Jupiter Composites Inc.

Compliance Plan

(Issued 7-22-14)

This plan describes how the facility will monitor the operations associated with the Title V permit to assure compliance:

1) A monthly check-off sheet is used to insure all activities associated with the permit are being followed. This sheet is maintained by the ES&H manager. A sample check-off sheet is included in this document, but this check-off sheet will be modified with data from the final permit.

2) Daily logs are maintained at both the gelcoat room and the grinding room to insure that the filters are working properly. These logs are maintained by the ES&H manager. Sample Logs are attached.

3) An Xcel worksheet is maintained to insure that the HAPS emissions from the site meet the subpart WWWW emission limits and to verify that the rolling average of total HAP emissions is below 25 tons/yr

Sample Monthly Check Sheet

Jupiter Compsites Ic.
Annual Environmental Check list
2014

The following is an annual tickle file that need to be reviewed monthly to insure that environmental task are completed.

January

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th
- [ ] Issue Semiannual Compliance Certification (SCC) to DEP by 28th

February

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th
- [ ] Issue Annual Compliance Certification (ACC) to DEP - by 28th
- [ ] Issue ACC to EPA -28th
- [ ] Title V annual emission fee - by 28th
- [ ] Review TIER II reporting requirement - by 28th

March

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th
- [ ] Submit AOR to DEP - by 31st

April

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th

May

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th

June

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th
- [ ] Verify that SARA 313 reports are not required - by 29th

Jupiter Compsites Ic.
Annual Environmental Check list
2014

July

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th
- [ ] Issue Semiannual Compliance Certification (SCC) to DEP by 28th

August

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th

September

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th

October

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th

November

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th

December

- [ ] Monthly Data Usage sent to CES - by 7th
- [ ] Rolling average returned by CES, signed and filed - by 15th

Notes:

CES Contact information:
Michael Long (o) 850-434-7727 (C) 850-232-1755

Sample Gelcoat and Grinding Room Pressure logs

Jupiter Group A/S

Pensacola Florida · www.jupitergroup.dk · info@jupitergroup.dk

EF-71-01	Air Pressure Filter Log		
Issued by: MGL	Effective Date: 8/6/2013	Rev. A	Pg. 1 of 1

Month: 12/2013 1/2014

Gelcoar Room or Grinding Room
circle unit

Date	Differential Pressure Reading	Initials	Comments
12-2-13	.2	DB	
12-3-13	.2	DB	
12-4-13	.2	DB	
12-5-13	.2	DB	
12-9-13	.2	DB	
12-10-13	.2	DB	
12-11-13	.2	DB	
12-12-13	.2	DB	
12-16-13	.2	DB	
12-17-13	.2	DB	
12-18-13	.2	DB	
12-19-13	.2	DB	
12-30-13	.2	DB	
12-31-13	.2	DB	
1-2-14	.2	DB	
1-6-14	.2	DB	
1-7-14	.2	DB	
1-8-14	.2	DB	
1-9-14	.2	DB	
1-13-14	.2	DB	
1-14-14	.2	DB	
1-15-14	.2	DB	
1-16-14	.2	DB	
1-20-14	.2	DB	
1-21-14	.2	DB	
1-22-14	.2	DB	
1-23-14	.2	DB	
1-27	.2	DB	
1-28	.2	DB	
1-30	.2	DB	

Jupiter Group A/S

Pensacola Florida · www.jupitergroup.dk · info@jupitergroup.dk

EF-71-01	Air Pressure Filter Log		
Issued by: MGL	Effective Date: 8/6/2013	Rev. A	Pg. 1 of 1

