Spurlin Industries, Incorporated
Panama City Facility

Facility ID No. 0050057
Bay County

Title V Air Operation Permit Renewal

Permit No. 0050057-008-AV
(Renewal of Title V Air Operation Permit No. 0050057-007-AV)

Permitting and Compliance Authority:
State of Florida
Department of Environmental Protection
Air Resource Management, Northwest District

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Title V Air Operation Permit Renewal

Permit No. 0050057-008-AV

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PROPOSED PERMIT

PERMITTEE:
Spurlin Industries, Incorporated
700 Jackson Way
Panama City, Florida 32402

Permit No. 0050057-008-AV
Panama City Facility
Facility ID No. 0050057
Title V Air Operation Permit Renewal

The purpose of this permit is to renew Title V Air Operation Permit No. 0050057-007-AV, for the above referenced facility. The existing Panama City plant is located in Bay County at 700 Jackson Way, Panama City, Florida. UTM Coordinates are: Zone 17, 627.46 km East and 3341.56 km North; and, Latitude: 30° 12' 02" North and Longitude: 85° 40' 33" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date:
Renewal Application Due Date: Exp. DATE -225
Expiration Date: Eff. DATE + 5 years

(Proposed)

_____

Rick Bradburn
Air Program Administrator

RB/aj/c

Facility Information.

This is a renewal of Title V Permit 0050057-007-AV, effective May 15, 2008. During this permit renewal, and at the applicant's request, the annual visible emissions test that is subject to the General Visible Emissions Standard with a limit of 20% has been removed because there was no rule-based requirement.

As a result of the current economic condition, manufacturing activities have been suspended at the facility. The site continues to operate as a distribution center for fiberglass reinforced bathroom products, such as shower stalls, tubs and related articles manufactured by the Spurlin Industries facility in Georgia.

Subsection A. Facility Description.

This is a Fiberglass Bathroom Fixtures Manufacturing facility. Shower stalls, whirlpool bathtubs and associated fixtures are manufactured from polyester resins. In the manufacturing process, forms and molds are prepared by applying a mold release agent. Styrene based gelcoat is sprayed on forms and molds within two modified waterfall booths. The booths use dry fabric filter pads with integral exhaust fans to control Particulate Matter (PM) emissions. The coated molds are then removed and rolled to one of the chopper gun stations.

Styrene-based polyester resins are pumped through a fixed piping line to a mix tank, combined with inert filler at up to 50% by volume. This mix then is pumped to each of the fiberglass chopper gun stations and applied to the gelcoated surface of the molds. Each chopper gun station has its own local area exhaust fan.

After curing, the parts are removed from the molds and trimmed. The majority of the grinding and sanding activity is conducted in a designated grinding area, located in the northeastern areas of the building. The PM generated in this area is controlled by a Torrit Model 80 CAB dust collector that exhausts within the building (making it unregulated). Small quantities of PM may be generated outside the grinding area from touch up trimming, cutting, shaping, and sanding which are controlled by portable vacuum collectors (shop vacuums) and good housekeeping procedures.

Adhesive, foams, solvents, and coatings, either water based or containing miscellaneous solvents, may be utilized principally in the assembly areas of the building. Although these materials are not used in significant quantities, the material usages and calculated emissions will be documented in the required facility record keeping.

Tubing, fittings, hoses and motors also are added in the assembly area before storage and/or shipping. Acetone is the principal cleanup solvent used. Waste acetone is reclaimed and recovered for re-use through the use of a recovery still. Acetone is not a regulated Volatile Organic Chemical (VOC) species by the U.S. Environmental Protection Agency (USEPA) or Florida Department of Environmental Protections (Department). Therefore, there are no specific permit conditions or limitation associated with acetone in this permit.

The manufacturing processes take place within a permanent building. Most VOC and Hazardous Air Pollutants (HAP) for the gelcoat spray booths and chopper gun areas are exhausted through roof vents. The building also has a number of wall-mounted exhaust fans.

