Jupiter Composites Inc.

Facility ID No. 0330287
Escambia County

Initial Title V Air Operation Permit

Permit No. 0330287-002-AV

Permitting and Compliance Authority:

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

160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Telephone: 850/595-8300
Fax: 850/595-8096

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DRAFT PERMIT

PERMITTEE:
Jupiter Composites Inc.
3301 Bill Metzger Lane
Pensacola, 32514

Permit No. 0330287-002-AV
Reinforced Plastics Composite Facility
Facility ID No. 0330287
Initial Title V Air Operation Permit

The purpose of this permit is for the initial Title V air operation permit for the above referenced facility. The existing Jupiter Composite facility is located in Escambia County at 3380 Bill Metzger Lane, Pensacola, Florida. UTM Coordinates are: Zone 16, 481.5 East and 3376.9 North.

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

Subsection A. Facility Description.

This facility fabricates wind turbine generator housings made of reinforced plastic composites using two different processes to apply gelcoat and resin. All parts are fabricated using vacuum infused technologies. Gelcoat is spray applied to the molds and allowed to cure. Pre-cut fiberglass and metal parts are added to the molds and the molds are prepared for vacuum infusion. Styrene resin is drawn into the mold cavity by vacuum. A section of the building is walled off from the rest of the facility for the gelcoat and trimming operations. A vacuum loop is installed around the resin infusion area. These areas have ventilation systems that are designed to capture fugitive particulate matter emissions and fugitive HAP and non-HAP VOC for discharge outside the building.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fabrication of wind turbine generator housing made of reinforced plastic composites (RPC)

Subsection C. Applicable Regulations.

Based on the initial Title V air operation permit application received June 30, 2011, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A – General Provisions	001
40 CFR 63, Subpart WWWW	001
62-213. 205	001
62-213. 410	001
62-213.420	001
62-213. 430	001
62-213. 440	001
62-210.300	001
62-210.370	001
62-4.030	001
62-4.070	001
62-4.160	001
62-296.100	001
62-296.320	001

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

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

Emissions and Controls

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

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

a. Fans and ventilation systems located in the buildings shall be operating during periods of resin/gel coat application and curing or when significant amounts of materials containing VOC/OS are being used and shall remain operating for at least 1 hour after the final application of any resin/gel coat has been completed.
b. All materials containing VOC/OS shall be stored in closed containers and/or in small automatic closing safety cans.
c. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.
d. Filters shall be maintained and changed regularly to ensure proper operation of the ventilation system.
e. Employees shall no use HAP or VOC containing solvents (e.g., acetone) for personal clean-up.
f. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of materials containing VOC/OS.
g. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.

[Rule 62-296.320(1), F.A.C., and permit 0330287-001-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. Paving and maintenance of roads, parking areas and yards.
b. Application of water or other suppressants to unpaved roads, yards, open stock piles and other activities to control emissions.
c. Removal of particulate matter from roads and other paved areas to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
d. Fabric filters installed on all blower suctions for the gelcoat and trimming area.

[Rule 62-296.320(4)(c), F.A.C., and application 0330287-002-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.]

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]

Subsection A. Emissions Unit 001

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

EU No.	Brief Description
001	Fabrication of wind turbine generator housing (RPC)

This facility fabricates wind turbine generator housings and parts made of reinforced plastic composites using two different processes to apply gelcoat and resin. All parts are fabricated using vacuum infused technologies. Gelcoat is spray-applied to the molds and allowed to cure. Pre-cut fiberglass and metal parts are added to the molds and the molds are prepared for vacuum infusion. Styrene resin is drawn into the mold cavity by vacuum. A section of the building is walled off from the rest of the facility for the gelcoat and trimming operations. A vacuum loop is installed around the resin infusion area. These areas have ventilation systems that are designed to capture fugitive particulate matter emissions and fugitive HAP and non-HAP VOCs for discharge outside the building. Gelcoat is applied by the following steps:

- Step1 – Gelcoat is applied to the wind turbine housings molds in the gelcoat room. Approximately 23' x 55' room (spray booth); One patriot gelcoat system is used to apply gelcoat; emission point (EP) 2 (exhaust blower with fabric filters and stack)
- Step 2 – Parts gelcoated in Step 1 and moved to the adjacent curing area. Approximately 40' x 55'; EP-1
- Step 3 – Cured parts are moved to the main factory floor where the parts are prepared for vacuum molding. Vacuum molding is completed in this area and the vacuum pumps discharge outside the building. Pre-cut fiberglass parts and metal framing are added to the molds; Molds are prepared for Vacuum Infusion; Vacuum infusion is completed using one of two vacuum pump systems. These systems are considered EP-3. One vacuum pump is considered an installed spare. Resin is mixed in this area for the vacuum molding and any emissions from the mixing drums are pulled through the EP-1 vent system in step 2 (Curing area).
- Step 4 – Parts are removed from the molds in the main factory and rolled into the trim room to remove rough edges. Approximately 45' x 55' room; Hand power tools are used to perform the trimming. EP-5 is used to vent the room – Exhaust blower and fabric filter to collect PM. Hand shop vacuums are used to remove dust not collected in the exhaust system.
- Step 5 – After parts are trimmed, gelcoat is applied to the unfinished side in the top coat room. Approximately 23' x 55' room (spray booth). One Patriot gelcoat system is used to apply gel coat. EP-4 exhaust blower with fabric filters and stack.
- Final Step – After the gelcoat has cured, the parts are moved back to the main factory floor where final inspection, assembly and shipping is completed.