Month: 9 - 2013
10 - 2013 11 - 2013

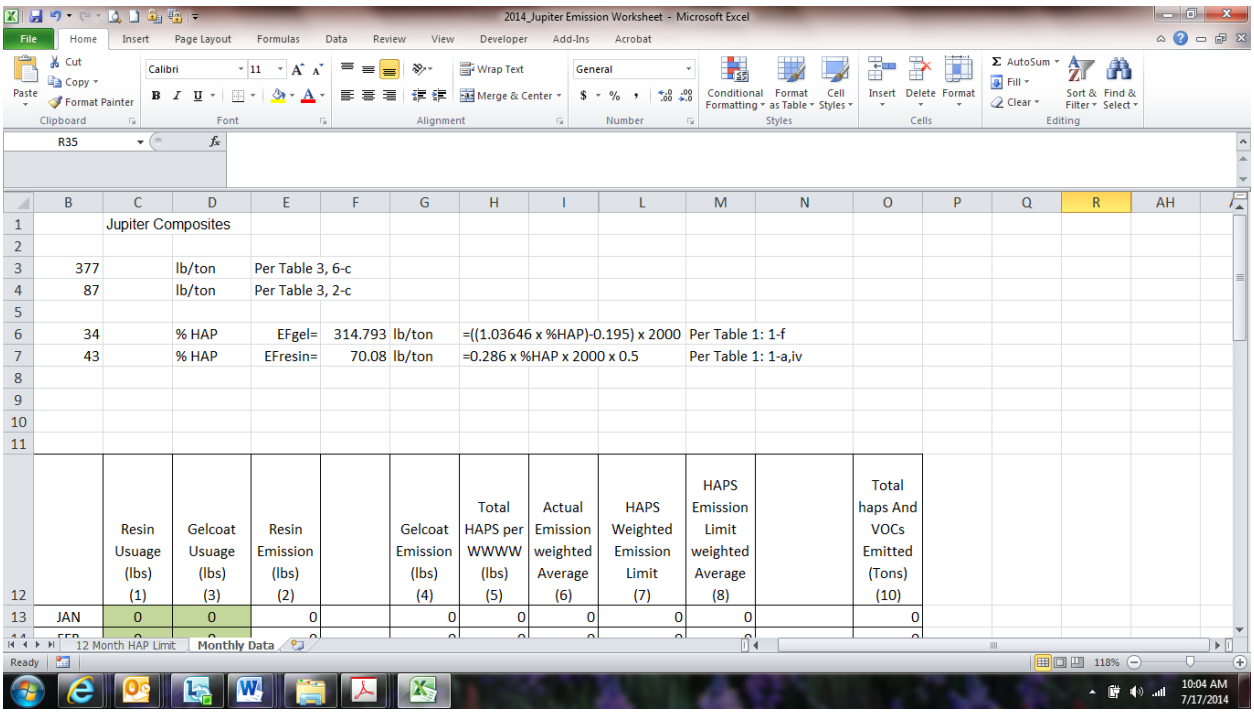
Gelcoar Room or Grinding Room
circle unit

Date	Differential Pressure Reading	Initials	Comments
9-9-13	.4	DB	
9-10-13	.4	DB	
9-11-13	.4	DB	
9-12-13	.4	DB	
9-16-13	.4	DB	Filters changed
9-17-13	.05	DB	
9-18-13	.05	DB	
9-19-13	.06	DB	
9-25-13	.08	DB	
10-3-13	.1	DB	
10-4-13	.1	DB	
10-7-13	.1	DB	
10-8-13	.1	DB	
10-9-13	.1	DB	
10-10-13	.1	DB	
10-14-13	.125	DB	
10-15-13	.15	DB	
10-16-13	.15	DB	
10-17-13	.15	DB	
10-21-13	.175	DB	
11-11-13	.75	DB	
11-12-13	.75	DB	
11-18-13	.2	DB	
11-19-13	.2	DB	
11-20-13	.2	DB	
11-21-13	.2	DB	
11-25-13	.2	DB	
11-26-13	.2	DB	
11-27-13	.2	DB	
11-28-13	.2	DB	

