CDR Systems Corporation
Palatka Plant
Facility ID No.: 1070031
Putnam County

# Title V Air Operation Permit Revision

**DRAFT Permit No.: 1070031-007-AV**
**Revision to Title V Air Operation Permit No.: 1070031-004-AV**


Permitting and Compliance Authority:

State of Florida
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

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**DRAFT Permit No.:** 1070031-007-AV
**Facility ID No.:** 1070031
**SIC No(s).:** 30
**Project:** Title V Air Operation Permit Revision

This permit revision is being reopened for the purpose of incorporating amendments to 40 CFR 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production. This existing facility is located at east of St. Johns Avenue, on Kay Larkin Drive, NW of Palatka, Putnam County; UTM Coordinates: Zone 17, 433.1 km East and 3280.6 km North; and, Latitude: 29°39'20" North and Longitude: 81°41'27" West.

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS version dated 06/23/06
40 CFR 63 Subpart WWWW Definitions, 63.5935
40 CFR 63 Subpart WWWW Tables 1-14
40 CFR 63 Subpart A as identified in 40 CFR 63 Subpart WWWW Table 15

**Initial Effective Date:** May 2, 2003
**Revision Effective Date:**
**Renewal Application Due Date:** November 2, 2007
**Expiration Date:** May 2, 2008

_____
Christopher L. Kirts, P.E.
District Air Program Administrator

CLK/rfs

## Section I. Facility Information.

## Subsection A. Facility Description.

CDR Systems Corporation manufactures Polymer Concrete and Fiberglass Reinforced Plastics polyester utility enclosure using two basic processes with ten variations. There are no physical processing units to which operating rates can be linked. Emissions from the plant are fugitive.

Polymer Concrete (PC) is a blend of coarse sand, fine sand and a fine filler, or aggregates, mixed with an unsaturated polyester resin in styrene monomer along with other minor additives. After mixing and placing in a mold, the PC hardens to an inert solid article, taking the shape of the mold. Under ideal conditions, all of the unsaturated polyester resin and the styrene polymerize to form the hardened plastics that in turn acts as binder to hold the aggregates together. During processing, the styrene containing resin is exposed to air for a period of time during which some of the styrene evaporates producing styrene emissions. The facility manufactures PC under four alternate methods of operations using different combinations of closed or open molded, and machine or hand mixed processes.

Fiberglass Reinforced Plastics (FRP) is fabricated from liquid polyester resin reinforced with glass fibers. With hand lay-up, the reinforcement is manually fitted to a mold wetted with catalyzed resin mix, after which it is saturated with more resin. The reinforcement is in the form of either fiberglass mat or a woven fabric. Layers of reinforcement and resin are added to build the desired laminate thickness. Squeegees, brushes, and rollers are used to smooth out and compact each layer as it is applied. With mechanical non-atomized application, a mechanical fluid delivery system, in this case the flow coater or the injection gun, is employed to apply resin to the glass reinforcement without atomizing the resin fluid stream. In most cases, the mixing, applying and curing are taken place with open molds, which is called open molded process, and styrene emissions occur during those processes. The closed molding process is vacuum bag molding, in which the surface is covered with a plastic film and vacuum is applied before rolling and styrene emissions are significantly reduced. The facility manufactures FRP under four alternate methods of operations using different combinations of closed or open molded, and machine or hand wetout processes.

Two processes involve using a non-atomizing gel coat spraying gun and a non-atomizing fiberglass chopping gun, which may involve either spraying a weather and UV light resistant gel coat onto a mold followed by chopping layers of structural fiberglass over the gel coat or chopping structural fiberglass onto a mold by spraying on a final layer of gel coat. Both these processes are carried out sequentially in one exhaust booth, and particulate matter emissions are controlled by a filter. Because Methyl Methacrylate is used as monomer in the gel coating operation in addition to styrene, Methyl Methacrylate and styrene emissions will occur during mixing, spraying, and curing.

Also included in this permit are insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Renewal application received August 16, 2002, this facility is a major source of hazardous air pollutants (HAPs).

***Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.***

## Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

| E.U. ID No. | Brief Description |
|---|---|
| 001 | Polymer Concrete & Fiberglass Reinforced Plastic Processes |

## Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Table 1-1: Summary of Air Pollutant Standards and Terms
Table 2-1: Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Statement of Basis

These documents are on file with the permitting authority:
Title V Air Operation Permit Renewal issued May 6, 2003
Title V 30-Day MACT Open for Cause Letter issued February 3, 2006
Comments from Applicant received June 16, 2006

## Section II. Facility-wide Conditions.

## The following conditions apply facility-wide:

**1.** APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

**2.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

**3.** General Particulate Emission Limiting Standards. General Visible Emissions Standard.
Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

**4.** 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 shall 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), F.A.C.; and, SIP approved]

**5.** Prevention of Accidental Releases (Section 112(r) of CAA).
**a.** The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301-429-5018

and,
**b.** The permittee shall 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]

**6.** Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

**7.** General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents 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.

The following requirements are "not federally enforceable":

1. All solvents and raw materials are to be stored and handled in appropriate containers equipped with tight fitting lids.
2. Good housekeeping and continuously training personnel.
3. Continuously research new products that will allow reductions in solvent usage and new production methods or techniques that reduce the overall VOC emissions from the facility.

[Rule 62-296.320(1)(a), F.A.C.; and, proposed by applicant in the initial Title V Air Operation Permit application received June 14, 1996]

**8.** Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-6, TITLE V CONDITIONS):

The following requirements are "not federally enforceable":

1. Paving of roads and other traffic areas in the facility. High traffic and work areas are paved in this facility.
2. General good housekeeping to reduce the amount of uncontrolled material around the facility. This includes periodic sweeping of areas with a vacuum sweeper vehicle. There is also a plant awareness to keep work areas clean of debris build up.
3. Mechanical conveyer systems are covered if necessary to reduce fugitive emissions.

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by the applicant in the initial Title V permit application received June 14, 1996]

**9.** When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

**10**. Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports.
[Rule 62-213.440(1)(b)3.a., F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(1)(b)3., F.A.C. (see Condition 43. of APPENDIX TV-6, TITLE V CONDITIONS.}"

**11.** Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}

**12.** The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northeast District, Air Section.

Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Telephone: 904/807-3300; FAX: 904/448-4363

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

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

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

## Section III. Emissions Unit(s) and Conditions.

### Subsection A. This section addresses the following emissions unit(s).

| E.U. ID No. | Brief Description |
|---|---|
| 001 | Polymer Concrete & Fiberglass Reinforced Plastic Processes |

Emission Unit 001 identifies PC (Polymer Concrete) and FRP (Fiberglass Reinforced Plastics) processes using two basic processes with ten variations. There are no physical processing units to which operating rates can be linked. Emissions are fugitive.

{Permitting note(s): This emissions unit is regulated under Rule 62-213, F.A.C., Operation Permits for Major Sources of Air Pollution. This emissions unit must comply with NESHAP - 40 CFR 63 Subpart WWWW by April 21, 2006, adopted and incorporated by reference in Rule 62-204.800, F.A.C.

*Note, Department has determined that sections of the 40 CFR 63, Subpart WWWW are not applicable to this facility. Such sections are not included as conditions of this Title V Permit Revision.*

*Note, This facility does not perform any centrifugal casting, continuous lamination/continuous casting, Sheet Mold Compound (SMC) Manufacturing, Bulk Mold Compound (BMC) Manufacturing, mixing, filament winding, or pultrusion. The facility also does not use an add-on control device. If at a future date, the permittee decides to add any of these operations, or use an add-on control device, the permittee must request and obtain the necessary Department permit(s) prior to construction and/or addition.*

### The following specific conditions apply to the emissions unit(s) listed above:

**Essential Potential to Emit (PTE) Parameters**

**A.1.** Permitted Capacity. The process rate shall not exceed 9,000 TPY of finished products. [Rule 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1070031-005-AC]

