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NORTHWEST
CLEAN AIR AGENCY

US COMPLIANCE

TITLE V AIR OPERATING PERMIT RENEWAL APPLICATION

for

MAAX US Corp.
2150 Division Street
Bellingham, Washington 98226
Permit No.: 011R4

April 10, 2026

MAAX US Corp.
Title V Air Operating Permit Renewal Application

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1.0 INTRODUCTION

MAAX US Corp. submits this Application for Renewal of their Air Operating Permit (AOP) Number 011R4. The current Air Operating Permit expires on July 29th, 2027. This renewal application is due by July 29th, 2026.

MAAX US Corp. qualifies as a major source subject to the requirements of the Clean Air Act (CAA) Title V program because it has the potential to emit more than 10 tons per year of styrene, a hazardous air pollutant (HAP).

A completed Northwest Clean Air Agency Renewal Application Form for Title V Air Operating Permits is included as Appendix A to this document. The most recent Annual Emissions Inventory, the 2025 Annual Emission Inventory, and Supporting Calculations are included as Appendix B. A highlighted permit table which highlights the facility's limits is included as Appendix C to this document. A highlighted permit table which highlights the facility's applicable requirements is included as Appendix D to this document. The most recent Annual Compliance Certification, the 2025 Annual Compliance Certification, is included as Appendix E. A Compliance Statement is included as Appendix F.

The Facility is not requesting changes to existing Operating Permit limits with this renewal application.

2.0 PROCESS DESCRIPTION

Each unit produced begins as a sheet of acrylic thermoformed to the desired part's shape. A mixture of resin, fillers, fiberglass, and catalyst is sprayed onto the back of the shaped acrylic resulting in a cured laminate. The excess material is trimmed from the outer edges and drains are drilled. Shower bases and standard bathtubs continue through finishing processes, inspection, and packaging. Whirlpool bathtubs are further drilled and fitted with jets and a pump before these final processes. Additional products such as a skirt (a panel designed to fit under the bathtub's lip and finish at floor level) are also manufactured at MAAX US Corp. Gaseous air contaminants may be released from resin storage, mixing, application and curing, and from solvent evaporation. Particulate is generated from resin application and cutting and sanding the products and molds. Combustion emissions result from heating appliances. For purposes of organization, the operating permit program divides activities such as these into categories called emission units.

Appendix A
Renewal Application Form



1600 S 2nd Street
Mount Vernon, WA 98273
Main: 360-428-1617
Fax: 360-428-1620
info@nwcleanairwa.gov
nwcleanairwa.gov

Title V Air Operating Permit Renewal Application

The information requested in this document must be provided for a complete application. The application may be submitted either electronically (as a signed pdf) or in paper.

If submitting electronically, email to: facilityreports@nwcleanairwa.gov.

If submitting in paper, mail to: 1600 South 2nd St, Mount Vernon, WA, 98273.

The certification at the end of this document applies to the entire submittal. It must be signed.

If additional room to reply is needed on any question, please attach pages.

In some cases, a prior submittal to the NWCAA (e.g., the annual emissions inventory) may include information requested below. If you'd like to refer to that information instead of providing it here, please note this below. Any submittal to which the NWCAA is referred will become part of your renewal application. It is also acceptable to attach relevant portions of your current Air Operating Permit if the information therein provides an adequate response to a question below.

Part 1: General Information

- 1) Company name: MAAX US Corp.
Facility address: 2150 Division Street, Bellingham, WA 98226
Mailing address: 2150 Division Street, Bellingham, WA 98226
- 2) Current Air Operating Permit number and expiration date
Air Operating Permit Number: 011R4
Expiration Date: July 29, 2027
- 3) Owner's name and agent
Owner: MAAX/ American Bath Group
Representative Contact: Randy Relethford
- 4) Responsible Official name and address
Randy Relethford
Regional Operations Manager
2150 Division Street, Bellingham, Washington 98226
- 5) Name and telephone number of plant site manager/contact
Randy Relethford
(877) 438-6229 ext. 8589
- 6) Were there any changes to the facility impacting air emissions since receiving the current Air Operating Permit? [if yes, please describe changes]
No changes

Part 2: Process and Emissions Information

- 7) Will there be any changes to the operating scenario(s) identified in the current AOP?
No changes
- 8) Provide a description of process and products by Standard Industrial Classification (SIC) Code. Please list the applicable SIC Code. Please repeat the list of processes and products for each alternative operating scenario.
SIC: 3088
- 9) Please list any and all pollutants that would cause the facility to be classified as a "major source" as defined in WAC 173-401.
MAAX qualifies as a major source subject to the requirements of the Clean Air Act (CAA) Title V program because it has the potential to emit more than 10 tons per year of styrene, a hazardous air pollutant (HAP).
- 10) Please identify and describe all points of emissions at the facility except those that qualify as insignificant emission units or activities as defined in WAC 173-401-530. Are these emissions units correctly identified and defined in the current AOP? If not, please note the requested changes below.
EU-1 Spray and hand layup of polyester resin or resin and glass fiber
EU-2 Spray and hand layup of polyester resin or resin and glass fiber
EU-3 HAP containing materials storage
No changes.
- 11) Please list and quantify all emissions of regulated air pollutants from the emission points identified in item 10 above. Please include calculations. If the most recent annual emissions inventory accurately describes these emissions, it is not necessary to repeat the same information here. Please refer the NWCAA to the most recent annual emissions inventory.
Please see Appendix B: 2025 Annual Emission Inventory & Supporting Calculations
- 12) List the fuels used and their respective usage rates at design capacity for the emission points identified in item 10 above.
Fuels are used in insignificant emission units. Insignificant units are listed in Air Operating Permit Number 011R4.
- 13) List the raw materials used and their respective usage rates at design capacity for the emission points identified in item 10 above.
Raw Material: Resin
Please see comments in item 14 below. For open molding other than tooling using mechanical application of neat production resin the HAP emission limit is 88 lb/ton. For open molding – tooling using mechanical application. the HAP emission limit is 254 lb/ton.
- 14) List the production rate at design capacity for the emission points identified in item 10 above.
Please see Table 1-1 Significant Emission Units in Air Operating Permit Number 011R4. For purposes of organization, the operating permit program divides activities into categories called "emission units". EU-01 is Building C Glass Shop, EU-2 is Building B Mold Shop, and EU-3 is Bulk Resin Storage. T
- 15) Identify the facility operating schedule (anticipated operating hours per day, days per week, weeks per year)
Hours/ Day 8.0, Days/Week 5.0, and Weeks/Year 51.
Hours/Years 2,040

- 16) Please identify all air pollution control equipment at the facility. Is this air pollution control equipment correctly identified and defined in the current AOP? If not, please provide information necessary to correct.

N/A

- 17) Please identify and describe all compliance monitoring devices or activities at the facility. Semi-Annual Compliance Monitoring Reports and Annual Compliance Monitoring Report

- 18) Identify any limitations on source operation that affect emissions of a regulated pollutant. Similarly, list any work practice standards that affect emissions of a regulated pollutant at this facility.

Please see Appendix C: Highlighted Permit Table- Limits;
Permit terms: 4.13 - 4.19, 5.1 - 5.7

For open molding other than tooling using mechanical application of neat production resin the HAP emission limit is 88 lb/ton. For open molding – tooling using mechan

Part 3: Applicable Requirements

- 19) Cite and describe all applicable requirements. An updated copy of the applicable requirements in the current AOP for the facility may be sufficient.

Please see Appendix D: Highlighted Permit Table- Applicable Requirements

- 20) Please list any applicable test method(s) for determining compliance with each applicable requirement listed in item 19 above. An updated copy of the current AOP for the facility may be sufficient.

N/A; Please see Appendix D: Highlighted Permit Table- Applicable Requirements

- 21) Does the applicant propose any exemptions from an otherwise applicable requirement? If so, please explain.

N/A

- 22) Does the CAM rule (40 CFR part 64) apply to any of the emissions units?

MAAX does not use any control devices, as these are defined in 40 CFR 64.1, to achieve compliance.

- 23) Does the accidental release prevention regulation (40 CFR part 68) apply to the facility?

There are no process substances in excess of the thresholds defined in 40 CFR Part 68 Subpart F and is therefore not an affected facility with respect to 40 CFR Part 68.

- 24) Do the federal Acid Rain rules (40 CFR parts 72-78) apply to any of the emissions units?

No sources affected by these rules are present at the MAAX US Corp. Bellingham Facility.

- 25) Are there any requested changes to any condition in the current Air Operating Permit? [if yes, identify the condition, the requested change, and the reason]

N/A

- 26) If the applicant would like to request that the permit shield be extended to cover certain requirements that the applicant believes are inapplicable, please list those requirements, below. Please include a brief narrative description of each requirement and the basis for the belief that each is inapplicable.

N/A

Part 4: Compliance Status and Certification

- 27) Describe the compliance status of the facility with regard to all applicable requirements. Compliance status for each applicable requirement shall be described as "continuous" or "intermittent". Please include the method used for determining compliance. If an annual compliance certification has been recently submitted to the NWCAA, the applicant may reference this report. However, if the applicable requirements or compliance status have changed since that submittal, an updated submittal is required.

Please see Appendix E: 2025 Annual Compliance Certification

- 28) Provide the following:

- a) For applicable requirements with which the source is in compliance, provide a statement that the source will continue to comply with such requirements;

Please see Appendix F: Compliance Statement

- b) For applicable requirements that become effective during the permit term, provide a statement that the source will meet such requirements on a timely basis;

Please see Appendix F: Compliance Statement

- c) For applicable requirements with which the source is not in compliance at the time of permit issuance, provide a narrative description and provide a schedule of compliance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based;

N/A

- d) For sources required to have a schedule of compliance to remedy a violation, provide a schedule for submission of certified progress reports every six months or at a more frequent period if specified in an applicable requirement; and

N/A

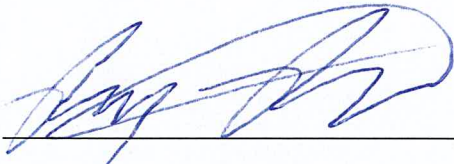
Statement of Certification: *Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.*

Randy Relethford

Regional Operations Manager

Name of responsible official

Title of responsible official



4-29-26

Signature of responsible official

Date

Appendix B

2025 Annual Emission Inventory & Supporting Calculations

Northwest Clean Air Agency

MAAX US CORP
Bellingham

D-073-00041

Operating

2025

Emission Summary

Emissions Units and Processes	TSP	PM10	PM2.5	SO2	NOx	VOC	CO	NH3	IEU?
Emissions Unit 01, FIBERGLASS FABRICATION									
Process 01, SCC 30800730						14.33			NO
Total Emissions (in tons)						14			
Total Fee Eligible Emissions						14			

MAAX Bath Inc.
Bellingham, WA
Air Operating Permit 011R4
2025 Emissions Summary

Process	Usage (tons)	Pollutant	EF (lbs/ton)^[1]	Emissions (tons/12 months)
General Purpose Resins	346	VOC (Styrene)	82.81	14.33
Tooling Resins	0.000	VOC (Styrene)	135.20	0.00
Facility-Wide Emissions (tons/12 months)				14.33

[1] Emission factor from Permit Term 5.2 of AOP 011R3

GENERAL PURPOSE RESIN EMISSIONS

* NOT TO EXCEED 88LBS/TON

Resin	EF= [(0.157 x %HAP) - .0165] x 2000 x (1- (.45 x VSE factor))	YEAR 2025	Method % in Access
STYRENE	average	0.370	
EF LBS / TON		82.81	
LBS RESIN USED		692,299.47	
TONS RESIN		346.15	4.1%
EMISSIONS YTD		28,663.17	