Xcel Emission Worksheet

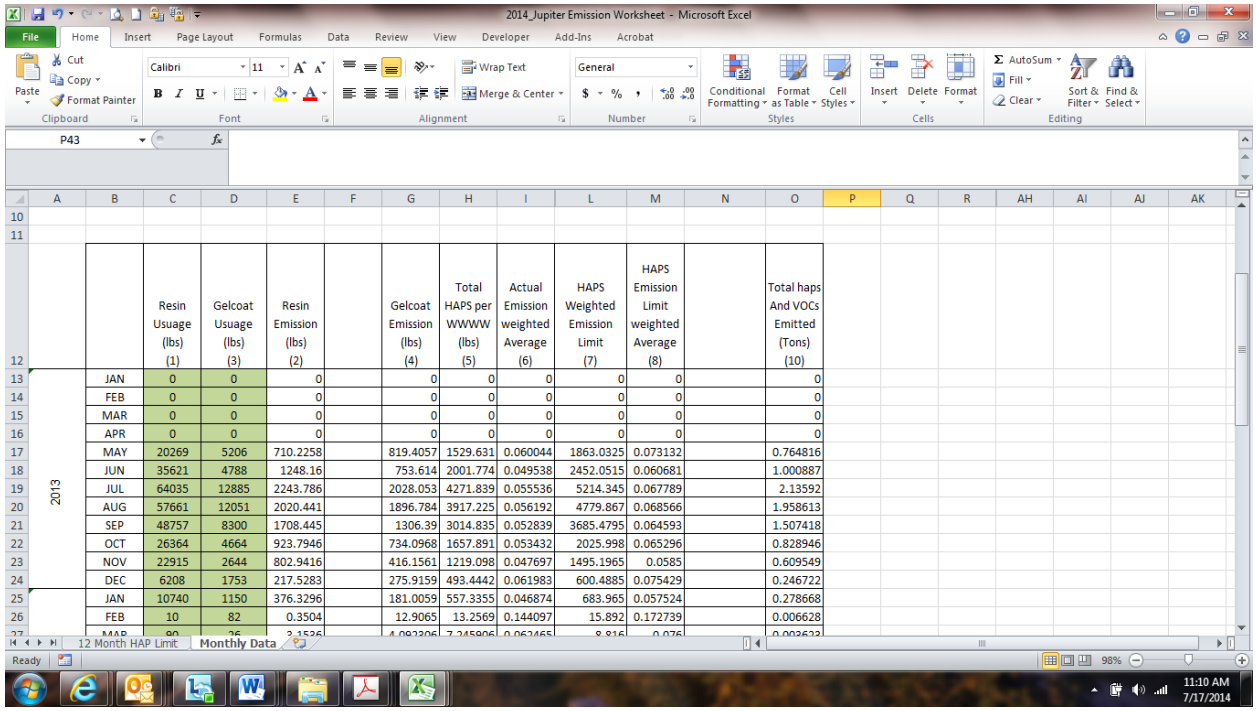
This Xcel monitoring worksheet “20XX_Juptier Emission Worksheet” is used to track HAPS emission compliance with the MACT 12-month rolling average emission compliance calculations as outlined in 40 CFR 63.5810. This worksheet also tracks the overall HAP emissions to verify that the facility emissions are less than the 25 tons/year permitted.

a) All MSDS for resin and gelcoat raw materials are review to determine the HAPS content on the material. This facility currently only uses one resin and one gelcoat and therefore, the HAP contents of these materials are constant. The allowable emissions for these compounds are generated from Table 3 and the actual emissions are generated from Table 1 in subpart WWWW. This is shown on the “Monthly Data” tab of the worksheet.



% HAPs Data Entry

b) Raw material is tracked on a monthly basis and maintained on a separate spreadsheet. A sum of the actual amount of resin and gelcoat consumer each month is entered in the consumption table located on the “Monthly Data” tab of the worksheet.



		Resin Usuage (lbs) (1)	Gelcoat Usuage (lbs) (3)	Resin Emission (lbs) (2)		Gelcoat Emission (lbs) (4)	Total HAPS per WWWW (lbs) (5)	Actual Emission weighted Average (6)	HAPS Weighted Emission Limit (7)	HAPS Emission Limit weighted Average (8)		Total haps And VOCs Emitted (Tons) (10)
2013	JAN	0	0	0		0	0	0	0	0		0
	FEB	0	0	0		0	0	0	0	0		0
	MAR	0	0	0		0	0	0	0	0		0
	APR	0	0	0		0	0	0	0	0		0
	MAY	20269	5206	710.2258		819.4057	1529.631	0.060044	1863.0325	0.073132		0.764816
	JUN	35621	4788	1248.16		753.614	2001.774	0.049538	2452.0515	0.060681		1.000887
	JUL	64035	12885	2243.786		2028.053	4271.839	0.055536	5214.345	0.067789		2.13592
	AUG	57661	12051	2020.441		1896.784	3917.225	0.056192	4779.867	0.068566		1.958613
	SEP	48757	8300	1708.445		1306.39	3014.835	0.052839	3685.4795	0.064593		1.507418
	OCT	26364	4664	923.7946		734.0968	1657.891	0.053432	2025.998	0.065296		0.828946
	NOV	22915	2644	802.9416		416.1561	1219.098	0.047697	1495.1965	0.0585		0.609549
	DEC	6208	1753	217.5283		275.9159	493.4442	0.061983	600.4885	0.075429		0.246722
	JAN	10740	1150	376.3296		181.0059	557.3355	0.046874	683.965	0.057524		0.278668
	FEB	10	82	0.3504		12.9065	13.2569	0.144097	15.892	0.172739		0.006628

