

*DRAFT*

#AOP-09-034  
DEC#SJ98-0175

Operating Permit Expiration Date: -----, 2015

**State of Vermont  
Agency of Natural Resources  
Department of Environmental Conservation**



**Air Pollution Control Division  
Waterbury, Vermont**

**TITLE V**  
**AIR POLLUTION CONTROL PERMIT**  
**TO CONSTRUCT AND OPERATE**

**Date Draft Permit Issued: October 22, 2009**

Owner/Operator:  
Weidmann Electrical Technology, Inc.  
P.O. Box 903  
St. Johnsbury, VT 05819-0903

Source:  
Weidmann Electrical Technology, Inc.  
Transformer Board Manufacturing and Assembly Facility  
One Gordon Mills Way  
St. Johnsbury, VT 05819

## FINDINGS OF FACT

### (A) FACILITY DESCRIPTION

Weidmann Electrical Technology, Inc. (also referred to herein as "Permittee") owns and operates a transformer board manufacturing and assembly facility located off U.S. Route 5 in St. Johnsbury, Vermont (also referred to herein as "Facility"). Weidmann Electrical Technology, Inc. has proposed to increase allowable No.6 fuel oil usage for West Building, Boiler #3, from 558,500 to 800,000 gallons/year. Additionally, the Permittee has proposed to limit the No.6 fuel oil sulfur content used in West Building Boiler #1 to 0.5% sulfur by weight consistent with the existing requirement for Boiler #3.

Upon issuance of this Permit, the Facility will consist of the following air pollution related equipment:

<b>Equipment and Stack Information</b>					
DESCRIPTION AND MODEL NUMBER	SIZE OR CAPACITY <sup>1,2</sup>	FUEL TYPE(S) OR PROCESS INPUT	DATE INSTALLED	POLLUTION CONTROL EQUIPMENT	STACK HEIGHT (FT Above Grade)
West Building Boiler #1 Cleaver Brooks Boiler	29.3 MMBtu/hr	No.6 oil	1970	None	54
West Building Boiler #3 Johnston Boiler	19.4 MMBtu/hr	No.6 Oil	2001	Low NO <sub>x</sub> Burner	53
North Building Boiler #1 Peerless	2.67 MMBtu/hr	No.2 Oil	1995	None	N/A
North Building Boiler #2 Peerless	2.67 MMBtu/hr	No.2 Oil	1995	None	N/A
North Building Boiler #3	1.05 MMBtu/hr	No. Oil	1/06/2006	None	N/A
West Building Dust Collector (stack #3)	15,000 acfm	Paperboard	1974	Carter Day Fabric Filter (72RJ96)	Horizontal vent
North Building Dust Collector (stack #6)	26,000 acfm	Paperboard	6/3/1985	Carter Day Fabric Filter (232RFT8)	Horizontal vent
North Building Dust Collector (stack #7)	25,000 acfm	Paperboard	1996	Torit & Day Fabric Filter (232RFW8)	Horizontal vent
Laminating Line	6,120 acfm	Laminated Transformer Board	1970's	None	50
	26,500 acfm				Horizontal vent
	N/A				Horizontal vent
Nomex Press Line	5,500 acfm	Paperboard, Resins & Solvents	1985	None	45.5
Gluing Operations	Fugitive	Various glues & adhesives	1970's	None	Fugitive

<sup>1</sup> MMBtu/hr - Million British Thermal Units per hour maximum rated heat input.

<sup>2</sup> acfm – actual cubic feet per minutes of exhaust gas flow.

## (B) FACILITY CLASSIFICATION

The Facility is classified as a source of air contaminants pursuant to Title 10 of the *Vermont Statutes Annotated* ("10 VSA") §555 and §5-401 of the *Vermont Air Pollution Control Regulations* (hereinafter "*Regulations*"). In addition, §5-101 of the *Regulations* defines a *stationary source* as any structure(s), equipment, installation(s), or operation(s), or combination thereof, which emit or may emit any air contaminant, which is located on one or more contiguous or adjacent properties and which is owned or operated by the same person or persons under common control. Based on this definition, all of the equipment, operations, and structures at the Facility are grouped together by the Agency of Natural Resources, Department of Environmental Conservation, Air Pollution Control Division (hereinafter "Agency") as one stationary air contaminant source for purposes of review under the *Regulations*.

## (C) PRIOR AGENCY ACTIONS/APPROVALS

The Facility has been issued the following "Permit to Construct" approvals pursuant to 10 VSA §556 and §§5-501 and/or 5-502 of the *Regulations* and the following "Permit to Operate" approvals pursuant to 10 VSA §556a and Subchapter X of the *Regulations*.

Prior Agency Approvals and Actions	
Date of Action	Description of Agency Approval/Action
January 19, 1984	Agency approval to allow the discharge of a fabric filter (Carter-Day Model 72 RJ 60) to the ambient air. (This fabric filter was removed in June 2009)
June 3, 1985	Agency approval to allow the installation and operation of a new fabric filter collector (Carter-Day Model 232RFT8) and additional machining equipment.
August 21, 1996	AP-96-011 – Agency approval to allow the installation and operation of a new fabric filter collector (Torit & Day Model 232RFW8), additional fuel burning equipment, and revised specifications for two existing collectors.
December 30, 1998	AP-96-011a – Agency approval to allow the installation and operation of a new fabric filter collector and make-up air duct heater in the Recycle Building.
May 19, 1999	AOP-95-075 – Initial operating permit for the Facility, combined with an administrative amendment of the existing Permit to Construct.
December 18, 2000	AOP-00-024 – Agency approval to allow the installation of a 500 hp (19.4 MMBtu/hr) boiler to replace the existing 350 hp boiler in the West Building.

## (D) FACILITY PERMIT APPLICABILITY

As noted above, the Facility is classified as a source of air contaminants under §5-401 of the *Regulations*. Pursuant to 10 VSA §556 and §5-501 of the *Regulations* a Permit to Construct, or an amendment to any existing Permit to Construct, must be obtained before commencing the construction, installation, modification or operation of an air contaminant source. The proposed increase in the fuel limit for the West Building Boiler #3 is considered a modification to the Facility under the *Regulations* and consequently a Permit to Construct must be obtained.