TOOLING RESINS (MOLD SHOP)

* NOT TO EXCEED 254LBS/TON

Resin (Styrene)	EF= 0.169XHAP%X2000	YEAR 2025	Method % in Access
STYRENE %	average	0.400	
EF LBS / TON		135.20	
LBS RESIN USED		0	
TONS RESIN		0.00	6.8%
EMISSIONS YTD		0.00	
MMA (1% tooling			
Factor	Tooling Resin used (lbs)		0 lbs
	0.0075		

	Adjusted actual LBS	TONS	Styrene %	Purchased
Jan	46,510	23.26	0.370	0
Feb	43,780	21.89	0.370	0
Mar	44,775	22.39	0.370	0
Apr	42,711	21.36	0.370	0
May	42,826	21.41	0.370	0
Jun	45,237	22.62	0.370	0
Jul	83,924	41.96	0.370	0
Aug	72,843	36.42	0.370	0
Sep	79,095	39.55	0.370	0
Oct	77,648	38.82	0.370	0
Nov	57,790	28.89	0.370	0
Dec	55,161	27.58	0.370	0

0.230335
0.189609
0.248429
0.331627

	Adjusted actual LBS	TONS	Styrene %	Purchased
Jan	0	0.00	0.400	0
Feb	0	0.00	0.400	0
Mar	0	0.00	0.400	0
Apr	0	0.00	0.400	0
May	0	0.00	0.400	0
Jun	0	0.00	0.400	0
Jul	0	0.00	0.400	0
Aug	0	0.00	0.400	0
Sep	0	0.00	0.400	0
Oct	0	0.00	0.400	0
Nov	0	0.00	0.400	0
Dec	0	0.00	0.400	0

Appendix C

Highlighted Permit Table- Limits

SECTION 4 GENERALLY APPLICABLE REQUIREMENTS

The cited requirements in the "Citation" column and incorporated herein by reference are applicable plant-wide at the source, including insignificant emission units. These requirements are federally enforceable unless identified as "State Only". A requirement designated "State Only" is enforceable only by the NWCAA, and not by the EPA or through citizen suits. "State Only" WAC citations are enforceable by NWCAA because they are adopted by reference in NWCAA 104.1, as amended February 10, 2022. All of the federal regulations listed in Section 4 have been adopted by reference in NWCAA 104.2, as amended February 10, 2022.

The "Description" column is a brief description of the applicable requirements for informational purposes only and is not enforceable. Periodic or continuous monitoring requirements (including testing) are specified in the "Monitoring, Recordkeeping and Reporting" column, which identifies monitoring, recordkeeping and reporting (MR&R) obligations the source must perform as required by the underlying requirement or by WAC 173-401-605(1) or -615. MR&R obligations do not apply to insignificant emission units.

The requirements in the MR&R column labeled as "Directly Enforceable" are legally enforceable requirements added under either the NWCAA's "gap-filling" authority (WAC 173-401-615(1)(b) & (c) (10/17/2002)), or the NWCAA's "sufficiency monitoring" authority (WAC 173-401-630(1), (3/5/2016)), as cited in each permit term. Other requirements not labeled "Directly Enforceable" are brief descriptions of the regulatory requirements for informational purposes and are not enforceable. Unless the text of the MR&R column is specifically identified to be directly enforceable, the language of the cited regulation takes precedence over a paraphrased requirement.

Table 4-1 Generally Applicable Requirements – Plantwide

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.1 General	WAC 173-401-630(1) (3/5/2016) WAC 173-401-520 (11/4/1993) 40 CFR 63 Subpart A 63.10(a)(5) (11/19/2020)	<u>Required Monitoring Reports</u> Submit reports of any required monitoring to the NWCAA at least once every six months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Permit Term 2.4.1.2.	<i>Directly Enforceable:</i> Unless specifically required otherwise by a permit term, monthly reports shall cover a calendar month, quarterly reports shall cover a calendar quarter, six-month or semiannual reports shall cover January through June and July through December, and annual reports shall cover a calendar year. The initial reporting period shall cover the time from permit issuance until the first month, quarter, six-month period, or year following permit issuance. Reports shall be submitted within 30 days after the close of the period that the reports cover. All required reports must be certified by a responsible official consistent with WAC 173-401-520. If the report submittal deadline falls on a weekend, then the deadline to submit shall be the next business day.
4.2 General	NWCAA Section 342 (9/8/1993) (7/14/2005 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Operation and Maintenance</u> Sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.	Operating instructions and maintenance schedules for process and/or control equipment must be available on site. <i>Directly Enforceable:</i> Monitor, keep records, and report in accordance with the terms of this permit.

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.3 Nuisance	NWCAA Section 530 (3/9/2000 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>General Nuisance</u></p> <p>No person shall discharge from any source quantities of air contaminants, with the exception of odors, in sufficient amounts and of such characteristics and duration as is likely to be injurious or cause damage to human health, plant or animal life, or property; or which unreasonably interferes with enjoyment of life and property.</p> <p>An air contaminant is defined as "dust, fumes, mist, smoke, other particulate matter, vapor gas, odorous substance, or any combination thereof.</p>	<p><i>Directly Enforceable:</i></p> <p>Within one hour of receiving an air contaminant complaint from the NWCAA or the public, all possible sources of the nuisance emissions at the facility shall be checked for proper operation. Problems identified shall be repaired or corrected as soon as practicable. If the problems identified cannot be repaired or corrected within four hours, action shall be taken to minimize emissions until repairs can be made and the NWCAA shall be notified within 12 hours with a description of the complaint and action being taken to resolve the problem.</p> <p>The results of the investigation, identification of any malfunctioning equipment or aberrant operation, and the date and time of repair or mitigation shall be recorded. A log of these records shall be maintained for inspection.</p> <p>Receipt of a nuisance complaint in itself shall not necessarily be a violation.</p>
4.4 Nuisance	WAC 173-400-040(5) (3/22/1991) WAC 173-400-040(6) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Emission Detrimental to Persons or Property</u></p> <p>No person shall cause or allow the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.</p>	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.5 Odor	NWCAA Section 535 (3/9/2000 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Odor Control Measures</u></p> <p>Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gases emitted into the atmosphere to a reasonable minimum.</p> <p>Any person who shall cause the generation of any odor from any source which may reasonably interfere with any other property owner's use and enjoyment of their property must use recognized best practices and control equipment to reduce these odors to a reasonable minimum.</p> <p>No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety or welfare of any person, or causes damage to property or business.</p>	<p><i>Directly Enforceable:</i></p> <p>Follow MR&R under AOP Term 4.3</p>
4.6 Odor	WAC 173-400-040(5) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Odors</u></p> <p>The source may not generate odors which may unreasonably interfere with property use and must use recognized good practices and procedures to reduce odors to a reasonable minimum.</p>	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.7 PM	NWCAA Section 550 (4/14/1993) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Preventing Particulate Matter from Becoming Airborne</u></p> <p>Install and operate Best Available Control Technology (BACT) to prevent the release of fugitive particulate matter emissions to the ambient air. Nuisance particulate fallout is prohibited.</p>	<p><i>Directly Enforceable:</i> Follow MR&R under AOP Term 4.3</p>
4.8 PM	NWCAA Section 550 (9/11/2014 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Preventing Particulate Matter from Becoming Airborne</u></p> <p>The owner or operator of a source or activity that generates fugitive dust, including, but not limited to, material handling, building construction or demolition, abrasive blasting, roadways, and lots, shall employ reasonable precautions to prevent fugitive dust from becoming airborne and must maintain and operate the source or activity to minimize emissions.</p> <p>It shall be unlawful for any person to cause or allow the emission of particulate matter which becomes deposited upon the property of others in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property.</p>	
4.9 PM	WAC 173-400-040(3) (7/1/2016 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Fallout</u></p> <p>Source may not generate the emission of particulate matter to be deposited beyond the property line in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.</p>	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.10 PM	WAC 173-400-040 (3)(a) (3/22/1991) WAC 173-400-040(4)(a) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Fugitive Emissions</u> Take reasonable precautions to prevent the release of air contaminants from an emissions unit engaging in materials handling, construction, demolition, or other operation which is a source of fugitive emissions.	<i>Directly Enforceable:</i> Follow MR&R under AOP Term 4.3
4.11 PM	WAC 173-400-040(8)(a) (3/22/1991) WAC 173-400-040(9)(a) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Fugitive Dust</u> Source shall take reasonable precautions to prevent the release of fugitive dust emissions. Maintain and operate the source to minimize emissions.	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.12 VE	NWCAA 451.1 (10/13/1994) (11/8/2007 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Emission of Air Contaminant - Visual Standard</u> No person shall cause or permit the emission, for any period aggregating more than three minutes in any one hour, of an air contaminant from any source which, at the point at emission, or within a reasonable distance of the point of emission, exceeds 20% opacity except: When there is valid data to show that the opacity is in excess of 20% as a result of the presence of condensed water droplets, and that the concentration of the particulate matter, as shown by a source test approved by the Control Officer, is less than 0.10 (0.23 g/m ³) grain/dscf.	<i>Directly Enforceable:</i> At least once during each calendar month that an emission unit operates, conduct qualitative visual observations on each stack while operating to determine whether there are visible emissions (VE). If, at any time, VE are observed, take one or more of the following actions within 24 hours, or it will be considered prima facie evidence that all applicable opacity limits have been exceeded: <ul style="list-style-type: none"> • Complete action that returns visible emissions to a non-visible level. • Shutdown the unit until appropriate corrective action can be taken. • Observe and record VE using a certified observer in accordance with WA Department of Ecology Method 9A. A certified observer shall determine opacity on a daily basis according to each applicable opacity limit until visible emissions are determined to be in compliance with each opacity limit.
4.13 VE	WAC 173-400-040(1) (3/22/1991); WAC 173-400-040(2) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Visible Emissions</u> No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any emissions unit which at the emission point, or within a reasonable distance of the emission point, exceeds 20% opacity (Ecology Method 9A) except: When the owner or operator of a source supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	For each qualitative VE observation, record the date and time of the observation, emission unit(s) observed, and name of observer. For stacks with VE, record any related equipment or operational failure, failure dates and times, duration of VE, and corrective actions taken. The periodic observation frequency may be reduced from monthly to quarterly if no VE are observed for six consecutive months. If VE are detected during any quarterly inspection, inspection frequency shall revert back to monthly.
4.14 PM	NWCAA 455.1 (4/14/1993) (5/11/1995 State Only) WAC 173-401-630(1) (3/5/2016)	<u>Emission of Particulate Matter</u> No person shall cause or permit emission of particulate matter in excess of 0.10 grain per dry standard cubic foot (gr/dscf) (0.23 g/m ³) corrected to 7% oxygen except gaseous and distillate fuel burning sources (not including internal combustion engines) shall not exceed 0.05 grains/dscf corrected to 7% oxygen.	Compliance with this MR&R does not excuse an exceedance of the underlying opacity standard.