Material Usage Entry

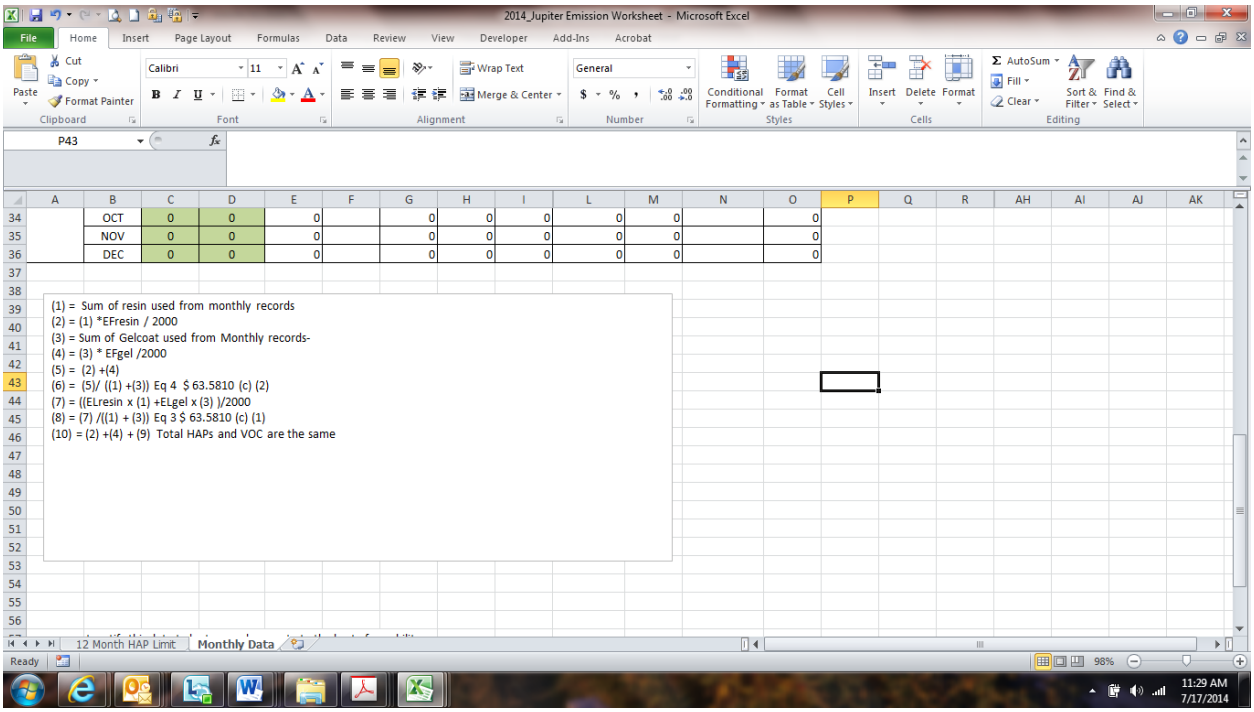
c) The actual weighted HAP emission and the HAP emission limits for each month are then calculated in the spreadsheet using the formulas found in section **§ 63.5810 (c)** *Demonstrate compliance with a weighted average emission limit.*

a. Weighted average HAP limit.

