

Alpha General Services, LLC Alpha General Services Facility

Facility ID No. 0550036

Highlands County

Title V Air Operation Permit Renewal

Permit No. 0550036-012-AV

(Renewal of Title V Air Operation Permit No. 0550036-009-AV)



Permitting Authority:

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Department of Environmental Protection
Division of Air Resource Management
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Title V Air Operation Permit Renewal

Permit No. 0550036-012-AV

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Sebring, Florida 33870

Permit No. 0550036-012-AV
Alpha General Services Facility
Facility ID No. 0550036
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Alpha General Services Facility is in Highlands County at 1578 Alpha Road, in Sebring. UTM Coordinates are Zone 17, 458.58 East and 3040.48 North. Latitude is: 27° 29' 18" North; and Longitude is: 81° 25' 09" West.

The 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, and 62-213. The above-named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

0550036-012-AV Effective Date: January XX, 2026
Renewal Application Due Date: November XX, 2030
Expiration Date: January XX, 2031

(Proposed)

David Lyle Read, P.E., Environmental Administrator
Permit Review Section
Division of Air Resource Management

DLR/mc

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

Alpha General Services, LLC, is a facility that manufactures reinforced fiberglass composite products, principally tanks and septic tanks. In the manufacturing operation, various molds are coated with a release wax to assist in the removal of the final part. In a limited number of products, a layer of gel coat may then be applied based on customer specified requirements and to provide color. The gel coat may be applied by spray, hand or roller. A fiberglass-resin coating is applied by non-atomized equipment or hand/roller to build up the wall thickness and provide strength to the tank. The actual application methods are recorded for use in the MACT compliance calculation. After sufficient layers of chop or resin coated mat are applied to the mold, hand rollers are used to force the resin into the layers, ensuring that air bubbles and dry spots are eliminated. Additional layers of chop or resin coated mat are applied as needed to achieve the required thickness, based on the required final dimensions of the product. The resin infused material is allowed to polymerize and harden.

After curing, the components are removed from the molds. The molds are cleaned, inspected and prepared for return to lamination in the mold care step using solvent-based materials. Scratches and other imperfections observed on the mold surface are repaired, if necessary, typically with resin or gel coat tooling. In some situations, for example a damaged mold or new product line, new molds will have to be manufactured using production or other resins as well as tooling. Hazardous air pollutants (HAP) and volatile organic compounds (VOC) emissions are the result of species evaporation during the application stage and the curing stage of the resins and gel coats, and to a lesser degree from the mold care materials. These species are exhausted through multiple horizontal flowing wall fans.

The excess material is trimmed from the hardened part, typically with a handheld air driven cut-off tool, where necessary. The trimming operation results in large fragments and particles too large to become airborne and result in fugitive emissions. Imperfections in the surfaces are removed by grinding the surface and re-applying gel coat and/or resin. Grinding surface imperfections is performed by hand tools. No large-scale sanding of the surfaces will occur. The smaller particulates generated inside the building are controlled by vacuum bag collectors on the hand tools, by portable shop vacuum collectors and normal good housekeeping procedures.

Miscellaneous styrene containing putties and filler may be used prior to or after removal of the part from the mold in the laminating area or for final assembly. Additional styrene-based materials may be used to bond the tank halves as the final product is assembled and prepared for shipping. After passing a final quality control inspection, the product is prepared for shipping.

The facility has a potential to emit approximately 40 tons per year VOC emissions as well as the HAP emissions at major source level subject to limitations in 40 CFR 63 Subpart WWWW. The facility is subject to 40 CFR 63, Subpart A – General Provisions and 40 CFR 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants (NESHAP) – Reinforced Plastic Composites Production. Subpart WWWW limits the facility's organic HAP emissions and imposes work practice standards. Subpart WWWW limitations are dependent on materials used and application methods.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Fiberglass tank manufacturing facility.

