careless operation or any other upset condition within the control of the owner or operator be considered a malfunction.
9. **Reports, Test Data, Monitoring Data, Notifications, and Requests for Renewal.** All such information shall be submitted to the:

Asheville-Buncombe Air Quality Agency
PO Box 2749
Asheville, NC 28802

10. **Right of Entry.** The Permittee shall allow authorized Local, State, and Federal representatives, upon the presentation of credentials:
- a. To enter upon the Permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the AB Air Quality Code;
 - c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the AB Air Quality Code; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

11. **Annual Fee Payment.** Pursuant to AB Air Quality Code 17.0203, the Permittee shall pay the Annual Permit Fee within thirty (30) days of receipt of an invoice by the Agency. Failure to pay the fee in a timely manner will cause the Agency to initiate action to revoke the permit.
12. **Permit Renewal Requirement.** The Permittee, at least ninety (90) days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with AB Air Quality Code 17.0304(d) and (f). Pursuant to AB Air Quality Code 17.0203(g), no permit application fee is required for renewal of an existing air permit provided no changes have been made to the permitted facility. In accordance with AB Air Quality Code 17.0304(b)(4), an air emissions inventory that contains the information specified under AB Air Quality Code 4.0202, quantifying actual air pollutant emissions for the preceding calendar year must accompany your renewal request letter. The Agency will send information on how to submit the emissions inventory, along with a reminder to renew your permit, about six months prior to your permit expiration. If you do not receive this information, please contact the Agency.
13. **Permit Suspension/Revocation.** This permit may be suspended or revoked by the AB Air Quality Board if the Permittee:
 - a. Knowingly makes material misstatements in the application for this permit or any amendments to it;
 - b. Fails to comply with the conditions of this permit;
 - c. Fails to comply with any emission standards applicable to the equipment listed in page 1 of this permit;
 - d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;
 - e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect on the date that the application for this permit is submitted;
 - f. Fails to operate this facility in accordance with the application for this permit or any amendments to it; or

g. Allows the permit to become invalid.

14. **Permit Retention.** The Permittee shall retain a copy of this permit on the premises of the facility to which it applies.

B. SPECIFIC CONDITIONS AND LIMITATIONS

1. **Permit Status.** Permit number 11-921-21, issued March 8, 2022, is the first permit issued to this facility.
2. **Particulate Matter - Emission Standard.** ES-Grind-01 shall be operated in accordance with the AB Air Quality Code 4.0515 – “Particulates from Miscellaneous Industrial Processes.” Particulate matter emissions shall not exceed allowable emission rates. The allowable emission rates are a function of the process weight rate and shall be determined by the following equation(s), where P is the process throughput rate in tons per hour (tons/hr) and E is the allowable emission rate in pounds per hour (lbs/hr).

$$E = 4.10*(P)^{0.67} \quad \text{for } P \leq 30 \text{ tons/hr, or}$$

$$E = 55.0*(P)^{0.11}-40 \quad \text{for } P >30 \text{ tons/hr.}$$

3. **Visible Emissions.** All sources shall be operated in accordance with AB Air Quality Code 4.0521 – “Control of Visible Emissions.” This regulation limits visible emissions from these sources to no more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20% opacity if:
- a. No six-minute period exceeds 87% opacity;
 - b. No more than one six-minute period exceeds 20% opacity in any hour; and
 - c. No more than four six-minute periods exceed 20% opacity in any 24-hour period.
4. **Fugitive Dust Emissions.** Per AB Air Quality Code 4.0540 - “Particulates From Fugitive Dust Emission Sources,” the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in AB Air Quality Code 4.0540(g).
5. **Odorous Emissions - Standard.** The facility shall be operated in accordance with the AB Air Quality Code 4.1806 – “Control and Prohibition of Odorous Emissions,”

such that suitable measures shall be employed to prevent odorous emissions from causing or contributing to objectionable odors beyond the facility's boundary.

6. **Synthetic Minor Facility.** In order to comply with this permit and to avoid the applicability of 40 CFR Part 70, The Federal Operating Permit Program (Title V) and AB Air Quality Code 17.0500 "Title V Procedures", this facility, per AB Air Quality Code 17.0315 - "Synthetic Minor Facilities," has requested certain emission limitations. The emissions of this facility shall be less than:
 - a. 100 tons per year of any criteria air pollutant;
 - b. 10 tons per year of each hazardous air pollutant; and
 - c. 25 tons per year of all hazardous air pollutants.
7. **Synthetic Minor Facility.** Per AB Air Quality Code 17.0315(e) the Director has required the following recordkeeping and reporting requirements to assure compliance with the emissions limit associated with the applicability of 40 CFR 70 and AB Air Quality Code 17.0500:
 - a. **Recordkeeping Requirements.** The facility shall keep a log of the amount of styrene used per month and total amount of styrene used during the 12-month period ending on that month.
 - b. **Reporting Requirements.** The facility shall submit a summary of the recordkeeping requirements in this section postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.
8. **Operating Limits.** In order to avoid the applicability of 40 CFR 70 and AB Air Quality Code 17.0500:
 - a. The facility shall not operate ES-Grind-01 unless the emissions from the equipment are controlled by the dust control filters.
9. **Fabric Filter Requirements.** Particulate matter emissions from ES-Grind-01 shall be controlled by the dust control filters.
 - a. **Inspection and Maintenance Requirements.** To comply with the provisions of this permit and ensure that emissions do not exceed the regulatory limits, the Permittee shall perform an annual inspection of the fabric filter system. In addition, the Permittee shall perform periodic inspections and maintenance as recommended by the equipment manufacturer.

b. Recordkeeping Requirements. The results of all inspections and any variance from manufacturer's recommendations or from those given in this permit (when applicable) shall be investigated with corrections made and dates of actions recorded in a logbook. Records of all maintenance activities shall be recorded in the logbook. The logbook (in written or electronic form) shall be kept on-site and made available to AB Air Quality personnel upon request.

10. Recordkeeping and Reporting Requirements. The facility shall be operated in accordance with the AB Air Quality Code 4.0605 – “General Recordkeeping and Reporting Requirements,” such that the following specific reports shall be submitted to the AB Air Quality by February 15 of each year:

<u>Equipment/Process</u>	<u>Reporting Requirement</u>	<u>Submittal Date</u> (Postmarked By)
ES-Base-01	<ol style="list-style-type: none"> 1. Total amount of styrene used per month for the preceding six-month period. 2. The 12-month rolling total of styrene used during each month in the preceding six-month period. 	January 30 for the period between July and December and July 30 for the period between January and July
ES-Base-01, ES-BlueLT-01, ES-PrintPro-01, ES-Pack-01	For each VOC-containing product used: <ol style="list-style-type: none"> 1. Product name; 2. VOC content; 3. Annual usage; and 4. Annual VOC emissions 	February 15 of the following year
ES-Base-01, ES-BlueLT-01, ES-PrintPro-01, ES-Pack-01	For each HAP-containing product used: <ol style="list-style-type: none"> 1. Product name; 2. HAP content; 3. Annual usage; and 4. Annual VOC emissions 	February 15 of the following year
ES-Grind-01	The number of hours of operation for the preceding year.	February 15 of the following year

Appendix A, Exempted Activities

For the purposes of this Permit No. 11-921-22 issued March 8, 2022, the following activities have been found to be exempt from permitting pursuant to AB Air Quality Code 17.0102 – “Activities Exempted from Permit Requirements”:

- No exempted activities.