FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
160 W. GOVERNMENT STREET, SUITE 308
PENSACOLA, FLORIDA 32502

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

*** DRAFT PERMIT ***

DATE

Sent via e-mail to:
seg@jupitergroup.dk

PERMITTEE

Jupiter Composites, Inc.
3301 Bill Metzger Lane
Pensacola, Florida 32514

Authorized Representative:
Mr. Sean Guidry, Site Manager

Air Permit No. 0330291-002-AC
Permit Expires:

Jupiter Composites Facility
Title V Air Construction Permit
Project Name: Reinforced Plastics
Composites Wind Turbine Housings & Components

This is the final air construction permit to replace the Air General Permit for your facility which fabricates wind turbine generator housings and components made of reinforced plastic composites. The proposed work will be conducted at the Jupiter Composites Reinforced Plastics Composites Wind Turbine Housings & Components fabrication facility (which is classified under Standard Industrial Classification No. 3999 for Manufacturing Industries, Not Elsewhere Classified). The facility is located in Escambia County at 3301 Bill Metzger Lane in Pensacola, Florida. The UTM coordinates are Zone 16, 481.4 km East, and 3376.7 km North. As noted in the Final Determination provided with this final permit, (no changes / only minor changes and clarifications) were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

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Executed in Pensacola, Florida

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_____ _____

J. Charles Harp Date
Program Administrator
Waste Management/Air Resources

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

c: Owen H. Taffe III, Jupiter Composites, Inc., oht@jupitercomposites.com
Michael G. Long, P.E., Cornerstone Engineering Services, LLC, longm@bellsouth.net
Ms. Ana Oquendo, EPA Region 4, oquendo.ana@epa.gov
Ms. Natasha Hazziez, U.S. EPA Region 4, hazziez.natasha@epa.gov

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

Clerk Date

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FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility is currently operated under the Reinforced Polyester Resin Operations Air General permit for 0330291-001-AG effective February 8, 2013.

Facility ID No. 0330291	
ID No.	**Emission Unit Description**
001	Resin and Gelcoat Operations
002	Reinforced Plastic Composites (RPC) Grinding

Proposed Project

An existing building will be modified to manufacture parts for wind turbine generator housings and parts made of reinforced plastic composites using two different processes to apply gelcoat and resin. All parts will be fabricated using vacuum infused technology. Gelcoat will be spray-applied to the molds and allowed to cure. Pre-cut fiberglass and metal parts will be added to the molds and the molds will be prepared for vacuum infusion. Styrene resin is drawn into the mold cavity by vacuum. A vacuum pump will be installed to draw the resin from the mixing room to the molds. PM, HAP and non-HAP VOCs emission from these areas of operations will be discharged outside the building from Stack No. 1and Stack No. 2. Each stack will be equipped with a fabric filter to remove PM.

A section of the building will be converted into the fiberglass manufacturing process. A 20’ by 45’ gelcoat room will be fabricated and equipped with both inlet and out exhaust blowers.

All resin and gelcoat will be mixed and handled in a 10’ by 15’ mixing room that will be fabricated and equipped with exhaust blowers the mixing room. Both the resin and the gelcoat operations will draw product from this room to either the vacuum molds or gelcoat spray system.

An existing vacuum collection loop will be modified and used to collect dust generated in the trimming process of the molds. This system will discharge through a new baghouse.

The facility is major for HAP. This facility, including the use of molds and the application of resin/gelcoat, is subject to the MACT standards of 40 CFR 63 subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

Facility ID No. 0330291	
ID No.	**Emission Unit Description**
001	Resin and Gelcoat Operations
002	Reinforced Plastic Composites (RPC) Grinding

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

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SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Northwest District Air Resource Management Program, Florida Department of Environmental Protection (Department). The District's mailing address is 160 W Government Street, Suite 308, Pensacola, Florida 32502-5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office at the above address or nwdair@dep.state.fl.us.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions; and

   d. Appendix D. Common Testing Requirements.

   e. Appendix 40 CFR 63 WWWW

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. Asbestos: This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

7. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

8. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4)

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through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

9. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/emission/permitting.htm. [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

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A. EU 001 Resin and Gelcoat Operations

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
001	Resin and Gelcoat Operations; Stack No. 1 – Gelcoat Room, Stack No. 2 – Mixing Room

An existing building will be modified to manufacture parts for wind turbine generator housings and parts made of Reinforced Plastic Composites (RPC) using different processes to apply gelcoat and resin. Gelcoat is spray applied to the wind turbine housing open molds. After the gelcoat has cured, precut fiberglass and metal are added to the mold. The molds are covered with plastic and sealed for the closed-mold vacuum infusion step, where resin is drawn into the molds by use of a vacuum. After the resin has cured, the plastic is removed and the housings are trimmed. A topcoat of gelcoat is then applied to the unfinished side previously covered by the plastic. The VOC and HAP emissions from this step are similar to those due from an open-mold process. The housings are then moved to the warehouse floor for final assembly and inspection.