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received October 1, 2025, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

SECTION I. FACILITY INFORMATION.

Regulation	EU No.
Federal Rule Citations	
40 CFR 63, Subpart 63, Subpart A – General Provisions	001
40 CFR 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants – Reinforced Plastic Composites Production	
State Rule Citations	
62-4, F.A.C.	001
62-210, F.A.C.	
62-213, F.A.C.	
62-296, F.A.C.	
62-297, F.A.C.	

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units 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.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which 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 Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) 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. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

FW5. 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. Application of water to paved and unpaved areas accommodating vehicular traffic.
- b. Removal of particulate matter from buildings or work areas.
- c. Enclosure or covering of activities or equipment where necessary.

[Rule 62-296.320(4)(c), F.A.C.]

Reports and Fees

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

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection’s Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP’s Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source’s most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source**

SECTION II. FACILITY-WIDE CONDITIONS.

Annual Emissions Fee, Post Office Box 3070, Tallahassee, Florida 32315-3070. Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <https://floridadep.gov/air/permitting-compliance/content/title-v-fees>. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <https://floridadep.gov/air/permitting-compliance/content/annual-operating-report>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

FW7. 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 and to the USEPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective. (See also Appendix RR, Conditions RR1 and RR7.) [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303
Attn: Air Enforcement Branch

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

- 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 electronically through EPA's Central Data Exchange system at the following address: <https://cdx.epa.gov>. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: <http://www2.epa.gov/rmp>. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
- 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]

FW9. Semi-Annual Reports. The permittee shall monitor compliance with the terms and conditions of this permit and shall submit reports at least every six months to the compliance office. Each semi-annual report shall cover the 6-month periods of January 1 – June 30 and July 1 – December 31. The reports shall be submitted by the 60th day following the end of each calendar half (i.e., March 1st and August 29th of every year). All instances of deviations from permit requirements (including conditions in the referenced Appendices) must be clearly identified in such reports, including reference to the specific requirement and the duration of such deviation. If there are no deviations during the reporting period, the report shall so indicate. Any semi-annual reporting requirements contained in applicable federal NSPS or NESHAP requirements may be submitted as part of this report. The submittal dates specified above shall replace the submittal dates specified in the federal rules. All additional reports submitted as part of this report should be clearly identified according to the specific federal requirement. All reports shall include a certification by a responsible official, pursuant to subsection 62-213.420(4), F.A.C. [Rule 62-213.440(1)(b)3.a., F.A.C.; and, 40 CFR 60.19(d), 40 CFR 61.10(h) & 40 CFR 63.10(a)(5)]

A summary of the required semi-annual reports for informational purposes is given in the table below. *Table can be deleted if there are no unit-specific semi-annual reports.*

Overall Facility		
Report	Reporting Deadline	Related Condition(s) and Regulation(s)
Title V Semi-Annual Report	Within 60 days after the end of each calendar half	09 [Rule 62-213.440(1)(b)3.a, F.A.C. & 40 CFR 70.6(a)(3)(iii)(A)]

SECTION II. FACILITY-WIDE CONDITIONS.

(See also Conditions RR2. - RR4. of Appendix RR, Facility-wide Reporting Requirements, for additional reporting requirements related to deviations.)

{Permitting Note: EPA has clarified that, pursuant to 40 CFR 70.6(a)(3), the word “monitoring” is used in a broad sense and means monitoring (i.e., paying attention to) the compliance of the source with all emissions limitations, standards, and work practices specified in the permit.}

Proposed

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

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

EU No.	Brief Description
001	Fiberglass Tank Manufacturing Facility

Emissions unit 001 is a manufacturing facility for reinforced fiberglass composite products, principally tanks and septic tanks. The facility's operation utilizes opening molding and both corrosion resistant high strength and non-corrosion resistant high strength resins, tooling resins and gel coats.

