Tampa Fiberglass, Inc.

Facility ID No. 0570472
Hillsborough County

Title V Air Operation Permit Renewal/Revision

FINAL Permit No. 0570472-008-AV
(Renewal/Revision of Title V Air Operation Permit No. 0570472-007-AV)

Permitting and Compliance Authority:

Environmental Protection Commission
of Hillsborough County
3629 Queen Palm Drive
Tampa, FL 33619

Telephone: (813)627-2600
Fax: (813)627-2660

Title V Air Operation Permit Renewal/Revision

Permit No. 0570472-008-AV

Table of Contents

Section **Page Number**

I. Facility Information.
A. Facility Description. 2
B. Summary of Emissions Units. 3
C. Applicable Regulations. 3

II. Facility-wide Conditions. 4-7

III. Emissions Units and Conditions.
A. Fiberglass Product Manufacturing 8-22
B. Boat Manufacturing..... 23-40

IV. Appendices. 41
Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart WWWW
Appendix NESHAP, Subpart VVVV
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.

Referenced Attachments. ..... At End
Table H, Permit History.
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.

PERMITTEE:
Tampa Fiberglass, Inc.
4209 Raleigh Street
Tampa, Florida 33619

FINAL Permit No. 0570472-008-AV
Tampa Fiberglass, Inc.
Facility ID No. 0570472
Title V Air Operation Permit Renewal/Revision

The purpose of this permit is to renew and revise the Title V air operation permit for the above referenced facility and to incorporate concurrently issued Permit No. 0570472-009-AC for the fiberglass boat manufacturing operation and the establishment of facility-wide emissions caps on VOC and HAP emissions. The existing facility is located in Hillsborough County at 4209 Raleigh Street, Tampa, Florida. UTM Coordinates are: Zone 17, 361.41 East and 3088.47 North. Latitude is: 27° 54' 56.0'' North; and, Longitude is: 82° 24' 30.0'' 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: April 14, 2014
Renewal Application Due Date: September 1, 2018
Expiration Date: April 14, 2019

_____
Richard D. Garrity, Ph.D.
Executive Director

RDG/SRH/srh

Subsection A. Facility Description.

Tampa Fiberglass manufactures custom fiberglass reinforced plastic products, such as septic tanks, small tanks for wastewater treatment plants, and pipes (12" in diameter), etc. The facility also manufactures fiberglass reinforced plastic boats using the same types of materials used to make the other reinforced plastic products. In the past, the facility also manufactured military tank simulators and cockpit simulators. The facility is still capable of manufacturing these simulators if the market demands. The operation consists of resin and gelcoat open molding (spray lay-up and hand lay-up), closed molding, finishing operations, and clean-up activities. The predominant materials associated with the processes include resin, gelcoat, polymerization initiator, styrene monomer, and miscellaneous filler. All these operations are performed inside a production building, which is divided into sections. Also on the southwest side of the production building is a separate, smaller building which is used to manufacture fiberglass boats, however, the boat manufacturing operations can take place in the main production building as well.

Usually, the parts/products with complex shapes are made through the closed molding process. In the case of the septic tank production, the top portion of the tanks are made through the closed molding process by injecting resin/fiberglass into the closed mold, and the bottom portion of the tanks are made through the open molding process by spraying resin/fiberglass on the mold (lamination). On the other hand, pipes are made by open molding, manual resin application, which involves laying the resin/fiberglass on a flat sheet and then rolling it into a round shape.

During the spray lay-up application process, the mold defines the structure of the outer surface. A layer of gelcoat is sprayed onto the mold and is allowed to cure. Following the gelcoat application, the styrene based resin and polymerization initiator is applied with a spray gun equipped with a glass chopper. Small droplets of resin from the spray gun are applied to the mold. The facility uses a non-atomized gun made by Magnum Venus Plastech (MVP), which employs Fluid Impingement Technology (FIT) for the spray nozzles to achieve a spray pressure of approximately 25 to 30 psi. The spray lay-up application activities are typically conducted in the south side of the facility.

The hand lay-up application involves manually mixing the resin and the polymerization initiator in a container and applying the mixture to the mold or material with a brush or roller. Each layer applied is rolled out to remove air pockets.

The closed molding operation consists of a low pressure molding process, where glass fiber mats are placed between two gelcoat coated molds. Catalyzed resin is injected into the molds after they are clamped together. The hand lay-up and closed molding application activities are typically conducted in the middle of the production building.

The finishing operations include grinding, sanding and gelcoat application, as necessary. Grinding is performed with hand-held grinding equipment. The gelcoat is applied on products that require a smooth finish. For the cleanup activities, acetone is used as a cleanup agent. Acetone that comes into contact with the styrene based resin and fiberglass material is incorporated into the manufacturing process as filler or glue. Since acetone has been delisted as a photochemically reactive VOC, this function is now unregulated. The cleanup activities can be done at the area where the application is conducted or in the north side of the production building.

Tampa Fiberglass, a major source of HAP emissions, is subject to the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW) and Boat Manufacturing (40 CFR 63, Subpart VVVV). Therefore, the facility must meet the organic HAP emissions limits in both subparts. Each subpart has different compliance options that the facility may use to comply with the emission limits. The permittee may switch between the compliance options, provided the proper procedures are followed as specified in the NESHAPs.

VOC and styrene emissions associated with these operations are controlled through material HAP content limitations and work practice standards.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fiberglass Product Manufacturing
002	Boat Manufacturing

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal/revision application received October 17, 2013 this facility is a major source of hazardous air pollutants (HAP). This facility is subject to the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW) and Boat Manufacturing (40 CFR 63, Subpart VVVV). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, NESHAP General Provisions	001, 002
40 CFR 63, Subpart WWWW	001
40 CFR 63, Subpart VVVV	002
Rule 62-296.320, F.A.C.	001, 002
Chapter 1-3.23 and 1-3.50, Rules of the EPCHC	001, 002

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.

a. Maintain tightly fitting covers, lids, etc., on all containers of VOC/OS when they are not being handled, tapped, etc.

b. Prevent excessive air turbulence across exposed VOC/OS materials.

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

d. All fittings, valve lines, etc., shall be properly maintained.

e. All VOC/OS spills shall be attended to immediately and the waste properly disposed of, or recycled.

f. All of the fiberglass resin and geloat application activities shall be take place inside the production buildings with concrete floors in order to prevent contamination of the soils and groundwater.

[Rule 62-296.320(1), F.A.C. and 0570472-007-AV]

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 shall include:

a. Using portable vacuums when using sanding, cutting, and grinding equipment.

b. Maintain facility grounds as necessary to preclude generation of particulate matter by vehicular traffic and other on-site activities.

[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees

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

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report

(EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available 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. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FW7. [RESERVED]

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.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW10. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. The first six-month monitoring report is due by September 1st each year, and the 2nd six-month monitoring report should be included with the Statement of Compliance. [Rule 62-213.440(1), F.A.C.]

FW11. The permittee shall submit all compliance related notifications and reports required of this permit to the Environmental Protection Commission of Hillsborough County at:

Environmental Protection Commission
of Hillsborough County
Air Management Division
3629 Queen Palm Drive
Tampa, FL 33619

FW12. Any reports, data, notifications, certifications and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Compliance Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155 Fax: 404/562-9163

FW13. As requested by the permittee, the total maximum facility-wide emissions of VOC and HAP shall not exceed the following:

a. VOC Emissions shall not exceed 48.0 tons for any 12-consecutive month period.
b. HAP Emissions shall not exceed 27.3 tons for any 12-consecutive month period.

