



July 27, 2023

James Nelson
Fiber Glass Systems, LP
Fiberglass Tank Division
1202 East Railroad Avenue
Laurel, MT 59044

Sent via email: james.nelson@nov.com

RE: Final Permit Issuance for MAQP #3821-03

Dear Mr. Nelson:

Montana Air Quality Permit (MAQP) #3821-03 is deemed final as of July 26, 2023, by DEQ. This permit is for Fiber Glass Systems, LP, a Fiberglass manufacturer. All conditions of the Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For DEQ,

A handwritten signature in black ink that reads "Julie A. Merkel".

Julie A. Merkel
Permitting Services Section Supervisor
Air Quality Bureau
(406) 444-3626

A handwritten signature in black ink that reads "Troy M. Burrows".

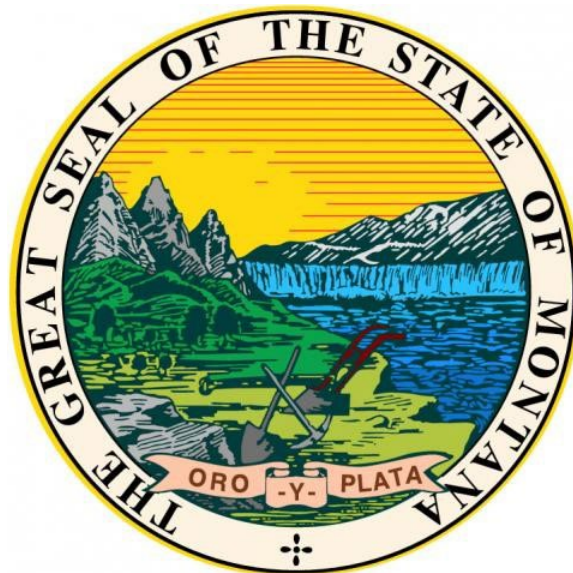
Troy M. Burrows
Air Quality Scientist
Air Quality Bureau
(406) 444-1452

Montana Department of Environmental Quality
Air, Energy & Mining Division
Air Quality Bureau

Montana Air Quality Permit #3343-03

Fiber Glass Systems, LP
Fiberglass Tank Division
1202 East Railroad Avenue
Laurel, MT 59044

July 26, 2023



MONTANA AIR QUALITY PERMIT

Issued to: Fiber Glass Systems, LP.
P.O. Box 206
Laurel, MT 59044

MAQP: #3821-03
Application Complete: 6/23/2023
DEQ's Decision Issued: 7/10/2023
Permit Final: 7/26/2023

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Fiber Glass Systems, LP. (FS), pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

Section I: Permitted Facilities

A. Plant Location

FS operates a manufacturing facility that produces tanks and other products made from fiberglass. FS's Tank Division is located in Section 16, Township 2 South, Range 24 East, in Yellowstone County. The physical address is 1202 E. Railroad Avenue, in Laurel, Montana.

B. Current Permit Action

On June 23, 2023, the Department of Environmental Quality (DEQ) received an Administrative Amendment request from FS to change the name from Fiberglass Structures, Inc. to Fiber Glass Systems, LP.

Section II: Conditions and Limitations

A. Emission Limitations

1. FS shall not exceed the applicable organic Hazardous Air Pollutant (HAP) emission limit listed in Table 3 of 40 CFR 63, Subpart WWWW on a 12-month rolling basis. For operations characterized as open molding – corrosion resistant and/or high strength, the following limits apply (ARM 17.8.342, 40 CFR 63 Subpart WWWW):
 - Mechanical resin application 113 pounds HAP/ton resin (lb/ton)
 - Manual resin application 123 lb/ton
 - Non-atomized Spray Gel 605 lb/ton
2. FS shall limit production of HAP emitting processes so total HAP emissions remain below 100 tpy on a 12-month rolling basis (40 CFR 63, Subpart WWWW and ARM 17.8.749).
3. FS shall comply with all applicable standards and limitations contained in 40 CFR 63, Subpart WWWW, including the work practice standards specified in Table 4 (ARM 17.8.342 and 40 CFR 63, Subpart WWWW).

4. FS shall use high volume/low pressure (HVLP) non-atomizing spray systems on the Chop Hoop Winder and the Chopper Guns (ARM 17.8.752).
5. FS shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
6. FS shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
7. FS shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.6 (ARM 17.8.749).

