Kitchen & Bath Center, Inc.

Facility ID No. 0910063
Okaloosa County

Title V Air Operation Permit Renewal

Permit No. 0910063-009-AV
(Renewal of Title V Air Operation Permit No. 0910063-008-AV)

Permitting and Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Northwest District

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DRAFT PERMIT

PERMITTEE:
Kitchen & Bath Center, Inc.
20 Northwest Ready Avenue
Fort Walton Beach, Florida 32548

Permit No. 0910063-009-AV
Kitchen & Bath Center
Facility ID No: 0910063
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Kitchen & Bath Center facility is located in Okaloosa County at 20 Ready Avenue Northwest, Fort Walton Beach, Florida. UTM Coordinates are: Zone 16, 532.01 km East and 3364.32 km North; and, Latitude: 30° 24' 44" North and Longitude: 86° 40' 00" West.

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

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

(Draft)

_____
Rick Bradburn
Air Program Administrator

RB/aj/c

SECTION I. FACILITY INFORMATION.

This renewal follows permit No. 0910063-008-AV, effective date April 2, 2007.

During this renewal, changes were made to the visible emissions limit and the Particulate Matter (PM) limit for Emission Units 004. The previous 5% visible emissions limit was changed in this permit to 20% per the general facility-wide VE standard because there was no rule-based requirement for PM testing and thus no reason for a 5% VE limit in exchange for a waiver of PM testing as was written in previous permits. The PM limit of less than 100 tons per year was also removed.

Subsection A. Facility Description.

The Kitchen & Bath Center facility manufactures cultured marble castings such as bathtubs, shower enclosures, bathroom sinks and countertops. It also manufactures solid surface and granite products such as kitchen countertops.

Cultured Marble Production

The cultured marble process utilizes cultured marble casting, consisting of gelcoat spraying into molds, resin mixing and hand laying into molds, curing of castings, and final finishing of molded pieces. Cleaning solvent and resins are purchased from outside suppliers and stored in closed metal or plastic containers. Cultured marble material (dust) is also purchased from an outside supplier and delivered to the facility via truck tankers. It is pneumatically blown into an outdoor storage silo located adjacent to the manufacturing building. Emissions created by this process are controlled by Baghouse No. 1, which is located atop of the storage silo. Resin mixing is conducted by mixing liquid resins with cultured marble dust to obtain resin mix. The mixing process itself is a wet process due to the fact that liquid resins have been added to mixers. Mixing is done in an open shop area with emissions removed by general ventilation such as roof exhaust fan located above the process. The process of casting starts with cleaning of molds using pure methyl chloride (H118). After being cleaned, molds are taken to a gelcoat spray booth where a coat of gelcoat is sprayed on. Special spray guns are used and spraying is done by trained workers to minimize overspray waste. The gelcoat spray booth is equipped with an exhaust fan and discharge stack exiting above shop building roof. Prior to being discharged, exhaust air is filtered through 2" disposable type paper filter covered with cotton cloth that acts as a pre-filter. The filter removes liquid caplets only. VOC and/or HAP emissions resulting from gelcoat spraying are uncontrolled and are included in the overall emissions calculations for the entire process. Negative air pressure inside gelcoat spray booth, relative to surrounding ambient, is measured by differential pressure measuring device.

Gelcoat coated molds are then transported to a drying tunnel for the gelcoat to cure. The drying tunnels (heaters) are fired using natural gas that is limited to 0.25 MMBtu/hr. Cured molds are removed from the drying tunnel and back to the open shop where resin mix is hand laid into molds to cast products such as bathtubs, shower enclosures, bathroom sinks and countertops, etc. Castings are allowed to dry/cure in the open shop areas.

The delivery of marble dust from the silo to the mixers are made through a closed system of conveyors and discharge chutes, therefore the PM fugitive emissions from the resin mixing process are considered insignificant. However, VOC and HAP emissions from cleaning of molds, mixing of resins, and resin application to molds and castings curing process are uncontrolled and are included in overall emissions calculations for the entire process.