Monthly and 12-month rolling records of VOC and HAP emissions shall be kept at the facility and available for inspection upon request. The monthly records shall be completed by the 15th day of the following month.

[Rules 62-210.200 (PTE) and 62-4.070(3), F.A.C.; and Air Construction Permit No. 0570472-009-AC]

FW14. The permittee shall notify the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted.
[Rules 62-297.340(1)(i) and 62-209.500, F.A.C]

FW15. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C]

FW16. When the Environmental Protection Commission of Hillsborough County, after investigation, has good reason (such as complaints, increased visible emissions, etc.), to believe that any applicable emission standard contained in Chapter 62-296, F.A.C., or in this permit is being violated, it may require the owner or operator of the source to conduct compliance testing which identify the nature and quantity of air pollutant emissions from the source and to provide a report on the results of said tests to the Environmental Protection Commission of Hillsborough County. [Rule 62-297.340(2), F.A.C.]

FW17. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

FW18. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(205), F.A.C., Modification. These changes do not include routine maintenance, repair, or replacement of component parts of an emissions unit, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.
C) Installation of an air pollution control device not otherwise reflected in the permit.

FW19. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

FW20. Applicable Requirements. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

FW21. Rules of the EPC. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

FW22. Chapter 84-446, Laws of Florida. The use of property, facilities, equipment, processes, products, or compounds, or any other act that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

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

EU No.	Brief Description
-001	Fiberglass Product Manufacturing

Essential Potential to Emit (PTE) Parameters

A.1. Reinforced plastic composites production is limited to the operations in which reinforced and/or non-reinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites. [40 CFR 63.5785(a)]

A.2. Methods of Operation. The facility is authorized to perform the following reinforced plastic composites production activities:

a. Open Molding Non-atomized Spray Lay-up Operations (Resin and Gel Coat)
b. Open Molding Manual Resin and Gel Coat Operations
c. Closed Molding Operations
d. Solvent Clean-up Operations using Acetone
e. Product Finishing Operations (Cutting, Grinding, and Sanding Equipment)

[Rule 62-213.410, F.A.C.; and Air Construction Permit No. 0570472-009-AC.]

A.3. Hours of Operation. This emission unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C., Permit No. 0570472-009-AC]

Emission Limitations and Standards

{Permitting Note: 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.4. Organic HAP Emissions. The fiberglass product manufacturing operation shall meet the organic HAP emissions limits in Table 3 or the organic HAP content limits in Table 7, and the work practice standards in Table 4 of Subpart WWWW that apply, at all times. [40 CFR 63.5805 and 63.5835]

A.5. Compliance Options. The permittee shall use one of the following methods in Specific Conditions A.5.a. through A.5.d. to meet the standards in 40 CFR §63.5805. When the permittee is complying with an emission limit in Tables 3 or 5 to Subpart WWWW, the permittee may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, covered curing techniques, and routing part or all of the facility's emissions to an add-on control. The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in Specific Conditions A.5.a. through A.5.d. When the permittee changes to an option based on a 12-month rolling average, the the permittee must base the average on the previous 12 months of data calculated using the compliance option the facility is currently using unless the permittee was using the compliant materials option in Specific Conditions A.5.d. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.
[40 CFR §63.5810 and Air Construction Permit No. 0570472-009-AC]

a. Meet the individual organic HAP emissions limits for each operation. Demonstrate that the facility meet the individual organic HAP emissions limits for each open molding operation in Tables 3, or 5 to Subpart WWWW. This is done in two steps. First, determine an organic HAP factor for each individual resin and gel coat, application method, and control method the facility uses in a particular operation. Second, calculate, for each particular operation type, a weighted average of those organic HAP emissions factors

based on resin and gel coat use. The permittee's calculated organic HAP emissions factor must either be at or below the applicable organic HAP emissions limit in Tables 3 or 5 to Subpart WWWW based on a 12-month rolling average. Use the procedures described in Specific Conditions A.5.a.(1) through A.5.a.(3) to calculate average organic HAP emissions factors for each of the facility's operations.
[40 CFR §63.5810(a)]

(1) Calculate the 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 three characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the application technique, or the control technique. The facility must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to Subpart WWWW for open molding, or site-specific organic HAP emissions factors discussed in 40 CFR §63.5796. If the permittee wants to use vapor suppressants to meet the organic HAP emissions limit for open molding, the permittee must determine the vapor suppressant effectiveness by conducting testing according to the procedures specified of Appendix A to Subpart WWWW of 40 CFR part 63. If the permittee wants to use an add-on control device to meet the organic HAP emissions limit, the permittee must determine the add-on control factor by conducting capture and control efficiency testing, using the procedures specified in 63.5850 to Subpart WWWW. The organic HAP emissions factor calculated from the equations in Table 1 to Subpart WWWW, or site-specific emissions factors, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control.

(2) Calculate the actual operation organic HAP emissions factor for the last 12 months for each open molding operation type by calculating the weighted average of the individual process stream organic HAP emissions factors within each respective operation. To do this, sum the product of each individual organic HAP emissions factor calculated in Specific Condition A.5.a.(1) and the amount of neat resin plus and neat gel coat plus usage that correspond 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. Use Equation 2 of this section to calculate the actual organic HAP emissions factor for each open molding operation type.

$$\text{Actual Operation Organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}\left(\text{Actual Process Stream } EF_i * \text{Material}_i\right)}{\sum_{i=1}^{n}\text{Material}_i} \quad \text{(Eq. 2)}$$

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

(3) Compare each organic HAP emissions factor calculated in Specific Conditions A.5.b.(2) with its corresponding organic HAP emissions limit in Tables 3 or 5 to Subpart WWWW. If all emissions factors are equal to or less than their corresponding emission limits, then the facility is in compliance.

b. HAP Emissions factor averaging option. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Tables 3 or 5 to Subpart WWWW that apply to the facility. When using this option, the permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all the open molding operations.
[40 CFR §63.5810(b)]

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the facility for the last 12-month period to determine the organic HAP emissions limit the permittee must meet. To do this, multiply the individual organic HAP emissions limits in Tables 3 or 5 to Subpart WWWW for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding 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 over the last 12 months. Use Equation 3 of this section to calculate the weighted average organic HAP emissions limit for all open molding operations.

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

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Tables 3, 5 or 7 to Subpart WWWW

$Material_i$ = 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 the actual weighted average organic HAP emissions factor for open molding. To do this, multiply the actual open molding operation organic HAP emissions factors and the amount of neat resin plus and neat gel coat plus used in each open molding 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 operations. The permittee must calculate the actual individual HAP emissions factors for each operation type as described in Specific Conditions A.5.a.(1) and A.5.a.(2). Use Equation 4 of this section to calculate the actual weighted average organic HAP emissions factor.

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

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 Specific Conditions A.5.b.(1) and A.5.b.(2). 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 the facility is in compliance.

c. If the facility has multiple operation types, meet the organic HAP emissions limit for one operation type, and use the same resins for all operations of that resin type. If the facility has more than one operation type, the facility may meet the emission limit for one of those operations, and use the same resins in all other open molding and centrifugal casting operations.
[40 CFR §63.5810(c)]

(1) 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.