B. Testing Requirements

1. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
2. The DEQ may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. FS shall supply the DEQ with annual production information for all emission points, as required by the DEQ in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the DEQ by the date required in the emission inventory request. Information shall be in the units required by the DEQ. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505). FS shall submit the following information annually to the DEQ by March 1 of each year; the information may be submitted along with the annual emission inventory (ARM 17.8.505).

2. FS shall notify the DEQ of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include the addition of a new emissions unit, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to the DEQ, in writing, 10 days prior to startup or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance

causing the de minimis change and must include the information requested in ARM 17.8.745(l)(d) (ARM 17.8.745).

3. FS shall document, by month, the VOC and HAP emissions from the facility. By the 25th day of each month, FS shall total the VOC and HAP emissions from the facility during the previous 12-months. The monthly information will be used to verify compliance with the rolling 12-month limitations in Section II.A.1 and Section II.A.2. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

For the fiberglass resin applications, the calculation of VOC and HAP emissions shall be based on the amount of each resin used, and the percentage of VOC and HAP in each resin. The emissions for the fiberglass process are to be calculated in accordance with the requirements of 40 CFR 63, Subpart WWWW.

For painting or other processes emitting VOCs and HAPs, the emissions will be based on the amount of raw material used (such as paint and thinner) and the percent VOC and HAP in each raw material.

4. FS must document any change in the raw materials, or VOC and HAP contents, with new or updated product information. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
5. All records compiled in accordance with this permit must be maintained by FS as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the DEQ, and must be submitted to the DEQ upon request. These records may be stored at a location other than the plant site upon approval by the DEQ (ARM 17.8.749).

D. Notification

FS must submit to the DEQ all notifications and reports in accordance with the requirements of 40 CFR 63, Subpart WWWW.

Section III: General Conditions

- A. Inspection – FS shall allow the DEQ’s representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment such as Continuous Emission Monitoring Systems (CEMS) or Continuous Emission Rate Monitoring Systems (CERMS), or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and the terms, conditions, and matters stated herein shall be deemed accepted if FS fails to appeal as indicated below.

- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving FS of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties, or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the DEQ’s decision may request, within 15 days after the DEQ renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the DEQ’s decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the DEQ’s decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the DEQ’s decision on the application is final 16 days after the DEQ’s decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by the DEQ at the location of the source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by FS may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

Montana Air Quality Permit (MAQP) Analysis
Fiber Glass Systems LP.
MAQP #3821-02

I. Introduction/Process Description

A. Permitted Equipment

Fiber Glass Systems, LP. (FS) operates a manufacturing facility that produces tanks and other products made from fiberglass. FS's Tank Division is located in Section 16, Township 2 South, Range 24 East, in Yellowstone County. The physical address is 1202 E. Railroad Avenue, in Laurel, Montana. Equipment used at the facility includes, but is not limited to the following:

- One Venus Chop Hoop Winder (High-Volume Low-Pressure (HVLP) non-atomizing);
- Three Venus Chopper Guns (HVLP non-atomizing);
- Paint Application – HVLP Hand Held Spray Gun;
- Gel-Coat Non-atomized Spray Booth;
- Three, Overhead Infra-red natural gas fired heaters (100,000 British thermal units each); and
- Associated Equipment.

B. Source Description

FS's Tank Division includes a process building where fiberglass tanks and other fiberglass reinforced plastic (FRP) products are produced. The manufacture of FRP at FS utilizes thermoset resins that contain styrene. Volatile Organic Compound (VOC) emissions, primarily styrene, result from the product manufacturing process. Styrene is a listed hazardous air pollutant (HAP). All materials/products produced at FS were determined to be characterized as —corrosion-resistant and/or high strength due to properties required for each product. The resins are non-suppressed.

Operations at FS are considered —open mold type production. The first step is fabrication of a plug, typically from wood. After generating the rough shape, the plug is coated with primer. A mold release compound (wax) is applied by hand. To make the mold, laminate (polyester resin, catalyst, and glass fibers) is then applied to the plug. The plug is removed, and the mold is then prepared for production by waxing the surface with the mold release wax.