**A.2.** Alternate Methods of Operation. This Emissions Unit shall be operated in any of the following ten Methods of Operation:

| Alternate Method Number | Description | **NESHAP Table 1 Reference**[1] |
|---|---|---|
| 001 | Closed Molded, Machine Mixed PC | AP-42[2] |
| 002 | Open Molded, Hand Mixed PC | AP-42[2] |
| 003 | Closed Molded, Hand Mixed PC | AP-42[2] |
| 004 | Open Molded, Machine Mixed PC | AP-42[2] |
| 005 | Hand Lay-up, Manual Wetout FRP | 1.a.i. |

| Alternate Method Number | Description | **NESHAP Table 1 Reference**[1] |
|---|---|---|
| 006 | Hand Lay-up, Machine Wetout FRP | 1.c.i. |
| 007 | Manual Wetout, Closed Molded FRP | 1.a.i. |
| 008 | Machine Wetout, Closed Molded FRP | 1.c.iv. |
| 009 | Fiberglass Chopping | 1.c.i. |
| 010 | Gel Coating | 1.g. |

***Note 1:*** Subpart WWWW, Table 1, paragraph references to relate process descriptions to the NESHAP definitions.
***Note 2:*** From AP-42. Although Section 4.4 of AP-42 was removed from EPA website, the emission factors for polymer casting are still valid.

[Rule 62-213.420(3)(j), F.A.C.; Construction permit No. 1070031-005-AC]

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

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.4.** The permittee shall comply with the stated requirements of 40 CFR Part 63, Subpart WWWW by April 21, 2006, as stated in 40 CFR Part 63, Subpart WWWW Table 2. 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.5.** The permittee shall comply with the requirements of 40 CFR Part 63, Subpart A- General Provisions as identified in 40 CFR 63 Subpart WWWW Table 15.
[40 CFR 63.5925]

**A.6. a.** Affected Sources. All parts of the facility engaged in the following operations are subject to the requirements of 40 CFR 63 Subpart WWWW:

- open molding,
- closed molding,
- sheet molding compound (SMC) manufacturing,
- bulk molding compound (BMC) manufacturing,
- mixing,
- cleaning of equipment used in reinforced plastic composites manufacture,
- HAP-containing materials storage, and
- repair operations on parts that are also manufactured by the facility.

**b.** Non-affected Sources/Operations. The following operations are specifically excluded from any requirements of 40 CFR 63 Subpart WWWW:

- application of mold sealing and release agents,
- mold stripping and cleaning,
- repair of parts that were not manufactured by the facility, including nonroutine manufacturing of parts,
- personal activities that are not part of the manufacturing operations (such as hobby shops on military bases),
- prepreg materials as defined in §63.5935 (Attachment – Definitions),
- non-gel coat surface coatings,
- application of putties, polyputties, and adhesives
- repair or production materials that do not contain resin or gel coat,
- research and development operations as defined in section 112(c)(7) of the Clean Air Act,
- polymer casting, and
- closed molding operations (except for compression/injection molding).

[40 CFR 63.5790(b) and (c)]

**A.7.** Total HAP Emissions. The Permittee shall comply with the following total HAP emission limits:

**a.** The organic HAP emissions limits established in 40 CFR 63 Subpart WWWW Table 3 and stated in the following table:

| Alternate Method Number | Emissions Limit 12-Month Rolling Average lbs/ton of resin used |
|---|---|
| 001 | Note 1 |
| 002 | Note 1 |
| 003 | Note 1 |
| 004 | Note 1 |
| 005 | 87 |
| 006 | 88 |
| 007 | 87 |
| 008 | 88 |
| 009 | 88 |
| 010 | 377 |

**Note 1:** Table 3, 40 CFR 63 Subpart WWWW does not include limits for polymer casting processes. Emissions from alternate methods 001 through 004 are limited by the plant-wide emissions limits in paragraph b below.

**b.** The total HAPs emissions from the facility shall not exceed 70 tons per any consecutive 12 months.

[Title V Air Operation Permit No. 1070031-003-AV; Construction Permit No. 1070031-005-AC; 40 CFR 63.5805(b)]

**A.8.** Work Practice Standards. The permittee shall meet the work practice standards stated in 40 CFR 63 Subpart WWWW Table 4.
[40 CFR 63.5805(b)]

**A.9.** Organic HAP Emissions - Repair Operations. If the facility has repair operations as defined below, these repair operations must meet the requirements 40 CFR 63 Subpart WWWW Tables 3 and 4, and are not required to meet the 95 percent organic HAP emissions reduction requirements in 40 CFR 63.5805(a)(1).