Fiberglass resin coating and gel coats are added to molds mechanically by non-atomized equipment or manually by rollers. After curing, the components are removed from the molds, the molds are cleaned using solvent-based materials. If necessary, the molds may be repaired with resin or gel coat tooling. HAP and VOC emissions are the result of species evaporation during the application stage, the curing stage of the resins and gel coats and from the mold care materials. HAP and VOC emissions are exhausted through multiple horizontal flowing wall fans.

Product production includes trimming and grinding operations. The trimming operation results in large fragments and particles too large to become airborne and result in fugitive emissions. Excess material is trimmed from the hardened part, typically with a handheld air driven cut off tool. Imperfections in the surfaces are removed by grinding the surface and re-applying gel coat and/or resin. Grinding surface imperfections is performed by hand tools. The smaller particulates generated inside the building are controlled by vacuum bag collectors on the hand tools, by portable shop vacuum collectors and normal good housekeeping procedures.

Miscellaneous styrene containing putties and filler may be used prior to or after removal of the part from the mold in the laminating area or for final assembly. Additional styrene-based materials may be used to bond the tank halves as the final product is assembled and prepared for shipping. After passing a final quality control inspection, the product is prepared for shipping.

This emissions unit is subject to emissions limitations in 40 CFR 63 Subpart WWWW. The facility is subject to 40 CFR 63, Subpart A – General Provisions and 40 CFR 63, Subpart WWWW, Reinforced Plastic Composites Production. Subpart WWWW limits the facility's organic HAP emissions and includes work practice standards. Subpart WWWW emission limitations are dependent on resin or gelcoat materials and operation/application type.

Essential Potential to Emit (PTE) Parameters

- A.1. Hours of Operation.** This emissions unit may operate continuously [Rule 62-210.200(PTE), F.A.C.; and Permit No. 0550036-004-AC]
- A.2. Emissions Unit Operating Rate Limitation After Testing.** See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(3), F.A.C.]
- A.3. Federal Operation and Maintenance Standards.** The owner or operator must always operate and maintain the emissions unit and facility, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). [40 CFR 63.5835(c)]

Emission Limitations and Standards

Unless otherwise specified, the averaging times for Specific Conditions A.4.-A.6. are based on the specified averaging time of the applicable test method.

- A.4. Federal Organic HAP Emissions.** In accordance 40 CFR 63 Subpart WWWW Table 3, the following organic HAP emission limits shall be met:

a. Open Molding – Non-Corrosion-Resistant and/or High Strength (CR/HS)

1. Mechanical resin application: 88 lb/ton.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

- 2. Manual resin application: 87 lb/ton.
- b. Open Molding-Corrosion-Resistant and/or High Strength (CR/HS)
 - 1. Mechanical resin application: 113 lb/ton
 - 2. Manual resin application: 123 lb/ton
- c. Open Molding – Tooling
 - 1. Mechanical resin application: 254 lb/ton
 - 2. Manual resin application: 157 lb/ton
- d. Open Molding – Gel Coat
 - 1. Tooling gel coating 440 lb/ton
 - 2. White/off white pigmented gel coating 267 lb/ton
 - 3. All other pigmented gel coating 377 lb/ton
 - 4. CR/HS or high-performance gel coat 605 lb/ton
 - 5. Fire retardant gel coat 854 lb/ton
 - 6. Clear production gel coat 522 lb/ton

[40 CFR 63.5805(b)]

A.5. Work Practice Standards. In accordance with 40 CFR 63 Subpart WWW, the owner or operator must meet the following work practice standard:

- a. For Cleaning Operations, the owner or operator must *not* use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- b. For HAP-containing materials storage operations, the owner must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing material storage tanks may be vented as necessary for safety.
- c. For mixing operations¹, the owner or operator must:
 - 1. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
 - 2. close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
 - 3. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

¹Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

[40 CFR 63.5805(b)]