The facility is limited to maximum HAP emissions of 99 tons per year and maximum VOC emissions of 99 tons per year. The HAP Methyl Methacrylate (MMA) is a common addition to Styrene in many resins and gelcoats. The facility is subject to 40 CFR 63 subpart A – General Provisions and 40 CFR 63 subpart WWWW, National Emissions Standards for Hazardous Air Pollutants – Reinforced Plastic Composites Production. Subpart WWWW limits the facility's organic HAP emissions and work practice standards.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
010	Fiberglass Bathroom Fixtures Manufacturing

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received September 28, 2012, this facility is a major source of HAP. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, General Provisions	001
40 CFR 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants – Reinforced Plastic Composites Production	001
62-213	001
62-297	001
62-296	001
62-210	001
62-4	001

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

a. Maintain tightly fitting cover, lids, etc., on all VOC containers when they are not being handled, tapped, etc. All containers that are used for temporary and permanent storage of VOC/organic solvents shall be covered where feasible to prevent vaporization of VOC when not in use.

b. All equipment, pipes, hoses, lids, fittings, etc., shall be operated and maintained in such a manner as to minimize leaks, fugitive emissions and spills of VOC materials.

c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc., of VOC so that it can be covered when not in use.

d. Immediately attend to all spills/waste as appropriate.

[Rule 62-296.320(1), F.A.C.; permit 0050057-004-AC; Initial Title V Permit No. 0050057-003-AV]
{Permitting Note: Additional work practices are included in Table 4 of Appendix NESHAP 40 CFR 63subpart WWWW.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Proper maintenance and disposal of exhaust fan filters and protecting dust containers from wind action that might make dust airborne.

b. Removal of particulate matter from buildings or work areas and closing doors on windy days as needed to prevent visible emission of unconfined particulate matter with opacity equal to or greater than 20%.

c. Enclosure of, or covering activities or equipment when necessary to prevent visible emissions of unconfined particulate matter with opacity equal to or greater than 20%.

d. Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent visible emission of unconfined particulate matter with opacity equal to or greater than 20%.

e. Maintenance of roads, parking areas and yards.

f. Application of water or other dust suppressants to roads, parking areas and yards when necessary to control emissions.

[Rule 62-296.320(4)(c)2., F.A.C.; permit 0050057-004-AC; Initial Title V Permit 0050057-003-AV]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1 of each year. A copy of the form and instructions may be obtained electronically at http://www.dep.state.fl.us/air/rules/forms/aor.htm. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1 of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

Subsection A. Emissions Unit 010

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
010	Fiberglass Bathroom Fixtures Manufacturing

The above emissions unit is composed of the following source segments: 1) Gelcoat spray process; 2) Chopper gun lay-up process and 3) Miscellaneous solvent usage and cleanup. Styrene-based gelcoat is sprayed on forms and molds within two modified waterfall booths. The booths used dry fabric filter pads with integral exhaust fans to control Particulate Matter (PM) emissions. The coated molds are then removed and rolled to one of the chopper gun stations.

VOC and HAP are emitted uncontrolled. A Torrit Model 80 CAB dust collector is used to control PM from the sanding and grinding activities. However, the Torrit is not regulated since it exhausts into the building. Any PM escaping the building is fugitive and is subject to the General Visible Emissions Standard of less than 20%.

During this permit renewal, and at the applicant's request, the annual visible emissions test that was used to demonstrate compliance with the General Visible Emissions Standard with a limit of 20% has been removed, because there was no rule-based emissions-unit-specific requirement.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0050047-004-AC]

Emission Limitations and Standards

{Permitting Note: Spurlin Industries only conducts open molding, mixing, cleaning of equipment, and HAP-containing material storage activities and repair operations on parts you also manufacture at their Panama City Facility. The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.2. Volatile Organic Compounds (VOC) Emissions. VOC emissions shall not exceed 99.0 tons per rolling 12-month period. [Rule 62-4.070, F.A.C.; Permit No. 0050057-004-AC]

A.3. Total HAP (Styrene+ Methyl Methacrylate) Emissions. Total HAP emissions shall not exceed 99.0 tons per rolling 12-month period. .[Rule 62-4.070, F.A.C., and Permit No. 0050057-004-AC]

A.4. Federal Organic HAP Emissions. In accordance 40 CFR 63 subpart WWWW Table 3, the following organic HAP emission limits shall be met:

Operation Type	Application Type or Gelcoat Type	Organic HAP Emission Limit
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.