***Repair Operations*** *are defined as the application of resin or gel coat to a part to correct a defect, where the resin or gel coat application occurs after the part has gone through all the steps of its typical production process, or the application occurs outside the normal production area. For purposes of this subpart, rerouting a part back through the normal production line, or part of the normal production line, is not considered repair*

*40 CFR 63.5805(a)(1): If the combination of all centrifugal casting and continuous lamination/casting operations emit 100 tpy or more of HAP, you must reduce the total organic HAP emissions from centrifugal casting and continuous lamination/casting operations by at least 95 percent by weight. As an alternative to meeting the 95 percent by weight requirement, centrifugal casting operations may meet the applicable organic HAP emissions limits in Table 5 to this subpart and continuous lamination/casting operations may meet an organic HAP emissions limit of 1.47 lbs/ton of neat resin plus and neat gel coat plus applied. For centrifugal casting, the percent reduction requirement does not apply to organic HAP emissions that occur during resin application onto an open centrifugal casting mold using open molding application techniques.*

[40 CFR 63.5805(g), 40 CFR 63.5785, 40 CFR 63.5935]

**A.10.** Determination of Organic HAP emissions in TPY. To calculate the organic HAP emissions in TPY for the facility as needed for Conditions A. 7. through A.9., the following procedures shall be used:

(a) N/A *[this source is an existing facility under 40 CFR 63 Subpart WWWW];*

(b) You may use the procedures in either paragraph (b)(1) or (2) of this condition. If the emission factors for an existing facility have changed over the period of time prior to their initial compliance date due to incorporation of pollution-prevention control techniques, existing facilities may base the average emission factor on their operations as they exist on the compliance date. If an existing facility has accepted an enforceable permit limit that would result in less than 100 tpy of HAP measured prior to any add-on controls, and can demonstrate that they will operate at that level subsequent to the compliance date, they can be deemed to be below the 100 tpy threshold.

(1) Use a calculated emission factor. Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. You may calculate this organic HAP emissions factor based on the equations in 40 CFR 63 Subpart WWWW Table 1, or you may use any organic HAP emissions factor approved by us, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.

a. This facility shall use the following organic HAP emissions factors:

| **Alternate Method Number** | **Emission Factors** (lbs per lb of resin or gel coat processed) (Note 1) | |
|---|---|---|
| | Resin containing less than 33% styrene | Resin containing 33% or more styrene |
| 001 | 1.5% of styrene (Note 2) | 1.5% of styrene (Note 2) |
| 002 | 3.0% of styrene (Note 2) | 3.0% of styrene (Note 2) |
| 003 | 2.0% of styrene (Note 2) | 2.0% of styrene (Note 2) |
| 004 | 2.0% of styrene (Note 2) | 2.0% of styrene (Note 2) |
| 005 | 0.126 x %HAP | 0.286 x %HAP – 0.0529 |
| 006 | 0.107 x %HAP | 0.157 x %HAP – 0.0165 |
| 007 | (0.126 x %HAP) x 0.5 | (0.286 x %HAP – 0.0529) x 0.5 |
| 008 | (0.107 x %HAP) x 0.55 | (0.157 x %HAP – 0.0165) x 0.55 |
| 009 | 0.107 x %HAP | 0.157 x %HAP – 0.0165 |
| 010 | 0.185 x %HAP | 0.4506 x %HAP –0.0505 |

**Note 1:** Emission factors for alternate methods 5 through 10 are from Table 1 of 40 CFR 63 Subpart WWWW

**Note 2:** From AP-42. Although Section 4.4 of AP-42 was removed from the EPA website, the emissions factors for polymer concrete casting are still valid.

(2) Conduct performance testing. Conduct performance testing using the test procedures in §63.5850 to determine a site-specific organic HAP emissions factor in units of lbs/ton of resin and gel coat used. Conduct the test under conditions expected to result in the highest possible organic HAP emissions. Multiply this factor by annual resin and gel coat use to determine annual organic HAP emissions. This calculation must be repeated and reported annually.

