

T&C Inc. dba Fiberglass Specialties  
Title V Permit to Operate No. AOP-28386 v4.0

**Statement of Basis**

(March 5, 2026)

Facility Background:

Fiberglass Specialties is located just south of US Highway 2 on the east side of Minot in Ward County, North Dakota. The facility manufactures fiberglass-reinforced plastics/composite (FRP/C) products. The facility operates out of three separate buildings and manufactures different types of products; currently, large tanks and fiberglass heater covers are the most common. The predominant source of air emissions is styrene from resin application.

Chronology of significant events (not all-inclusive):

1986 - The facility began operation manufacturing railway switch covers from fiberglass.

May 5, 2010 - Fiberglass Specialties submitted a permit to construct application for the facility which was prompted by a tank manufacturing increase in resin usage, and subsequently an increased the styrene potential to emit. The facility started manufacturing 400- and 500-barrel fiberglass tanks.

September 22, 2010 - Permit to Construct (PTC) No. ACP-17274 v1.0 (formerly PTC10030) was issued for the reinforced fiberglass production plant to facilitate open molding operations with chopper guns for non-atomized mechanical operation (for creation of fiberglass tank tops and bottoms), and a filament winder (for the creation of fiberglass tank walls). This PTC included a federally enforceable HAP limit of 95 tons per year from all operations at the facility.

March 3, 2011 - The Department received an application dated February 18, 2011, from Fiberglass Specialties for an initial Title V Permit to Operate for operation of their fiberglass products production facility.

July 28, 2011 - The initial Title V Permit to Operate No. AOP-28386 v1.0 was issued.

July 16, 2016 - Renewed Title V Permit to Operate No. AOP-28386 v2.0 was issued.

March 1, 2022 - Renewed Title V Permit to Operate No. AOP-28386 v2.0 was issued. The permit included administrative revisions to clarify the 40 CFR 63, Subpart WWWW requirements.

Current Action:

On January 14, 2026 the Department received a timely application from Fiberglass Specialties for a renewed Title V permit. All changes and updates in the draft permit are administrative in nature and include updated table names.

The Department proposes to issue Title V Permit to Operate No. AOP-28386 v4.0 after the required 30-day public comment period and subsequent 45-day EPA review period of the draft permit. This statement of basis summarizes the relevant information considered during the

issuance of the Title V permit. The legal basis for each permit condition is stated in the draft permit under the heading of “Applicable Requirement.”

Applicable Programs/As-Needed Topics:

1. **Title V.** The facility requires a Title V Permit to Operate because potential annual Hazardous Air Pollutant (HAP) emissions exceed 10 tons per year major source threshold. Potential emissions of criteria pollutants are below the major source thresholds for the Title V program.
2. **New Source Performance Standards (NSPS).** No NDAC 33.1-15-12-02 and 40 CFR 60 Subparts apply to the facility.
3. **National Emission Standards for Hazardous Air Pollutants (NESHAP).** No NDAC 33.1-15-13 and 40 CFR 61 subparts apply to the facility, with the possible exception of NDAC 33.1-15-13-02 (40 CFR 61) Subpart M (National Emission Standard for Asbestos) may apply during facility modifications involving asbestos.
4. **NESHAP/Maximum Available Control Technology (MACT).** The following NDAC 33.1-15-22-03 and 40 CFR 63 subparts apply to the facility, which is a major source of HAP emissions.  
  
Subpart A, General Provisions, applies to all source units to which another MACT subpart applies.  
  
Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (EUs 1 through 3).
5. **Acid Rain.** NDAC 33.1-15-21 (40 CFR 72, 73, 75 and 76) does not apply to the facility since the plant is not an existing electric utility steam generating plant rated at greater than 25 MWe.
6. **Prevention of Significant Deterioration (PSD).** The facility is not a major source under NDAC 33.1-15-15 (40 CFR 52) because it does not have the potential to emit more than 250 tons per year of a regulated air contaminant during normal operations; therefore, this permit is not subject to PSD review.
7. **BACT.** Since the facility is not a major PSD source and does not contain changes that increase the potential emissions by a PSD-significant amount, a BACT review is not required for this permit. This facility also does not have any required control technology.
8. **Gap Filling for Periodic Monitoring.** This permit does not contain gap filling for testing, monitoring or recordkeeping not otherwise required by rule.
9. **Streamlining Decisions.** This permit does not contain streamlining decisions.

10. **Compliance Assurance Monitoring (CAM).** CAM does not apply because there is no add-on air pollution control equipment installed that is required to achieve compliance and adequate monitoring is specified in post-11/15/90 MACT (Subpart WWWW) regulations.
11. **Permit Shield.** Does not apply because the permit to operate does not contain a permit shield.
12. **New Conditions/Limits.** There are no new conditions or limits with this renewal. Specific changes are identified in the "Permit Changes by Section" below.
13. **40 CFR 98 - Mandatory Greenhouse Gas Reporting.** This rule requires sources above certain emission thresholds or in certain supplier thresholds to calculate, monitor and report greenhouse gas emissions. According to the definition of "applicable requirement" in 40 CFR 70.2, neither Subpart 98, nor Clean Air Act Section 307(d)(1)(V), the CAA authority under which Subpart 98 was promulgated, are listed as applicable requirements for the purpose of Title V permitting. Although the rule is not an applicable requirement under 40 CFR 70, the source is not relieved from the requirement to comply with the rule separately from compliance with their Part 70 operating permit. It is the responsibility of each source to determine applicability to the subpart and to comply, if necessary.

Permit Changes by Section:

Note: Administrative changes were made to some sections of the permit to update to the current North Dakota (ND) format and to correct errors. Table numbers and names were added throughout the permit and table number references were updated to reflect the table number in the permit.

Cover: The expiration date and permit version were updated.

Table of Contents: Page numbers were updated as necessary.

1. **Emission Unit Identification:** Added table number and name.
2. **Applicable Standards, Restrictions and Miscellaneous Conditions:** Added table number and name. Updated table number references as necessary.
3. **Emission Unit Limits:** Added table number and name. Updated table number references as necessary. Removed the EP column from Table 3.1 as it was unnecessary.
4. **Monitoring Requirements and Conditions:** Added table number and name. Updated table number references as necessary.
5. **Recordkeeping Requirements:** No change.
6. **Reporting:** Former Condition No. 7.A was moved to be Condition No. 6.B as it was better suited for the Reporting section. Following condition numbers were updated. Condition No. 6.D was updated to add AEIR abbreviation.

7. **Facility Wide Operating Conditions:** Condition numbers were updated after Condition No. 7.A was moved under the reporting section.
8. **General Conditions:** No change.
9. **State Enforceable Only Conditions (not Federally enforceable):** No change.

Comments/Recommendations:

It is recommended that Title V Permit to Operate No. AOP-28386 v4.0 be processed and considered for issuance following a 30-day public comment period and a subsequent 45-day EPA review period.