Finished castings are removed from the molds and taken to the finishing area where abrasive processes are used, such as cutting and/or sanding. The finishing is done inside the finishing booth with a continuous flow of air so that dust created by the process is exhausted across the work area and delivered to Baghouse No. 2 located outside the building. The finishing booth is measured by a differential pressure measuring device to assure that negative pressure inside the booth is maintained.

Solid Surface and Granite Surface Fabrication and Finishing

Granite fabrication consists of cutting and shaping of solid surface and granite materials. Both, granite and solid surface materials are purchased from outside suppliers and brought into this facility for fabrication. Fabrication is

done using saws and/or routers to create forms as required for different applications. PM emissions from this process are partially controlled by a baghouse(s) venting inside the building.

Finishing of fabricated solid surface and granite pieces are accomplished in a room adjacent to solid surface and granite fabrication area. Finishing is done using miscellaneous grinding and sanding tools. PM emissions created by fabrication and finishing of granite and solid surface products, (including exhaust from internal baghouse) are fugitives being removed from the building by roof exhaust fan(s).

Also included in this renewal permit are miscellaneous insignificant emissions units and/or activities. These include the facility's operation of two additional small baghouses located within and exhaust within the manufacturing facility. Therefore, these units are not required by rule but are rather used to control PM emissions within the working area.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
003	Product Casting
004	Cultured Marble Handling & Product Finishing

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received September 15, 2011, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A – General Provisions	Facility
40 CFR 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants – Reinforced Plastic Composites Production	Facility
62-213	Facility
62-297	Facility
62-296	Facility
62-210	Facility
62-204	Facility
62-4	Facility

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. This shall include but is not limited to the following measures:

a. All vats, containers, etc. that are used for temporary and permanent storage of VOC/organic solvents shall be covered to prevent vaporization of VOC when not in use.

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

c. Measures shall be taken to insure a negative air pressure inside the manufacturing facility to ensure that airflow is incoming to the building when doors or windows are opened.

[Rule 62-296.320(1), F.A.C., and permit 0910063-005-AC]

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

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

a. General maintenance and housekeeping
b. Use of negative air filters
c. Maintaining air flow in the facility when doorways or windows are open
d. 5 MPH speed limit on gravel surfaces
e. Use of an emission control curtain around the bottom discharge of Baghouse No. 2.

[Rule 62-296.320(4)(c), F.A.C.; permit 0910063-005-AC and application 0910063-009-AV]

Annual Reports and Fees

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

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source

Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

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

Subsection A. Emissions Unit 003

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

EU No.	Brief Description
003	Product Casting

This emissions unit includes product casting, with emissions resulting from cultured marble resin mixing, gelcoat application, and marble/resin casting and curing. Combustion-related emissions associated with the natural gas fired drying tunnels, with a reported maximum heat input of 0.25 MMBtu/hour, have been determined to be insignificant with regard to the facility-wide emissions. VOC and HAP emissions are controlled by limiting the gelcoat and resin styrene content, and by the use of controlled gelcoat spraying consistent with the Consolidated Fabricators Association program including spray operator training, spray gun pressure calibration, and close containment mold flanges. The gelcoat spray booth also contains two types of filters, a two-inch thick paper filter with a cotton cloth cover that acts as a pre-filter.

This emissions unit is subject to the requirements of 40 CFR 63, subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.; Permit 0910063-005-AC]

A.2. Methods of Operation. The drying tunnel shall be fired by natural gas. [Rule 62-213.410, F.A.C.; Permit 0910063-005-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.3. Volatile Organic Compounds (VOC) emissions. VOC emissions shall not exceed 59.4 tons per rolling 12-month period. [Rule 62-4.070, F.A.C.; Letter to DEP dated November 8, 2006 and Permit No. 0910063-005-AC]

A.4. Total Hazardous air Pollutants (HAP) Emissions. Total HAP emissions shall not exceed 59.4 tons per rolling12-month period. [Rule 62-4.070, F.A.C.; Letter to DEP dated November 8, 2006 and Permit No. 0910063-005-AC]