(c) Existing facilities must initially perform this calculation based on their 12 months of operation prior to the effective date of this subpart, and include this information with their initial notification report. Existing facilities must repeat the calculation based on their resin and gel coat use in the 12 months prior to their initial compliance date, and submit this information with their initial compliance report. After their initial compliance date, existing and new facilities must recalculate organic HAP emissions over the 12-month period ending June 30. Subsequent calculations should cover the periods in the semiannual compliance reports.

***NOTE*** This facility is not required to calculate or report emissions under this Condition because it is an existing facility that does not have centrifugal casting or continuous lamination/casting operations. However, emissions calculation and emission reporting procedures in other sections of 40 CFR 60 Subpart WWWW still apply.

[40 CFR 63.5799]

**A.11.** Methods of Compliance. You must use one of the following methods in Conditions. A.12. through A.14. to meet the standards for open molding operations in 40 CFR 63 Subpart WWWW Table 3 or 5. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, and using covered curing techniques. You may use different compliance options for the different operations listed in 40 CFR 63 Subpart WWWW Table 3 or Table 5. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in Conditions A.12. through A.15. 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.

[40 CFR 63.5810]

**A.12.** Individual Organic HAP Emissions Factor Option. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in 40 CFR 63 Subpart WWWW Table 3 or Table 5.

(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 40 CFR 63 Subpart WWWW Table 1 for open molding, or site-specific organic HAP emissions factors discussed in Condition A.16. 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 40 CFR 63 Subpart WWWW Table 1, 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.

(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 40 CFR 63 Subpart WWWW Table 3. 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 Conditions A.13. through A.15., then all process streams using that individual resin or gel coat must be included in the averaging calculations.

[40 CFR 63.5810(a)]

**A.13.** HAP Emissions factor averaging option. 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 40 CFR 63 Subpart WWWW Table 3 that applies to you.

(1)(i) Group the process streams described in Condition A.12. by operation type and resin application method or gel coat type listed in 40 CFR 63 Subpart WWWW Table 3 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 (1) of Condition A.12. 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 condition.

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

Where:
Actual Process Stream EFi=actual organic HAP emissions factor for process stream i, lbs/ton;
Materiali=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 Condition A.12., subject to the limitations described in paragraph (2) of Condition A.12., and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in Condition A.15.

(2) Compare each organic HAP emissions factor calculated in paragraph (1) of this condition with its corresponding organic HAP emissions limit in 40 CFR 63 Subpart WWWW Table 3 or 5. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

[40 CFR 63.5810(b)]

**A.14.** Weighted Average Option. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in 40 CFR 63 Subpart WWWW Table 3 or 5 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 40 CFR 63 Subpart WWWW Table 3 or 5 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.

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

Where:
ELi=organic HAP emissions limit for operation type i, lbs/ton from 40 CFR 63 Subpart WWWW Tables 3 or 5;
Materiali=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 (1) of Condition A.13. 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.

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

Where:
Actual Individual EFi=Actual organic HAP emissions factor for operation type i, lbs/ton;
Materiali=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 (1) and (2) of this condition. 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.

[40 CFR 63.5810(c)]

**A.15.** Multiple Operations. 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 (1). 40 CFR 63 Subpart WWWW Table 7 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 40 CFR 63 Subpart WWWW Table 7, the resin is in compliance.

(2) You may also use a weighted average organic HAP content for each application method described in paragraph (1) of this condition. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (1) of Condition A.13. 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 40 CFR 63 Subpart WWWW Table 7.

(3) You may simultaneously use the averaging provisions in Condition A.13. or A.14. to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (1) and (2) of this condition. However, any resins for which you claim compliance under the option in paragraphs (1) and (2) of this condition may not be included in any of the averaging calculations described in Conditions A.13. or A.14.

(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 (1) of this condition unless you elect to include that resin in the averaging calculations described in paragraph (2) of this condition.

[40 CFR 63.5810(d)]

**A.16.** Determining Organic HAP Emission Factors – 40 CFR 63 Subpart WWWW Table 1. Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in 40 CFR 63 Subpart WWWW Tables 3 and 5. You may use the equations in 40 CFR 63 Subpart WWWW Table 1 to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test.

In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data.