The RPC application of gelcoat and resin will be performed using the following steps:

Step 1:

Gelcoat is applied to the wind turbine housings open molds in the gelcoat room.

- Mold release wax is applied to molds
- Gelcoat is applied to the molds with a Patriot gelcoat system (or equal). All gelcoat is supplied from the mixing room
- Gelcoat and Hardener are mixed at the gelcoat spraying system
- Emission from this operation will be emitted from Stack No. 1 which will be equipped with a fabric filter to remove Fugitive PM Emissions
- Mixing Room emissions will be exhausted through Stack No. 2 which will be equipped with a fabric filter to remove fugitive PM emissions

Step 2:

Cured parts are removed from the gelcoat room to be prepared for vacuum infusion.

- Precut fiberglass and metal are added to the mold
- Molds are covered with plastic and sealed in preparation ~~of~~ for Vacuum infusion

Step 3:

Molds are *Vacuum infused with resin, a closed-mold process, and allowed to cure.

- Resin and Hardener are mixed in the mixing room
- Mixed Resin is drawn via the vacuum pump from the mixing room into the molds
- Emissions for this operation are from the vacuum pump and the exhaust from the mixing room (Stack No. 2)

After parts are trimmed, gelcoat (Topcoat) is applied to the unfinished side. Parts are moved to the warehouse floor for final assembly and inspection.

This emissions unit, including the use of molds and the application of resin/gelcoat, is subject to the MACT standards of 40 CFR 63 subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

PERFORMANCE RESTRICTIONS

1. Permitted Capacity: Production capacity limited to 250 units per year. Permittee shall maintain records of the quantity produced. [Rule 62-210.200(PTE), F.A.C.] *{Permit Note: The construction permit was a subtype AC1E for sources 5 T/yr but less than 25 T/yr. Based on permittee information the facility has the potential to emit >10 TPY styrene, making the facility a major Title V source for HAPs.}*

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2. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

3. Emissions Standards:

   a. Hazardous Air Pollutant (HAP) - Total hazardous air pollutants *(including Styrene and Methyl Methacrylate)* emissions from this facility shall not equal or exceed 25 tons per rolling 12-month period. [As requested by permittee in the construction permit Application No. 0330291-002-AC and Rules 62-4.050(4)(a)2.d., and 62-210.200(PTE), F.A.C.]

   b. Total Volatile Organic Compound (VOC) - Total VOC emissions from this facility including Styrene, MMA and other HAPs that are VOCs, shall not equal or exceed 25 tons in any rolling 12-month period. [As requested by permittee in the construction permit Application No. 0330291-002-AC and Rules 62-4.050(4)(a)2.d., and 62-210.200(PTE), F.A.C.]

Compliance Dates and Standards

References to "this subpart" mean 40 CFR 63 subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

4. You must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. Facilities meeting an organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

If your facility is . . .	And . . .	Then you must comply by this date . . .
5. A new source	Is an area source at startup and becomes a major source	Immediately upon becoming a major source.

[40 CFR 63.5800]

The following specific conditions apply to the open-molding gelcoat spray application process only.

5. You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date. [40 CFR 63.5840]

6. Federal Organic HAP emissions. Federal Organic HAP Emissions. In accordance 40 CFR 63 subpart WWWW Table 3, the following organic HAP emission limits shall meet the parts that apply to you.

If your operation type is . . .	And you use . . .	[1]Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application c. manual resin application	113 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application c. manual resin application	88 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	a. mechanical resin application	497 lb/ton.

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products	c. manual resin application	238 lb/ton.
5. open molding—shrinkage controlled resins[2]	a. mechanical resin application c. manual resin application	354 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]

7. 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. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. a new or 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.
3. a new or 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.
6. 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.

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7. 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.
8. 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]

{Permitting Note: facility uses a bulk molding compound (BMC) process to prepare the resin to use in their reinforced composites manufacturing process.}

8. 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 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 40 CFR 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.

(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

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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.

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

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;

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$Material_i$ = 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.

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

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.

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[40 CFR 63.5810]

9. Demonstrating initial compliance with the standards.

(a) You demonstrate initial compliance with each organic HAP emissions standard in paragraphs (a) through (h) of §63.5805 that applies to you by using the procedures shown in Tables 8 and 9 to this subpart.

Table 8 to Subpart WWWW of Part 63—Initial Compliance With Organic HAP Emissions Limits

For . . .	That must meet the following organic HAP emissions limit . . .	You have demonstrated initial compliance if . . .
1. open molding and centrifugal casting operations	a. an organic HAP emissions limit shown in Tables 3 or 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart	i. you have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in §63.5810 on a 12-month rolling average 1 year after the appropriate compliance date, and/or ii. you demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or iii. you demonstrate using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

Table 9 To Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting	the owner or operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.
2. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement	the owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain no HAP.
3. a new or 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	the owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as

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For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
		necessary for safety.
4. an existing or new mixing or BMC manufacturing operation	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	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.