Pursuant to 10 VSA §556a and Subchapter X of the *Regulations* a Permit to Operate is required for any air contaminant source with allowable emissions of all air contaminants combined of ten (10) tons per year ("tpy") or more or that is subject to a standard, limitation or other requirement under §111 and/or §112 of the Clean Air Act.

In addition, an amendment to any existing Permit to Operate is required prior to commencing any modifications to the Facility not previously allowed under the Permit to Operate. The proposed changes to the Facility are considered a modification under the *Regulations* and consequently an amendment to the Permit to Operate must be obtained consistent with the requirements of Subchapter X of the *Regulations*. Allowable emissions from the Facility are estimated to be greater than ten (10) tpy combined, and the estimated emissions of at least one pollutant is greater than the threshold for applicability to Title V of the federal Clean Air Act. Therefore, pursuant to §§5-1002, 5-1003, and 5-1005 of the *Regulations*, the Facility is classified as a "Title V Subject Source."

In accordance with 10 VSA §556(e) the Agency has combined the Permit to Construct modification and the Permit to Operate renewal for this Facility into one combined Permit to Construct and Operate. The allowable emissions for the Facility are summarized below:

Future Allowable Air Contaminant Emissions (tons/year) <sup>1</sup>						
PM/PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOCs	Total Criteria	HAPs <sup>2</sup>
88.1	113.1	99.2	7.7	<50	>10	<10/25

<sup>1</sup> PM/PM<sub>10</sub> - particulate matter and particulate matter of 10 micrometers in size or smaller; SO<sub>2</sub> - sulfur dioxide; NO<sub>x</sub> - oxides of nitrogen measured as NO<sub>2</sub> equivalent; CO - carbon monoxide; VOCs - volatile organic compounds; HAPs - hazardous air pollutants as defined in §112 of the federal Clean Air Act.

<sup>2</sup> Emissions of each individual HAP is < 10 tpy and emissions of total HAPs combined <25 tpy.

## (E) REVIEW FOR THE PERMIT TO CONSTRUCT

### (a) New Source Review Designation

The Facility, prior to the construction of the proposed modification, is designated as a major stationary source of air contaminants since it has allowable emissions of a single air contaminant of fifty (50) tons per year or greater. Consequently, any *modification* of the source that would result in a significant increase in emissions of any air contaminant, as defined in §5-101 of the *Regulations*, is designated as a major modification and is subject to review under §5-501 and §5-502 of the *Regulations*. The proposed project identified in Findings of Fact (A) above, together with all previous minor modifications constructed at the Facility since July 1, 1979, and which have not been previously reviewed under §5-502 of the *Regulations*, will result in a significant increase in emissions. Boiler #3 was previously installed in 2001 but accepted a fuel restriction at that time to maintain its allowable emissions below significant levels. The proposed increase in fuel usage for this boiler now makes its allowable emissions greater than significant levels for SO<sub>2</sub>. Consequently, the proposed modification is designated as a major modification and is subject to the requirements of §5-502 of the *Regulations*.

## (b) Most Stringent Emission Rate

Pursuant to §5-502 of the *Regulations*, the owner/operator of each new major stationary source or major modification must apply control technology adequate to achieve the Most Stringent Emission Rate ("MSER") with respect to those air contaminants for which there would be a major or significant actual emissions increase, respectively, but only for those currently proposed physical or operational changes which would contribute to the increased emissions.

The proposed project is designated as a major modification of a stationary source and therefore is subject to review under the MSER requirements in §5-502 of the *Regulations*.

The Agency has determined that the Most Stringent Emission Rate for SO<sub>2</sub> emissions from Boiler #3 is the use of No. 6 fuel oil containing a maximum of 0.5% sulfur by weight.

Prior MSER Evaluations: The Facility was previously reviewed under §5-502 of the *Regulations* for modifications to the Facility:

Most Stringent Emission Rate Determinations		
Date of Determination/ Permit #	Pollutant	Description/Emission limit
August 21, 1996 #AP-96-011	PM/PM <sub>10</sub>	MSER was applied to the emissions from three fabric filter collectors (#M41 in the West Building and the two Fab North collectors). Emission limit: 0.020 gr/dscf of undiluted exhaust.

## (c) Ambient Air Quality Impact Evaluation

An ambient air quality impact evaluation is performed to demonstrate whether or not a proposed project will cause or contribute to violations of the ambient air quality standards and/or significantly deteriorate existing air quality.

Based on the level of emissions from this Facility, it is not expected to cause or contribute to a violation of any ambient air quality standard or significantly deteriorate air quality. Therefore, an air quality impact evaluation was not required by the Agency for the proposed project. In addition, there has been no prior ambient air quality impact evaluations conducted for any of the previous modifications to the Facility.

(F) REVIEW FOR THE PERMIT TO OPERATE

(a) Applicable Requirements

The operations at the Facility are subject to the following state and federal laws and regulations, the requirements of which are embodied in the conditions of this Permit.

(i) *Vermont Air Pollution Control Regulations:*

<b>Applicable Requirements from the Vermont Air Pollution Control Regulations</b>
§ 5-201 – Prohibition of Open Burning
§ 5-202 – Permissible Open Burning
§ 5-211(2) - Prohibition of Visible Air Contaminants, Installations Constructed Subsequent to April 30, 1970.
§ 5-221(1) - Prohibition of Potentially Polluting Materials in Fuel, Sulfur Limitation in Fuel.
§ 5-231(1) - Prohibition of Particulate Matter; Industrial Process Emissions.
§ 5-231(3) - Prohibition of Particulate Matter; Combustion Contaminants.
§ 5-231(4) - Prohibition of Particulate Matter; Fugitive Particulate Matter.
§ 5-241 – Prohibition of Nuisance and Odor.
Section 5-261(3) – Control of Hazardous Air Contaminants - Hazardous Most Stringent Emission Rate.
§ 5-402 – Written Reports When Requested.
§ 5-403 – Circumvention.
§ 5-502(3) – Major Stationary Source and Major Modifications (Most Stringent Emission Rate)
Subchapter VIII – Registration of Air Contaminant Sources.
Subchapter X – Operating Permits.