A.5. Styrene Emissions. Styrene emissions shall not exceed 57.4 tons per rolling 12-month period. [Rule 62-4.070, F.A.C.; Letter to DEP dated November 8, 2006 and Permit No. 0910063-005-AC]

A.6. Permittee shall monitor the filter pressure differential for the gelcoat spray booth, and shall replace filters at a pressure differential of –0.3" WG. The pressure normally reads –0.3" to 0.7" WG. The pressure differentials shall be surrogate compliance parameters. The filters (two-inch thick paper filter and cotton cloth pre-filter) shall be maintained consistent with the attached Appendix ECP (Environmental Compliance Plan). [Rule 62-4.070, F.A.C., Appendix ECP, and Permit 0910063-005-AC]

A.7. Permittee shall maintain records, in the following format:

a. Throughput Materials. This shall include the throughput of (ton per month) gelcoat, marble fines, marble resin, and other solvents and/or VOC/HAP-containing materials, styrene content (%) of throughput materials and Methyl Chloride, MC, content (%) of throughput materials.

b. VOC, HAP and styrene emissions. This shall include calculated monthly and rolling twelve-month VOC and HAP emission totals. The calculated emissions shall identify total VOC, HAP and styrene emissions and all individual HAP emissions in excess of 1,000 pounds (or 0.5 tons) per rolling 12-month period. The calculations shall be based on materials usage (resins, gelcoats, VOC/HAP containing solvents and other materials such as cements, cleaners, etc.) and emission factors acceptable to the Department.
c. Gelcoat booth filter pressure differential readings (inches, WG) shall be logged daily when in operation and logs shall include dates of filter changes.

Monthly summaries and rolling 12-month (annual) emission calculations shall be certified and signed by the responsible company representative to be accurate and truthful calculated representations of actual emissions. The records of monthly summaries and rolling 12-month (annual) emission totals shall be kept and maintained for at least five years, and shall be made available for Department inspection as necessary. Permittee shall install, use, and maintain appropriate systems to gather the necessary data.
[Rule 62-4.070, F.A.C.; Permit 0910063-005-AC]

A.8. If any of the HAP, VOC or Styrene emission calculation records exceed the permitted emissions limits, the Permittee must notify the Department, in writing, within 20 days of the end of that month. [Rule 62-4.070, F.A.C.; Permit 0910063-005-AC]

A.9. Permittee shall notify the Department in writing before any planned change or product replacement of gelcoat, resin, or cleaning products currently utilized at this facility. [Rule 62-4.070, F.A.C.; Permit 0910063-005-AC]

A.10. Permittee shall maintain current training certification records available for Department inspection of all gelcoat spray gun operators. [Rule 62-4.070, F.A.C.; Permit 0910063-005-AC]

Training Requirements

A.11. Gelcoat Spray Operators. Gelcoat spray gun operators shall be trained in understanding the effects of transfer efficiency on emissions, of spray gun pressure calibration, and of proper spray gun handling. The gelcoat spray gun operators shall be provided annual refresher training. All training shall be conducted utilizing Consolidated Fabricators Association recommended training techniques as appropriate to maintain a program of controlled gelcoat spraying. [Rule 62-4.070, F.A.C.; Permit 0910063-005-AC]

Other Requirements

A.12. This emissions unit is also subject to the requirements listed in Common Conditions **C.** [Title V Operation Permit 0910063-009-AV]

Subsection B. Emissions Unit 004

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

EU No.	Brief Description
004	Cultured Marble Handling and Product Finishing

This emissions unit includes activities resulting in particulate emissions controlled by two baghouses. Baghouse #1 controls PM emissions from the pneumatic offloading of cultured marble material (dust) from tanker trucks into a 100-ton vertical storage silo. Baghouse #2 controls PM emissions from product finishing which includes sanding, grinding and polishing.