4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins[2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat[3]	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

[1]Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.
[2]This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.
[3]If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.
[40 CFR 63.5805(b)]

A.5. Work Practice Standards. In accordance with 40 CFR 63 subpart WWWW, the owner or operator must meet the following work practice standard:

For ...	You must ...
1. existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
2. existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
3. all mixing or BMC manufacturing operations[1]	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
4. all mixing or BMC manufacturing operations[1]	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
5. all mixing or BMC manufacturing operations[1]	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

[1]Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.
[40 CFR 63.5805(b)]

A.6. Federal Standards. All operations must meet, as well as be in compliance with, the organic HAP emissions limits in Table 3 in 40 CFR 63 subpart WWWW and the work practice standards in Table 4 in 40 CFR 63 subpart WWWW, regardless of the quantity of HAP emitted. [40 CFR 63.5805(b) and 40 CFR 63.5835(a)]

{Permitting Note: This emissions unit is an existing facility and is not listed in 40 CFR 63.5805(a).]

Test Methods and Procedures

A.7. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.8. Determining HAP Content of Resins and Gel Coats. As required by 40 CFR 63 subpart WWWW, in order to determine the organic HAP content of resins and gel coats, the owner or operator shall use the information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in (a) through (c), as applicable.

a. *HAP to Include in Total*. The organic HAP total shall include each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.
b. *HAP Content Provided as Range*. If the organic HAP content is provided by the material supplier or manufacturer as a range, the owner or operator must use the upper limit of the range for determining compliance.
c. *HAP Content Provided as Single Value*. If the organic HAP content is provided as a single value, the owner or operator may use that value to determine compliance.

[40 CFR 63.5797]

A.9. Determining Compliance with Federal HAP Emission Standards. The owner or operator may use the equations in Table 1 in 40 CFR 63 subpart WWWW to calculate emissions factors. Equations have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. [40 CFR 63.5796]

A.10. Changing Federal Compliance Options. You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to non-atomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) *Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.*

(1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate

equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\%\ \text{Control Efficiency}}{100} \qquad \text{(Eq. 1)}$$

Where:
Percent Control Efficiency = a value calculated from organic HAP emissions test measurements made according to the requirements of §63.5850 to this subpart.

{Permitting Note: If there are no add-on controls do not calculate an Add-on Control Factor}

(2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

(b) *Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.* Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.

(1)

(i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^{n} Material_i} \qquad \text{(Eq. 2)}$$

Where:
Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i, lbs/ton;
$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;

n = number of process streams where you calculated an organic HAP emissions factor.

(ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.

(2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

(c) *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n}(EL_i * Material_i)}{\sum_{i=1}^{n} Material_i} \qquad \text{(Eq. 3)}$$

Where:
EL_i = organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;
$Material_i$ = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;
n = number of operations.

(2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Operation } EF_i * Material_i)}{\sum_{i=1}^{n} Material_i} \qquad \text{(Eq. 4)}$$

Where:
Actual Individual EF_i = Actual organic HAP emissions factor for operation type i, lbs/ton;

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;
n = number of operations.

(3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

(d) *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

(1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

(2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

(3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.

(4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

[40 CFR 63.5810]

A.11. Continuous Compliance Demonstration. The owner or operator must demonstrate continuous compliance with each HAP emissions or work practice standard as follows:

a. *HAP Emissions Standards*. Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 in 40 CFR 63 subpart WWWW, on a 12-month rolling average.

b. *Work Practice Standards*. Compliance with the work practice standards in Table 4 in 40 CFR 63 subpart WWWW is demonstrated by performing the work practice required for the operation.