(ii) Reasonably Available Control Technology - §5-1010 of the *Regulations*

Pursuant to 10 VSA §556a(d) and §5-1010 of the *Regulations* the Agency may establish and include within any Permit to Operate emission control requirements based on Reasonably Available Control Technology ("RACT"). The Agency has not imposed any RACT requirements on this Facility under this authority at this time.

(iii) Existing Air Pollution Control Permit to Construct and/or Operate

The Facility currently operates under the confines of a Permit to Construct and Operate issued on December 18, 2000 (#AOP-00-024). The conditions

within that existing permit are considered applicable requirements pursuant to §5-1002 of the *Regulations*. The requirements of that permit which are not being modified herein are incorporated into this new combined Permit to Construct and Operate (#AOP-09-034).

- (iv) Federal Requirements:
- (v)

<b>Applicable Requirements from Federal Regulations and the Clean Air Act</b>
40 <i>CFR</i> Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: §60.42c Standards for sulfur dioxide; §60.43c Standards for particulate matter; §60.48c Reporting and recordkeeping requirements. Applicable to all units of 10 MMBTU per hour or greater manufactured after June 9, 1989. <i>This applies to the West Building Boiler #3.</i>

- (b) Non-Applicable Requirements

Pursuant to §5-1015(a)(14) of the *Regulations*, an owner or operator of a Facility may request a permit shield from specific state or federally enforceable regulations and standards which are not applicable to the source. In the permit application for AOP-95-075, the Permittee requested a permit shield with respect to several potentially applicable requirements. At that time, the Agency reviewed the request and granted a permit shield in accordance with §5-1015(a)(14) of the *Regulations* for the following requirements which were determined not to be applicable to the Facility based on the information provided by the Permittee:

<b>Requirement for Which a Permit Shield has been Requested</b>	<b>Description of Requirement</b>
§5-241(3) of <i>Regulations</i>	Prohibition of Nuisance and Odor - Control of Odor from Industrial Processes
§5-251(1) of <i>Regulations</i>	Control of Nitrogen Oxide Emissions
§5-251(3) of <i>Regulations</i>	Control of Nitrogen Oxide Emissions - Reasonably Available Control Technology for Large Stationary Sources
§5-252 of <i>Regulations</i>	Control of Sulfur Dioxide Emissions
§5-253.10 of <i>Regulations</i>	Control of VOCs - Paper Coating
§5-253.14 of <i>Regulations</i>	Control of VOCs - Solvent Metal Cleaning
§5-253.20 of <i>Regulations</i>	Control of VOCs - Other Sources That Emit Volatile Organic Compounds

- (c) Enforceability

This section delineates which permit conditions are federally enforceable and which conditions are state only enforceable. All federal enforceable conditions are subject

to federal citizen suit provisions. Conditions (7) & (8) are enforceable by the state authorities only. With the exception of Conditions (7) & (8) all other conditions of this Permit are enforceable by both state and federal authorities.

(d) Compliance Certification

The Permittee is required by this Permit to certify compliance as part of its annual registration with the Agency pursuant to the requirements of Subchapter X of the *Regulations*. Additionally, this Permit requires the submission of semi-annual reports of monitoring records used to demonstrate compliance with the limitations contained in this Permit.

(G) HAZARDOUS MOST STRINGENT EMISSION RATE

Pursuant to §5-261 of the *Regulations*, any stationary source whose current or proposed actual emission rate of a hazardous air contaminant ("HAC") is equal to or greater than the respective Action Level (found in Appendix C of the *Regulations*) shall achieve the Hazardous Most Stringent Emission Rate ("HMSER") for the respective HAC. The Facility is expected to have regulated emissions of two HACs in excess of their respective Action Levels.

The Agency has determined that the Facility will have regulated emissions of acetone and styrene in excess of their respective Action Levels. The Agency has determined HMSER to be as follows:

Styrene:

1. The use of a non-atomizing resin application, such as the curtain coater currently being used.
2. Where possible, the use of covered resin handling equipment to include, but not limited to: an enclosed curtain coating head (currently in use) and a tight fitting cover on the resin mix tank.
3. Reconfiguring catch troughs to reduce exposed wet areas.
4. Continued to investigation of alternatives to polyester resins.
5. Annual limit of 8.6 tons/yr of styrene emissions.

## Acetone:

1. Evaluate lower viscosity polyester resins so less solvent is required to clean the resin handling system. The lower viscosity resin should result in a more complete draining of the resin from the system and improve cleanup, thereby reducing the time acetone is circulating through the system, and the associated evaporative losses.
2. Evaluate how to modify the resin handling system to minimize the wetted surfaces. This is to include, but is not limited to, trialing a single pipe feed to the coating head. Currently three pipes feed the coating head; any decrease in the wetted surface area to be cleaned should reduce acetone flush duration, and therefore evaporative losses.
3. Evaluation of alternate cleaning solvents. The alternate cleaning solvents shall include, but are not limited to, a product called Acrastrip.
4. Continue to evaluate the effectiveness of using masking materials on the conveyor belts. This should require less physical cleaning with acetone and further reduce evaporative losses.

These HMSER evaluations shall be subject to re-evaluation five (5) years from the date of its determination and shall remain in effect until revised by the Agency. This and prior HMSER determinations for this Facility are presented below.