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.15 PM	WAC 173-400-060 (11/25/2018) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Emission Standards for General Process Units</u> Particulate emissions greater than 0.1 grain/dscf prohibited.	<i>Directly Enforceable:</i> Follow MR&R under AOP Term 4.12.
4.16 PM	WAC 173-400-050(1) and (3) (3/22/1991); (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Emission Standards for Combustion and Incineration Units</u> Particulate emissions from combustion units shall not exceed 0.1 grains/dscf corrected to 7% oxygen.	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.17 SO ₂	NWCAA Section 462 (10/13/1994) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Emission of Sulfur Compounds</u> Sulfur compounds emissions, calculated as SO₂, shall not exceed 1,000 ppmvd at 7% oxygen. This requirement is not violated if reasonable evidence is presented that concentrations will not exceed ambient standards and the permittee demonstrates that no practical method of reducing the concentration exists.</p>	<p><i>Directly Enforceable:</i> Records of natural gas usage shall be made available for inspection upon request.</p>
4.18 SO ₂	NWCAA 462 (3/13/1997 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Emission of Sulfur Compounds</u> Sulfur compound emissions, calculated as SO₂, shall not exceed 1,000 ppmvd corrected to 7% oxygen, averaged for a 60 consecutive minute period. This requirement is not violated if reasonable evidence is presented that concentrations will not exceed ambient standards and the permittee demonstrates that no practical method of reducing the concentration exists.</p>	
4.19 SO ₂	WAC 173-400-040(6) first paragraph only (3/22/1991) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Sulfur Dioxide</u> SO₂ emissions shall not exceed 1,000 ppmvd corrected to 7% oxygen for combustion sources, based on the average of any 60 consecutive minute period.</p>	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.20 SO ₂	NWCAA 520.1, 520.11, 520.12, 520.13, and 520.15 (4/14/1993) (5/9/1996 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Sulfur Compounds in Fuel</u> Prohibited to burn, sell, or make available for sale for burning in fuel burning equipment within the jurisdiction of the NWCAA, fuel containing sulfur in excess of the following for a time period not to exceed 30 days in a 12-month period: <ul style="list-style-type: none"> • #1 distillate – 0.3 wt% • #2 distillate – 0.5 wt% • Other fuel oils – 2.0 wt% • Solid fuels – 2.0 wt% 	<i>Directly Enforceable:</i> Follow MR&R under AOP Term 4.17.

SECTION 5 SPECIFIC REQUIREMENTS FOR EMISSION UNITS

The cited requirements in the “Citation” column and incorporated herein by reference are applicable to the emission units specified in the header of the table. These requirements are federally enforceable unless identified as “State Only”. A requirement designated “State Only” is enforceable only by the state or the NWCAA, and not by the EPA or through citizen suits. “State Only” WAC citations are enforceable by NWCAA because they are adopted by reference in NWCAA 104.1, as amended February 10, 2022. All of the federal regulations listed in Section 5 have been adopted by reference in NWCAA 104.2, as amended February 10, 2022.

The “Description” column is a brief description of the applicable requirements for informational purposes only and is not enforceable. Periodic or continuous monitoring requirements, including testing, are specified in the “Monitoring, Recordkeeping, and Reporting” (MR&R) column, which identifies MR&R obligations the source must perform as required by WAC 173-401-605(1) and 615(1) and (2) or the underlying requirement.

MR&R obligations do not apply to insignificant emission units. The test method cited or any credible evidence may be used to determine compliance.

The requirements in the MR&R column labeled “Directly Enforceable” are legally enforceable requirements added under either the NWCAA’s “gap-filling” authority (WAC 173-401-615(1)(b) & (c) (10/17/2002)) or the NWCAA’s “sufficiency monitoring” authority (WAC 173-401-630(1), (3/5/2016)), as cited in each permit term. Other requirements not labeled “Directly Enforceable” are brief descriptions of the regulatory requirements for informational purposes and are not enforceable. Unless the text of the MR&R column is specifically identified to be directly enforceable, the language of the cited regulation takes precedence over a paraphrased requirement.

The provisions of federally approved NWCAA Sections 365, 366 and the “Guidelines for Industrial Monitoring Equipment and Data Handling” have been replaced in this section by NWCAA Section 367 and Appendix A – “Ambient Monitoring, Emission Testing, and Continuous Emission and Opacity Monitoring”. NWCAA Section 367 and Appendix A were adopted on July 14, 2005 with a provision that applicable sources would be allowed one year from the date of adoption to achieve compliance with Appendix A. The new regulations are “State Only” until incorporated into the State Implementation Plan.

Table 5-1 Specifically Applicable Requirements – MAAX US Corp. EU-1, EU-2, and EU-3

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.1 HAP	40 CFR 63.5797 (4/21/2003), 40 CFR 63.5915(c) (3/20/2020), 40 CFR 63.5920 (3/3/2020)	<p>Determining HAP content of resins:</p> <p>Use the MSDS provided by the manufacturer to establish the organic HAP content of resins.</p> <p>Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens, and at 1.0 percent by mass or more for other organic HAP compounds.</p> <p>If HAP content is provided as a range, the upper end of the range must be used, unless a measured total organic HAP content value exceeds the upper range, at which point the measured value must be used.</p> <p>If HAP content is provided as a single value, that value may be used, unless a measured total organic HAP content value exceeds that single value by 2% or more, at which point the measured value must be used.</p>	<p>Keep records of all data, assumptions, and calculations performed to determine the organic HAP content of resins used.</p> <p>Keep each record readily accessible for five years after the date of generation. The records must be kept onsite for at least two years after the date of generation. The records may be kept offsite for the remaining three years.</p>

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
<p>5.2 HAP</p>	<p>40 CFR 63.5805(b) (8/25/2005), 40 CFR 63.5810 (8/25/2005), 40 CFR 63.5835 (3/20/2020) 40 CFR 63.5900(b) and (c) (3/20/2020) 40 CFR 63.5910(a), (b)(5), (c), (d), and (i) (3/20/2020) 40 CFR 63.5912(c) (3/20/2020) 40 CFR 63.5915(a)(1) and (c) (3/20/2020) 63.5920(a)-(d) (3/20/2020) NESHAP WWWW Table 3, (2.a.), (2.c.) and (3) (8/25/2005) Table 14 (3/20/2020)</p>	<p>Use one (or more, as appropriate) of the methods in AOP Terms 5.3-5.6 to meet the following organic HAP emissions limits at all times:</p> <ul style="list-style-type: none"> • For non-corrosion-resistant or non-high strength resins using: <ul style="list-style-type: none"> ○ Mechanical application, 88 lb/ton, 12-month rolling average ○ Manual application, 87 lb/ton, 12-month rolling average • For tooling resins using: <ul style="list-style-type: none"> ○ Mechanical application, 254 lb/ton, 12-month rolling average ○ Manual application, 157 lb/ton, 12-month rolling average <p>MAAX may switch between the compliance options in AOP Terms 5.3-5.6.</p>	<p>Comply with the MR&R of AOP Terms 5.3-5.6, as applicable.</p> <p>When changing to an option based on a 12-month rolling average, base the average on the previous 12 months of data calculated using the new compliance option, unless an option that did not require maintenance of records of resin use was previously used. In this case, immediately begin collecting resin use data and demonstrate compliance 12 months after changing options.</p> <p>Submit semiannual compliance reports in accordance with AOP Term 4.1.</p> <p>The semiannual compliance report must contain the company name and address, certification by responsible official, date of report and dates of reporting period, and if there were no deviations, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.</p> <p>Include each deviation from the requirements of emission standards with the semi-annual compliance report, the total operating time of the affected source during the reporting period, and information on the number, duration, and cause of deviations, and the corrective action taken.</p> <p>State in the compliance report if MAAX has changed compliance options since the last compliance report.</p> <p>Maintain a copy of each semiannual report submitted.</p> <p>Keep records of all data, assumptions, and calculations performed to determine the organic HAP emissions factors or average organic HAP contents for resins used.</p> <p>Keep each record used to comply with this AOP Term readily accessible for five years after the date of generation. The records must be kept onsite for at least two years after the date of generation. The records may be kept offsite for the remaining three years.</p>

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.3 HAP	40 CFR 63.5796 (4/21/2003) 40 CFR 63.5810(a) (8/25/2005) 40 CFR 63.5895(d) (8/25/2005) 40 CFR 63.5900(a)(2) (3/20/2020) NESHAP WWWW Table 1, (1.a.ii.) and (1.c.ii.) (8/25/2005) NESHAP WWWW Table 3, (2.a.), (2.c.) and (3) (8/25/2005) NESHAP WWWW Appendix A (4/21/2003)	<p>When electing to comply with 63.5810(a):</p> <p>Calculate the actual organic HAP emissions factor (EF) for each different process stream, defined as each individual combination of resin and application technique listed in AOP Term 5.2, using the following equations as appropriate:</p> <ul style="list-style-type: none"> • For non-atomized mechanical application of vapor-suppressed resins: <ul style="list-style-type: none"> ○ With an organic HAP content of greater than or equal to 33%: $EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times (1 - (0.45 \times VSE))$, ○ With an organic HAP content of less than 33%: $EF = 0.107 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE))$, • For manual application of vapor-suppressed resins: <ul style="list-style-type: none"> ○ With an organic HAP content of greater than or equal to 33%: $EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times (1 - (0.5 \times VSE))$, ○ With an organic HAP content of less than 33%: $EF = 0.126 \times \%HAP \times 2000 \times (1 - (0.5 \times VSE))$, <p>Where VSE = the vapor suppressant effectiveness (VSE) determined by conducting testing according to the procedures specified in Appendix A to this Subpart.</p> <p>The calculated EF for each individual process stream must be less than or equal to the applicable emission limit in AOP Term 5.2.</p>	<p>Complete all necessary calculations within 30 days after the end of each month.</p> <p>Keep records of all data, assumptions, and calculations performed.</p> <p>Retain records of resin organic HAP content.</p> <p>Include in the semiannual compliance report a list of resins complying with this AOP Term and identify their application methods.</p> <p>Include in the semiannual compliance report a statement that resins individually meet the appropriate organic HAP content limits in this AOP Term.</p>

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.4 HAP	40 CFR 63.5810(a)(2) and (b) (8/25/2005) 40 CFR 63.5895(c) (8/25/2005) 63.5900(a)(2) (3/20/2020) NESHAP WWW Table 3, (2.a.), (2.c.) and (3) (8/25/2005)	<p>When electing to comply with 63.5810(b):</p> <p>Group the process streams, defined as each individual combination of resin and application technique, by operation type and resin application method as listed in AOP Term 5.2. All process streams that use the same resin must be included in the group. Calculate a weighted average emission factor (EF) based on the amounts of each individual resin used for the last 12 months, using the following equation:</p> $\text{Avg organic HAP EF} = \frac{\sum_{i=1}^n \text{Actual Process Stream EF}_i * \text{Material}_i}{\sum_{i=1}^n \text{Material}_i}$ <p>Where:</p> <ul style="list-style-type: none"> Actual Process Stream EF_i = actual organic HAP EF for process stream <i>i</i>, lb/ton, calculated as per AOP Term 5.3, Material_i = neat resin plus used during previous 12 calendar months for process stream <i>i</i>, tons, and, n = number of process streams where an organic HAP EF was calculated. <p>MAAX may include process streams where compliance is demonstrated in accordance with AOP Term 5.3.</p> <p>Do not include process streams where compliance is demonstrated in accordance with AOP Term 5.5.</p> <p>The calculated average EF for each group of process streams must be less than or equal to the applicable emission limit in AOP Term 5.2.</p>	<p>Complete all necessary calculations within 30 days after the end of each month.</p> <p>Keep records of all data, assumptions, and calculations performed.</p> <p>Retain records of resin use, organic HAP content, and operation where the resin was used. Resin use records may be based on purchase records if it can be reasonably estimated how the resin was applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.</p>