[40 CFR 63.5796]

**A.17.** Determining Organic HAP Emission Factors – Alternative. If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in 40 CFR 63 Subpart WWWW Table 1, you may use the procedures in paragraphs (a) or (b) of this condition to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits of 40 CFR 63 Subpart WWWW and to calculate facility organic HAP emissions.

(a) Perform a organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850.

(b) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in 40 CFR 63 Subpart WWWW Table 1.

[40 CFR 63.5798]

**A.18.** Determination of Organic HAP Content of Resins and Gel Coats. In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this condition, as applicable.

(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]

General Compliance Requirements

**A.19.** The Permittee shall be in compliance at all times with the work practice standards in 40 CFR 63 Subpart WWWW Table 4, as well as the organic HAP emissions limits in 40 CFR 63 Subpart WWWW Tables 3, or 5, or the organic HAP content limits in 40 CFR 63 Subpart WWWW Table 7, as applicable.

[40 CFR 63.5835(a)]

**A.20.** The Permittee shall always operate and maintain the facility according to the provisions in 40 CFR Part 63 Subpart A, 63.6(e)(1)(i).

[40 CFR 63.5835(c)]

**A.21.** Compliance Deadline Dates. The Permittee shall conduct initial compliance demonstrations by the compliance date specified in Attachment Table 2. However, open molding and centrifugal casting operations that elect to meet a organic HAP emissions limit on a 12-month rolling average shall initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date.
[40 CFR 63.5840]

**A.22.** Operation Requirements – Initial Compliance. The Permittee shall demonstrate initial compliance with each applicable organic HAP emissions standard in Conditions A.7.a., A.8. through A.9 by using the procedures shown in 40 CFR 63 Subpart WWWW Tables 8 and 9.
[40 CFR 63.5855(a)]

**A.23.** Operation Requirements – Continuous Compliance.

(a) You must demonstrate continuous compliance with each standard in Conditions A.7.a., A.8. through A.9 according to the methods specified in paragraphs (a)(1) through (3) of this condition.

(1) N/A/ *[this facility does not utilize add-on controls]*

(2) 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 or 5 to this subpart, on a 12-month rolling average. *[Option in 40 CFR 63.5895(d) is N/A as Rule 62-210.370(3)(a)1, F.A.C. requires reporting for all Title V Sources.]*

(3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average. *[Option in 40 CFR 63.5895(d) is N/A as rule 62-210.370(3)(a)1, F.A.C. requires reporting for all Title V Sources.]*

(4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.

(b) You must report each deviation from each standard in Conditions A.7.a., A.8. through A.9 that applies to you. The deviations must be reported according to the requirements in Condition A.30. and A.31.

(c) Except as provided in paragraph (d) of this condition, during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.

(d) N/A *[this facility does not utilize add-on controls]*

(e) N/A *[this facility does not utilize add-on controls]*

[40 CFR 63.5900]

**A.24.** Compliance with Condition A.7.b. shall be determined by recording the total HAP emissions facility-wide. These emissions shall be based on material balance reports. The Emissions Report shall include the following at a minimum:

- Material balance Reports
- Facility-wide total HAP emissions [Tons/any consecutive 12-month period]

[Title V Air Operation Permit No. 1070031-003-AV; Construction Permit No. 1070031-005-AC]

## Notification Requirements

**A.25.** Notification Requirements. The Permittee shall submit all of the applicable notifications in Attachment Table 13 to the Department by the dates specified in 40 CFR 63 Subpart WWWW Table 13. The notifications are described more fully in 40 CFR Part 63, Subpart A, referenced in 40 CFR 63 Subpart WWWW Table 13.

[40 CFR 63.5905(a)]

**A.26.** Notification – Information Changes. If any information submitted in any notification is changed, the changes shall be submitted, in writing, to the Department within 15 calendar days after the change.

[40 CFR 63.5905(b)]

## Reporting Requirements

**A.27.** Report Requirements and Submittal. The Permittee shall submit each applicable report in 40 CFR 63 Subpart WWWW Table 14 by the date specified in 40 CFR 63 Subpart WWWW Table 14 according to paragraphs (1) through (5) below, unless the Department has approved a different schedule for submission of the reports pursuant to 40 CFR Part 63 Subpart A, 63.10(a).