<b>Hazardous Most Stringent Emission Rate Determinations</b>		
Date of Determination/ Permit #	Pollutant	Description/Emission limit
January xx, 2010 #AOP-09-034	Styrene	HMSER is a combination of management practices: <ol style="list-style-type: none"> <li>1. Non-atomizing resin applicator</li> <li>2. Covered resin tanks and coater head</li> <li>3. Minimizing surface area of collected excess resin</li> <li>4. Evaluation of alternatives to polyester resin</li> <li>5. Annual limit of 8.6 tons of styrene emissions</li> </ol>
	Acetone	HMSER is a combination of management practices: <ol style="list-style-type: none"> <li>1. Evaluating lower viscosity polyester resins</li> <li>2. Minimizing wetted surface area of resin system</li> <li>3. Evaluating alternate cleaning solvents</li> <li>4. Evaluating masking materials on conveyor belt</li> </ol>

Based on the Agency's review of the Facility's application and the above Findings of Fact, the Agency concludes that the Facility, subject to the following Permit conditions, complies with all applicable state and federal air pollution control laws and regulations or is subject to an acceptable schedule of compliance. Therefore, pursuant to 10 VSA §§556 and 556a, as amended, the Agency hereby issues a Permit approving the Facility, as described in the above Findings of Fact, subject to the following:

## **PERMIT CONDITIONS**

### **- Construction and Equipment Specifications -**

- (1) The Permittee shall construct and operate the Facility in accordance with the plans and specifications submitted to the Agency and in accordance with the conditions set forth herein, including the equipment specifications as listed in Findings of Fact (A) or their equivalent as approved by the Agency. [10 V.S.A. §§556(c) and 556a(d)] [§5-501(1) of the *Regulations*]
- (2) The Permittee shall control emissions of PM/PM<sub>10</sub> from the transformer board machining operations by installing and operating fabric filter collectors or equivalent devices as determined by the Agency. All elements of the fabric filter collectors shall be maintained in good working order at all times and operated in accordance with the manufacturer's operation and maintenance recommendations. [10 V.S.A. §§556(c)]

### **- Operational Limitations -**

- (3) The sulfur content of No. 6 fuel oil used in the West Building Boiler #1 [i.e., Cleaver Brooks boiler with a heat input of 29.3 MMBTU/hr boiler] shall not exceed 0.5 % by weight. [10 V.S.A. §556(c)] [Application for AOP-09-034]
- (4) The sulfur content of No. 6 fuel oil used in the West Building Boiler #3 [i.e., Johnston boiler with a heat input of 19.4 MMBTU/hr] shall not exceed 0.5 % by weight. [10 V.S.A. §556(c)] [40 CFR Part 60 Subpart Dc][§5-502 of the *Regulations*]
- (5) The sulfur content of No. 2 fuel oil used at the Facility shall not exceed 0.5 % by weight. [10 V.S.A. §556(c)]
- (6) The Permittee shall not burn more than 800,000 gallons of No. 6 fuel oil per rolling twelve consecutive calendar month period in West Building Boiler #3. [10 V.S.A. §556(c)] [Application for AOP-09-034]

- (7) HMSER for styrene: To minimize the emission of styrene, the Permittee shall implement the following:
- (a) The use of a non-atomizing resin application, such as the curtain coater currently being used.
  - (b) Where possible, the use of covered resin handling equipment to include, but not limited to: an enclosed curtain coating head (currently in use) and a tight fitting cover on the resin mix tank.
  - (c) Reconfiguring catch troughs to reduce exposed wet areas.
  - (d) Continued to investigation of alternatives to polyester resins.
  - (e) Annual limit of 8.6 tons/yr of styrene emissions.  
[§5-261(2) of the *Regulations*][Enforceable by State only]
- (8) HMSER for acetone: To minimize the emission of acetone, the Permittee shall implement the following:
- (a) Evaluate lower viscosity polyester resins so less solvent is required to clean the resin handling system.
  - (b) Evaluate how to modify the resin handling system to minimize the wetted surfaces. This is to include, but is not limited to, trialing a single pipe feed to the coating head.
  - (c) Evaluation of alternate cleaning solvents. The alternate cleaning solvents shall include, but are not limited to, a product called Acrastrip.
  - (d) Continue to evaluate the effectiveness of using masking materials on the conveyor belts.  
[§5-261(2) of the *Regulations*][Enforceable by State only]
- (9) Engines: The Permittee shall not install or operate a stationary reciprocating internal combustion engine, as defined in the *Regulations*, that is 450 bhp or greater unless the engine complies with §5-271 of the *Regulations*, as applicable. All engines, including emergency engines, installed on or after July 1, 2007 must comply with the applicable emission standards (Tier 2) of §5-271 immediately upon installation. Installation of any size engine, even those below 450 bhp, may still require approval from the Agency in the form of an amended permit prior to installation. Stationary reciprocating internal combustion engines include those used to power electric generator sets or to provide shaft power for other equipment such as compressors but does not include engines used to power motor vehicles. [§§5-271 and 5-501 of the *Regulations*]
- (10) Open Burning: Open burning is prohibited except as provided for in §5-202 of the *Regulations*. Prior to conducting open burning of any material, other than leaves, brush, or tree cuttings from normal grounds maintenance, the Permittee shall contact the Air Pollution Officer and obtain approval for such burning, if required. [§5-202 of the *Regulations*]

**- Emission Limitations -**

- (11) Fabric Filter PM/PM<sub>10</sub> Emission Limitations: Emissions of particulate matter (PM) from the process equipment listed in the following table shall at no time exceed the corresponding emission limitations:

Source	Emission Limitations	
	Concentration, gr/dscf <sup>1</sup>	Emission Rate, lbs/hr <sup>1</sup>
West Building Dust Collector (stack #3) (Carter-Day #72RJ96)	0.060	7.7
North Building Dust Collector (stack #6) (Carter-Day #232RFT8)	0.020	4.5
North Building Dust Collector (stack #7) (Torit & Day #232RFW8)	0.020	4.3

<sup>1</sup> gr/dscf means grains per dry standard cubic foot of undiluted exhaust gas. Lbs/hr means pounds per hour.

If any emission testing is conducted to demonstrate compliance with the emission limits in Table 1 above, the Permittee shall use Reference Method 5 in Appendix A of Title 40 Code of Federal Regulations ("40 CFR") Part 60 or an alternative method which has been published in 40 CFR provided the federally approved alternative method has been accepted in writing by the Agency before testing. [10 V.S.A. §556(c) and §5-502(3) of the *Regulations*][AP-96-011]

- (12) Emissions of combustion contaminants from the fuel burning equipment listed in the following table shall at no time exceed the corresponding emission limitations.

