

CDR Systems Corporation

Facility ID No.: 1070031

Putnam County

Title V Air Operation Permit Renewal

Permit Project No.: 1070031-010-AV

Renewal of Title V Air Operation Permit No. 1070031-008-AV



Permitting & Compliance Authority:

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Title V Air Operation Permit Renewal
Permit No. 1070031-010-AV

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**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
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SECRETARY

PERMITTEE:

CDR Systems Corporation
2 Kay Larkin Circle
Palatka Fl, 32177

Permit No. 1070031-010-AV
CDR Systems Corporation
Facility ID No. 1070031
Title V Air Operation Permit Renewal

The purpose of this permit is for the renewal of Title V Air Operation Permit No. 1070031-008-AV.

The existing facility is located at 2 Kay Larkin Circle east of St. Johns Avenue , Putnam County; UTM Coordinates: Zone 17, 433.1 km East and 3280.6 km North.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: January 23, 2013

Renewal Application Due Date: June 12, 2017

Expiration Date: January 23, 2018

Khalid Al-Nahdy, P.E.
District Air Program Administrator

KAA:yke

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 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 act 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 October 15, 2007, this facility is a major source of hazardous air pollutants (HAPs).

SECTION I. FACILITY INFORMATION.

Subsection B. Summary of Emissions Units:

<u>EU</u>	<u>Description</u>
<i>Regulated Emissions Units</i>	
001	Polymer Concrete & Fiberglass Reinforced Plastic Processes

Subsection C. Applicable Regulations:

Based on the Title V air operation permit EPSAP renewal application received August 31, 2012, this facility is a TV major source for Hazardous Air Pollutants (HAP) and is subject to regulation under 40 CFR 63 Subpart WWWW, - National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites production.

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission unit(s) and activities:

- FW1.** Appendices: The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated.
[Rule 62-213.440, F.A.C.]
- FW2.** 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. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rule 62-296.320(2), and 62-210.200(Definitions), F.A.C.]
- FW3.** General 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.]
- FW4.** **Not federally enforceable.** 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.
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. Operation Permit 1070031-008-AV]

SECTION II. FACILITY-WIDE CONDITIONS.

- FW5. Not federally enforceable. Unconfined Particulate Matter:** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:
- a. Paving of roads and other traffic areas in the facility. High traffic and work areas are paved in this facility.
 - b. Mechanical conveyer systems are covered if necessary to reduce fugitive emissions.
 - c. 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.

The following techniques may be used to control unconfined PM emissions on an as-needed basis:

- a. Paving and maintenance of roads, parking areas, and yards.
- b. Chemical (dust suppressants) or water application to:
 - Unpaved roads
 - Unpaved yard areas
- c. Landscaping or planting of vegetation
- d. Confining abrasive blasting where possible.
- e. Other techniques, as necessary.

[Rule 62-296.320(4)(c), F.A.C.; and, Permit No. 1070031-008-AV]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

- FW6. Annual Reports and Fees:** 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.]

- FW7. Annual Operating Report:** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.

[Rule 62-210.370(3), F.A.C.]

SECTION II. FACILITY-WIDE CONDITIONS.

FW8. Annual Emissions Fee Form and Fee: The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site:

<http://www.dep.state.fl.us/air/emission/tvfee.htm>

[Rule 62-213.205, F.A.C.]

FW9. Annual Statement of Compliance: The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW10. Prevention of Accidental Releases (Section 112(r) of CAA): If and when the facility becomes subject to 112(r), the permittee shall:

- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
- b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW 11. 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.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

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

<u>EU</u>	<u>Description</u>
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.

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.

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.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation: This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. 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]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

A.3. 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)
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.iv.
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.Section 4.4 Table 4.4-2 revised with an explanatory footnote 2008.

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

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

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 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.5.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)]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

A.6. 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:

Alternative method Number	Emissions Limit 12- Month Rolling average lbs/ton of Resin and Gelcoat 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 the paragraph 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.7. 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)]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

A.8. Determination of Organic HAP emissions in TPY: To calculate the organic HAP emissions in TPY for the facility as needed for Specific Conditions A. 6 and A.7., 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/gelcoat containing less than 33% styrene/less than 19% organic HAP	Resin/gelcoat containing 33% or more styrene/19% or more organic HAP
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: Polymer casting processes are not subject to 40 CFR 63 Subpart WWWW. Emission Factors are from AP-42. Section 4.4 .revised with an explanatory footnote 2008.

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

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

A.9. Method of Compliance -Weighted Average Option: Demonstrate each month that each weighted average of the organic HAP emissions limits in Condition A.6. 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 Specific Condition A.6. 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:

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

Where:

EL_i=organic HAP emissions limit for operation type i, lbs/ton from 40 CFR 63 Subpart WWWW Tables 3 and stated in Specific Condition A.6.;

Material_i=neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n=number of operations

- (2) Each month calculate 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 Specific Condition A.8. 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:

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

Where:

Actual Individual EF_i=Actual organic HAP emissions factor for operation type i, lbs/ ton;

Material_i=neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n=number of operations.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

A.9. Continued:

- (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.10. 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 Specific Condition A.8.), 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.11. 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]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

GENERAL COMPLIANCE REQUIREMENTS

A.12. 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 Specific Condition A.6.), or the organic HAP content limits in 40 CFR 63 Subpart WWWW Table 7, as applicable.

[40 CFR 63.5835(a)]

A.13. 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.14. Operation Requirements – Continuous Compliance:

(a) The facility must demonstrate continuous compliance with each standard in Conditions A.6.a., A.7 and A.8 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.6.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 the facility operation.

(b) The facility must report each deviation from each standard in Specific Conditions A.6.a., A.7 and A.8 that applies. The deviations must be reported according to the requirements in Specific Conditions A.20 and A.21.

(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.15. Compliance with Specific Condition A.6.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]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

Notification Recordkeeping and Reporting Requirements:

A.16. 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.17. 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)]

A.18. 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 as stated 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).

- (a). 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.
- (b). 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.
- (c). 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 subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (a) through (b) above.

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

A.19. The Emissions Report required by Specific Condition A.15. 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]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

A.20. 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.21. 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 Specific Condition A.18. (a) and (b) 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.22. 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.23. 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.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

[40 CFR 63.5910(h)]

A.24. 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.25. 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]

A.26. 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.27. 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.28. 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.29. 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)]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

A.30. 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), each record must be kept 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]

REFERENCED ATTACHMENTS.

The Following Appendices Are Attachments Included for Applicant Convenience

Appendix A, Glossary.

Appendix I, List of Insignificant Emissions Units and/or Activities.

Appendix NESHAP, 40 CFR 63 Subpart A – General Provisions.

Appendix NESHAP, 40 CFR 63 Subpart WWWW

Appendix RR, Facility-wide Reporting Requirements.

Appendix TV, Title V General Conditions.

REFERENCED ATTACHMENTS.

The Following Appendices Are Attachments Included for Applicant Convenience

Appendix H-1, Permit History

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Table 1-1, Summary of Air Pollutant Standards and Terms.

Table 2-1, Summary of Compliance Requirements.

Statement of Basis