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.5 HAP	40 CFR 63.5810(c) (8/25/2005) 40 CFR 63.5895(c) (8/25/2005) 63.5900(a)(2) (3/20/2020) NESHAP WWW Table 3, (2.a.), (2.c.) and (3) (8/25/2005)	<p>When electing to comply with 63.5810(c):</p> <p>Demonstrate compliance each month by calculating the weighted average of the applicable individual HAP emissions limits for each operation type in AOP Term 5.2 using the following equation:</p> $\text{Weighted avg emission limit} = \frac{\sum_{i=1}^n EL_i * Material_i}{\sum_{i=1}^n Material_i}$ <p>Where:</p> <ul style="list-style-type: none"> • EL_i = organic HAP emissions limit for operation type i, lb/ton, from AOP Term 5.2, • $Material_i$ = neat resin plus used during previous 12 calendar months for operation type i, tons, and, • n = number of operations. <p>Next, calculate the actual weighted average organic HAP emissions factor (EF) for each operation type using the following equation:</p> $\text{Actual weighted avg HAP EF} = \frac{\sum_{i=1}^n \text{Actual Individual } EF_i * Material_i}{\sum_{i=1}^n Material_i}$ <p>Where:</p> <ul style="list-style-type: none"> • Actual Individual EF_i = actual organic HAP EF for operation type i, lb/ton, calculated as per AOP Term 5.4, • $Material_i$ = neat resin plus used during previous 12 calendar months for operation type i, tons, and, • n = number of operations. <p>The actual weighted average HAP EF for each operation type must be less than or equal to the corresponding weighted average emission limit for that operation type calculated in this AOP Term.</p>	<p>Complete all necessary calculations within 30 days after the end of each month.</p> <p>Keep records of all data, assumptions, and calculations performed.</p> <p>Retain records of resin use, organic HAP content, and operation where the resin was used. Resin use records may be based on purchase records if it can be reasonably estimated how the resin was applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.</p>

<p>5.6 HAP</p>	<p>40 CFR 63.5810(d) (8/25/2005) 40 CFR 63.5895(c) (8/25/2005) 40 CFR 63.5900(a)(3) (3/20/2020) NESHAP WWWW Table 7, (5.a.) and (7) (8/25/2005)</p>	<p><u>When electing to comply with 63.5810(d):</u> For any combination of manual or non-atomized mechanical application of a resin type, use a resin with an organic HAP content less than or equal to the following:</p> <ul style="list-style-type: none"> • For all non-corrosion resistant and non-high strength production resins: <ul style="list-style-type: none"> ◦ 38.5 percent by weight. • For all tooling resins: <ul style="list-style-type: none"> ◦ 91.4 percent by weight. <p>When using this option, the same resin must be used in all applications of that resin type. MAAX may also calculate the weighted average organic HAP content for each application method monthly using the following equation:</p> $\text{Weighted avg organic HAP content} = \frac{\sum_{i=1}^n \text{Actual Process Stream HAP content}_i * \text{Material}_i}{\sum_{i=1}^n \text{Material}_i}$ <p>Where:</p> <ul style="list-style-type: none"> • Actual Process Stream HAP content_i = actual organic HAP content for process stream <i>i</i>, percent, • Material_i = neat resin plus used during previous 12 calendar months for process stream <i>i</i>, tons, and, • n = number of process streams. <p>The weighted average organic HAP content based on the previous 12 months of resin use must be less than or equal to the applicable organic HAP content limit in this AOP Term. MAAX may simultaneously use the averaging provisions in AOP Terms 5.4 or 5.5 to demonstrate compliance for any operations and/or resins not included in the compliance demonstration under this AOP Term. Do not use any resins included in the compliance demonstration under this term with the averaging calculations in AOP Terms 5.4 or 5.5.</p>	<p>Complete all necessary calculations within 30 days after the end of each month. Keep records of all data, assumptions, and calculations performed. If using the averaging calculations in this AOP Term, maintain a record of monthly resin use in tons for each individual resin. Retain records of resin use, organic HAP content, and operation where the resin was used. Resin use records may be based on purchase records if it can be reasonably estimated how the resin was applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. Include in the semiannual compliance report a statement that resins individually meet the appropriate organic HAP content limits in this AOP Term.</p>
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Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
<p>5.7 HAP</p>	<p>40 CFR 63.5805(b) (8/25/2005), 40 CFR 63.5835(a) (3/20/2020) 40 CFR 63.5900(a)(4), (b), and (c) (3/20/2020) 40 CFR 63.5910(a), (b)(5), (c), (d), and (i) (3/20/2020) 40 CFR 63.5915(d) (3/20/2020) NESHAP WWWW Table 4, (2), (3), (6)-(8) (3/20/2020) NESHAP WWWW Table 14 (3/20/2020)</p>	<p><u>Work Practice Standards</u> The source must be in compliance at all times with the following work practice standards:</p> <ul style="list-style-type: none"> • Do not use cleaning solvents that contain HAP, except that organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. • Containers with HAP-containing material must be closed or covered at all times except when material is being added or removed from them. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. • Mixer covers must have no visible gaps except around shafts or instrumentation, when one-inch gaps are permissible. • Mixer vents must be closed during mixing, except when material is added. • Mixer covers must be on at all times except when material is added or when changing covers to the mixer vessels. • Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are actively being used to apply resin. 	<p>Submit semiannual compliance reports in accordance with AOP Term 4.1. The semiannual compliance report must contain the company name and address, certification by responsible official, date of report and dates of reporting period, and if there were no deviations, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. Include each deviation from the requirements of emission standards with the semi-annual compliance report, the total operating time of the affected source during the reporting period, and information on the number, duration, and cause of deviations, and the corrective action taken.</p>

Appendix D

Highlighted Permit Table- Applicable Requirements

SECTION 4 GENERALLY APPLICABLE REQUIREMENTS

The cited requirements in the “Citation” column and incorporated herein by reference are applicable plant-wide at the source, including insignificant emission units. These requirements are federally enforceable unless identified as “State Only”. A requirement designated “State Only” is enforceable only by the NWCAA, and not by the EPA or through citizen suits. “State Only” WAC citations are enforceable by NWCAA because they are adopted by reference in NWCAA 104.1, as amended February 10, 2022. All of the federal regulations listed in Section 4 have been adopted by reference in NWCAA 104.2, as amended February 10, 2022.

The “Description” column is a brief description of the applicable requirements for informational purposes only and is not enforceable. Periodic or continuous monitoring requirements (including testing) are specified in the “Monitoring, Recordkeeping and Reporting” column, which identifies monitoring, recordkeeping and reporting (MR&R) obligations the source must perform as required by the underlying requirement or by WAC 173-401-605(1) or -615. MR&R obligations do not apply to insignificant emission units.

The requirements in the MR&R column labeled as “Directly Enforceable” are legally enforceable requirements added under either the NWCAA’s “gap-filling” authority (WAC 173-401-615(1)(b) & (c) (10/17/2002)), or the NWCAA’s “sufficiency monitoring” authority (WAC 173-401-630(1), (3/5/2016)), as cited in each permit term. Other requirements not labeled “Directly Enforceable” are brief descriptions of the regulatory requirements for informational purposes and are not enforceable. Unless the text of the MR&R column is specifically identified to be directly enforceable, the language of the cited regulation takes precedence over a paraphrased requirement.

Table 4-1 Generally Applicable Requirements – Plantwide

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
<p>4.1 General</p>	<p>WAC 173-401-630(1) (3/5/2016) WAC 173-401-520 (11/4/1993) 40 CFR 63 Subpart A 63.10(a)(5) (11/19/2020)</p>	<p><u>Required Monitoring Reports</u> Submit reports of any required monitoring to the NWCAA at least once every six months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Permit Term 2.4.1.2.</p>	<p><i>Directly Enforceable:</i> Unless specifically required otherwise by a permit term, monthly reports shall cover a calendar month, quarterly reports shall cover a calendar quarter, six-month or semiannual reports shall cover January through June and July through December, and annual reports shall cover a calendar year. The initial reporting period shall cover the time from permit issuance until the first month, quarter, six-month period, or year following permit issuance. Reports shall be submitted within 30 days after the close of the period that the reports cover. All required reports must be certified by a responsible official consistent with WAC 173-401-520. If the report submittal deadline falls on a weekend, then the deadline to submit shall be the next business day.</p>
<p>4.2 General</p>	<p>NWCAA Section 342 (9/8/1993) (7/14/2005 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)</p>	<p><u>Operation and Maintenance</u> Sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.</p>	<p>Operating instructions and maintenance schedules for process and/or control equipment must be available on site. <i>Directly Enforceable:</i> Monitor, keep records, and report in accordance with the terms of this permit.</p>

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.3 Nuisance	NWCAA Section 530 (3/9/2000 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>General Nuisance</u></p> <p>No person shall discharge from any source quantities of air contaminants, with the exception of odors, in sufficient amounts and of such characteristics and duration as is likely to be injurious or cause damage to human health, plant or animal life, or property; or which unreasonably interferes with enjoyment of life and property.</p> <p>An air contaminant is defined as "dust, fumes, mist, smoke, other particulate matter, vapor gas, odorous substance, or any combination thereof.</p>	<p><i>Directly Enforceable:</i></p> <p>Within one hour of receiving an air contaminant complaint from the NWCAA or the public, all possible sources of the nuisance emissions at the facility shall be checked for proper operation. Problems identified shall be repaired or corrected as soon as practicable. If the problems identified cannot be repaired or corrected within four hours, action shall be taken to minimize emissions until repairs can be made and the NWCAA shall be notified within 12 hours with a description of the complaint and action being taken to resolve the problem.</p> <p>The results of the investigation, identification of any malfunctioning equipment or aberrant operation, and the date and time of repair or mitigation shall be recorded. A log of these records shall be maintained for inspection.</p> <p>Receipt of a nuisance complaint in itself shall not necessarily be a violation.</p>
4.4 Nuisance	WAC 173-400-040(5) (3/22/1991) WAC 173-400-040(6) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Emission Detrimental to Persons or Property</u></p> <p>No person shall cause or allow the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.</p>	<p>Receipt of a nuisance complaint in itself shall not necessarily be a violation.</p>