Control Unit I.D. and Info.	Baghouse No. 1	Baghouse No. 2
Baghouse Manufacturer	StaClean	Gruber (6-105-84)
Model Number	9-3.2 BD5	6-105-84
Number of Bags	9	105
Bag Material	Spunbound Polyester	Cotton
Bag Cleaning System	Pneumatic Shaker	Pneumatic Shaker
Cloth Area	240 ft^2	1,154 ft^2
Air-To-Cloth Ratio	4.15 to 1	4.3 to 1
Exhaust Blower Manufacturer		Jacksonville Blowpipe Co.
Model Number	3 Hp	N/A
Size	1000 CFM	5,000 CFM

Hp = Horsepower
RPM = Revolutions per minute
CFM = cubic feet per minute

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The maximum pneumatic unloading rates of the marble material (dust) shall not exceed 25 tons per hour at a maximum pressure of 12 psig: Permittee shall maintain records of the quantity of marble dust unloaded. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Permit 0910063-005-AC]

B.2. Methods of Operation. The product finishing baghouse (Baghouse No. 2, 105 cotton bags) shall be pneumatically shaken at a minimum of once per day when in operation. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Permit 0910063-005-AC]

B.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

B.4. Visible Emissions. This emissions unit is subject to the General Visible Emission Standard (20% opacity). No scheduled visible emissions testing is specifically required.
[Rules 62-4.070, and 62-296.320(4)(b)1 & 4, F.A.C.]

Test Methods and Procedures

B.5. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is

being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department [Rule 62-297.310(7)(b), F.A.C.]

Monitoring of Operations, Record keeping and Reporting Requirements

B.6. The baghouses shall be maintained consistent with the attached Appendix ECP (Environmental Compliance Plan). [Rule 62-4.070, F.A.C.; Appendix ECP-1; Permit 0910063-005-AC]

a. Permittee shall maintain records consistent with the approved Appendix ECP and shall include at a minimum: Date, start and stop time, quantity of marble dust unloaded and baghouse pressure differential readings when unloading marble dust to the storage silo (Baghouse #1).
b. Weekly baghouse pressure differential readings (inches, WG), and the time of day the 105 cotton bags of the product finishing baghouse (Baghouse #2) are pneumatically shaken.
c. Explanation when pressure differential readings are outside the ranges of 4" to 6" WG for Baghouse # 1 and 6" to 7.5" WG for Baghouse #2.
d. Date and reason of all bag replacements and date and description of any conducted maintenance for Baghouse #1 and Baghouse #2.

[Rule 62-4.070, F.A.C.; Appendix ECP-1; Permit 0910063-005-AC]

B.7. This emissions unit is also subject to the requirements listed in Common Conditions **C.** [Title V Operation Permit 0910063-009-AV]**.**

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

EU No.	Brief Description
003	Product Casting
004	Cultured Marble Handling and Product Finishing

The facility is subject to 40CFR Part 63 subpart WWWW (NESHAPS for Reinforced Plastic Composites Production) because it is a reinforced plastic composites production facility (operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites) and emits greater than 10 tons per year (i.e., major source) of an individual HAP (styrene), per 40CFR 63.5785. Because the facility was constructed prior to the August 2, 2001 (per 40CFR 63.5795), it is considered an existing facility.

Emission Limitations and Standards

C.1. Federal Organic HAP Emissions. In accordance 40 CFR 63 subpart WWWW Table 3, the following organic HAP emission limits shall be met:

Operation Type	Application Type or Gelcoat Type	Organic HAP Emission Limit
open molding—non- corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. manual resin application	88 lb/ton. 87 lb/ton.
open molding—tooling	a. manual resin application	157 lb/ton.
open molding—gel coat	a. tooling gel coating b. CR/HS or high performance gel coat c. clear production gel coat	440 lb/ton. 377 lb/ton. 522 lb/ton.

[40 CFR 63.5805(b)]

C.2. Work Practice Standards. In accordance with 40 CFR 63 subpart WWWW, the owner or operator must meet the following work practice standard:

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

	exempt from this requirement.
5. all mixing or BMC manufacturing operations[1]	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

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

[40 CFR 63.5805(b)]

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

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

Test Methods and Procedures

C.4. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

C.5. Determining HAP Content of Resins and Gel Coats. As required by 40 CFR 63 subpart WWWW, in order to determine the organic HAP content of resins and gel coats, the owner or operator shall use the information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in (a) through (c), as applicable.