This emissions unit is subject to 40 CFR 63subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

*{Permit Note: Summary of the five emission points: EP 1, *2 and 4 – Three blowers each with their own stack will remove vapor from the gelcoat area. EP 5 – will remove air from the trim room. These blowers will be equipped with fabric filters to contain PM due to overspray or trimming operations. EP 3 – is the discharge from the vacuum pumps used in the vacuum infused molds process. *EP 2 – is the gelcoat spray room and should have the greatest potential of VOC emissions compared to all other stacks.}*

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

<u>Essential Potential to Emit (PTE) Parameters</u>

A.1. <u>Hours of Operation</u>. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., and permit 0330287-001-AC]

A.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

A.3. Federal Operation and Maintenance Standards. The owner or operator must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls. [40 CFR 63.5835(a)]

Emission Limitations and Standards

Unless otherwise specified, the averaging time(s) for Specific Condition(s) **A.4.-A.6**. are based on the specified averaging time of the applicable test method.

A.4. Hazardous Air Pollutant (HAP) Emissions. Total hazardous air pollutants *(including Styrene and Methyl Methacrylate)* emissions from this facility shall not exceed 25 tons per rolling12-month period. [Rules 62-4.050(4)(a)2.d., and 62-210.200(PTE), F.A.C., and Permit No. 0330287-001-AC]

A.5. Volatile Organic Compounds (VOC) Emissions. Total VOC emissions *including Styrene, MMA and other HAPs* that are VOCs, shall not exceed 25 tons per year (TPY) in any rolling 12-month period. [Rules 62-4.050(4)(a)2.d., and 62-210.200(PTE), F.A.C., and Permit No. 0330287-001-AC]

Compliance Dates and Standards

A.6. You must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. Facilities meeting an organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance. [40 CFR 63.5800]

A.7. Work Practice Standards. The owner or operator must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you. [40 CFR 63.5805(c)]

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

A.8. You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date. [40 CFR 63.5840]

A.9. Federal Organic HAP emissions. You must meet the requirements of this section that apply to you. You may elect to comply using any options to meet the standards described in 40 CFR 63.5810 through 40 CFR 63.5830.

(a) - (b)NA

(c) If you have a new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.

(d)

(1) NA.

(2)

(i) If your new facility manufactures large reinforced plastic composites parts using open molding or pultrusion operations, the specific open molding and pultrusion operations used to produce large parts

are not required to reduce HAP emissions by 95 weight percent, but must meet the emission limits in Table 3 to this subpart.

(ii) A large open molding part is defined as a part that, when the final finished part is enclosed in the smallest rectangular six-sided box into which the part can fit, the total interior volume of the box exceeds 250 cubic feet, or any interior sides of the box exceed 50 square feet.

(iii) A large pultruded part is a part that exceeds an outside perimeter of 24 inches or has more than 350 reinforcements.

(e) - (h) NA.

[40 CFR 63.5805]

A.10. You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

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

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

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

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

(1)

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

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

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

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

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

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

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

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

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

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

Test Methods and Procedures

A.11. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.12. Determining HAP Content of Resins and Gel Coats. As required by 40 CFR 63 Subpart WWWW, in order to determine the organic HAP content of resins and gel coats, the owner or operator shall use the information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this section, as applicable.

(a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.

(b) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.

(c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance. [40 CFR 63.5797]

A.13. Determining HAP Content of Resins and Gel Coats. The owner or operator may use the equations in Table 1 in 40 CFR 63 Subpart WWWW to calculate emissions factors. Equations have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. [40 CFR 63.5796].

The following specific condition applies only to the vacuum infusion (closed-molding) process

A.14. Work Practice Standards. The owner or operator must meet the work practice standards in Table 4 to this subpart that apply to you. [40 CFR 63.5805(c)]

Specific Condition A.15 – A.28 apply both to open molding and vacuum infusion (closed-molding) process

A.15. Continuous Compliance Demonstration. The owner or operator must demonstrate continuous compliance with each HAP emissions or work practice standard [40 CFR 63.5900(a)]

A.16. 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)]

Recordkeeping and Reporting Requirements

A.17. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Notice of Compliance Report	Semi-Annual	A.22, 23, 24

[Rule 62-213.440, F.A.C.]

A.18. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

A.19. 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) and Permit 0330287-001-AC]

A.20. Deviation Reporting. The owner or operator must report each deviation from each standard in 40 CFR 63.5805. The deviations must be reported according to the requirements in 40 CFR 63.5910. [40 CFR 63.5900(b)]

A.21. Report Submittals. The owner or operator must submit all reports required in Table 14 in 40 CFR 63 subpart WWWW. [40 CFR 63.5910(a)]

A.22. Compliance Reports, Reporting Periods and Due Dates. The owner or operator must submit each report by the date specified in Table 14 in 40 CFR 63 Subpart WWWW

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

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

[40 CFR 63.5910(b)]

A.23. 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 §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.

[40 CFR 63.5910(c)]

A.24. 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 in this subpart 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 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [40 CFR 63.5910(g)]

A.25. Compliance Reports and Startup, Shutdown, and Malfunction Reports. The owner or operator shall submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 in 40 CFR 63 Subpart WWWW, and not based on the requirements in 40 CFR 63.999. [40 CFR 63.5910(h)]

A.26. Reporting Change in Compliance Options. Where multiple compliance options are available, the owner or operator must state in the next compliance report if the owner or operator have changed compliance options since the last compliance report. [40 CFR 63.5910(i)]

A.27. Recordkeeping. The owner or operator must keep the following records in a. thru d.:

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

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

A.28. Records Maintenance**.**

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

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

Other Requirements

A.29. Notifications

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

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

A.30. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 60, Subpart A – General Provisions and 40 CFR 63 subpart WWWW – National Emissions Standards for Hazardous Air Pollutants Reinforced Plastic Composites Production. [Rule 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. (Include for all units that are subject to a NESHAP)
Appendix NESHAP, Subpart WWWW