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.5 Odor	NWCAA Section 535 (3/9/2000 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Odor Control Measures</u></p> <p>Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gases emitted into the atmosphere to a reasonable minimum.</p> <p>Any person who shall cause the generation of any odor from any source which may reasonably interfere with any other property owner’s use and enjoyment of their property must use recognized best practices and control equipment to reduce these odors to a reasonable minimum.</p> <p>No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety or welfare of any person, or causes damage to property or business.</p>	<p><i>Directly Enforceable:</i></p> <p>Follow MR&R under AOP Term 4.3</p>
4.6 Odor	WAC 173-400-040(5) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Odors</u></p> <p>The source may not generate odors which may unreasonably interfere with property use and must use recognized good practices and procedures to reduce odors to a reasonable minimum.</p>	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.7 PM	NWCAA Section 550 (4/14/1993) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Preventing Particulate Matter from Becoming Airborne</u></p> <p>Install and operate Best Available Control Technology (BACT) to prevent the release of fugitive particulate matter emissions to the ambient air. Nuisance particulate fallout is prohibited.</p>	<p><i>Directly Enforceable:</i></p> <p>Follow MR&R under AOP Term 4.3</p>
4.8 PM	NWCAA Section 550 (9/11/2014 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Preventing Particulate Matter from Becoming Airborne</u></p> <p>The owner or operator of a source or activity that generates fugitive dust, including, but not limited to, material handling, building construction or demolition, abrasive blasting, roadways, and lots, shall employ reasonable precautions to prevent fugitive dust from becoming airborne and must maintain and operate the source or activity to minimize emissions.</p> <p>It shall be unlawful for any person to cause or allow the emission of particulate matter which becomes deposited upon the property of others in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property.</p>	
4.9 PM	WAC 173-400-040(3) (7/1/2016 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Fallout</u></p> <p>Source may not generate the emission of particulate matter to be deposited beyond the property line in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.</p>	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.10 PM	WAC 173-400-040 (3)(a) (3/22/1991) WAC 173-400-040(4)(a) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Fugitive Emissions</u> Take reasonable precautions to prevent the release of air contaminants from an emissions unit engaging in materials handling, construction, demolition, or other operation which is a source of fugitive emissions.	<i>Directly Enforceable:</i> Follow MR&R under AOP Term 4.3
4.11 PM	WAC 173-400-040(8)(a) (3/22/1991) WAC 173-400-040(9)(a) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Fugitive Dust</u> Source shall take reasonable precautions to prevent the release of fugitive dust emissions. Maintain and operate the source to minimize emissions.	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.12 VE	NWCAA 451.1 (10/13/1994) (11/8/2007 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	Emission of Air Contaminant - Visual Standard No person shall cause or permit the emission, for any period aggregating more than three minutes in any one hour, of an air contaminant from any source which, at the point at emission, or within a reasonable distance of the point of emission, exceeds 20% opacity except: When there is valid data to show that the opacity is in excess of 20% as a result of the presence of condensed water droplets, and that the concentration of the particulate matter, as shown by a source test approved by the Control Officer, is less than 0.10 (0.23 g/m ³) grain/dscf.	<i>Directly Enforceable:</i> At least once during each calendar month that an emission unit operates, conduct qualitative visual observations on each stack while operating to determine whether there are visible emissions (VE). If, at any time, VE are observed, take one or more of the following actions within 24 hours, or it will be considered prima facie evidence that all applicable opacity limits have been exceeded: <ul style="list-style-type: none"> • Complete action that returns visible emissions to a non-visible level. • Shutdown the unit until appropriate corrective action can be taken. • Observe and record VE using a certified observer in accordance with WA Department of Ecology Method 9A. A certified observer shall determine opacity on a daily basis according to each applicable opacity limit until visible emissions are determined to be in compliance with each opacity limit.
4.13 VE	WAC 173-400-040(1) (3/22/1991); WAC 173-400-040(2) (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Visible Emissions</u> No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any emissions unit which at the emission point, or within a reasonable distance of the emission point, exceeds 20% opacity (Ecology Method 9A) except: When the owner or operator of a source supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	For each qualitative VE observation, record the date and time of the observation, emission unit(s) observed, and name of observer. For stacks with VE, record any related equipment or operational failure, failure dates and times, duration of VE, and corrective actions taken. The periodic observation frequency may be reduced from monthly to quarterly if no VE are observed for six consecutive months. If VE are detected during any quarterly inspection, inspection frequency shall revert back to monthly.
4.14 PM	NWCAA 455.1 (4/14/1993) (5/11/1995 State Only) WAC 173-401-630(1) (3/5/2016)	<u>Emission of Particulate Matter</u> No person shall cause or permit emission of particulate matter in excess of 0.10 grain per dry standard cubic foot (gr/dscf) (0.23 g/m ³) corrected to 7% oxygen except gaseous and distillate fuel burning sources (not including internal combustion engines) shall not exceed 0.05 grains/dscf corrected to 7% oxygen.	Compliance with this MR&R does not excuse an exceedance of the underlying opacity standard.

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.15 PM	WAC 173-400-060 (11/25/2018) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Emission Standards for General Process Units</u> Particulate emissions greater than 0.1 grain/dscf prohibited.	<i>Directly Enforceable:</i> Follow MR&R under AOP Term 4.12.
4.16 PM	WAC 173-400-050(1) and (3) (3/22/1991); (9/16/2018 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<u>Emission Standards for Combustion and Incineration Units</u> Particulate emissions from combustion units shall not exceed 0.1 grains/dscf corrected to 7% oxygen.	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.17 SO ₂	NWCAA Section 462 (10/13/1994) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Emission of Sulfur Compounds</u></p> <p>Sulfur compounds emissions, calculated as SO₂, shall not exceed 1,000 ppmvd at 7% oxygen.</p> <p>This requirement is not violated if reasonable evidence is presented that concentrations will not exceed ambient standards and the permittee demonstrates that no practical method of reducing the concentration exists.</p>	<p><i>Directly Enforceable:</i></p> <p>Records of natural gas usage shall be made available for inspection upon request.</p>
4.18 SO ₂	NWCAA 462 (3/13/1997 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Emission of Sulfur Compounds</u></p> <p>Sulfur compound emissions, calculated as SO₂, shall not exceed 1,000 ppmvd corrected to 7% oxygen, averaged for a 60 consecutive minute period.</p> <p>This requirement is not violated if reasonable evidence is presented that concentrations will not exceed ambient standards and the permittee demonstrates that no practical method of reducing the concentration exists.</p>	
4.19 SO ₂	WAC 173-400-040(6) first paragraph only (3/22/1991) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Sulfur Dioxide</u></p> <p>SO₂ emissions shall not exceed 1,000 ppmvd corrected to 7% oxygen for combustion sources, based on the average of any 60 consecutive minute period.</p>	

Permit Term	Citation	Description	Monitoring, Recordkeeping, and Reporting
4.20 SO ₂	NWCAA 520.1, 520.11, 520.12, 520.13, and 520.15 (4/14/1993) (5/9/1996 State Only) WAC 173-401-615(1)(b) & (c) (10/17/2002)	<p><u>Sulfur Compounds in Fuel</u></p> <p>Prohibited to burn, sell, or make available for sale for burning in fuel burning equipment within the jurisdiction of the NWCAA, fuel containing sulfur in excess of the following for a time period not to exceed 30 days in a 12-month period:</p> <ul style="list-style-type: none"> • #1 distillate – 0.3 wt% • #2 distillate – 0.5 wt% • Other fuel oils – 2.0 wt% • Solid fuels – 2.0 wt% 	<p><i>Directly Enforceable:</i></p> <p>Follow MR&R under AOP Term 4.17.</p>

SECTION 5 SPECIFIC REQUIREMENTS FOR EMISSION UNITS

The cited requirements in the “Citation” column and incorporated herein by reference are applicable to the emission units specified in the header of the table. These requirements are federally enforceable unless identified as “State Only”. A requirement designated “State Only” is enforceable only by the state or the NWCAA, and not by the EPA or through citizen suits. “State Only” WAC citations are enforceable by NWCAA because they are adopted by reference in NWCAA 104.1, as amended February 10, 2022. All of the federal regulations listed in Section 5 have been adopted by reference in NWCAA 104.2, as amended February 10, 2022.

The “Description” column is a brief description of the applicable requirements for informational purposes only and is not enforceable. Periodic or continuous monitoring requirements, including testing, are specified in the “Monitoring, Recordkeeping, and Reporting” (MR&R) column, which identifies MR&R obligations the source must perform as required by WAC 173-401-605(1) and 615(1) and (2) or the underlying requirement.

MR&R obligations do not apply to insignificant emission units. The test method cited or any credible evidence may be used to determine compliance.

The requirements in the MR&R column labeled “Directly Enforceable” are legally enforceable requirements added under either the NWCAA’s “gap-filling” authority (WAC 173-401-615(1)(b) & (c) (10/17/2002)) or the NWCAA’s “sufficiency monitoring” authority (WAC 173-401-630(1), (3/5/2016)), as cited in each permit term. Other requirements not labeled “Directly Enforceable” are brief descriptions of the regulatory requirements for informational purposes and are not enforceable. Unless the text of the MR&R column is specifically identified to be directly enforceable, the language of the cited regulation takes precedence over a paraphrased requirement.

The provisions of federally approved NWCAA Sections 365, 366 and the “Guidelines for Industrial Monitoring Equipment and Data Handling” have been replaced in this section by NWCAA Section 367 and Appendix A – “Ambient Monitoring, Emission Testing, and Continuous Emission and Opacity Monitoring”. NWCAA Section 367 and Appendix A were adopted on July 14, 2005 with a provision that applicable sources would be allowed one year from the date of adoption to achieve compliance with Appendix A. The new regulations are “State Only” until incorporated into the State Implementation Plan.

Table 5-1 Specifically Applicable Requirements – MAAX US Corp. EU-1, EU-2, and EU-3

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.1 HAP	40 CFR 63.5797 (4/21/2003), 40 CFR 63.5915(c) (3/20/2020), 40 CFR 63.5920 (3/3/2020)	<p><u>Determining HAP content of resins:</u></p> <p>Use the MSDS provided by the manufacturer to establish the organic HAP content of resins.</p> <p>Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens, and at 1.0 percent by mass or more for other organic HAP compounds.</p> <p>If HAP content is provided as a range, the upper end of the range must be used, unless a measured total organic HAP content value exceeds the upper range, at which point the measured value must be used.</p> <p>If HAP content is provided as a single value, that value may be used, unless a measured total organic HAP content value exceeds that single value by 2% or more, at which point the measured value must be used.</p>	<p>Keep records of all data, assumptions, and calculations performed to determine the organic HAP content of resins used.</p> <p>Keep each record readily accessible for five years after the date of generation. The records must be kept onsite for at least two years after the date of generation. The records may be kept offsite for the remaining three years.</p>

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.2 HAP	40 CFR 63.5805(b) (8/25/2005), 40 CFR 63.5810 (8/25/2005), 40 CFR 63.5835 (3/20/2020) 40 CFR 63.5900(b) and (c) (3/20/2020) 40 CFR 63.5910(a), (b)(5), (c), (d), and (i) (3/20/2020) 40 CFR 63.5912(c) (3/20/2020) 40 CFR 63.5915(a)(1) and (c) (3/20/2020) 63.5920(a)-(d) (3/20/2020) NESHAP WWWW Table 3, (2.a.), (2.c.) and (3) (8/25/2005) Table 14 (3/20/2020)	Use one (or more, as appropriate) of the methods in AOP Terms 5.3-5.6 to meet the following organic HAP emissions limits at all times: <ul style="list-style-type: none"> • For non-corrosion-resistant or non-high strength resins using: <ul style="list-style-type: none"> ○ Mechanical application, 88 lb/ton, 12-month rolling average ○ Manual application, 87 lb/ton, 12-month rolling average • For tooling resins using: <ul style="list-style-type: none"> ○ Mechanical application, 254 lb/ton, 12-month rolling average ○ Manual application, 157 lb/ton, 12-month rolling average MAAX may switch between the compliance options in AOP Terms 5.3-5.6.	Comply with the MR&R of AOP Terms 5.3-5.6, as applicable. When changing to an option based on a 12-month rolling average, base the average on the previous 12 months of data calculated using the new compliance option, unless an option that did not require maintenance of records of resin use was previously used. In this case, immediately begin collecting resin use data and demonstrate compliance 12 months after changing options. Submit semiannual compliance reports in accordance with AOP Term 4.1. The semiannual compliance report must contain the company name and address, certification by responsible official, date of report and dates of reporting period, and if there were no deviations, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. Include each deviation from the requirements of emission standards with the semi-annual compliance report, the total operating time of the affected source during the reporting period, and information on the number, duration, and cause of deviations, and the corrective action taken. State in the compliance report if MAAX has changed compliance options since the last compliance report. Maintain a copy of each semiannual report submitted. Keep records of all data, assumptions, and calculations performed to determine the organic HAP emissions factors or average organic HAP contents for resins used. Keep each record used to comply with this AOP Term readily accessible for five years after the date of generation. The records must be kept onsite for at least two years after the date of generation. The records may be kept offsite for the remaining three years.