(2) For any combination of manual resin application, mechanical resin application, filament application, the permittee may elect to meet the organic HAP emissions limit for any one of these operations and use that operation's same resin in all of the resin operations listed in this paragraph. Table 7 to Subpart WWWW 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 values shown in Table 7 to Subpart WWWW, the facility is in compliance.

(3) The facility may also use a weighted average organic HAP content for each operation described in Specific Condition A.5.c.(2). Calculate the weighted average organic HAP content monthly. Use Equation 2 in Specific Condition A.5.a.(2) except substitute organic HAP content for organic HAP emissions factor. The facility is 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 Subpart WWWW.

(4) The facility may simultaneously use the averaging provisions in Specific Condition A.5.b. to demonstrate compliance for any operations and/or resins the permittee does not include in the compliance demonstrations is Specific Conditions A.5.c.(2) and A.5.c.(3). However, any resins for which the permittee claims compliance under the option in Specific Conditions A.5.c.(2) and A.5.c.(3) may not be included in any of the averaging calculations described in paragraphs a. or b. of this section used for resins for which the permittee are not claiming compliance under this option.

d. Use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 7 to Subpart WWWW. [40 CFR §63.5810(d)]

Monitoring of Operations

A.6. Material Organic HAP Content. In order to determine the organic HAP content of resins and gel coats, the permittee may rely on 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 condition, as applicable. [40 CFR §63.5797, Rule 62-4.070(3), F.A.C., and Permit No. 0570472-009-AC]

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, the permittee 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 the permittee must use the measured organic HAP content to determine compliance.

c. If the organic HAP content is provided as a single value, the permittee 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 the permittee 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 the permittee must use the measured organic HAP content to determine compliance.

Recordkeeping and Reporting Requirements

A.7. The permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the permittee is meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to Subpart WWWW. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP content limits in Table 7 to if the permittee is averaging organic HAP contents. Resin use records may be based on purchase records if the permittee 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. The permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, or 7 to the Subpart.
[40 CFR 63.5895(c) and 63.5915(c); and Air Construction Permit No. 0570472-009-AC]

A.8. The permittee shall maintain a recordkeeping/reporting system to demonstrate compliance with the facility-wide emission limits in Facility-wide Condition FW13. The system shall include, as a minimum, the following information and make it available for inspection/verification by the Environmental Protection Commission of Hillsborough County for at least the most recent 5 years for Title V source: [40 CFR §63.5915(a), Rules 62-4.070(3) and 62-213.440(1), F.A.C., and AC Permit No. 0570472-009-AC]

a. Preparations of monthly resin usage by process (i.e. spray lay-up, hand lay-up, and closed molding).
b. Preparation of monthly consumption records of all materials used containing HAPs and VOC. These records should include the individual HAP and VOC content per MSDS or applicable test of each such material on the same form.
c. Summation of individual HAP and VOC emissions on a monthly basis.
d. Rolling 12 month totals of styrene/HAPs and VOC emissions.
e. Retention of purchase orders and invoices for at least the minimum period required above.

A.9. The permittee shall demonstrate continuous compliance with the annual average organic HAP emissions limits in Table 3 to Subpart WWWW and the work practice standards in Table 4 to Subpart WWWW that apply to the facility according to the methods specified in the following: [40 CFR 63.5900 and Air Construction Permit No. 0570472-009-AC]

a. 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 Tables 3, or 5 to the Subpart, on a 12-month rolling average, or by including in each compliance report a statement that all resins

and gel coats meet the appropriate organic HAP emissions limits, as discussed in the Rule 62-210.370(3)(a)(1) F.A.C. that requires reporting for all Title V sources. [40 CFR 63.5900(a)(2)]

b. Compliance with organic HAP content limits in Table 7 to the Subpart WWWW is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to Subpart WWWW, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits, as discussed in the Rule 62-210.370(3)(a)(1) F.A.C. that requires reporting for all Title V sources. [40 CFR 63.5900(a)(3)]

c. Compliance with the work practice standards in Table 4 to Subpart WWWW is demonstrated by performing the work practice required for the facility's operation. [40 CFR 63.5900(a)(4)]

d. The permittee shall report each deviation from the Table 3 and the Table 4 to Subpart WWWW that applies to the facility. The deviations shall be reported according to the requirements in the Specific Condition A.11. [40 CFR 63.5900(b)]

A.10. Reporting Schedule. The permittee shall submit all of the notifications and reports in Table 13 and 14 to Subpart WWWW that apply by the dates specified. The notifications are described more fully in 40 CFR Part 63, Subpart A. [40 CFR 63.5905 and 63.5910]

A.11. Compliance Report. The semiannual compliance report required under 63.5910 must contain the following information: [40 CFR 63.5910(c)]

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 there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to the facility, and there are no deviations from the requirements for work practice standards in Table 4 to the Subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. All deviations from the standards in Specific Condition A.4. shall be detailed in the report.

A.12. The permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.5920(b)]

A.13. The permittee 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(d)]

A.14. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

A.15. Federal Rule Requirements. In addition to the specific conditions listed above, these emission units are subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart WWWW. [Rule 62-204.800, F.A.C.]

Table 1 to Subpart WWWW of Part 63—Equations To Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

Table 1 to Subpart WWWW of Part 63--Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams[1]

As specified in §63.5810, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:

If your operation type is a new or existing...	And you use...	With...	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat)[2,3,4]...	Use this organic HAP emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat)[2,3,4]...
1. open molding operation	a. manual resin application	i. nonvapor-suppressed resin	EF = 0.126 x %HAP x 2000	EF = ((0.286 x %HAP)-0.0529) x 2000
		ii. vapor-suppressed resin	EF = 0.126 x %HAP x 2000 x (1-(0.5 x VSE factor))	EF = ((0.286 x %HAP)-0.0529) x 2000 x (1-(0.5 x VSE factor))
		iii. vacuum bagging/closed-mold curing with roll out	EF = 0.126 x %HAP x 2000 x 0.8	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.8
		iv. vacuum bagging/closed-mold curing without roll-out	EF = (0.126 x %HAP x 2000 x 0.5	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.5
	b. atomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000	EF = ((0.714 x %HAP)-0.18) x 2000
		ii. vapor-suppressed resin	EF = 0.169 x %HAP x 2000 x (1-(0.45 x VSE factor))	EF = ((0.714 x %HAP)-0.18) x 2000 x (1-(0.45 x VSE factor))
		iii. vacuum bagging/closed-mold curing with roll-out	EF = 0.169 x %HAP x 2000 x 0.85	EF = ((0.714 x %HAP)-0.18) x 2000 x 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.169 x %HAP x 2000 x 0.55	EF = ((0.714 x %HAP)-0.18) x 2000 x 0.55
	c. nonatomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.107 x %HAP x 2000	EF = ((0.157 x %HAP)-0.0165) x 2000
		ii. vapor-suppressed resin	EF = 0.107 x %HAP x 2000 x (1-(0.45 x VSE factor))	EF = ((0.157 x %HAP)-0.0165) x 2000 x (1-(0.45 x VSE factor))
		iii. closed-mold curing with roll-out	EF = 0.107 x %HAP x 2000 x 0.85	EF = ((0.157 x %HAP)-0.0165) x 2000 x 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.107 x %HAP x 2000 x 0.55	EF = ((0.157 x %HAP)-0.0165) x 2000 x 0.55
	d. atomized mechanical resin application with robotic or automated spray control[5]	nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000 x 0.77	EF = 0.77 x ((0.714 x %HAP)-0.18) x 2000
	e. filament application[6]	i. nonvapor-suppressed resin	EF = 0.184 x %HAP x 2000	EF = ((0.2746 x %HAP)-0.0298) x 2000
		ii. vapor-suppressed resin	EF = 0.12 x %HAP x 2000	EF = ((0.2746 x %HAP)-0.0298) x 2000 x 0.65
	f. atomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000	EF = ((1.03646 x %HAP)-0.195) x 2000