To produce the tanks or other fiberglass products, laminate is applied to the mold. FS conducts mostly mechanical applications, although manual applications are occasionally used. The Chop Hoop Winders are the predominant equipment used at FS's Tank Division. Both are HVLP non-atomizing spray unit, used only for the manufacture of

large and medium sized tanks. The Chopper Guns are also a HVLP non-atomizing unit, used for a variety of smaller products. Both spray a shaped stream of resin and catalyst, mixing externally with glass fibers fed through a chopper wheel. Depending upon the resin type and the product, the laminate is allowed to cure for 30 minutes to 24 hours before removal from the mold. Acetone, which is not a VOC, is used for cleaning the application equipment.

C. Permit History

On, September 28, 2006, FS was issued **MAQP #3821-00** to operate a manufacturing facility that produces tanks and other products made from fiberglass.

On July 15, 2011, FS was issued **MAQP #3821-01**, providing for the addition of two chopper guns and one chop hoop winder to the existing permitted equipment. In addition to these changes, this permit action updated current rule references, the permit format, and the emissions inventory. MAQP #3821-01 replaced MAQP #3821-00.

One March 26, 2018, an air quality permit application was received by the DEQ. This permit action removed one Chop-Hoop Winder and added one Gel Coat Spray Booth which was defined as an open-mold non-atomized application. The Gel Coat sprayer functionally matched an existing sprayer for determining the increase in emissions and therefore was based on actual emissions scaled to 8760 hours per year. Gel Coat emissions were primarily styrene with little other contribution of VOC. The removal of the Chop-Hoop Winder provided for a decrease in emissions, resulting in the overall project providing a decrease in the potential to emit. In addition to these changes, this permit action updated current rule references, the permit format, and the emissions inventory. A previous limit on VOC emissions was modified to reflect a requirement of 40 CFR 63, Subpart WWW to include a production limit to keep total HAP emissions below 100 tons per year (tpy). A complete list of the permitted equipment is contained in Section I.A of the permit analysis. **MAQP #3821-02** replaced MAQP #3821-01.

D. Current Permit Action

On June 23, 2023, the Department of Environmental Quality (DEQ) received an Administrative Amendment request from FS to change the name from Fiberglass Structures, Inc. to Fiber Glass Systems, LP. **MAQP #3821-03** replaces MAQP #3821-02.

E. Response to Public Comments

Person/Group Commenting	Permit Reference	Comment	Department Response
None received			

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department of Environmental Quality (DEQ). Upon request, the DEQ will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the DEQ, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the DEQ.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the DEQ, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

FS shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the DEQ upon request.

4. ARM 17.8.110 Malfunctions. (2) The DEQ must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀
11. ARM 17.8.230 Fluoride in Forage

FS must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 – Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, FS shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.
6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device as described in (1) of this rule.
7. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). FS is not considered an NSPS affected facility under 40 CFR Part 60.
8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:
 - a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to an NESHAP Subpart as listed below:
 - b. 40 CFR 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Owners or operators of facilities that use thermoset resins and/or gel coats that contain styrene, and that are a major source of HAPs, as defined and applied in 40 CFR Part 63, shall comply with the standards and provisions of 40 CFR 63, Subpart WWWW. Based on the information submitted by FS, the facility is subject to the provisions of 40 CFR 63, Subpart WWWW because the facility uses thermoset resins and/or gel coats that contain styrene and therefore, the facility is a major source of HAPs.

FS currently has limited production to limit HAPs below 100 tpy, otherwise FS would be subject to further requirements under Subpart WWWW.

- D. ARM 17.8, Subchapter 4 – Stack Height and Dispersion Techniques, including, but not limited to:
1. ARM 17.8.401 Definitions. This rule includes a list of definitions used in this chapter, unless indicated otherwise in a specific subchapter.
 2. ARM 17.8.402 Requirements. FS must demonstrate compliance with the ambient air quality standards with a stack height that does not exceed Good Engineering Practices (GEP).
- E. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:
1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the DEQ. FS is not required to submit a permit application fee for the current Administrative Amendment permit action.
 2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the DEQ by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by the DEQ. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The DEQ may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that prorate the required fee amount.
- F. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
 2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, modify, or use any air contaminant sources that have the potential to emit (PTE) greater than 25 tons per year (tpy) of any pollutant. FS has a PTE greater than 25 tpy of VOCs and HAPs; therefore an air quality permit is required.
 3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.