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

b. Actual Weighted HAP Emission

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



34		OCT	0	0	0		0	0	0	0	0		0
35		NOV	0	0	0		0	0	0	0	0		0
36		DEC	0	0	0		0	0	0	0	0		0

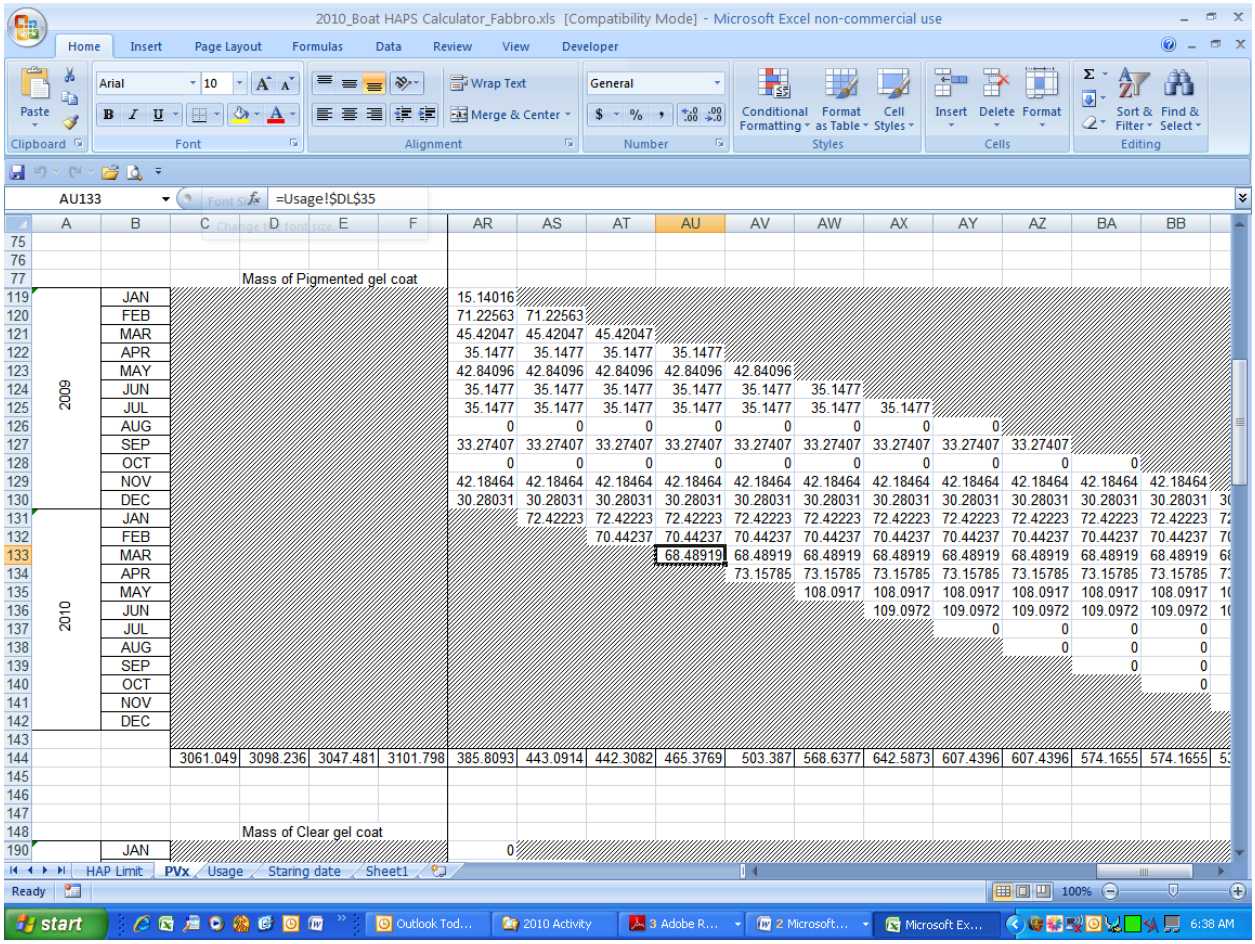
(1) = Sum of resin used from monthly records
(2) = (1) *EFresin / 2000
(3) = Sum of Gelcoat used from Monthly records-
(4) = (3) * EFgel /2000
(5) = (2) +(4)
(6) = (5)/ ((1) +(3)) Eq 4 $ 63.5810 (c) (2)
(7) = ((ELresin x (1) +ELgel x (3))/2000
(8) = (7) /((1) + (3)) Eq 3 $ 63.5810 (c) (1)
(10) = (2) +(4) + (9) Total HAPs and VOC are the same

Summary of equations in table

d) A 12-month rolling average is maintained on the “12 Month HAP Limit” tab. This tab calculates the 12 month rolling average and identifies the 12 month average difference between allowed and actual. This tab also shows the actual 12 month HAP emissions to insure that the 25 ton limit is not reached.

e) This form is completed monthly by Cornerstone Engineering Services and reviewed by the ES&H manager to assure compliance.