	g. nonatomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.185 x %HAP x 2000	EF = ((0.4506 x %HAP)-0.0505) x 2000
	h. atomized spray gel coat application using robotic or automated spray	nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000 x 0.73	EF = ((1.03646 x %HAP)-0.195) x 2000 x 0.73
2. centrifugal casting operations [7,8]	a. heated air blown through molds	nonvapor-suppressed resin	EF = 0.558 x (%HAP) x 2000	EF = 0.558 x (%HAP) x 2000
	b. vented molds, but air vented through the molds is not heated	nonvapor-suppressed resin	EF = 0.026 x (%HAP) x 2000	EF = 0.026 x (%HAP) x 2000

Footnotes to Table 1

[1] The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart NNNN. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facilit from using the equations in this table to calculate emission factors for purposes other then rule compliance if these equations are the most accurate available.

[2] To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

[3] Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

[4] The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

[5] This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

[6] Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

[7] These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

[8] If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

[70 FR 50129, Aug. 26, 2005]

Table 3 to Subpart WWWW of Part 63—Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP

As specified in §63.5805, you must meet the following organic HAP emissions limits 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 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.
7. centrifugal casting—CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure b. resin application with the mold closed, and the mold is not vented during spinning and cure c. resin application with the mold open, and the mold is vented during spinning and cure d. resin application with the mold open, and the mold is not vented during spinning and cure	25 lb/ton.[4] NA—this is considered to be a closed molding operation. 25 lb/ton.[4] Use the appropriate open molding emission limit.[5]

8. centrifugal casting—non-CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure b. resin application with the mold closed, and mold is not vented during the spinning and cure c. resin application with the mold open, and the mold is vented during spinning and cure d. resin application with the mold open, and the mold is not vented during spinning and cure	20 lb/ton.[4] NA—this is considered to be a closed molding operation. 20 lb/ton.[4] Use the appropriate open molding emission limit.[5]
9. pultrusion[6]	N/A	reduce total organic HAP emissions by at least 60 weight percent.
10. continuous lamination/casting	N/A	reduce total organic HAP emissions by at least 58.5 weight percent or not exceed an organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.

[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.

[4]For compliance purposes, calculate your emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to this subpart, or a site specific emission factor for after the mold is closed as discussed in §63.5796.

[5]Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to this subpart, or a site specific emission factor as discussed in §63.5796.

[6]Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 4 to this subpart.

[70 FR 50131, Aug. 25, 2005]

Table 4 to Subpart WWWW of Part 63—Work Practice Standards

As specified in §63.5805, you must meet the work practice standards in the following table that apply to you:

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.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC.
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.
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.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of	i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s),

1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s),
	v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

[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.

[70 FR 50133, Aug. 25, 2005]

Table 7 to Subpart WWWW of Part 63—Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type

As specified in §63.5810(d), when electing to use the same resin(s) for multiple resin application methods, you may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

If your facility has the following resin type and application method . . .	**The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .**	**is . . .**
1. CR/HS resins, centrifugal casting[1,2]	a. CR/HS mechanical	[3]48.0
	b. CR/HS filament application	48.0
	c. CR/HS manual	48.0
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.4
	b. CR/HS manual	46.4
3. CR/HS resins, filament application	CR/HS manual	42.0

4. non-CR/HS resins, filament application	a. non-CR/HS mechanical	[3]45.0
	b. non-CR/HS manual	45.0
	c. non-CR/HS centrifugal casting[1,2]	45.0
5. non-CR/HS resins, nonatomized mechanical	a. non-CR/HS manual	38.5
	b. non-CR/HS centrifugal casting[1,2]	38.5
6. non-CR/HS resins, centrifugal casting[1,2]	non-CR/HS manual	37.5
7. tooling resins, nonatomized mechanical	tooling manual	91.4
8. tooling resins, manual	tooling atomized mechanical	45.9

[1]If the centrifugal casting operation blows heated air through the molds, then 95 percent capture and control must be used if the facility wishes to use this compliance option.

[2]If the centrifugal casting molds are not vented, the facility may treat the centrifugal casting operations as if they were vented if they wish to use this compliance option.

[3]Nonatomized mechanical application must be used.

[70 FR 50133, Aug. 25, 2005]

Table 13 to Subpart WWWW of Part 63—Applicability and Timing of Notifications

As required in §63.5905(a), you must determine the applicable notifications and submit them by the dates shown in the following table:

If your facility . . .	You must submit . . .	By this date . . .
1. Is an existing source subject to this subpart	An Initial Notification containing the information specified in §63.9(b)(2)	No later than the dates specified in §63.9(b)(2).
2. Is a new source subject to this subpart	The notifications specified in §63.9(b)(4) and (5)	No later than the dates specified §63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in §63.9(c)	A request for a compliance extension as specified in §63.9(c)	No later than the dates specified in §63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions	A Notification of Compliance Status as specified in §63.9(h)	No later than 1 year plus 30 days after your facility's compliance date.

5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging	A Notification of Compliance Status as specified in §63.9(h)	No later than 30 calendar days after your facility's compliance date.
6. Is complying by using an add-on control device	a. A notification of intent to conduct a performance test as specified in §63.9(e)	No later than the date specified in §63.9(e).
	b. A notification of the date for the CMS performance evaluation as specified in §63.9(g)	The date of submission of notification of intent to conduct a performance test.
	c. A Notification of Compliance Status as specified in §63.9(h)	No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

Table 14 to Subpart WWWW of Part 63—Requirements for Reports

As required in §63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report	a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period	Semiannually according to the requirements in §63.5910(b).
	b. The information in §63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and	Semiannually according to the requirements in §63.5910(b).

	operating parameter monitoring systems, was out of control, as specified in §63.8(c)(7), the report must contain the information in §63.5910(e)	
	c. The information in §63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan	Semiannually according to the requirements in §63.5910(b).
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	b. The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§63.10(d)(5)(ii)).

Subsection B. Emission Unit 002

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

EU No.	Brief Description
-002	Boat Manufacturing

Essential Potential to Emit (PTE) Parameters

B.1. The permittee is authorized to conduct fiberglass boat manufacturing operations, which includes the manufacture of hulls or decks of boats from fiberglass or assembly of boats from pre-manufactured hulls and decks, or builds molds to make fiberglass hulls or decks. [40 CFR 63.5779 and Air Construction Permit No. 0570472-009-AC]

B.2. Methods of Operation. The facility is authorized to perform the following activities, as part of the fiberglass boat manufacturing operations.

a. Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
b. Closed molding resin operations.
c. Resin and gel coat mixing operations.
d. Resin and gel coat application equipment cleaning operations.
e. Carpet and fabric adhesive operations.