Unit	Emission Rate Limitations Per Air Contaminant					
	lbs/MMBTU <sup>1</sup>			lbs/hr		
	PM/PM <sub>10</sub>	NO <sub>x</sub>	CO	PM/PM <sub>10</sub>	NO <sub>x</sub>	CO
West Building Boiler #1 Cleaver Brooks Boiler (29.3 MMBTU/hr)	0.21	0.49	0.075	6.2	14	2.2
West Building Boiler #3 Johnston Boiler (19.4 MMBTU/hr)	0.12	0.52	0.040	2.35	10.2	0.78
North Building Boiler #1 Peerless (2.67 MMBTU/hr)	0.5	---	---	1	---	---
North Building Boiler #2 Peerless (2.67 MMBTU/hr)	0.5	---	---	1	---	---
North Building Boiler #3 (1.05 MMBTU/hr)	0.5	---	---	0.5	---	---
Recycling Building Heater (0.10 MMBTU/hr)	0.5	---	---	0.05	---	---
Training Center Boiler (0.13 MMBTU/hr)	0.5	---	---	0.07	---	---

<sup>1</sup> lbs/MMBTU means pounds per million British Thermal Units of heat input.

If any emission testing is conducted to demonstrate compliance with the PM/PM<sub>10</sub>, NO<sub>x</sub>, and CO emission limits in Table 2 above, the Permittee shall use Reference Methods 5, 7E, and 10, respectively, in Appendix A of 40 CFR Part 60 or an alternative method(s) which has been published in 40 CFR provided the federally approved alternative method(s) has been accepted in writing by the Agency before testing. [10 V.S.A. §556(c) and §5-231(3)(a)(i) of the *Regulations*][AP-96-011][AOP-00-024]

- (13) Total emissions of VOCs from the Facility (including but not limited to: the laminating line, Nomex press line, gluing activities, and boilers) shall not equal or exceed fifty (50) tons per rolling twelve (12) consecutive calendar month period. Compliance with this limit shall be determined based upon the products employed, monthly usage rates, and VOC contents of the various products used by the Permittee at the Facility. [10 V.S.A. §556(c)][AP-96-011]
- (14) Total emissions of acetone from the Facility (including but not limited to: the laminating line, Nomex press line, and gluing activities) shall not equal or exceed fifty (50) tons per rolling twelve (12) consecutive calendar month period. Compliance with this limit shall be determined based on the products employed, monthly usage rates, and acetone content of the various products used by the EHV Weidmann at the Facility. [10 V.S.A. §556(c)][AP-96-011]
- (15) Visible Emissions [Facility Wide]: Emissions of visible air contaminants from any installation at the Facility, except where otherwise noted in this Permit, shall not exceed twenty (20) percent opacity for more than a period or periods aggregating six (6) minutes in any hour and at no time shall visible emissions exceed sixty (60) percent opacity.

Any emission testing conducted to demonstrate compliance with the above emission limits shall be performed in accordance with 40 CFR Part 51, Appendix M, Methods 203B and 203C, respectively, or equivalent methods approved in writing by the Agency. [§§5-211(2), 5-211(3) and 5-404 of the *Regulations*]

- (16) Hazardous Air Pollutants: Emission of federally regulated hazardous air pollutants (HAPs) from the Facility shall not equal or exceed ten (10) tons per year of any single HAP or twenty-five (25) tons per year of all HAPs combined per calendar year per year based on any rolling twelve (12) consecutive calendar month period. [40 CFR Part 63]
- (17) Hazardous Air Contaminants: Emissions of state hazardous air contaminants (HACs) from the applicable operations at the Facility shall not equal or exceed their respective Action Level (found in Appendix C of the *Regulations*) unless the Agency has reviewed and approved such HAC emission under §5-261(3) of the *Regulations*. [§5-261 of the *Regulations*]

- (18) Fugitive Emissions: The Permittee shall take reasonable precautions at all times to control and minimize emissions of fugitive particulate matter and volatile organic compounds from the operations at the Facility. This shall include but not be limited to the following:
- (a) Taking reasonable precautions to prevent fugitive particulate matter (i.e., dust) during the handling and disposal of the material collected from the machining operations; and,
  - (b) The covering of all VOC containing containers when not in use.

[10 V.S.A. §§556(c) and 556a(d)] [§5-231(4) of the *Regulations*][AP 96-011]

- (19) Nuisance and Odor: The Permittee shall not discharge, cause, suffer, allow, or permit from any source whatsoever such quantities of air contaminants or other material which will cause injury, detriment, nuisance or annoyance to any considerable number of people or to the public or which endangers the comfort, repose, health or safety of any such persons or the public or which causes or has a natural tendency to cause injury or damage to business or property. The Permittee shall not discharge, cause, suffer, allow, or permit any emissions of objectionable odors beyond the property line of the premises. [§5-241(1) and (2) of the *Regulations*]

#### - Compliance Testing and Monitoring -

- (20) Operation and Maintenance Plan [Wood Waste Dust Collection System Fabric Filters]: The Permittee shall develop and implement an operation and maintenance plan (O&M Plan) for the wood waste dust collection system fabric filters. The purpose of said O&M Plan shall be to ensure the proper operation and maintenance of the fabric filters in order to ensure optimum performance and continuous compliance with the respective conditions and emission limits of this Permit. The O&M Plan shall include, but not be limited to, a description of routine maintenance and inspection procedures, provisions for maintaining records of such maintenance and inspections as well as findings of those inspections and any corrective actions which were taken. Said O&M Plan shall be present at the facility at all times and shall be made available to representatives of the Agency upon request. The Permittee shall revise said O&M Plan at the Agency's request or on its own motion based on operating experience or to reflect equipment or operational changes. [10 V.S.A. §§556(c) and 556a(d)] [§5-405(1) of the *Regulations*]