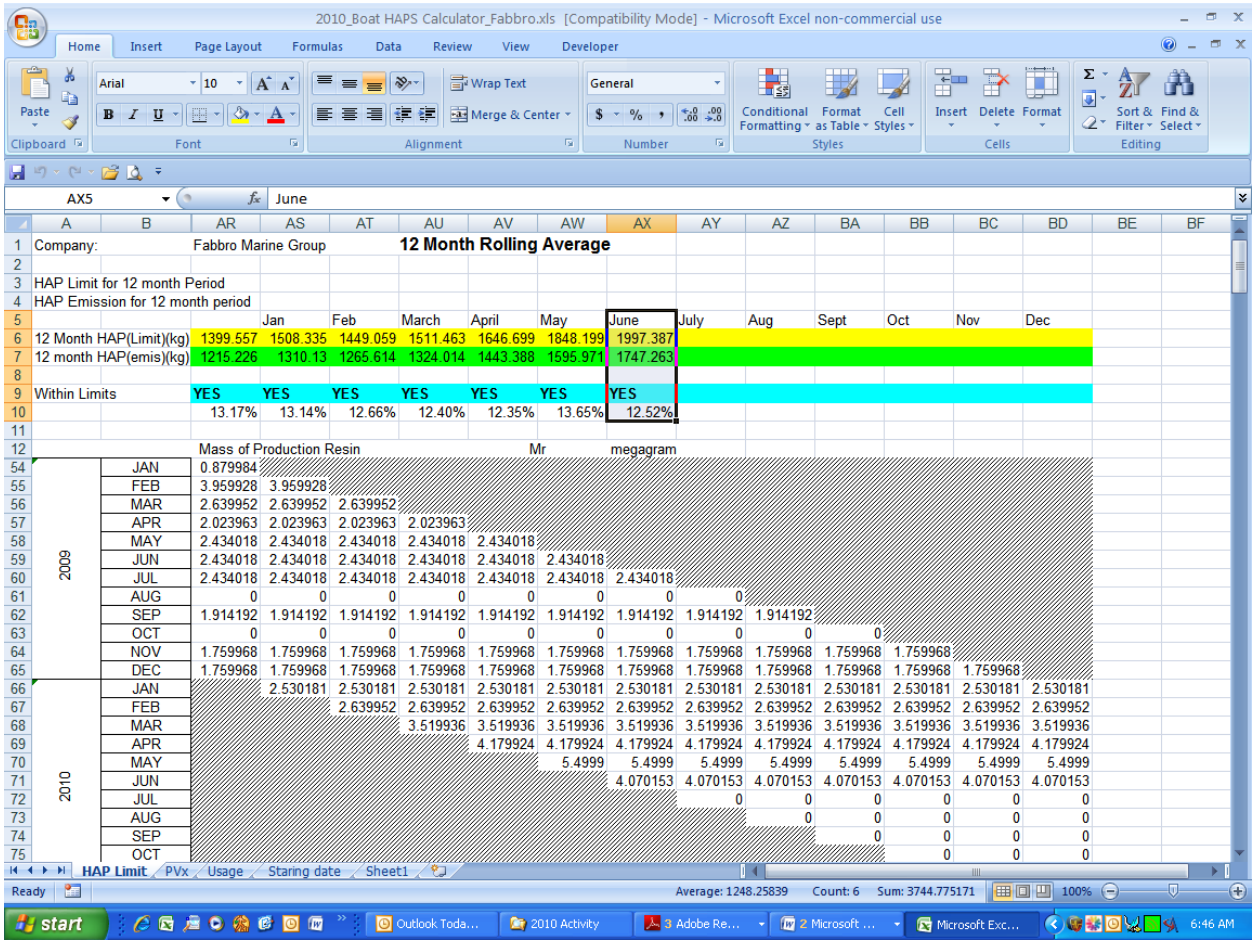
g) The “PVx tab” of the worksheet calculates the monthly 12-month rolling average of the sum of the MiPVi per 40 CFR 63.5698.