[40 CFR 63.5689, Rules 62-213.410 and 62-4.070(3), F.A.C.; and, Air Construction Permit No. 0570472-009-AC]

B.3. Hours of Operation. This emission unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C. and Permit No. 0570472-009-AC]

Emission Limitations and Standards

{Permitting Note: 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.}

B.4. Organic HAP Emissions. You must limit organic HAP emissions from the five open molding operations - production resins, pigmented gel coats, clear gel coats, tooling resins, and tooling gel coats to the limit specified by the equation, based on a 12-month rolling average.

$$HAP_{limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})]$$ Where:

HAP Limit = Total allowable organic HAP that can be emitted from the open molding operations (kilograms)

M_R = Mass of production resin used in the past 12 months, excluding any materials exempt under Specific Condition No. B.5.(megagrams)

M_{PG} = Mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under Specific Condition No. B.5.(megagrams)

M_{CG} = Mass of clear gel coat used in the past 12 months, excluding any materials exempt under Specific Condition No. B.5. (megagrams)

M_{TR} = Mass of tooling resin used in the past 12 months, excluding any materials exempt under Specific Condition No. B.5. (megagrams)

M_{TG} = Mass of tooling gel coat used in the past 12 months, excluding any materials exempt under Specific Condition No. B.5. (megagrams)

[40 CFR 63.5698(a) and (b), and Air Construction Permit No. 0570472-009-AC]

B.5. Exempt Materials. The following materials are exempt from the open molding emissions limit specified in Specific Condition No. B.4.

a. Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of life boats, rescue boats, and other life saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with non-atomizing (non-spray) resin application equipment.

b. Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the facility on a 12 month rolling average basis. In order to claim the exemption, records must be kept for the amount of gel coats used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

c. Pure, 100 percent, vinylester resin used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a twelve month rolling average basis. In order to claim the exemption, records must be kept for the amount of 100 percent vinylester skin coat resin used per month that is eligible and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

[40 CFR 63.5698(d)]

B.6. Compliance Options. Compliance with the open molding emission limit for boat manufacturing in Specific Condition No. B.4. (40 CFR 63.5698) shall be determined using one or more of the following options for the resins and gel coats used in open molding operations:

a. Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option
   (1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emissions limit in Specific Condition B.4.
   (2) Those operations and materials not included in the emissions average must comply with paragraph b. below.

b. Compliant materials options. Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to Subpart VVVV. Compliance with this option is based on a 12-month rolling average.

[40 CFR 63.5701]

B.7. a. If the permittee chooses the Maximum Achievable Control Technology (MACT) model point value averaging (emissions averaging) option to comply open molding emission limit, the permittee must demonstrate by performing the following steps:

(1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in Specific Condition No. B.4. (40 CFR 63.5698) using the procedures described in Specific Condition No.B.9. (40 CFR 63.5710). Compliance with this option is based on a 12-month rolling average.

(2) For those open molding operations and materials complying with the emissions averaging option, compliance shall be demonstrated by performing the following procedures:

(a) Use the methods specified in Specific Condition No. B.19. (40 CFR 63.5758) to determine the organic HAP content of resins and gel coats.

(b) Complete the calculations described in Specific Condition No. B.9. (40 CFR 63.5710) to show that the organic HAP emissions do not exceed the limit specified in Specific Condition No. B.4. (40 CFR 63.5698).

(c) Keep records as specified in 1 through 4 below for each resin and gel coat.

1. Hazardous air pollutant content.
2. Amount of material used per month.
3. Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized technology.
4. Calculations performed to demonstrate compliance based on MACT model point values, as described in Specific Condition No. B.9.(40 CFR 63.5710).

(d) Prepare and submit the implementation plan described in Specific Condition No. B.20. (40 CFR 63.5707) to the Environmental Protection Commission of Hillsborough County and keep it up to date.

(e) Submit semiannual compliance reports to the Environmental Protection Commission of Hillsborough County as specified in Specific Condition No. A.20.(40 CFR 63.5764).

(3) Those operations and materials not included in the emissions averaging must comply with paragraph b. below.

b. If the permittee chooses the <u>Compliant Materials</u> option, compliance shall be demonstrated by using the procedures listed below for each open molding operation. Compliance shall be based on a twelve-month rolling average.

(1) Use the methods specified in Specific Condition No. B.19. to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in Specific Condition No. B10. to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 of Subpart VVVV.

(3) Keep records as specified in (a) through (d) below for each resin and gel coat.

(a) Hazardous air pollutant (HAP) content.

(b) Application method for production resin and tooling resin.

(c) Amount of material used per month.

(d) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in Specific Condition No. B.10. (40 CFR 63.5713).

(4) Submit semiannual compliance reports to the Environmental Protection Commission of Hillsborough County as specified in Specific Condition No. B.21. (40 CFR 63.5764).

[40 CFR 63.5704 and 40 CFR 63.5701]

B.8. When demonstrating compliance with 40 CFR 63, Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used, it must be used for a minimum of twelve consecutive months before switching to the other option and a notification must be submitted to EPC at least 30-days prior to the switch. [Rule 62-4.070(3), F.A.C.]

Recordkeeping and Reporting Requirements

B.9. Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). At the end each month, Equation No. 1 shall be used to demonstrate that the organic HAP emissions from those operations included in the average for the previous 12-month period do not exceed the emission limit in Specific Condition No. B.4. (40 CFR 63.5698) calculated for the same 12- month period. (Include terms in Equation No. 1 of 40 CFR 63.5698 (Specific Condition No. B.4.) and Equation No. 1 of this Specific Condition for only those operations and materials included in the average.) [40 CFR 63.5710]

Equation No. 1

$$HAP_{emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + PV_{TG})(M_{TG})]$$

Where:

$HAP_{emissions}$ = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

M_R = Mass of production resin used in the past 12 months, megagrams.

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.

PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.

PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

M_{TR} = Mass of tooling resin used in the past 12 months, megagrams.

PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams.

At the end of every month, Equation No. 2 shall be used to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^{n}(M_i\ PV_i)}{\sum_{i=1}^{n}(M_i)} \qquad (Eq.\ 2)$$

Where:

PV_{OP} = Weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, PV_{TR}, and PV_{TG}) included in the average, kilograms of HAP per megagram of material applied.

M_i = Mass of resin or gel coat "i" used within an operation in the past 12 months, megagrams.

n = Number of different open molding resins and gel coats used within an operation in the past 12 months.

PV_i = The MACT model point value for resin or gel coat "i" used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

The equations in Table 3 of Subpart VVVV shall be used to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months. If the organic HAP emissions are less than the organic HAP limit calculated in Specific Condition No. B.4. for the same 12-month period, then compliance with the emission limit in Specific Condition No. B.4. for those operations and materials included in the average has been demonstrated.

