

Jupiter Composites
Permit No. 0330291-002-AC
June 17, 2014 Air Compliance Inspection
Additional Comments

On June 17, 2014, Department personnel conducted an air compliance inspection at Jupiter Composites located in Escambia County. The Department would like to thank Mr. Sean Guidry, Mr. William Gill and Mr. Michael Long for their assistance during and following the inspection.

Jupiter Composites operated under air general permit no. 0330291-001-AG until issuance of construction permit 0330291-002-AC on May 3, 2013. The facility is subject to 40 CFR 63 Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

The following deviations were noted during the inspection and are required to be addressed:

- The permittee failed to notify the Compliance Authority upon commencement of construction, as required by Section 2 Permit Condition 7 and Section 4 Appendix C Common Condition 15. According to a letter received from Mr. Guidry dated June 23, 2014, construction commenced on May 6, 2013.
- The permittee failed to apply for a Title V air operation permit no later than 180 days after commencing operation, as required by Section 2 Permit Condition 9 and in violation of Rule 62-213.420(1)(a)1, F.A.C., which states that a facility that commences operation as a Title V source or that otherwise becomes subject to the permitting requirements of Chapter 62-213, F.A.C., must file an application for an operation permit under this chapter at least ninety days before expiration of the source's air construction permit, but no later than 180 days after commencing operation as a Title V source. According to the June 23, 2014 letter, the facility commenced operation on May 6, 2013 following issuance of the construction permit.
- The permittee failed to submit the 2013 Annual Operation Report by April 1, 2014, as required by Section 4, Appendix C, Permit Condition 11.c and Rule 62-210.370(3), F.A.C.
- The July - December 2013 semiannual report, required by **40 CFR 63.5910** and outlined in Section 3A Permit Conditions 7, 18, 19, 20 and 21, was submitted late with inaccurate information. The report was due by January 31, 2014, and received on February 25, 2014. The report stated that the facility was in compliance with all permit conditions. However, the facility has failed to comply with multiple conditions of the permit which are described in detail in this report.
- As a reminder, Rule 62-213.420(4), F.A.C., requires any responsible official (RO) certification statement to be based on information and belief formed after reasonable inquiry. The semiannual report and Annual Statement of Compliance were signed and certified by a responsible official. Reasonable inquiry into the facility's permit requirements prior to report submittal should have revealed the failure to comply with multiple permit conditions. A more thorough review of the permit conditions and compliance status by the RO is required prior to submittal of any future reports, compliance statements, application forms, compliance plans or compliance schedules.

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- The permittee failed to submit a notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after that date, as required by Section 3A Permit Condition 25, and **40 CFR 63.5905**. According to information obtained during the inspection and the June 23, 2014 letter, the actual date of startup following issuance of the construction permit was May 6, 2013.
- The permittee failed to submit a Notification of Compliance Status no later than one year plus 30 days after the facility's compliance date as required by Section 3A Permit Condition 25, **40 CFR 63.5905, and Table 13 to Subpart WWWW of 40 CFR Part 63**. According to Table 2 to Subpart WWWW of 40 CFR Part 63, the compliance date is the startup date, May 6, 2013.
- The permittee failed to demonstrate initial compliance with the emission standards for visible emissions by conducting a Method 9 Visible Emission test within 60 days of achieving permitted capacity, but not later than 180 days after initial operation as required by Section 3B Permit Condition 4.
- The permittee failed to submit an Operations and Maintenance (OANDM) Plan pertaining to the baghouse within 120 days of issuance of the permit, as required by Section 3B Permit Condition 7.

Upon request, the facility submitted a letter on June 23, 2014, which explained several areas of noncompliance and steps taken to maintain future compliance. The letter stated that following issuance of the construction permit, on Monday, May 6, 2013 the facility continued fabricating windmill housing parts by spraying gelcoat and vacuum infusion of the parts (EU001). The vacuum infusion operation occurred in the production area without additional modifications to the system. The gelcoat operation occurred in the gelcoat booth which was part of the air general permit but not 100% operational until June 24, 2013. The letter stated that the HAP emissions from the gelcoat operation are the same with or without the gelcoat booth. The grinding operation (EU002) completed construction and was in full operation on September 6, 2013.

Corrective actions described in the letter included scheduling a visible emission test for EU002, submitting a Title V Air Operating Permit Application by July 3, 2014, and resubmitting the semiannual report and Annual Statement of Compliance to the Department.

Immediately following the inspection on June 17, 2014, the facility notified the Department of a Visible Emission test scheduled for EU002 on July 8, 2014. The visible emission report was submitted to the Department on July 8, 2014 and it indicated compliance with the opacity limit.

The 2013 Annual Operating Report was submitted on June 24, 2014, the Initial Title V Permit Application was submitted on July 11, 2014 and a revised Semiannual Report was submitted on July 14, 2014.

Currently, the Department is waiting for submittal of the Notification of Compliance Status and the Operations and Maintenance Plan for the baghouse.

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The June 23, 2014 letter also stated that the facility stopped general operation December 2013 and does not anticipate producing any new units until February 2015. Jupiter Composites plans to shutdown EU001 and EU002 until the permit issues are resolved. Neither unit was in operation during the inspection.

Please submit the requested documents as soon as possible. If you have any questions or require any assistance, please contact Jennifer Waltrip at 850/595-0662 or via email at jennifer.waltrip@dep.state.fl.us.