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

[40 CFR 63.5797]

C.6. Determining Compliance with Federal HAP Emission Standards. The owner or operator may use the equations in Table 1 in 40 CFR 63 subpart WWWW to calculate emissions factors. Equations have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. [40 CFR 63.5796]

C.7. Changing Federal Compliance Options. You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to non-atomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the

compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

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

(1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

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

Where:

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

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

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

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

(1)

(i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in

paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

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

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

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

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

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

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

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

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

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

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

Where:

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

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

n = number of operations.

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

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

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

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

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

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

[40 CFR 63.5810]

C.8. Continuous Compliance Demonstration. The owner or operator must demonstrate continuous compliance with each HAP emissions or work practice standard as follows:

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

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

[40 CFR 63.5900(a)]

C.9. Compliance during Startup, Shutdown or Malfunction. During periods of startup, shutdown or malfunction, the owner or operator must meet the organic HAP emissions limits and work practice standards that apply. [40 CFR 63.5900(c)]

Monitoring of Operations, Recordkeeping and Reporting Requirements

C.10. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

C.11. Material Recordkeeping. The owner or operator must collect and keep records of resin and gel coat use, organic HAP content (both resin and gel coat), and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 in 40 CFR 63 subpart WWWW. Resin use records may be based on purchase records if the owner or operator can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [40 CFR 63.5895(c) and (d)]

C.12. Deviation Reporting. The owner or operator must report each deviation from each standard in 40 CFR 63.5805. The deviations must be reported according to the requirements in 40 CFR 63.5910. [40 CFR 63.5900(b)]

C.13. Report Submittals. The owner or operator must submit all reports required by Table 14 in 40 CFR 63 subpart WWWW and not based on the requirements in 40 CFR 63.999. [40 CFR 63.5910(a) and (h)]

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

a. *Reporting Period.* Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

b. *Due Dates*. Each compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

[40 CFR 63.5910(b)]

C.15. Compliance Report Content. The compliance report must contain the information in paragraphs a. through f.:

a. Company name and address.

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

c. Date of the report and beginning and ending dates of the reporting period.

d. If the owner or operator had a startup, shutdown, or malfunction during the reporting period and the owner or operator took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in 40 CFR 63.10(d)(5)(i).

e. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
f. The owner or operator must include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. [40 CFR 63.5895(d)]

[40 CFR 63.5910(c)]

C.16. Reporting of Deviations. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined 40 CFR 63 subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 in 40 CFR 63 subpart WWWW along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [40 CFR 63.5910(g)]

C.17. Reporting Change in Compliance Options. Where multiple compliance options are available, the owner or operator must state in the next compliance report if the owner or operator have changed compliance options since the last compliance report. [40 CFR 63.5910(i)]

C.18. Recordkeeping. The owner or operator must keep the following records in a. thru d.:
a. *Federal Notifications and Reports*. A copy of each notification and report that the owner or operator submitted to comply with 40 CFR 63 subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
b. *Startup, Shutdown, and Malfunction Records*. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
c. *Emissions Data and Calculations*. The owner or operator must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, in 40 CFR 63 subpart WWWW.
d. *Work Practice Compliance Statement*. The owner or operator must keep a certified statement that they are in compliance with the work practice requirements in Table 4 in 40 CFR 63 subpart WWWW.

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

C.19. <u>Records Maintenance</u>**.**
a. *Readily Accessible and Suitable*. The owner or operator must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).
b. *5 Year Retention*. As specified in 40 CFR 63.10(b)(1), the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
c. *2 Year Retention Onsite*. The owner or operator must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The owner or operator can keep the records offsite for the remaining 3 years.
d. *Retention Format*. The owner or operator may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

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

Other Requirements

C.20. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, subpart A – General Provisions and 40 CFR 63 subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. [Rules 62-204.800 and 62-213.440, F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, 40 CFR 63 Subpart WWWW.
Appendix ECP, Environmental Compliance Plan.