B.10. Compliance with the Compliant Materials option shall be demonstrated as follows. The weighted-average organic HAP content shall be calculated using the following procedures.

a. Compliance using the organic HAP content requirements listed in Table 2 of Subpart VVVV is based on a 12-month rolling average that is calculated at the end of every month. If the facility utilizes filled material (production resin or tooling resin), then compliance is demonstrated according to the procedure described in Specific Condition No. B.11.
b. At the end of each month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2 of Subpart VVVV, then the facility is in compliance with the emission limit specified in Specific Condition No. B.4. for that 12-month period for that operation. In addition, the weighted-average organic HAP content calculation contained in paragraph c. of this section for that operation does not need to be completed.
c. At the end of every month, use Equation No. 3 below to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

Equation No. 3

$$\textit{Weighted-Average}\ \text{HAP Content}\ (\%) = \frac{\sum_{i=1}^{n}(M_i\ \text{HAP}_i)}{\sum_{i=1}^{n}(M_i)}$$

where:

M_i = Mass of open molding resin or gel coat "i" used in the past 12 months in an operation (megagrams).

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat "i" used in the past 12 months in an operation. Use the methods in Specific Condition No. B.19. (40 CFR 63.5758) to determine organic HAP content.

n = Number of different open molding resins or gel coats used in the past 12 months in an operation.

d. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 of Subpart VVVV, then the facility complies with the emission limit specified in Specific Condition No. B.4.

[40 CFR 63.5713]

B.11. If filled production resins or filled tooling resins are used, compliance must be demonstrated for the filled production resins and tooling resins on as-applied basis using Equation No. 4 below.

Equation No. 4

$$PV_F = PV_u \times \frac{(100 - \%\ \text{Filler})}{100}$$

Where:

PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 of Subpart VVVV

% Filler = The weight-percent of filler in the as-applied filled resin system.

a. If the filled resin is used as a production resin and the value of PV_F calculated by Equation No. 4 of this condition does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

b. If the filled resin is used as a tooling resin and the value of PV_F calculated by Equation No. 4 of this condition does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

c. If you are including a filled resin in the emissions averaging procedure described in Specific Condition No. B.9., then use the value of PV_F calculated using Equation No. 4 of this condition for the value of PV_i in Equation 2 of Specific Condition No B.9.

[40 CFR 63.5714]

B.12. The permittee shall not allow the mixing of resins or gel coats in containers with a capacity equal to or greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, without covers which have no visible gaps. The covers shall be in place at all times except when material is being manually added to, or removed from, a container, or when mixing or pumping equipment is being placed into, or removed from, a container. [40 CFR 63.5731]

B.13. All mixing containers with a capacity equal to or greater than 208 liters (55 gallons) shall be inspected at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover. Records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken, shall be maintained in accordance with Specific Condition No. B.23. [40 CFR 63.5731]

B.14. All routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), shall be performed using a cleaning solvent that contains no more than 5.0 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies. (Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.) [40 CFR 63.5734]

B.15. All organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers shall have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in, or removed from, the container. On containers with a capacity greater than 7.6 liters (2.0 gallons), the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid. [40 CFR 63.5734]

B.16. Compliance with the organic HAP content of the cleaning solvents subject to the standards in Specific Condition No. B.14. shall be determined using the methods specified in Specific Condition No. B.19. If any cleaning solvents are recycled on site, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in Specific Condition No. B.19. for demonstrating compliance with organic HAP content limits. [40 CFR 63.5737]

B.17. All containers holding organic HAP-containing solvents used for removing cured resin and gel coat shall be inspected at least once per month to ensure that the containers have covers with no visible gaps. Records must be kept documenting the monthly inspections and any repairs made to the covers. These records shall be retained in accordance with Specific Condition No. B.23. [40 CFR 63.5737]

B.18. The permittee shall not allow the use of carpet and fabric adhesives that contain more than 5.0 percent organic HAP by weight. Compliance with the organic HAP content for carpet and fabric adhesives shall be demonstrated using the methods in Specific Condition No. B.19. [40 CFR 63.5740]

B.19. The determination of the organic HAP content for each material used in the open molding, resin, and gel coat operations, and the carpet and fabric adhesive operations shall be accomplished using one of the following methods.

a. Method 311 (Appendix A to 40 CFR part 63) may be used for determining the mass fraction of organic HAP. Use the procedures specified in (1) and (2) below when determining organic HAP content by Method 311.
   (1) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA) defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).
   (2) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
b. ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins) may be used to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
c. An alternative test method for determining mass fraction of organic HAP may be used with prior approval by the Administrator. An alternative test method request must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
d. Information from the supplier or manufacturer of the material may be used such as manufacturer's formulation data, according to (1) through (3) below.
   (1) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0

percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, it does not have to be included in the organic HAP total.

(2) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the upper limit of the range shall be used for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in Specific Condition No. B.19. a. through c. exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the measured organic HAP content shall be used to determine compliance.

(3) If the organic HAP content is provided as a single value, it may assumed the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in Specific Condition No. B.19. a. through c. is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the provided value may be used to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the measured organic HAP content shall be used to determine compliance.

e. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends is not available, the values for organic HAP content that are listed in Table 5 or 6 of Subpart VVVV shall be used. Table 6 of Subpart VVVV shall be used only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 of Subpart VVVV and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 of Subpart VVVV, then the test results must be used for determining compliance.

[40 CFR 63.5758]

B.20. Implementation Plan. The permittee shall prepare and submit an implementation plan for all open molding operations for which compliance will be demonstrated by using the emissions averaging option described in 40 CFR 63.5704(a). The implementation plan must describe the steps taken to bring the open molding operations covered by this subpart into compliance. The implementation plan shall be submitted to the Environmental Protection Commission of Hillsborough County with the initial "notification of compliance status" specified in Specific Condition No. B.22. (The initial "notification of compliance status" shall be submitted no later than 30 calendar days after the end of the first full twelve month averaging period following issuance of Air Construction Permit No. 0570472-009-AC.) A copy of the implementation plan shall be kept on site and made available for review upon request. If the implementation plan is revised, it shall be submitted with the next "semiannual compliance report" required in Specific Condition No. B.21. For each operation included in the emissions average, the implementation plan must include the elements listed below.

A) A description of each operation included in the average.

B) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.

C) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in Specific Condition B.4.

[40 CFR 63.5707 and Air Construction Permit No. 0570472-009-AC]

B.21. Semi-annual Compliance Reports. The permittee shall submit the semiannual compliance reports specified in paragraphs a.(1) through (4) below. To the extent possible, each report shall be organized according to the facility operations covered by this subpart and the compliance procedure followed for that operation.

a. Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), each report must be submitted by the dates specified below.

(1) If the source is not controlled by an add-on control device (i.e. compliance with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the issuance of Air Construction Permit No. 0570472-009-AC and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period. [Permit No.: 0570472-009-AC]

(2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in Specific Condition No. B.21.a.(1) above.

(3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

b. The compliance report must include the following information.

(1) Company name and address.

(2) A statement by the responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.

(3) The date of the report and the beginning and ending dates of the reporting period.

(4) A description of any changes in the manufacturing process since the last compliance report.

(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.

(6) If the facility was in compliance with the emission limits and work practice standards during the reporting period, the compliance report must include a statement to that effect.

(7) If there were any deviations from an emission limit or work practice standard during the reporting period, the compliance report must also include the information listed in below in the semiannual compliance report.

(A) A description of the operation involved in the deviation.

(B) The quantity, organic HAP content, and application method of the materials involved in the deviation.