#### - Record Keeping and Reporting -

- (21) Fabric Filter Record Keeping: The Permittee shall maintain a logbook of maintenance performed and monthly observations of the pressure drop across each fabric filter collector exhausting to the ambient air. For maintenance, the logbook shall contain records of the date of inspection, findings of the inspection, and any corrective actions taken. For pressure drop readings, the logbook shall contain the name of the individual making the observation, the results of the observation in terms of inches of water observed, and the corrective action taken to maintain the pressure drop within acceptable ranges for each respective fabric filter, if any. [§§5-402(1) and 5-1015(a)(3) of the *Regulations* and 40 CFR Part 70 §70.6(a)(3)(i)(B)] [AOP-95-075]
- (22) Boiler Maintenance Record Keeping: The Permittee shall maintain a logbook of

maintenance performed on its fuel burning equipment at the Facility, including the results of weekly combustion efficiency testing of the two (2) boilers located in the West Building. The logbook shall contain the following minimum information: date work performed, maintenance performed, any results of combustion efficiency testing, and the corrective action taken to improve combustion efficiency, if any. [§§5-402(1) and 5-1015(a)(3) of the *Regulations* and 40 *CFR* Part 70 §70.6(a)(3)(i)(B)] [AOP-95-075]

- (23) In addition to the record keeping requirements of Conditions (21) and (22) of this Permit, the Permittee shall maintain the following records:
- (a) Monthly usage rate of each resin, coating, adhesive, glue, and cleaning solvent in units of gallons or pounds:
    - (i) The Permittee may, until such time as Facility-wide emissions of VOCs or acetone equal or exceed forty-five (45) tons per rolling twelve (12) consecutive calendar month period, record use on a calendar year basis for those materials identified in item (a) above which have a usage rate of five (5) gallons per month or less.
    - (ii) At the beginning of each month, the Permittee shall calculate the total quantity of VOC and acetone emissions during the previous twelve (12) consecutive calendar month period.
  - (b) Calendar year production of transformer boards through the machining departments, laminating line, and Nomex press line.
  - (c) Fuel Oil Records:
    - (i) Monthly consumption of No. 6 fuel oil in gallons for West Building Boiler #1 (i.e., Cleaver Brooks boiler with rated heat input of 29.3 MMBTU/hr);
    - (ii) Daily and monthly consumption of No. 6 fuel oil in gallons for West Building Boiler #3 (i.e., Johnston Boiler with rated heat input of 19.4 MMBTU/hr) and the occurrence and duration of any startup, shutdown, or malfunction in its operation;
    - (iii) At the beginning of each month the Permittee shall calculate the total quantity of No. 6 fuel oil consumed in each of the boilers, in gallons, during the previous twelve (12) consecutive month period.
    - (iv) Calendar year consumption of No. 2 fuel oil in gallons for remaining fuel oil burning equipment at the Facility.
  - (d) Sulfur content of all fuels delivered to the Facility:
    - (i) No.2 Fuel Oil: The Permittee may supply the Agency with information provided by the fuel oil supplier, such as a fuel delivery ticket containing a statement regarding the sulfur content of the fuel oil delivered, or periodic fuel oil sampling and analysis results performed by the fuel supplier.

- (ii) No. 6 Fuel Oil: The Permittee shall obtain from the fuel supplier, for each shipment of No. 6 fuel oil received at the Facility a certification or invoice regarding the sulfur content of the fuel oil. The certification or invoice shall include: the date of delivery, name of the fuel oil supplier, fuel type, quantity of fuel oil delivered, the sulfur content of the fuel delivered, and the location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location, and the method used to determine the sulfur content of the oil.

[10 V.S.A. §556(c), §5-402(1) of the *Regulations*] [40 *CFR* Part 60 Subpart Dc §§60.48c(g)(2), 60.42c(h) and 60.48c(f)] [AOP-95-075]

- (24) Semi-Annual Periodic Monitoring Reports: Within thirty (30) days after January 1<sup>st</sup> and July 1<sup>st</sup> of each year, the Permittee shall submit to the Agency a report, signed by a responsible official of the Facility, containing the following information regarding the preceding six (6) months:
  - (a) A summary of the VOC and acetone emissions records required by Condition (23)(a) of this Permit;
  - (b) A statement of the sulfur content of any and all fuel delivered to EHV Weidmann during the reporting period; and
  - (c) A summary of the monthly and weekly observations required by Conditions (21) and (22) of this Permit.

[§§5-402(1), 5-405(1) and 5-1015(a)(5) of the *Regulations*]

- (25) Federal reporting requirements for the boilers subject to 40 *CFR* Part 60 Subpart Dc: West Building Boiler #3 (i.e., Johnston Boiler with rated heat input of 19.4 MMBTU/hr). The Permittee shall submit semi-annual reports for this boiler to the Agency and U.S. EPA postmarked by the 30<sup>th</sup> day following the end of each six-month period. The reports shall cover operations from January 1<sup>st</sup> through June 30<sup>th</sup> and July 1<sup>st</sup> through December 31<sup>st</sup>. Such semi-annual reports shall include the following information:
  - (a) Calendar dates covered in the reporting period;
  - (b) Records of fuel supplier certification as described in this Permit, and
  - (c) A certified statement signed by a responsible official of the Facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the calendar quarter. [10 V.S.A. §§556(c) and 556a(d)] [40 *CFR* Subpart Dc §§60.48c(d), 60.48c(e) and 60.48c(j)]

- (26) Annual Compliance Certification: By February 1st of each year, the Permittee shall submit to the Agency and the U.S. EPA an annual certification of compliance for the previous calendar year which ascertains and identifies the compliance status of the Facility with respect to all terms and conditions of this Permit, including but not limited to the following:
- (a) Identification of each term or condition of the permit that is the basis of the certification;
  - (b) The compliance status;
  - (c) The methods used for determining the compliance status of the Facility over the reporting period; and
  - (d) Whether compliance was continuous or intermittent.
  - (e) Whether emissions of VOCs were below fifty (50) tons for the previous year.