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.3 HAP	40 CFR 63.5796 (4/21/2003) 40 CFR 63.5810(a) (8/25/2005) 40 CFR 63.5895(d) (8/25/2005) 40 CFR 63.5900(a)(2) (3/20/2020) NESHAP WWWW Table 1, (1.a.ii.) and (1.c.ii.) (8/25/2005) NESHAP WWWW Table 3, (2.a.), (2.c.) and (3) (8/25/2005) NESHAP WWWW Appendix A (4/21/2003)	<p>When electing to comply with 63.5810(a):</p> <p>Calculate the actual organic HAP emissions factor (EF) for each different process stream, defined as each individual combination of resin and application technique listed in AOP Term 5.2, using the following equations as appropriate:</p> <ul style="list-style-type: none"> • For non-atomized mechanical application of vapor-suppressed resins: <ul style="list-style-type: none"> ○ With an organic HAP content of <u>greater than or equal to 33%</u>: $EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times (1 - (0.45 \times VSE))$, ○ With an organic HAP content of <u>less than 33%</u>: $EF = 0.107 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE))$, • For manual application of vapor-suppressed resins: <ul style="list-style-type: none"> ○ With an organic HAP content of <u>greater than or equal to 33%</u>: $EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times (1 - (0.5 \times VSE))$, ○ With an organic HAP content of <u>less than 33%</u>: $EF = 0.126 \times \%HAP \times 2000 \times (1 - (0.5 \times VSE))$, <p>Where VSE = the vapor suppressant effectiveness (VSE) determined by conducting testing according to the procedures specified in Appendix A to this Subpart.</p> <p>The calculated EF for each individual process stream must be less than or equal to the applicable emission limit in AOP Term 5.2.</p>	<p>Complete all necessary calculations within 30 days after the end of each month.</p> <p>Keep records of all data, assumptions, and calculations performed.</p> <p>Retain records of resin organic HAP content.</p> <p>Include in the semiannual compliance report a list of resins complying with this AOP Term and identify their application methods.</p> <p>Include in the semiannual compliance report a statement that resins individually meet the appropriate organic HAP content limits in this AOP Term.</p>

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.4 HAP	40 CFR 63.5810(a)(2) and (b) (8/25/2005) 40 CFR 63.5895(c) (8/25/2005) 63.5900(a)(2) (3/20/2020) NESHAP WWW Table 3, (2.a.), (2.c.) and (3) (8/25/2005)	<p>When electing to comply with 63.5810(b):</p> <p>Group the process streams, defined as each individual combination of resin and application technique, by operation type and resin application method as listed in AOP Term 5.2. All process streams that use the same resin must be included in the group. Calculate a weighted average emission factor (EF) based on the amounts of each individual resin used for the last 12 months, using the following equation:</p> $\text{Avg organic HAP EF} = \frac{\sum_{i=1}^n \text{Actual Process Stream } EF_i * \text{Material}_i}{\sum_{i=1}^n \text{Material}_i}$ <p>Where:</p> <ul style="list-style-type: none"> Actual Process Stream EF_i = actual organic HAP EF for process stream i, lb/ton, calculated as per AOP Term 5.3, Material_i = neat resin plus used during previous 12 calendar months for process stream i, tons, and, n = number of process streams where an organic HAP EF was calculated. <p>MAAX may include process streams where compliance is demonstrated in accordance with AOP Term 5.3.</p> <p>Do not include process streams where compliance is demonstrated in accordance with AOP Term 5.5.</p> <p>The calculated average EF for each group of process streams must be less than or equal to the applicable emission limit in AOP Term 5.2.</p>	<p>Complete all necessary calculations within 30 days after the end of each month.</p> <p>Keep records of all data, assumptions, and calculations performed.</p> <p>Retain records of resin use, organic HAP content, and operation where the resin was used. Resin use records may be based on purchase records if it can be reasonably estimated how the resin was applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.</p>

Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.5 HAP	40 CFR 63.5810(c) (8/25/2005) 40 CFR 63.5895(c) (8/25/2005) 63.5900(a)(2) (3/20/2020) NESHAP WWWWW Table 3, (2.a.), (2.c.) and (3) (8/25/2005)	<p>When electing to comply with 63.5810(c):</p> <p>Demonstrate compliance each month by calculating the weighted average of the applicable individual HAP emissions limits for each operation type in AOP Term 5.2 using the following equation:</p> $\text{Weighted avg emission limit} = \frac{\sum_{i=1}^n EL_i * Material_i}{\sum_{i=1}^n Material_i}$ <p>Where:</p> <ul style="list-style-type: none"> • EL_i = organic HAP emissions limit for operation type i, lb/ton, from AOP Term 5.2, • $Material_i$ = neat resin plus used during previous 12 calendar months for operation type i, tons, and, • n = number of operations. <p>Next, calculate the actual weighted average organic HAP emissions factor (EF) for each operation type using the following equation:</p> $\text{Actual weighted avg HAP EF} = \frac{\sum_{i=1}^n \text{Actual Individual } EF_i * Material_i}{\sum_{i=1}^n Material_i}$ <p>Where:</p> <ul style="list-style-type: none"> • Actual Individual EF_i = actual organic HAP EF for operation type i, lb/ton, calculated as per AOP Term 5.4, • $Material_i$ = neat resin plus used during previous 12 calendar months for operation type i, tons, and, • n = number of operations. <p>The actual weighted average HAP EF for each operation type must be less than or equal to the corresponding weighted average emission limit for that operation type calculated in this AOP Term.</p>	<p>Complete all necessary calculations within 30 days after the end of each month.</p> <p>Keep records of all data, assumptions, and calculations performed.</p> <p>Retain records of resin use, organic HAP content, and operation where the resin was used. Resin use records may be based on purchase records if it can be reasonably estimated how the resin was applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.</p>

<p>5.6 HAP</p>	<p>40 CFR 63.5810(d) (8/25/2005) 40 CFR 63.5895(c) (8/25/2005) 40 CFR 63.5900(a)(3) (3/20/2020) NESHAP WWW Table 7, (5.a.) and (7) (8/25/2005)</p>	<p><u>When electing to comply with 63.5810(d):</u> For any combination of manual or non-atomized mechanical application of a resin type, use a resin with an organic HAP content less than or equal to the following:</p> <ul style="list-style-type: none"> • For all non-corrosion resistant and non-high strength production resins: <ul style="list-style-type: none"> ◦ 38.5 percent by weight. • For all tooling resins: <ul style="list-style-type: none"> ◦ 91.4 percent by weight. <p>When using this option, the same resin must be used in all applications of that resin type. MAAX may also calculate the weighted average organic HAP content for each application method monthly using the following equation:</p> $\text{Weighted avg organic HAP content} = \frac{\sum_{i=1}^n \text{Actual Process Stream HAP content}_i * \text{Material}_i}{\sum_{i=1}^n \text{Material}_i}$ <p>Where:</p> <ul style="list-style-type: none"> • Actual Process Stream HAP content_i = actual organic HAP content for process stream <i>i</i>, percent, • Material_i = neat resin plus used during previous 12 calendar months for process stream <i>i</i>, tons, and, • n = number of process streams. <p>The weighted average organic HAP content based on the previous 12 months of resin use must be less than or equal to the applicable organic HAP content limit in this AOP Term. MAAX may simultaneously use the averaging provisions in AOP Terms 5.4 or 5.5 to demonstrate compliance for any operations and/or resins not included in the compliance demonstration under this AOP Term. Do not use any resins included in the compliance demonstration under this term with the averaging calculations in AOP Terms 5.4 or 5.5.</p>	<p>Complete all necessary calculations within 30 days after the end of each month. Keep records of all data, assumptions, and calculations performed. If using the averaging calculations in this AOP Term, maintain a record of monthly resin use in tons for each individual resin. Retain records of resin use, organic HAP content, and operation where the resin was used. Resin use records may be based on purchase records if it can be reasonably estimated how the resin was applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. Include in the semiannual compliance report a statement that resins individually meet the appropriate organic HAP content limits in this AOP Term.</p>
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Permit Term	Citation	Description	Monitoring/Recordkeeping/Reporting
5.7 HAP	40 CFR 63.5805(b) (8/25/2005), 40 CFR 63.5835(a) (3/20/2020) 40 CFR 63.5900(a)(4), (b), and (c) (3/20/2020) 40 CFR 63.5910(a), (b)(5), (c), (d), and (i) (3/20/2020) 40 CFR 63.5915(d) (3/20/2020) NESHAP WWWW Table 4, (2), (3), (6)-(8) (3/20/2020) NESHAP WWWW Table 14 (3/20/2020)	<p><u>Work Practice Standards</u></p> <p>The source must be in compliance at all times with the following work practice standards:</p> <ul style="list-style-type: none"> Do not use cleaning solvents that contain HAP, except that organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. Containers with HAP-containing material must be closed or covered at all times except when material is being added or removed from them. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. Mixer covers must have no visible gaps except around shafts or instrumentation, when one-inch gaps are permissible. Mixer vents must be closed during mixing, except when material is added. Mixer covers must be on at all times except when material is added or when changing covers to the mixer vessels. Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are actively being used to apply resin. 	<p>Submit semiannual compliance reports in accordance with AOP Term 4.1.</p> <p>The semiannual compliance report must contain the company name and address, certification by responsible official, date of report and dates of reporting period, and if there were no deviations, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.</p> <p>Include each deviation from the requirements of emission standards with the semi-annual compliance report, the total operating time of the affected source during the reporting period, and information on the number, duration, and cause of deviations, and the corrective action taken.</p>

Appendix E
2025 Annual Compliance Certification

January 13, 2026

Northwest Clean Air Agency
ATTN: Air Operating Permits
1600 South Second Street
Mount Vernon, WA 98273-5202

Re: MAAX US Corp
Air Operating Permit 011R3
2025 Annual Title V Permit Compliance Certification

Dear Compliance Officer:

Please find the enclosed 2025 Annual Title V Permit Compliance Certification for MAAX US Corp located at 2150 Division Street in Bellingham, WA 98226.

This report was completed by U.S. Compliance with information provided by MAAX US Corp. If you have any questions regarding the reports, please contact Zack Rabas of U.S. Compliance at zrabas@uscompliance.com or at 952-567-5713.

Sincerely,

Randy Relethford
Regional Operations Manager
MAAX US Corp.

Cc: Northwest Clean Air Agency, U.S. Compliance

Encl: 2025 Annual Title V Permit Compliance Certification

FORM: Annual Compliance Certification Statement

Facility Name	Permit Number:
MAAX US Corp.	011R4

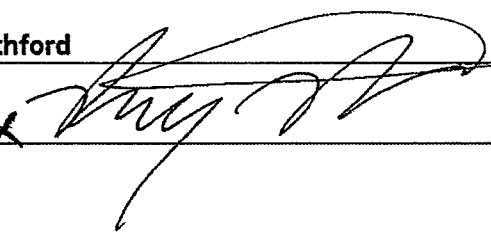
Based upon the specific test methods, monitoring recordkeeping and/or reporting required under the facility's Air Operating Permit and any other information reasonably available, I, the undersigned certify to the following for the reporting period beginning, January 1, 2025, and ending December 31, 2025 :

The facility has been in continuous compliance with all terms and conditions of the facility's Air Operating Permit as noted in the below pages.

I am the responsible official as defined in WAC 173-401-200, for this source.

Based upon information and belief formed after reasonable inquiry, I certify that the statements and information in this document and all referenced documents and attachments are true, accurate and complete.