4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements.

(1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. FS submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. FS was not required to submit an affidavit of publication of public notice since this is an Administrative Amendment to the permit.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the DEQ must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the DEQ at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving FS of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes the DEQ's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.760 Additional Review of Permit Applications. This rule describes the DEQ's responsibilities for processing permit applications and making permit decisions on those applications that require an environmental impact statement.
12. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
13. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules

adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).

14. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
15. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the DEQ.

G. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification, with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source because this facility is not a listed source and the facility's PTE is below 250 tons per year of any pollutant (excluding fugitive emissions).

H. ARM 17.8, Subchapter 10 – Preconstruction Permit Requirements for Major Stationary Sources of Modifications Located Within Attainment or Unclassified Areas, including, but not limited to:

ARM 17.8.1004 When Air Quality Preconstruction Permit Required. This current permit action does not constitute a major modification. Therefore, the requirements of this subchapter do not apply.

I. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any source having:
 - a. PTE > 100 tons/year of any pollutant;

- b. PTE > 10 tons/year of any one hazardous air pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the DEQ may establish by rule; or
 - c. PTE > 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) in a serious PM₁₀ nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) Title V of the FCAA amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #3821-02 for FS, the following conclusions were made:
- a. The facility's PTE is less than 100 tons/year for any pollutant.
 - b. The facility's PTE is greater than 10 tons/year for any one HAP and greater than 25 tons/year for all HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is not subject to a current NSPS.
 - e. This facility is subject to NESHAP (40 CFR 63, Subpart WWWW). FS is currently voluntarily limiting their production to limit total HAP emissions below 100 tpy total HAPs, otherwise FS will be subject to additional requirements contained within 40 CFR 63, Subpart WWWW.
 - f. This source is not a Title IV affected source, or a solid waste combustion unit.
 - g. This source is not an EPA designated Title V source.

Based on these facts, the DEQ determined that FS is major source of emissions as defined under Title V and currently operates under Title V Operating Permit #OP3821-02, which was issued final and effective on July 11, 2012. The Title V renewal is currently being updated and some minor text changes describing the emitting units associated with this action are expected to be incorporated into Operating Permit #OP3821-03.

III. BACT Determination

A BACT determination is required for each new or modified source. FS shall install on the new or modified source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized.

A BACT analysis was not required for the current permit action because it is considered an administrative change.

IV. Emission Inventory

The summary of the emission inventory is included below.

HAPs = hazardous air pollutants
 VOC = volatile organic compounds

Source	VOC	HAP (Styrene)
1-Venus Automatic Chop-Hoop Winder	33.33	33.33
3-Venus Chopper Guns	9.86	9.86
Manual Application	17.0	17.0
Gel Coat Spray Booth	8.06	8.06
Paint and Thinner	4.73	0
Mold Release	0.03	0
Total	73.01	68.25

Inventory reflects emissions based on a 5-day work week, 10 hours per day, with holidays excluded to determine the actual run hours and then scaled to 8,760 hours to reach full potential to emit. This modification used five year actual emissions from years 2006 through 2010 to estimate updated emissions for both the Chop Hoop Winder and the new Gel Coat spray booth.

V. Existing Air Quality

FS's Tank Division is located in Section 16, Township 2 South, Range 24 East, in Yellowstone County. The physical address is 1202 E. Railroad Avenue, in Laurel, Montana. This facility is located in the Laurel SO₂ nonattainment area. The area is considered attainment for all other criteria pollutants. The Billings CO nonattainment area was reclassified to attainment by EPA's direct final rulemaking on April 22, 2002.

VI. Ambient Air Quality Impact Analysis

The DEQ determined that the impacts from this permitting action will be minor as the overall project scope provides for a reduction in the potential to emit. The DEQ believes it will not cause or contribute to a violation of any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the DEQ conducted the following private property taking and damaging assessment.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

Based on this analysis, the DEQ determined there are no taking or damaging implications associated with this permit action.

VIII. Environmental Assessment

An environmental assessment is not required by the Montana Environmental Policy Act, since this is an Administrative Amendment.

Analysis Prepared By: Troy Burrows

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