[§114(a)(3) of the CAA] [§§5-402(1) and 5-1015(a)(11) of the *Regulations*][40 CFR Part 70 §70.6(c)(5)(iv)]

- (27) Annual Progress Report on Reducing Acetone and Styrene Emissions. On or before February 1 of each year the Permittee shall submit, in writing, to the Agency a report with an up date on:
- (a) The HMSER actions listed in Condition (7) and the progress to reduce styrene emissions.
  - (b) The HMSER actions listed in Condition (8) and the progress to reduce acetone emissions.

- (28) Annual Registration: The Permittee shall calculate the quantity of emissions of air contaminants from the Facility, including the emissions from the fabric filter collectors, laminating line, Nomex press line, boilers, and general adhesive usage on-site, annually. If the Facility emits more than five (5) tons of any and all air contaminants per year, the Permittee shall register the source with the Secretary of the Agency (hereinafter "Secretary"), and shall renew such registration annually. Each day of operating a source which is subject to registration without a valid, current registration shall constitute a separate violation and subject the Permittee to civil penalties. The registration process shall follow the procedures set forth in Subchapter VIII of the *Regulations*, including the payment of the annual registration fee on or before May 15 of each year. [Subchapter VIII §§5-802, 5-803, 5-807, 5-808 of the *Regulations*]

- (29) Records of all required compliance testing shall include the following:
- (a) the date, place, and time of sampling or measurements;
  - (b) the date analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of all such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement.

[§§5-402(1), 5-405(1) and 5-1015(5) of the *Regulations*][40 CFR Part 70 §70.6(a)(3)(ii)(A)]

- (30) All records shall be retained for a minimum period of five (5) years from the date of record and shall be made available to the Agency upon request. [§§5-402(1), 5-405(1) and 5-1015(a)(7) of the *Regulations*]

- (31) The Permittee shall notify the Agency in writing within ten (10) days of any violation, of which it is aware, of any requirements of this Permit. This notification shall include, at a minimum, the cause for the violation and corrective action or preventative maintenance taken to correct the violation. [§§5-402(1) and 5-1015(a)(6) of the *Regulations*][40 CFR Part 70 §70.6(a)(3)(iii)(B)]
- (32) The Permittee shall notify the Agency in writing of any proposed physical or operational change at the Facility which may increase the emission rate of any air contaminant to the ambient air regardless of any concurrent emission reductions that may be achieved. This notification requirement includes, but is not limited to, the proposed installation of any new equipment that is a source of air pollution, including the replacement of an existing permitted air pollution source. If the Agency determines that a permit amendment is required, a new application and the appropriate application fee shall be submitted. The permit amendment shall be obtained prior to commencing any such change except as may otherwise be allowed by the *Regulations*. [10 V.S.A. §556(c)] [§§5-402(1) and 5-501 of the *Regulations*]
- (33) All records, reports, and notifications that are required to be submitted to the Agency by this Permit shall be submitted to:

Agency of Natural Resources  
Air Pollution Control Division  
103 South Main Street, Bldg 3 South  
Waterbury, Vermont 05671-0402.

[§5-402(1) of the *Regulations*]

- (34) All records, reports and notifications that are required to be submitted to the U.S. EPA by this Permit shall be submitted to:

Air Technical Unit  
Office of Environmental Stewardship  
U.S. Environmental Protection Agency  
1 Congress Street, Suite 1100 (SEA)  
Boston, MA 02114-2023

[§5-402(1) of the *Regulations*]

**- Permit Shield -**

- (35) In accordance with §5-1015(a)(14) of the *Regulations*, the Facility is granted a "permit shield" and is not subject to the regulations and standards listed in Finding of Fact (F)(b) of this Permit. The Agency's "permit shield" determination is based upon the information submitted by the Permittee in its application. The "permit shield" shall be binding only with respect to activities disclosed in the Permittee's application. [§5-1015(a)(14) of the *Regulations*]

**- Standard Permit Conditions -**

- (36) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Agency which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [10 V.S.A. §§556(c) and 556a(d)]
- (37) These Permit conditions may be suspended, terminated, modified, or revoked for cause and reissued upon the filing of a written request with the Secretary of the Agency (hereinafter "Secretary") or upon the Secretary's own motion. Any modification shall be granted only with the written approval of the Secretary. If the Secretary finds that modification is appropriate, only the conditions subject to modification shall be re-opened. The filing of a request for modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any terms or conditions of this Permit. The Secretary may provide opportunity for public comment on any proposed modification of these conditions. If public comments are solicited, the Secretary shall follow the procedures set forth in 10 V.S.A. §556 and §556a, as amended. [10 V.S.A. §§556(d) and 556a(g)] [§5-1008(a) and 5-1008(e) of the *Regulations*]
- (38) Cause for reopening, modification, termination and revocation of this Permit includes, but is not limited to:
- (a) Inclusion of additional applicable requirements pursuant to state or federal law;
  - (b) A determination that the permit contains a material mistake or that inaccurate information was used to establish emissions standards or other terms or conditions of the operating permit;
  - (c) A determination that the operating permit must be modified or revoked to ensure compliance with applicable requirements;
  - (d) A determination that the subject source has failed to comply with a permit condition;
  - (e) For Title V subject sources, a determination by U.S. EPA that cause exists to terminate, modify, revoke or reissue an operating permit;
  - (f) Those causes which are stated as grounds for refusal to issue, renew or modify an operating permit under §5-1008(a) of the *Regulations*; or
  - (g) If more than three (3) years remain in the permit term and the source becomes subject to a new applicable requirement.
- [§5-1008(e)(4) of the *Regulations*]
- (39) The Permittee shall furnish to the Agency, within a reasonable time, any information that the Agency may request in writing to determine whether cause exists to modify, revoke, reissue, or terminate the Permit or to determine compliance with this Permit. Upon request, the Permittee shall also furnish to the Agency copies of records required to be kept by this Permit. [10 V.S.A. §§556(c) and 556a(d)] [§5-402(1) of the *Regulations*] [40 CFR Part 70 §70.6(a)(6)(v)]