Responsible Official:

Name: Randy Relethford	Title: Regional Operations Manager
Signature: 	Date: X 1-19-26

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
2.1.1	N/A		Continuous
2.1.2	N/A		Continuous
2.1.3	N/A		Continuous
2.1.4	N/A		Continuous
2.1.5	N/A		Continuous
2.1.6	N/A		Continuous
2.1.7	N/A		Continuous
2.1.8	N/A		Continuous
2.1.9	N/A		Continuous

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
2.1.10	N/A		Continuous
2.1.11	N/A		Continuous
2.2.1	N/A		Continuous
2.2.2	N/A		Continuous
2.2.3	N/A		Continuous
2.2.4	N/A		Continuous
2.2.5	N/A		Continuous
2.2.6	N/A		Continuous
2.2.7	N/A		Continuous

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
2.2.8	N/A		Continuous
2.2.9	N/A		Continuous
2.2.10	N/A		Continuous
2.2.11	N/A		Continuous
2.2.12	N/A		Continuous
2.2.13	N/A		Continuous
2.2.14	N/A		Continuous
2.2.15	N/A		Continuous
2.3.1	N/A		Continuous

FORM: Table 1

Permit Number: 011R4
 Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
2.3.2	N/A		Continuous
2.3.3	N/A		Continuous
2.3.4	N/A		Continuous
2.3.5	N/A		Continuous
2.4.1	Submission of this form		Continuous
2.4.2	N/A		Continuous
2.4.3	Records kept as required		Continuous
2.4.4	Annual Emissions Report		Continuous
2.4.5	Annual Emissions Report		Continuous

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
2.4.6	N/A		Continuous
2.4.7	N/A		Continuous
2.4.8	N/A		Continuous
2.4.9	N/A		Continuous
2.4.10	N/A		Continuous
2.5.1	N/A		Continuous
2.5.2	N/A		Continuous
2.6	N/A		Continuous
2.7.1	N/A		Continuous

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
2.7.2	N/A		Continuous
2.7.3	N/A		Continuous
2.7.4	N/A		Continuous
2.7.5	N/A		Continuous
2.7.6	N/A		Continuous
2.7.7	N/A		Continuous
2.7.8	N/A		Continuous
2.7.9	N/A		Continuous
2.7.10	N/A		Continuous

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
2.7.11	N/A		Continuous
2.7.12	N/A		Continuous
2.8.1	N/A		Continuous
2.8.2	N/A		Continuous
2.8.3	N/A		Continuous
2.8.4	N/A		Continuous
2.8.5	N/A		Continuous
2.8.6	N/A		Continuous
2.8.7	N/A		Continuous

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
2.9	Annual Emissions Report		Continuous
3.1	N/A		Continuous
3.2	N/A		Continuous
3.3	SSMP		Continuous
3.4	N/A		Continuous
3.5	N/A		Continuous
3.6	N/A		Continuous
3.7	N/A		Continuous
3.8	N/A		Continuous

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
3.9	Records of all reports and documentation retained		Continuous
3.10	N/A		Continuous
4.1	Semi-annual report		Continuous
4.2	Records kept as required		Continuous
4.3	Records kept as required		Continuous
4.4	Records kept as required		Continuous
4.5	Records kept as required		Continuous
4.6	Records kept as required		Continuous
4.7	Records kept as required		Continuous

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?	
4.8	Records kept as required		Continuous	
4.9	Records kept as required		Continuous	
4.10	Records kept as required		Continuous	
4.11	Records kept as required		Continuous	
4.12	Monitoring and Recordkeeping maintained as required		Continuous	
4.13	Monitoring and Recordkeeping maintained as required		Continuous	
4.14	Monitoring and Recordkeeping maintained as required		Continuous	
4.15	Monitoring and Recordkeeping maintained as required		Continuous	
4.16	Records Kept as Required		Continuous	
4.17	Records Kept as Required		Continuous	

FORM: Table 1

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Terms & Conditions and Compliance Status Table 1

Complete this table for all terms and conditions under the facility's air operating permit.

Permit Term or Condition (# and/or Title)	Method Used for Determination of Compliance	Identify any other information reasonably available or otherwise known relating to the compliance status (Optional).	During the reporting period, was compliance continuous or intermittent?
4.18	Records Kept as Required		Continuous
4.19	Records Kept as Required		Continuous
4.20	Records Kept as Required		Continuous
5.1	MSDS from Manufacturer		Continuous
5.2	MACT work practice log / annual Air Emissions Report		Continuous
5.3	MACT work practice log		Continuous
5.4	Records Kept as Required		Continuous
5.5	Records Kept as Required		Continuous
5.6	Records Kept as Required		Continuous

FORM: Table 2

Permit Number: 011R4

Name of Facility: MAAX US Corp.

Washington Air Operating Permit Deviation Report Summary Table 2⁽¹⁾ For each deviation from any term or condition, completing the following:

Permit Term or Condition (# and/or Title)	Date the report was submitted	Report description (Briefly describe content. Was deviation previously reported to the agency?)	Additional information (Has agency taken enforcement action, such as issuing an NOV? If yes, discuss.)
N/A	None	None	None

⁽¹⁾ Table 2 must be submitted with the compliance certification. If no deviations have occurred, write "Not Applicable" in the table.

Appendix F
Compliance Statement

Compliance Statement

MAAX US Corp.

Permit No. 011R4

Based upon the specific test methods, monitoring recordkeeping and/or reporting required under the facility's Air Operating Permit (No. 011R4) and any other information reasonably available, I, the undersigned certify to that MAAX Corp. is in compliance with all terms and conditions of the facility's Air Operating Permit and will continue to comply with such requirements.

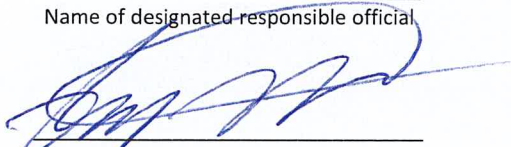
Additionally, for applicable requirements that become effective during the permit term, the MAAX US Corp. will meet such requirements on a timely basis.

I am the responsible official as defined in WAC 173-401-200, for this source.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Randy Relethford

Name of designated responsible official



Signature of responsible official

Plant Manager

Title of responsible official

4-29-26

Date

Section 1. Identification

Product name C431-CGA-13
Product type Polyester Resin Solution
Chemical family Aromatic.
SDS No. NA-1601:3224 (Version: 5.1)

Relevant identified uses of the substance or mixture and uses advised against

Identified uses Used in the manufacture of thermoset plastic parts.
Uses advised against No additional information.

Supplier's details

United States:

Canada:

AOC
 955 Highway 57 East
 Collierville, TN 38017
 Phone Number: (901) 854-2800
 Hours: 8AM-5pm (Central Time) Mon-Fri
 E-Mail: aoc.sds@aocresins.com
 Website: www.aocresins.com

AOC
 38 Royal Road
 Guelph, Ontario Canada N1H 1G3
 Phone Number: (519) 821-5180
 Hours: 8am-5pm (Eastern) Mon-Fri

Emergency telephone number

CHEMTREC Within USA and Canada	+1 (800) 424-9300	CCN1023
CHEMTREC Outside USA and Canada	+1 (703) 527-3887	
CANUTEC Within Canada	+1 (613) 996-6666	

Section 2. Hazards identification

OSHA/HCS status

This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Classification of the substance or mixture

- FLAMMABLE LIQUIDS – Category 3 – H226
- ACUTE TOXICITY (Inhalation) – Category 4 – H332
- SKIN IRRITATION – Category 2 – H315
- EYE IRRITATION – Category 2A – H319
- CARCINOGENICITY – Category 2 – H351
- REPRODUCTIVE TOXICITY – Category 2 – H361d
- SPECIFIC TARGET ORGAN TOXICITY (SINGLE EXPOSURE) – Category 3 – H335
- SPECIFIC TARGET ORGAN TOXICITY (REPEATED EXPOSURE) – Category 1 – H372
- ASPIRATION HAZARD – Category 1 – H304

GHS label elements

Hazard pictograms



Signal word

Danger

Hazard statements

- H226: Flammable liquid and vapor.
- H332: Harmful if inhaled.
- H319: Causes serious eye irritation.
- H315: Causes skin irritation.
- H361d: Suspected of damaging the unborn child.
- H351: Suspected of causing cancer.
- H304: May be fatal if swallowed and enters airways.
- H335: May cause respiratory irritation.
- H372: Causes damage to organs through prolonged or repeated exposure. (hearing organs, kidneys)

Precautionary statements

General

Section 2. Hazards identification

P101: If medical advice is needed, have product container or label at hand.

P102: Keep out of reach of children.

Prevention

P201: Obtain special instructions before use.

P202: Do not handle until all safety precautions have been read and understood.

P280: Wear protective gloves/protective clothing/eye protection/face protection.

P210: Keep away from heat, sparks and hot surfaces. - No smoking.

P240: Ground/bond container and receiving equipment.

P241: Use explosion-proof electrical/ventilating/lighting/material-handling equipment.

P242: Use only non-sparking tools.

P243: Take precautionary measures against static discharge.

P233: Keep container tightly closed.

P271: Use only outdoors or in a well-ventilated area.

P260: Do not breathe vapor or mist.

P270: Do not eat, drink or smoke when using this product.

P264: Wash hands thoroughly after handling.

Response

P314: Get medical attention if you feel unwell.

P308+P313: IF exposed or concerned: Get medical attention.

P304+P340: IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.

P312: Call a POISON CENTER or physician if you feel unwell.

P370+P378: In case of fire: Use dry chemical, CO₂, water spray (fog) or foam.

P301+P310: IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician.

P331: Do NOT induce vomiting.

P303+P361+P353: IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower.

P362+P364: Take off contaminated clothing and wash it before reuse.

P332+P313: If skin irritation occurs: Get medical attention.

P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P337+P313: If eye irritation persists: Get medical attention.

P391: Collect spillage.

Storage

P405: Store locked up.

P403+P235: Store in a well-ventilated place. Keep cool.

P233: Keep container tightly closed.

Disposal

P501: Dispose of contents and container in accordance with all local, regional, national and international regulations.

Hazards not otherwise classified

None known.

Section 3. Composition/information on ingredients

Substance/mixture

Mixture

Ingredient name	CAS number	%
styrene	100-42-5	37.0
α-methylstyrene	98-83-9	<1
cobalt bis(2-ethylhexanoate)	136-52-7	≤0.3

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

Eye contact

Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower eyelids. Use of buffered baby shampoo will aid in removal. If irritation persists, get medical attention.

Inhalation

Move the victim to a safe area as soon as possible. Allow the victim to rest in a well-ventilated area. If breathing is difficult, give oxygen. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek immediate medical attention.

Skin contact

In case of contact, immediately flush skin with plenty of water. Remove contaminated clothing and shoes. If irritation persists, seek medical attention. Wash contaminated clothing before reuse. Clean shoes thoroughly before reuse.

Section 4. First aid measures

Ingestion

Wash out mouth with water. Remove dentures if any. Stop if the exposed person feels sick as vomiting may be dangerous. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Seek immediate medical attention.

Most important symptoms/effects, acute and delayed

Eye contact

Causes serious eye irritation.

Inhalation

Harmful if inhaled. May cause respiratory irritation. May cause drowsiness or dizziness.

Skin contact

Causes skin irritation.

Ingestion

Irritating to mouth, throat and stomach.

Over-exposure signs/symptoms

Eye contact

Adverse symptoms may include the following: pain or irritation, watering, redness.

Inhalation

Adverse symptoms may include the following: respiratory tract irritation, coughing.

Skin contact

Adverse symptoms may include the following: irritation, redness.

Ingestion

Adverse symptoms may include the following: Irritating to mouth, throat and stomach.

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician

Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media

Use dry chemical, CO₂, water spray (fog) or foam.

Unsuitable extinguishing media

Do not use water jet.

Specific hazards arising from the chemical

Flammable liquid and vapor. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion. The vapor/gas is heavier than air and will spread along the ground. Vapors may accumulate in low or confined areas or travel a considerable distance to a source of ignition and flash back. Runoff to sewer may create fire or explosion hazard. This material is harmful to aquatic life with long lasting effects. Fire water contaminated with this material must be contained and prevented from being discharged to any waterway, sewer or drain.

Hazardous thermal decomposition products

Decomposition products may include the following materials: carbon dioxide

Special protective actions for fire-fighters

Fire water contaminated with this material must be contained and prevented from being discharged to any waterway, sewer or drain.

Special protective equipment for fire-fighters

Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel

No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Avoid breathing vapor or mist. Provide adequate ventilation.