(1) The first compliance report must cover the period beginning on April 21, 2006, and ending on December 31.

(2) The first compliance report must be postmarked or delivered no later than January 31.

(3) Each subsequent 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.

(4) Each subsequent 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.

(5) For each affected source that is subject to permitting requirements pursuant to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (1) through (4) above.

[40 CFR 63.5910(a) and (b)]

**A.28.** The Emissions Report required by Specific Condition A.24. shall be submitted to the Northeast District Office on a semi-annual basis. All semi-annual reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

| Reporting Period | Report Due Date |
|---|---|
| January – June | August 15 |
| July – December | March 1[1] |

[1]The annual operating report for that calendar year shall be submitted in lieu of the July -December semi-annual report. The second semi-annual report shall be due on March 1 of the following calendar year (Same date as the AOR).

[Rules 62-4.070(3); 62-213.440, F.A.C.; Construction Permit No. 1070031-005-AC]

**A.29.** Compliance Report Requirements. The compliance report shall contain the information in paragraphs (1) through (6) below:

(1) Company name and address.

(2) 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.

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

(4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in 40 CFR Part 63, Subpart A, 63.10(d)(5)(i).

(5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that are applicable, and there are no deviations from the requirements for work practice standards in 40 CFR 63 Subpart WWWW Table 4, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

(6) N/A/ *[CEMS and CMS not required]*

[40 CFR 63.5910(c)]

**A.30.** Compliance Report Requirements – Deviations- No CMS. For each deviation from a organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in 40 CFR Part 63 Subpart WWWW, the compliance report must contain the information in Condition A.27. (1) through (4) and in paragraphs (1) and (2) of this condition. This includes periods of startup, shutdown, and malfunction.

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR 63.5910(d)]

**A.31.** Reporting Deviations – Semi-Annual Reports. The Permittee shall report all deviations as defined in 40 CFR 63 Subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to 40 CFR 63 Subpart WWWW Table 14 along with, or as part of, the semiannual monitoring report required by §70.6(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, 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 Department.

[40 CFR 63.5910(g)]

**A.32.** Compliance Reports/SSM Reports – Submittals. The Permittee shall submit compliance reports and Startup, Shutdown, and Malfunction Reports based on the requirements in 40 CFR 63 Subpart WWWW Table 14, and not based on the requirements in 40 CFR Subpart SS, §63.999.

[40 CFR 63.5910(h)]

**A.33.** Multiple Compliance Option Reports. Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

[40 CFR 63.5910(i)]

**A.34.** Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", shall be completed for each calendar year on or before March 1 of the following calendar year and submitted to the air compliance section of this office.

[Rule 62-210.370(3), F.A.C.; Construction Permit No. 1070031-005-AC]

## Recordkeeping Requirements

**A.35.** Recordkeeping Requirements. The Permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if any organic HAP emissions limits based on an organic HAP emissions limit in 40 CFR 63 Subpart WWWW Tables 3 or 5 are met. The Permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if any organic HAP content limits in 40 CFR 63 Subpart WWWW Table 7 are met if the averaging of organic HAP contents is used. Resin use records may be based on purchase records if it can be reasonably estimated 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); 40 CFR 63.5895(d) is subsumed by Rule 62-210.370(3)(a)(1), F.A.C.]

**A.36.** Facility Records. The Permittee shall keep the records listed in paragraphs (1) through (3) below.

(1) A copy of each notification and report that you submitted to comply with 40 CFR Part 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that were submitted, according to the requirements in §63.10(b)(2)(xiv).

(2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).

[40 CFR 63.5915(a)]

**A.37.** Facility Records - Organic HAP Factors/Contents. The Permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in 40 CFR 63 Subpart WWWW Tables 3, 5, and 7.

[40 CFR 63.5915(c)]

**A.38.** Facility Records - Work Practice Certification Statement. The Permittee shall keep a certified statement that the facility is in compliance with the work practice requirements in 40 CFR 63 Subpart WWWW Table 4, as applicable.

[40 CFR 63.5915(d)]

**A.39.** Facility Records – Format and Duration. The Permittee shall maintain all applicable records as follows:

(a) In such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) Each record shall be kept onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.

(d) Records may be kept 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]