(C) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.

(D) A statement of whether or not your facility was in compliance for the 12- month averaging period that ended at the end of the reporting period.

c. A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.

d. A statement of whether or not your facility was in compliance for the 12- month averaging period that ended at the end of the reporting period.

[40 CFR 63.5764]

B.22. The permittee must submit all of the notifications listed in Table 7 of Subpart VVVV which apply to the facility by the specified date(s). {This facility is required to submit a "notification of compliance status" required by 40 CFR 63.9(h) within 30 days of the end of the first 12-month period following issuance of Air Construction Permit No. 0570472-009-AC. The notifications are described more fully in 40 CFR 63, Subpart A, General Provisions, referenced in Table 8 of Subpart VVVV. If any information submitted in any notification is changed, the permittee shall submit the changes in writing to the Environmental Protection Commissions of Hillsborough County within 15 calendar days after the change.
[40 CFR 63.5761]

B.23. The permittee shall implement and maintain a recordkeeping/reporting system to demonstrate compliance with the restrictions in Facility-wide Condition FW13. and Specific Condition No. B.4. Records shall be maintained and made available for inspection/verification by the Environmental Protection Commission of Hillsborough County for at least the most recent five years. The system shall include, as a minimum, the following information.

A) Record the number of boats, with its respective project identification, being built in a monthly and 12-month rolling period.
B) Monthly and rolling 12-month consumption records in tons of all materials used containing VOC and/or HAP. These records would include the VOC and/or individual HAP content per MSDS or applicable test of each such material on the same form.
C) VOC and individual HAP emissions on a monthly and rolling 12-month basis. These reports shall be submitted along with the required annual operating report (AOR) for the months covered by that AOR.
D) Retention of purchase orders and invoices for gel coats, resins, and carpet adhesives for at least the previous five consecutive years.
E) Reporting of any exceedance of any emission limitation in this permit within 30 calendar days.
F) Application method for production resin and tooling resin. (This record is not required if all production resins and tooling resins are applied with non-atomized technology.)
G) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in Specific Condition No. B.9.
H) Monthly records of which mixing containers are subject to the resin mixing and storage requirements of Specific Condition Nos. B.12. and B.13., the results of the inspections, and a description of any repairs or corrective actions taken.
I) Amount and VOC/HAP content of any solvents recycled on-site.
J) Inspection reports for any containers which are used to store solvents.
K) HAP content of each carpet and fabric adhesive used (percent).
L) The percent by weight of exempted gel coat materials used at the facility based on a 12-month rolling average in accordance with Specific Condition No. B.5.
M) The percent by weight of pure, 100 percent, vinyl ester resin used for skin coats at the facility based on a twelve month rolling average in accordance with Specific Condition No. B.5.

[Rules 62-4.070(3) and 62-213.440(1)(b)2.b., F.A.C., and 40 CFR 63, Subpart VVVV]

Table 2 to Subpart VVVV of Part 63—Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations

As specified in §§63.5701(b), 63.5704(b)(2), and 63.5713(a), (b), and (d), you must comply with the requirements in the following table:

For this operation—	And this application method—	You must not exceed this weighted-average organic HAP content (weight percent) requirement—
1. Production resin operations	Atomized (spray)	28 percent.
2. Production resin operations	Nonatomized (nonspray)	35 percent.
3. Pigmented gel coat operations	Any method	33 percent.
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent.
6. Tooling resin operations	Nonatomized (nonspray)	39 percent.
7. Tooling gel coat operations	Any method	40 percent.

Table 3 to Subpart VVVV of Part 63—MACT Model Point Value Formulas for Open Molding Operations[1]

As specified in §§63.5710(d) and 63.5714(a), you must calculate point values using the formulas in the following table:

For this operation—	And this application method—	Use this formula to calculate the MACT model plant value for each resin and gel coat—
1. Production resin, tooling resin	a. Atomized	$0.014 \times (\text{Resin HAP\%})^{2.425}$
	b. Atomized, plus vacuum bagging with roll-out	$0.01185 \times (\text{Resin HAP\%})^{2.425}$
	c. Atomized, plus vacuum bagging without roll-out	$0.00945 \times (\text{Resin HAP\%})^{2.425}$
	d. Nonatomized	$0.014 \times (\text{Resin HAP\%})^{2.275}$

	e. Nonatomized, plus vaccum bagging with roll-out	$0.0110 \times (\text{Resin HAP\%})^{2.275}$
	f. Nonatomized, plus vacuum bagging without roll-out	$0.0076 \times (\text{Resin HAP\%})^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	$0.445 \times (\text{Gel coat HAP\%})^{1.675}$

[1]Equations calculate MACT model point value in kilograms of organic HAP per megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric. HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100 percent.

Table 5 to Subpart VVVV of Part 63—Default Organic HAP Contents of Solvents and Solvent Blends

As specified in §63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
1. Toluene	108-88-3	100	Toluene.
2. Xylene(s)	1330-20-7	100	Xylenes, ethylbenzene.
3. Hexane	110-54-3	50	n-hexane.
4. n-hexane	110-54-3	100	n-hexane.
5. Ethylbenzene	100-41-4	100	Ethylbenzene.
6. Aliphatic 140		0	None.
7. Aromatic 100		2	1% xylene, 1% cumene.
8. Aromatic 150		9	Naphthalene.
9. Aromatic naptha	64742-95-6	2	1% xylene, 1% cumene.
10. Aromatic solvent	64742-94-5	10	Naphthalene.
11. Exempt mineral spirits	8032-32-4	0	None.
12. Ligroines (VM & P)	8032-32-4	0	None.
13. Lactol spirits	64742-89-6	15	Toluene.
14. Low aromatic white spirit	64742-82-1	0	None.
15. Mineral spirits	64742-88-7	1	Xylenes.
16. Hydrotreated naphtha	64742-48-9	0	None.

17. Hydrotreated light distillate	64742-47-8	0.1	Toluene.
18. Stoddard solvent	8052-41-3	1	Xylenes.
19. Super high-flash naphtha	64742-95-6	5	Xylenes.
20. Varol® solvent	8052-49-3	1	0.5% xylenes, 0.5% ethyl benzene.
21. VM & P naphtha	64742-89-8	6	3% toluene, 3% xylene.
22. Petroleum distillate mixture	68477-31-6	8	4% naphthalene, 4% biphenyl.

Table 6 to Subpart VVVV of Part 63—Default Organic HAP Contents of Petroleum Solvent Groups

As specified in §63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent type	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naptha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.)	3	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.)	6	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

Table 7 to Subpart VVVV of Part 63—Applicability and Timing of Notifications

As specified in §63.5761(a), you must submit notifications according to the following table:

If your facility—	You must submit—	By this date—
1. Is an existing source subject to this subpart	An initial notification containing the information specified in §63.9(b)(2)	No later than the dates specified in §63.9(b)(2).
2. Is a new source subject to this subpart	The notifications specified in §63.9(b) (3) to (5)	No later than the dates specified §63.9(b)(4) and (5).

3. Qualifies for a compliance extension as specified in §63.9(c)	A request for a compliance extension as specified in §63.9(c)	No later than the dates specified in §63.6(i).
4. Is complying with organic HAP content limits, application equipment requirements; or MACT model point value averaging provisions	A notification of compliance status as specified in §63.9(h)	No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date.