- A.6. Federal Standards.** All operations must meet, as well as be in compliance with, the organic HAP emissions limits in Table 3 in 40 CFR 63 Subpart WWWW and the work practice standards in Table 4 in 40 CFR 63 Subpart WWWW, regardless of the quantity of HAP emitted. [40 CFR 63.5805(b) and 40 CFR 63.5835(a)]

{Permitting Note: This emissions unit is an existing facility and is not listed in 40 CFR 63.5805(a)}

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

- A.7. Common Testing Requirements.** Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

{Permitting Note: Air compliance test notifications can now be completed online in the Department's Business Portal. To access this online process, go to <http://www.fldepportal.com/go/home> and sign in (or register if you're a new user) from the link in the upper right corner of the page. On the Welcome page select the Submit option, then select Registration/Notification, and then click on Air Compliance Test Notifications. Once in the process, just carefully read the instructions on each screen (and under the Help tabs) to complete the notification.}

- A.8. Determining HAP Content of Resins and Gel Coats.** As required by 40 CFR 63 Subpart WWWW, in order to determine the organic HAP content of resins and gel coats, the owner or operator shall use the information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in (a) through (c).

- a. **HAP to Include in Total.** The organic HAP total shall include 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. **HAP Content Provided as Range.** If the organic HAP content is provided by the material supplier or manufacturer as a range, the owner or operator must use the upper limit of the range for determining compliance.
- c. **HAP Content Provided as Single Value.** If the organic HAP content is provided as a single value, the owner or operator 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]

- A.9. Determining Compliance with Federal HAP Emission Standards.** The owner or operator may use the equations in Table 1 in 40 CFR 63 Subpart WWWW to calculate emissions factors. Equations have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. [40 CFR 63.5796]

- a. **Weighted Average Method.** The owner or operator shall use the following method to meet the standards for open molding operations in Table 3 in 40 CFR 63 Subpart WWWW.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

The necessary calculations must be completed within 30 days after the end of each month. [40 CFR 63.5810]

1. The owner or operator must demonstrate compliance each month that they meet each weighted average of the organic HAP emissions limits in Table 3 in 40 CFR 63 Subpart WWWW. The weighted average organic HAP emissions limit and weighted average organic HAP emissions factor shall be calculated as described in (i) and (ii). Compliance shall be determined as described in (iii).
 - i. Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the facility for the last 12-month period to determine the organic HAP emissions limit the facility must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 40 CFR 63 Subpart WWWW for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding 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 over the last 12 months as shown in Equation 3.

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

Where:

EL_i =organic HAP emissions limit for operation type i, lbs/ton from Tables 3 in 40 CFR 63 Subpart WWWW.

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.

- ii. Each month calculate the weighted average organic HAP emissions factor for open molding. To do this, multiply the actual open molding operation organic HAP emissions factors and the amount of neat resin plus and neat gel coat plus used in each open molding 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 operations as shown in Equation 4 of this section.

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

Where:

Actual Individual EF_i =Actual organic HAP emissions factor for operation type i, lbs/ton [calculated in accordance with 63.5810(a)1 and (b)1.];

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.

- iii. Compare the values calculated to the applicable limit. Compliance is demonstrated 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.

[40 CFR 63.5810 and (c)]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

- A.10. Changing Federal Compliance Options.** The owner or operator may switch between the compliance options in 40 CFR 63.5810. When the owner or operator changes to an option based on a 12-month rolling average, the owner or operator must base the average on the previous 12 months of data calculated using the compliance option the owner or operator are changing to, unless the owner or operator were previously using an option that did not require the owner or operator to maintain records of resin and gel coat use. In this case, the owner or operator must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. [40 CFR 63.5810]
- A.11. Continuous Compliance Demonstration.** The owner or operator must demonstrate continuous compliance with each HAP emissions or work practice standard in Specific Conditions **A.6.** and **A.5.** as follows:
- HAP Emissions Standards.** 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 in 40 CFR 63 Subpart WWWW, on a 12-month rolling average.
 - Work Practice Standards.** Compliance with the work practice standards in Table 4 in 40 CFR 63 Subpart WWWW is demonstrated by performing the work practice required for the operation.
- [40 CFR 63.5900(a)]
- A.12. Compliance During Startup, Shutdown or Malfunction.** During periods of startup, shutdown or malfunction, the owner or operator must meet the organic HAP emissions limits and work practice standards in Specific Conditions **A.4.** and **A.5.** [40 CFR 63.5900(c)]