- (40) By acceptance of this Permit, the Permittee agrees to allow representatives of the State of Vermont access to the properties covered by the Permit, at reasonable times, to ascertain compliance with Vermont environmental and health statutes and regulations and with this Permit. The Permittee also agrees to give the Agency access to review and copy any records required to be maintained by this Permit, and to sample or monitor at reasonable times to ascertain compliance with this Permit. [10 V.S.A. §§556(c), 556a(d) and 557] [ §§5-402(1), 5-404, and 5-1015(a)(10) of the *Regulations*]
- (41) All data, plans, specifications, analyses and other information submitted or caused to be submitted to the Agency as part of the application for this Permit or an amendment to this Permit shall be complete and truthful and, for Title V permit applications, certified by a responsible official whose designation has been approved by the Secretary. Any such submission which is false or misleading shall be sufficient grounds for denial or revocation of this Permit, and may result in a fine and/or imprisonment under the authority of Vermont statutes. [10 V.S.A. §§556(c) and 556a(d)] [ §§5-505 and 5-1006(f) of the *Regulations*]
- (42) For the purpose of establishing whether or not a person has violated or is in violation of any condition of this Permit, nothing in this Permit shall 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 or procedure had been performed. [10 V.S.A. §§556(c) and 556a(d)]
- (43) Any permit noncompliance could constitute a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [10 V.S.A. §§556(c) and 556a(d)] [ §§5-1008(a) and 5-1008(e) of the *Regulations*]
- (44) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this Permit. [10 V.S.A. §§556(c) and 556a(d)]
- (45) No person shall build, erect, install or use any article, machine, equipment or other contrivances, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which otherwise would constitute a violation of these *Regulations*. [ §5-403 of the *Regulations*]
- (46) The provisions of this Permit are severable. If any provision of this Permit, or its application to any person or circumstances is held invalid, illegal, or unenforceable by a court of competent jurisdiction, the invalidity shall not apply to any other portion of this Permit which can be given effect without the invalid provision or application thereof. [10 V.S.A. §§556(c) and 556a(d)]
- (47) This Permit does not convey any property rights of any sort or any exclusive privilege, nor does it authorize any injury to private property or any invasion of personal rights. [10 V.S.A. §§556(c) and 556a(d)]
- (48) All subsequent owners and/or operators of this Facility must request an amendment and transfer of this Permit prior to commencing any operations covered by this Permit. All subsequent owners and/or operators shall submit to the Agency as part of the request for

amendment all such information the Agency deems necessary to establish legal ownership and/or interest in the property and all such information the Agency deems necessary to ensure the new owners and/or operators will construct and operate the Facility in compliance with the *Regulations* and this Permit. The terms and conditions of this Permit shall remain in full force and effect after submittal of the request for amendment and until the issuance of an amended Permit or denial. Should the Secretary deny the request, the new owner and/or operator must take whatever action is necessary to comply with the denial. [10 V.S.A. §§556 and 556a] [§§5-501, 5-1004, and 5-1013(a) of the *Regulations*]

- (49) Pursuant to 10 V.S.A. Chapter 220, any appeal of this decision must be filed with the clerk of the Environmental Court within 30 days of the date of the decision. The appellant must attach to the Notice of Appeal the entry fee of \$225.00 payable to the State of Vermont. The Notice of Appeal must specify the parties taking the appeal and the statutory provision under which each party claims party status; must designate the act or decision appealed from; must name the Environmental Court; and must be signed by the appellant or their attorney. In addition, the appeal must give the address or location and description of the property, project or facility with which the appeal is concerned and the name of the applicant or any permit involved in the appeal. The appellant must also serve a copy of the Notice of Appeal in accordance with the Rule 5(b)(4)(B) of the Vermont Rules for Environmental Court Proceedings. For further information, see the Vermont Rules for Environmental Court Proceedings, available on-line at [www.vermontjudiciary.org](http://www.vermontjudiciary.org). The address for the Environmental Court is 2418 Airport Road, Suite 1, Barre, Vermont 05641 (Tel. #802-828-1660).
- (50) Conditions (1) – (6), (11) – (14), (18), (23), (25) and (32) are derived from the new source review requirements of Subchapter V of the *Regulations*. With the exception of the cited new source review conditions, this Operating Permit shall expire as indicated on the cover page to this Permit. The Permittee shall submit to the Agency a complete application for renewal of the Operating Permit at least twelve (12) months before the expiration of the Operating Permit. If a timely and administratively complete application for an operating permit renewal is submitted to the Secretary, but the Secretary has failed to issue or deny such renewal before the end of the term of this Operating Permit, then the Permittee may continue to operate the subject source and all terms and conditions of this Operating Permit shall remain in effect until the Secretary has issued or denied the operating permit renewal. However, this Operating Permit shall automatically expire if, subsequent to the renewal application being determined or deemed administratively complete pursuant to §5-1006 of the *Regulations*, the Permittee fails to submit any additional information required by the Secretary as well as information pertaining to changes to the Facility within thirty (30) days or such other period as specified in writing by the Secretary. [§§5-1011 and 5-1012(a) of the *Regulations*] [§§5-1005(c) and 5-1012 of the *Regulations*]
- (51) The conditions of this Permit as set forth above supercede all conditions contained in all prior Permits issued by the Agency to the Permittee for this Facility. [10 V.S.A. §§556(c) and 556a(d)]

The Agency's issuance of this Air Pollution Control Permit relies upon the data, judgment, and other information supplied by the Permittee. The Agency makes no assurances that the air contaminant source approved herein will meet performance objectives or vendor guarantees supplied to the source Permittee. It is the sole responsibility of the Permittee to operate the source in accordance with the conditions herein and with all applicable state and federal standards and regulations.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_, in the town of Waterbury, county of Washington, state of Vermont.

Agency of Natural Resources

Justin G. Johnson, Commissioner  
Department of Environmental Conservation

By: \_\_\_\_\_  
Richard A. Valentinetti, Director  
Air Pollution Control Division

sks  
A2 file: Weidmann Electrical Technology, Inc. – St. Johnsbury