Table 8 to Subpart VVVV of Part 63—Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart VVVV

As specified in §63.5773, you must comply with the applicable requirements of the General Provisions according to the following table:

Citation	Requirement	Applies to subpart VVVV	Explanation
§63.1(a)	General Applicability	Yes.	
§63.1(b)	Initial Applicability Determination	Yes.	
§63.1(c)(1)	Applicability After Standard Established	Yes.	
§63.1(c)(2)		Yes	Area sources are not regulated by subpart VVVV.
§63.1(c)(3)		No	[Reserved]
§63.1(c)(4)-(5)		Yes.	
§63.1(d)		No	[Reserved]
§63.1(e)	Applicability of Permit Program	Yes.	
§63.2	Definitions	Yes	Additional definitions are found in §63.5779.
§63.3	Units and Abbreviations	Yes.	
§63.4(a)	Prohibited Activities	Yes.	
§63.4(b)-(c)	Circumvention/Severability	Yes.	
§63.5(a)	Construction/Reconstruction	Yes.	
§63.5(b)	Requirements for Existing, Newly Constructed, and Reconstructed Sources	Yes.	
§63.5(c)		No	[Reserved]
§63.5(d)	Application for Approval of Construction/Reconstruction	Yes.	
§63.5(e)	Approval of Construction/Reconstruction	Yes.	

§63.5(f)	Approval of Construction/Reconstruction Based on prior State Review	Yes.	
§63.6(a)	Compliance with Standards and Maintenance Requirements—Applicability	Yes.	
§63.6(b)	Compliance Dates for New and Reconstructed Sources	Yes	§63.695 specifies compliance dates, including the compliance date for new area sources that become major sources after the effective date of the rule.
§63.6(c)	Compliance Dates for Existing Sources	Yes	§63.5695 specifies compliance dates, including the compliance date for existing area sources that become major sources after the effective date of the rule.
§63.6(d)		No	[Reserved]
§63.6(e)(1)-(2)	Operation and Maintenance Requirements	No	Operating requirements for open molding operations with add-on controls are specified in §63.5725.
§63.6(e)(3)	Startup, Shut Down, and Malfunction Plans	Yes	Only sources with add-on controls must complete startup, shutdown, and malfunction plans.
§63.6(f)	Compliance with Nonopacity Emission Standards	Yes.	
§63.6(g)	Use of an Alternative Nonopacity Emission Standard	Yes.	
§63.6(h)	Compliance with Opacity/Visible Emissions Standards	No	Subpart VVVV does not specify opacity or visible emission standards.
§63.6(i)	Extension of Compliance with Emission Standards	Yes.	
§63.6(j)	Exemption from Compliance with Emission Standards	Yes.	
§63.7(a)(1)	Performance Test Requirements	Yes.	
§63.7(a)(2)	Dates for performance tests	No	§63.5716 specifies performance test dates.
§63.7(a)(3)	Performance testing at other times	Yes.	
§63.7(b)-(h)	Other performance testing requirements	Yes.	
§63.8(a)(1)-(2)	Monitoring Requirements—Applicability	Yes	All of §63.8 applies only to sources with add-on controls. Additional monitoring requirements for sources with add-on controls are found in §63.5725.
§63.8(a)(3)		No	[Reserved]

§63.8(a)(4)		No	Subpart VVVV does not refer directly or indirectly to §63.11.
§63.8(b)(1)	Conduct of Monitoring	Yes.	
§63.8(b)(2)-(3)	Multiple Effluents and Multiple Continuous Monitoring Systems (CMS)	Yes	Applies to sources that use a CMS on the control device stack.
§63.8(c)(1)-(4)	Continuous Monitoring System Operation and Maintenance	Yes.	
§63.8(c)(5)	Continuous Opacity Monitoring Systems (COMS)	No	Subpart VVVV does not have opacity or visible emission standards.
§63.8(c)(6)-(8)	Continuous Monitoring System Calibration Checks and Out-of-Control Periods	Yes.	
§63.8(d)	Quality Control Program	Yes.	
§63.8(e)	CMS Performance Evaluation	Yes.	
§63.8(f)(1)-(5)	Use of an Alternative Monitoring Method	Yes.	
§63.8(f)(6)	Alternative to Relative Accuracy Test	Yes	Applies only to sources that use continuous emission monitoring systems (CEMS).
§63.8(g)	Data Reduction	Yes	
§63.9(a)	Notification Requirements—Applicability	Yes.	
§63.9(b)	Initial Notifications	Yes	
§63.9(c)	Request for Compliance Extension	Yes.	
§63.9(d)	Notification That a New Source Is Subject to Special Compliance Requirements	Yes.	
§63.9(e)	Notification of Performance Test	Yes	Applies only to sources with add-on controls.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart VVVV does not have opacity or visible emission standards.
§63.9(g)(1)	Additional CMS Notifications—Date of CMS Performance Evaluation	Yes	Applies only to sources with add-on controls.
§63.9(g)(2)	Use of COMS Data	No	Subpart VVVV does not require the use of COMS.
§63.9(g)(3)	Alternative to Relative Accuracy Testing	Yes	Applies only to sources with CEMS.
§63.9(h)	Notification of Compliance Status	Yes.	
§63.9(i)	Adjustment of Deadlines	Yes.	

§63.9(j)	Change in Previous Information	Yes.	
§63.10(a)	Recordkeeping/Reporting—Applicability	Yes.	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	§§63.567 and 63.5770 specify additional recordkeeping requirements.
§63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	Yes	Applies only to sources with add-on controls.
§63.10(b)(2)(xii)-(xiv)	General Recordkeeping Requirements	Yes.	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	§63.5686 specifies applicability determinations for non-major sources.
§63.10(c)	Additional Recordkeeping for Sources with CMS	Yes	Applies only to sources with add-on controls.
§63.10(d)(1)	General Reporting Requirements	Yes	§63.5764 specifies additional reporting requirements.
§63.10(d)(2)	Performance Test Results	Yes	§63.5764 specifies additional requirements for reporting performance test results.
§63.10(d)(3)	Opacity or Visible Emissions Observations	No	Subpart VVVV does not specify opacity or visible emission standards.
§63.10(d)(4)	Progress Reports for Sources with Compliance Extensions	Yes.	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Yes	Applies only to sources with add-on controls.
§63.10(e)(1)	Additional CMS Reports—General	Yes	Applies only to sources with add-on controls.
§63.10(e)(2)	Reporting Results of CMS Performance Evaluations	Yes	Applies only to sources with add-on controls.
§63.10(e)(3)	Excess Emissions/CMS Performance Reports	Yes	Applies only to sources with add-on controls.
§63.10(e)(4)	COMS Data Reports	No	Subpart VVVV does not specify opacity or visible emission standards.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes.	
§63.11	Control Device Requirements—Applicability	No	Facilities subject to subpart VVVV do not use flares as control devices.
§63.12	State Authority and Delegations	Yes	§63.5776 lists those sections of subpart A that are not delegated.
§63.13	Addresses	Yes.	
§63.14	Incorporation by Reference	Yes.	

§63.15	Availability of Information/Confidentiality	Yes.	

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
Appendix NESHAP, Subpart VVVV
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History.
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.