[40 CFR 63.5860(a)]

Test Methods and Procedures

10. 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 paragraphs (a) through (c) of this section, as applicable.
    (a) Include in the organic HAP total 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) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.
    (c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance. [40 CFR 63.5797]

11. Determining HAP Content of Resins and Gel Coats. 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]

The following Specific Condition applies only to the vacuum infusion (closed-molding) process

12. Work Practice Standards. The owner or operator must meet the work practice standards in Table 4 to this subpart that apply to you. [40 CFR 63.5805(c)]

The following Specific Conditions apply both to open molding and vacuum infusion (closed-molding) process

13. Continuous Compliance Demonstration. The owner or operator must demonstrate continuous compliance with each HAP emissions or work practice standard. [40 CFR 63.5900(a)]

14. 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)]

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MONITORING AND RECORDKEEPING REQUIREMENTS

15. 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 Table 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) and Application No. 0330291-002-AC]

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)]

17. Report Submittals. The owner or operator must submit all reports required in Table 14 in 40 CFR 63 subpart WWWW. [40 CFR 63.5910(a)]

18. Compliance Reports, Reporting Periods and Due Dates. The owner or operator must submit each 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)]

19. Compliance Report Content. The compliance report must contain the information in paragraphs (c)(1) through (5):
    1. Company name and address.
    2. 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.
    3. Date of the report and beginning and ending dates of the reporting period.
    4. 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).
    5. 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.

[40 CFR 63.5910(c)]

20. Reporting of Deviations. Each affected source that has obtained a title V operating permit pursuant to 40 CFR 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 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)]

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21. Compliance Reports and Startup, Shutdown, and Malfunction Reports. The owner or operator shall submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 in 40 CFR 63 Subpart WWWW, and not based on the requirements in 40 CFR 63.999. [40 CFR 63.5910(h)]

22. 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)]

23. 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)]

24. Records Maintenance.
    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 five 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 two 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 three 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)]

Other Requirements

25. Notifications

(a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR 63 Subpart A, referenced in Table 13 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.
[40 CFR 63.5905]

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 60, Subpart A - General Provisions and 40 CFR

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63 subpart WWWW - National Emissions Standards for Hazardous Air Pollutants Reinforced Plastic Composites Production. [Rule 62-213.440, F.A.C]

27. The permittee shall keep monthly logs (electronic logs are allowed) of VOC and HAP - containing materials used in the manufacturing process and estimated VOC and HAP emissions for the facility to document compliance with emissions limitations. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, for monthly records "purchases" may be used instead of "usage" in determining HAP/VOC emissions, provided that no materials are used which are not purchased and the material is not used in multiple application methods with different emission factors. The daily logs shall not utilize "purchase" records to demonstrate compliance. The daily logs shall include a cumulative total to demonstrate compliance with emissions limitations. The logs shall be retained on file at the facility for the most recent five years. The monthly logs shall include at least the following information:
    a. Facility Name, Facility ID No., Emission Unit ID No., and Description;
    b. Month, year and method used for records (use or purchase – if applicable);
    c. Each log shall have the appropriate footnotes listing emission factors used in calculation;
    d. Each log, where applicable, shall have attached the documentation for all chemicals removed from the facility if the permittee seeks emission credits for the wastes; and
    e. The emission factors used to calculate HAP and VOC emissions for the logs shall be updated upon receiving more accurate emission data, such as updates to subpart WWWW, UEF Table AP-42, or other references or methods approved by the Department.

    [Rule 624.070(3), F.A.C.]

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B. EU 002 Reinforced Plastic Composites (RPC) Grinding

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
002	Reinforced Plastic Composites (RPC) Grinding

Parts are removed from the molds and trimmed of excess material with hand tools. A vacuum system will collect the dust generated from this operation. The collection system will discharge through a baghouse (BH-1; Nederman FlexFilter equipped with 129 ft² of filter area) to reduce PM emissions.

EQUIPMENT

1. New Equipment: The permittee is authorized to install a Nederman model BH-1Flex Filter baghouse with 129 ft² of filter area, or equivalent. [Application No. 0330291-002-AC]

PERFORMANCE RESTRICTIONS

2. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

3. Emissions Standards: Visible emissions shall not equal or be greater than 20% opacity. [Rules 62-4.070, and 62-296.320(4)(b)1 & 4, F.A.C., and Application No. 0330291-002-AC]

TESTING REQUIREMENTS

4. Initial Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for VE. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. This is a one-time VE test requirement. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

5. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Notification may be sent via e-mail to nwdair@dep.state.fl.us. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

6. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rules 62-204.800 and 62-297.401, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.401, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

7. The applicant shall submit an Operations and Maintenance (O&M) Plan pertaining to the baghouse that shall include.
   a. Pressure differential ranges under normal operation
   b. Manufacturer's recommended maintenance schedule

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B. EU 002 Reinforced Plastic Composites (RPC) Grinding

The O&M Plan shall be submitted within 120 days of issuance of this permit for Department review and approval.
[Rule 62-4.070, F.A.C., and Application No. 0330291-002-AC]

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