		AR	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB
2009	JAN	15.14016										
	FEB	71.22563	71.22563									
	MAR	45.42047	45.42047	45.42047								
	APR	35.1477	35.1477	35.1477	35.1477							
	MAY	42.84096	42.84096	42.84096	42.84096	42.84096						
	JUN	35.1477	35.1477	35.1477	35.1477	35.1477	35.1477					
	JUL	35.1477	35.1477	35.1477	35.1477	35.1477	35.1477	35.1477				
	AUG	0	0	0	0	0	0	0	0			
	SEP	33.27407	33.27407	33.27407	33.27407	33.27407	33.27407	33.27407	33.27407	33.27407		
	OCT	0	0	0	0	0	0	0	0	0	0	
	NOV	42.18464	42.18464	42.18464	42.18464	42.18464	42.18464	42.18464	42.18464	42.18464	42.18464	42.18464
	DEC	30.28031	30.28031	30.28031	30.28031	30.28031	30.28031	30.28031	30.28031	30.28031	30.28031	30.28031
2010	JAN		72.42223	72.42223	72.42223	72.42223	72.42223	72.42223	72.42223	72.42223	72.42223	72.42223
	FEB			70.44237	70.44237	70.44237	70.44237	70.44237	70.44237	70.44237	70.44237	70.44237
	MAR				68.48919	68.48919	68.48919	68.48919	68.48919	68.48919	68.48919	68.48919
	APR					73.15785	73.15785	73.15785	73.15785	73.15785	73.15785	73.15785
	MAY						108.0917	108.0917	108.0917	108.0917	108.0917	108.0917
	JUN							109.0972	109.0972	109.0972	109.0972	109.0972
	JUL								0	0	0	0
	AUG									0	0	0
	SEP										0	0
	OCT											0
	NOV											
	DEC											
		385.8093	443.0914	442.3082	465.3769	503.387	568.6377	642.5873	607.4396	607.4396	574.1655	574.1655
	JAN	0										

12 month rolling average of MiPVi

h) The “HAP limit tab” calculates the 12-month rolling average of the Mi and compares the allowable emissions to actual average emissions per 40 CFR 63.5698. The spreadsheet then determines if the facility is in compliance and a percentage of the difference between the values is given to help monitor if the facility is getting close to the limits.



2010_Boat HAPS Calculator_Fabbro.xls [Compatibility Mode] - Microsoft Excel non-commercial use

AX5 June

	A	B	AR	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD
1	Company:		Fabbro Marine Group			12 Month Rolling Average									
2															
3	HAP Limit for 12 month Period														
4	HAP Emission for 12 month period														
5				Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
6	12 Month HAP(Limit)(kg)		1399.557	1508.335	1449.059	1511.463	1646.699	1848.199	1997.387						
7	12 month HAP(emis)(kg)		1215.226	1310.13	1265.614	1324.014	1443.388	1595.971	1747.263						
8															
9	Within Limits		YES	YES	YES	YES	YES	YES	YES						
10			13.17%	13.14%	12.66%	12.40%	12.35%	13.65%	12.52%						
11															
12			Mass of Production Resin					Mr	megagram						
54	2009	JAN	0.879984												
55		FEB	3.959928	3.959928											
56		MAR	2.639952	2.639952	2.639952										
57		APR	2.023963	2.023963	2.023963	2.023963									
58		MAY	2.434018	2.434018	2.434018	2.434018	2.434018								
59		JUN	2.434018	2.434018	2.434018	2.434018	2.434018	2.434018							
60		JUL	2.434018	2.434018	2.434018	2.434018	2.434018	2.434018	2.434018						
61		AUG	0	0	0	0	0	0	0	0					
62		SEP	1.914192	1.914192	1.914192	1.914192	1.914192	1.914192	1.914192	1.914192	1.914192				
63		OCT	0	0	0	0	0	0	0	0	0	0			
64		NOV	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968		
65		DEC	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	1.759968	
66	2010	JAN		2.530181	2.530181	2.530181	2.530181	2.530181	2.530181	2.530181	2.530181	2.530181	2.530181	2.530181	2.530181
67		FEB			2.639952	2.639952	2.639952	2.639952	2.639952	2.639952	2.639952	2.639952	2.639952	2.639952	2.639952
68		MAR				3.519936	3.519936	3.519936	3.519936	3.519936	3.519936	3.519936	3.519936	3.519936	3.519936
69		APR					4.179924	4.179924	4.179924	4.179924	4.179924	4.179924	4.179924	4.179924	4.179924
70		MAY						5.4999	5.4999	5.4999	5.4999	5.4999	5.4999	5.4999	5.4999
71		JUN							4.070153	4.070153	4.070153	4.070153	4.070153	4.070153	4.070153
72		JUL								0	0	0	0	0	0
73		AUG									0	0	0	0	0
74		SEP										0	0	0	0
75		OCT											0	0	0

HAP Limit | PVx | Usage | Staring date | Sheet1

Ready Average: 1248.25839 Count: 6 Sum: 3744.775171 100%

start Outlook Toda... 2010 Activity 3 Adobe Re... 2 Microsoft ... Microsoft Exc... 6:46 AM