For emergency responders

If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment. See also the information in "For non-emergency personnel".

Section 6. Accidental release measures

Environmental precautions

Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air). Water polluting material. May be harmful to the environment if released in large quantities.

Methods and materials for containment and cleaning up

Small spill

Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor.

Large spill

Stop leak if without risk. Move containers from spill area. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

Protective measures

Put on appropriate personal protective equipment (see Section 8). Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. Do not breathe vapor or mist. Do not ingest. Avoid contact with eyes, skin and clothing. Avoid release to the environment. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Store and use away from heat, sparks, open flame or any other ignition source. Use only non-sparking tools. Take precautionary measures against electrostatic discharges. Empty containers retain product residue and can be hazardous. Do not reuse container.

Advice on general occupational hygiene

Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

Conditions for safe storage, including any incompatibilities

Store in accordance with local regulations. Store in a segregated and approved area. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Eliminate all ignition sources. Segregate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination. Refer to the product label and/or technical data sheet for further information.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
styrene	ACGIH TLV (United States, 1/2022). Ototoxicant. TWA: 10 ppm 8 hours. STEL: 20 ppm 15 minutes. OSHA PEL Z2 (United States, 2/2013). TWA: 100 ppm 8 hours. CEIL: 200 ppm AMP: 600 ppm 5 minutes. NIOSH REL (United States, 10/2020). TWA: 50 ppm 10 hours. TWA: 215 mg/m ³ 10 hours. STEL: 100 ppm 15 minutes. STEL: 425 mg/m ³ 15 minutes.
α-methylstyrene	ACGIH TLV (United States, 1/2022). TWA: 10 ppm 8 hours. NIOSH REL (United States, 10/2020). TWA: 50 ppm 10 hours. TWA: 240 mg/m ³ 10 hours. STEL: 100 ppm 15 minutes. STEL: 485 mg/m ³ 15 minutes. OSHA PEL (United States, 5/2018). CEIL: 100 ppm

Section 8. Exposure controls/personal protection

cobalt bis(2-ethylhexanoate)

CEIL: 480 mg/m³
OSHA PEL (United States).
TWA: 0.1 mg/m³
ACGIH TLV (United States, 1/2022). [cobalt and inorganic compounds as Co] Skin sensitizer. Inhalation sensitizer.
TWA: 0.02 mg/m³, (as Co) 8 hours.

Appropriate engineering controls

Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.

Individual protection measures

Hygiene measures

Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Ensure that eyewash stations and safety showers are close to the workstation location.

Eye/face protection

Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists or dusts.

Hand protection

Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary.

Body protection

Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Other skin protection

Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection

Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.



Section 9. Physical and chemical properties

Appearance

Physical state	Liquid.
Color	Blue.
Odor	Aromatic.
Odor threshold	0.01 - 0.1 ppm (<i>Styrene</i>)
pH	<i>Not applicable.</i>
Melting point	-23.8°F / -30.6°C (<i>Styrene</i>)
Boiling point	293°F / 145°C (<i>Styrene</i>)
Flash point	88°F / 31°C (<i>Styrene</i>)
Evaporation rate	< 1 (Butyl acetate = 1)
Flammability (solid, gas)	<i>Not applicable.</i>
Lower and upper explosive (flammable) limits	Lower: 1.1% Upper: 6.1% (<i>Styrene</i>)
Vapor pressure	<2.58mmHg @ 70°F (21°C) per ASTM D 323
Vapor density	3.6 (Air = 1) (<i>Styrene</i>)
Relative density	1.1 (Water = 1)
Solubility	Slight.
Partition coefficient: n-octanol/water	Not available.
Auto-ignition temperature	914°F / 490°C (<i>Styrene</i>)
Decomposition temperature	Not available.
Viscosity	Not available.
Molecular weight	1,000 to 15,000

Section 10. Stability and reactivity

Reactivity

No specific test data related to reactivity available for this product or its ingredients.

Chemical stability

The product is stable. Stable under recommended storage and handling conditions (see Section 7).

Possibility of hazardous reactions

Under normal conditions of storage and use, hazardous reactions will not occur.

Conditions to avoid

Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.

Incompatible materials

Reactive or incompatible with the following materials: oxidizing materials

Hazardous decomposition products

Under normal conditions of storage and use, hazardous decomposition products should not be produced.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Ingredient name	Result	Species	Dose	Exposure
styrene	LC50 Inhalation Gas.	Rat	2770 ppm	4 hours
	LC50 Inhalation Vapor	Rat	11800 mg/m ³	4 hours
	LC50 Inhalation Vapor	Rat	5634.2 ppm	4 hours
α-methylstyrene	LD50 Oral	Rat	2650 mg/kg	-
	LD50 Oral	Rat	4900 mg/kg	-
	LD50 Oral	Rat	4900 mg/kg	-
cobalt bis(2-ethylhexanoate)	LD50 Dermal	Rabbit	>5 g/kg	-
	LD50 Oral	Rat	1.22 g/kg	-

Irritation/Corrosion

Ingredient name	Result	Species	Score	Exposure	Observation
styrene	Eyes - Mild irritant	Human	-	50 ppm	-
	Eyes - Moderate irritant	Rabbit	-	24 hours 100 mg	-
	Eyes - Severe irritant	Rabbit	-	100 mg	-
	Skin - Mild irritant	Rabbit	-	500 mg	-
	Skin - Moderate irritant	Rabbit	-	100 %	-
α-methylstyrene	Eyes - Mild irritant	Rabbit	-	91 mg	-
	Skin - Moderate irritant	Rabbit	-	100 %	-

Sensitization

No data on skin sensitization due to this product.

Carcinogenicity

Classification

Ingredient name	ACGIH	IARC	NTP
styrene	-	2A	Reasonably anticipated to be a human carcinogen.
α-methylstyrene	-	2B	-
cobalt bis(2-ethylhexanoate)	-	2B	Reasonably anticipated to be a human carcinogen.

- 1) Negative Study A published study concluded that the mechanism for producing cancer in mice exposed to styrene is not applicable in human metabolism. (June 2013 Pharmacology & Toxicology 66 (2013))
- 2) Negative Study A recent update to an extensive study of reinforced plastic workers from 1948-1977 concluded that there was no coherent evidence that styrene exposure increased risk of cancer (March 2013 Epidemiology Vol. 24 Issue 2)
- 3) Positive Study Styrene induced pulmonary toxicity and carcinogenicity in mice was shown to be caused by a metabolite of styrene, probably styrene oxide. (Dec.2001 Toxicology Vol.169 Issue 2)

Mutagenicity

No known significant effects or critical hazards.

Reproductive toxicity

Suspected of damaging the unborn child.

Teratogenicity

No known significant effects or critical hazards.

Specific target organ toxicity (single exposure)

May cause respiratory irritation.

Specific target organ toxicity (repeated exposure)

Section 11. Toxicological information

A study of long term effects of workers exposed to styrene levels in the range of 25-35 ppm, 8 hour TWA, indicated a possible mild hearing loss.

Aspiration hazard

May be fatal if swallowed and enters airways.

Potential acute health effects

Eye contact

Causes serious eye irritation.

Inhalation

Harmful if inhaled. May cause respiratory irritation. May cause drowsiness or dizziness.

Skin contact

Causes skin irritation.

Ingestion

Irritating to mouth, throat and stomach.

Symptoms related to the physical, chemical and toxicological characteristics

Eye contact

Adverse symptoms may include the following: pain or irritation, watering, redness.

Inhalation

Adverse symptoms may include the following: respiratory tract irritation, coughing.

Skin contact

Adverse symptoms may include the following: irritation, redness.

Ingestion

Adverse symptoms may include the following: Irritating to mouth, throat and stomach.

Section 12. Ecological information

Toxicity

Ingredient name	Result	Species	Exposure
styrene	Acute EC50 78000 µg/l Marine water	Algae - Skeletonema costatum	96 hours
	Acute EC50 4700 µg/l Fresh water	Daphnia - Daphnia magna	48 hours
	Acute LC50 52 mg/l Marine water	Crustaceans - Artemia salina	48 hours
	Acute LC50 4020 µg/l Fresh water	Fish - Pimephales promelas	96 hours

Persistence and degradability

Not available.

Bioaccumulative potential

Ingredient name	LogP _{ow}	BCF	Potential
styrene	0.35	13.49	low
α-methylstyrene	3.48	15 to 140	low
cobalt bis(2-ethylhexanoate)	-	15600	high

Mobility in soil

Soil/water partition coefficient (K_{oc})

Not available.

Other adverse effects

No known effect according to our database.

Section 13. Disposal considerations

The information in this section contains generic advice and guidance. The list of Identified Uses in Section 1 should be consulted for any available use-specific information provided in the Exposure Scenario(s).

Disposal methods

The generation of waste should be avoided or minimized wherever possible. Empty containers or liners may retain some product residues. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Avoid disposal. Attempt to use product completely in accordance with intended use. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible.

Special precautions

This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Do not cut, weld or grind used containers unless they have been cleaned thoroughly internally. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Section 14. Transport information

DOT /TDG / IMDG/IMO / ICAO/IATA and National regulations.

UN number UN1866
Proper shipping name Resin Solution
Transport hazard class(es) 3



Packing group III
Additional information US regulations require the reporting of spills when the amount exceeds the Reportable Quantity (RQ) for specific components of this material. See CERCLA in Section 15, Regulatory Information, for the Reportable Quantities.

IMDG Emergency schedules (EmS): F-E, S-E
Remarks: FP- 31°C

IATA No additional information.

Environmental hazards Marine pollutant: No.
Special precautions for user Transport within user's premises: always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Section 15. Regulatory information

International regulations lists

United States inventory (TSCA 8b) All components are active or exempted.
Australia (AICS) Not determined.
Canada (DSL) All components are listed or exempted.
China (IECSC) Not determined.
New Zealand (NZIoC) Not determined.
Philippines (PICCS) At least one component is not listed.
Japan (ENCS) Not determined.
Republic of Korea (KECI) Not determined.
Taiwan (CSNN) Not determined.

U.S. Federal regulations

SARA 311/312

Per the June 13, 2016 Federal Register notice, EPA harmonized the EPCRA 311/312 hazard categories with the 2012 OSHA hazard communication standard for classifying and labeling of chemicals (i.e. GHS). Please refer to Section 2 of the SDS to identify the appropriate hazard categories for reporting purposes.

SARA 313

	Ingredient name	CAS number
Form R - Reporting requirements	styrene cobalt bis(2-ethylhexanoate)	100-42-5 136-52-7

CERCLA RQ - styrene - 1000 lbs. (453.6 kg)

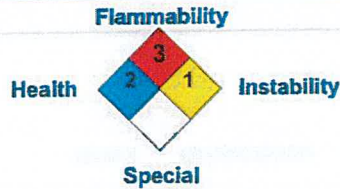
State regulations

California Prop. 65

WARNING: This product can expose you to chemicals including Styrene and α -Methyl styrene, which are known to the State of California to cause cancer, and Methanol, which is known to the State of California to cause birth defects or other reproductive harm. For more information go to www.P65Warnings.ca.gov.

Section 16. Other information

National Fire Protection Association (U.S.A.)



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History

Date of issue	06/20/2023
Date of previous issue	04/15/2022
Version	5.1
Prepared by	AOC Corporate Regulatory Affairs
Key to abbreviations	ATE = Acute Toxicity Estimate BCF = Bioconcentration Factor GHS = Globally Harmonized System of Classification and Labelling of Chemicals IATA = International Air Transport Association IBC = Intermediate Bulk Container IMDG = International Maritime Dangerous Goods LogPow = logarithm of the octanol/water partition coefficient MARPOL = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution) UN = United Nations

Indicates information that has changed from previously issued version.

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