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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7825 Baymeadows Way, Suite B200
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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
Comments from Applicant received November 14, 2006
Comments from Applicant received December 14, 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 (Note 1)**
001	Closed Molded, Machine Mixed PC	AP-42 **(Note 2)**
002	Open Molded, Hand Mixed PC	AP-42 **(Note 2)**
003	Closed Molded, Hand Mixed PC	AP-42 **(Note 2)**

Alternate Method Number	Description	**NESHAP Table 1 Reference (Note 2)**
004	Open Molded, Machine Mixed PC	AP-42 **(Note 2)**
005	Hand Lay-up, Manual Wetout FRP	1.a.i.
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,
- 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**

Alternate Method Number	Emissions Limit 12-Month Rolling Average lbs/ton of resin used
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), 40 CFR 63.5796]

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. Determination of Organic HAP emissions in TPY. To calculate the organic HAP emissions in TPY for the facility as needed for Conditions A. 7. and A.8., the 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)**

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
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: Polymer casting processes are not subject to 40 CFR 63 Subpart WWWW. Emission Factors are 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.

[40 CFR 63.5799(b)(1) and (c)]

A.10. Method of Compliance -Weighted Average Option. Demonstrate each month that each weighted average of the organic HAP emissions limits in Condition A.7. for Alternate Method of Operation (AMO) Nos. 005 through 010 are met. The necessary calculations must be completed within 30 days after the end of each month.

(1) Each month multiply the individual organic HAP emissions limit in Condition A.7. for Alternate Method of Operation Nos. 005 through 010 by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each AMO, 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 operations over the last 12 months as shown in the equation below:

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

Where:

ELi=organic HAP emissions limit for operation type i, lbs/ton from 40 CFR 63 Subpart WWWW Tables 3 and stated in Condition A.7.;

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 the weighted average organic HAP emissions factor for AMO Nos. 005 through 010. To do this, multiply the individual organic HAP emissions factor for Alternate Method of Operation Nos. 005 through 010 as stated in Condition A.9. by the amount of neat resin plus and neat gel coat plus used in each AMO, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in the equation below:

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

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 and 40 CFR 63.5810(c)]

A.11. 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 (stated in Condition A.9.), 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 40 CFR 63.5850.

(b) Submit a petition to the Administrator for administrative review of 40 CFR 63 Subpart WWWW. 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. The Administrator shall review the submitted data, and, if appropriate, update the equations in 40 CFR 63 Subpart WWWW Table 1.

[40 CFR 63.5798]

A.12. 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.13. 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 (stated in Condition A.7.), or the organic HAP content limits in 40 CFR 63 Subpart WWWW Table 7, as applicable.

[40 CFR 63.5835(a)]

A.14. 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.15. Compliance Deadline Dates. The Permittee shall conduct initial compliance demonstrations by the compliance date of April 21, 2006. However, open molding 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.

This facility must initially perform the calculation required in Condition A.9. based on the resin and gel coat use in the 12 months prior to April 21, 2006, and submit this information with the initial compliance report. After April 21, 2006, the facility must recalculate organic HAP emissions over the 12-month period ending June 30. Subsequent calculations should cover the periods in the semiannual compliance reports.

[40 CFR 63.5799(c) and 40 CFR 63.5840]

A.16. 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.17. 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 for AMO Nos. 005 through 010 is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Condition A.7.a, 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) N/A

(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.24. and A.25.

(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.18. 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.19. 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.20. 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.21. 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, 2006.

(2) The first compliance report must be postmarked or delivered no later than January 31, 2007.

(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.22. The Emissions Report required by Condition A.18. shall be submitted to the Northeast District Office on a semi-annual basis. All semi-annual reports shall be postmarked no later than the dates specified below:

Reporting Period	Report Due Date
January – June	July 31
July – December	January 31

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

A.23. Compliance Report Requirements. The compliance report shall contain the information in paragraphs (1) through (5) 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.

[40 CFR 63.5910(c)(1) –(5)]

A.24. 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.21. (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.25. 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.26. 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.27. 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.28. 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.29. 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 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.30. 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.31. 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.32. 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.33. 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]