Recordkeeping and Reporting Requirements

- A.13. Reporting Schedule.** The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Notice of Compliance Report	Semi-Annual	A.20., 22.

[Rule 62-213.440, F.A.C.]

- A.14. Other Reporting Requirements.** See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]
- A.15. Material Recordkeeping.** The owner or operator must collect and keep records of resin and gel coat use, organic HAP content (both resin and gel coat), and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 in 40 CFR 63 Subpart WWWW. Resin use records may be based on purchase records if the owner or operator can reasonably estimate 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) and (d)]
- A.16. Deviation Reporting.** The owner or operator must report each deviation from each standard in 40 CFR 63.5805. The deviations must be reported according to the requirements in 40 CFR 63.5910. [40 CFR 63.5900(b)]
- A.17. Report Submittals.** The owner or operator must submit all reports required in Table 14 in 40 CFR 63 Subpart WWWW. [40 CFR 63.5910(a)]
- A.18. Compliance Reports Reporting Periods and Due Dates.** The owner or operator must submit each report by the date specified in Table 14 in 40 CFR 63 Subpart WWWW and according to in Specific Condition A.20.a. and A.20.b.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

- a. *Reporting Period.* Each 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. *Due Dates.* Each 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.

[40 CFR 63.5910(b)]

A.19. Compliance Report Content. The compliance report must contain the information in paragraphs a. - e.:

- a. Company name and address.
- b. 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.
- c. Date of the report and beginning and ending dates of the reporting period.
For each deviation from an organic HAP emissions limitation or 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 this subpart, the compliance report must contain (1) The total operating time of each affected source during the reporting period and (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken pursuant to 40 CFR 63.5910(d).
- d. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that, there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
- e. The owner or operator must include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. [40 CFR 63.5895(d)][40 CFR 63.5910(c)]

A.20. Reporting of Deviations. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined 40 CFR 63 Subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 in 40 CFR 63 Subpart WWWW along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(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 in this subpart, 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 permitting authority. [40 CFR 63.5910(g)]

A.21. Reporting Change in Compliance Options. Where multiple compliance options are available, the owner or operator must state in the next compliance report if the owner or operator have changed compliance options since the last compliance report. [40 CFR 63.5910(f)]

A.22. Recordkeeping. The owner or operator must keep the following records in a. thru d.:

- a. *Federal Notifications and Reports.* A copy of each notification and report that the owner or operator submitted to comply with 40 CFR 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the

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requirements in 40 CFR 63.10(b)(2)(xiv).

- b. *Emissions Data and Calculations.* The owner or operator must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, in 40 CFR 63 Subpart WWWW.
- c. *Work Practice Compliance Statement.* The owner or operator must keep a certified statement that they are in compliance with the work practice requirements in Table 4 in Subpart WWWW.

[40 CFR 63.5915(a), (c) and (d)]

A.23. Records Maintenance.

- a. *Readily Accessible and Suitable.* The owner or operator must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).
- b. *5 Year Retention.* As specified in 40 CFR 63.10(b)(1), the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- c. *2 Year Retention Onsite.* The owner or operator must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The owner or operator can keep the records offsite for the remaining 3 years.
- d. *Retention Format.* The owner or operator may keep records 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(a), (b), (c) and (d)]

Other Requirements

- A.24. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants Reinforced Plastic Composites Production. [Rule 62-213.440, F.A.C.]