[40 CFR 63.5900(a)]

A.12. Compliance during Startup, Shutdown or Malfunction. During periods of startup, shutdown or malfunction, the owner or operator must meet the organic HAP emissions limits and work practice standards that apply. [40 CFR 63.5900(c)]

Monitoring of Operations, Recordkeeping and Reporting Requirements

A.13. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

A.14. Material Recordkeeping. The owner or operator must collect and keep records of resin and gel coat use, organic HAP content (both resin and gel coat), and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 in 40 CFR 63 subpart WWWW. Resin use records may be based on purchase records if the owner or operator can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [40 CFR 63.5895(c) and (d)]

A.15. Emissions Recordkeeping. Emissions shall be calculated monthly and presented on a rolling 12-month totals basis for VOC, Styrene and Methyl Methacrylate pollutants. These records shall be kept for five years. This information shall be made available for inspection by Department personnel upon demand.[Rule 62-4.070, F.A.C., and Permit No. 0050057-004-AC]

A.16. Deviation Reporting. The owner or operator must report each deviation from each standard in 40 CFR 63.5805. The deviations must be reported according to the requirements in 40 CFR 63.5910. [40 CFR 63.5900(b)]

A.17. Report Submittals. The owner or operator must submit all reports required by Table 14 in 40 CFR 63 subpart WWWW and not based on the requirements in 40 CFR 63.999. [40 CFR 63.5910(a) and (h)]

A.18. Compliance Reports Reporting Periods and Due Dates. The owner or operator must submit each Compliance Report by the date specified in Table 14 in 40 CFR 63 subpart WWWW.

a. *Reporting Period.* Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
b. *Due Dates*. Each compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

[40 CFR 63.5910(b)]

A.19. Compliance Report Content. The compliance report must contain the information in paragraphs a. through f.:

a. Company name and address.
b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
c. Date of the report and beginning and ending dates of the reporting period.
d. If the owner or operator had a startup, shutdown, or malfunction during the reporting period and the owner or operator took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in 40 CFR 63.10(d)(5)(i).
e. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
f. The owner or operator must include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. [40 CFR 63.5895(d)]

[40 CFR 63.5910(c)]

A.20. Reporting of Deviations. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined 40 CFR 63 subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 in 40 CFR 63 subpart WWWW along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [40 CFR 63.5910(g)]

A.21. Reporting Change in Compliance Options. Where multiple compliance options are available, the owner or operator must state in the next compliance report if the owner or operator have changed compliance options since the last compliance report. [40 CFR 63.5910(i)]

A.22. Recordkeeping. The owner or operator must keep the following records in a. thru d.:

a. *Federal Notifications and Reports*. A copy of each notification and report that the owner or operator submitted to comply with 40 CFR 63 subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
b. *Startup, Shutdown, and Malfunction Records*. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
c. *Emissions Data and Calculations*. The owner or operator must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, in 40 CFR 63 subpart WWWW.
d. *Work Practice Compliance Statement*. The owner or operator must keep a certified statement that they are in compliance with the work practice requirements in Table 4 in 40 CFR 63 subpart WWWW.

[40 CFR 63.5915(a), (c) and (d)]

A.23. <u>Records Maintenance</u>**.**

a. *Readily Accessible and Suitable*. The owner or operator must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).
b. *5 Year Retention*. As specified in 40 CFR 63.10(b)(1), the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
c. *2 Year Retention Onsite*. The owner or operator must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The owner or operator can keep the records offsite for the remaining 3 years.
d. *Retention Format*. The owner or operator may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

[40 CFR 63.5920(a), (b), (c) and (d)]

<u>Other Requirements</u>

A.24. Change of Operations. The permittee shall notify the Department prior to operating with any gelcoat or resin products other than Styrene or Methyl Methacrylate based. A change from these current products many change the basis of this permit and require additional permitting action. [Rule 62-4.070, F.A.C.; Permit No. 0050057-004-AC]

A.25. Particulate Emissions Control. In order to limit particulate emissions generated form the cutting, grinding, and sanding operations, the permittee shall maintain and operate the Torrist Model 80 CARB dust

collector in accordance with the manufacturers recommended procedures during each activity that generates particulate emissions. This dust collector vents back into the building, therefore it is not subject to a VE requirement. [Rule 62-296.320 and 62-4.070(3), F.A.C.; Permit No. 0050057-004-AC]

A.26. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63 subpart A – General Provisions and 40 CFR 63 subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. [Rules 62-204.800 and 62-213.440, F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart WWWW, Reinforced Plastic Composites Production
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.