

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: January 29, 2013 Effective Date: January 29, 2013

Expiration Date: December 31, 2017

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 43-00314

Federal Tax Id - Plant Code: 25-1826588-1

Owner Information

Name: VEC TECH LLC		
Mailing Address: 639 KEYSTONE RD		
GREENVILLE, PA 16125-9747		
	Plant Information	
Plant: VEC TECHNOLOGY INC/GREENVILLE		
Location: 43 Mercer County	43803	Greenville Borough
SIC Code: 3732 Manufacturing - Boat Building And	Repairing	
	Responsible Official	
Name: JOHN WIRT		
Title: PRESIDENT		
Phone (724) 588 - 1000		
	Permit Contact Person	
Name: ALBERT B HAMMOND		
Title: PROGRAM MANAGER		
Phone: (724) 588 - 1000 Ext.1544		
[Signature]		
JOHN F. GUTH, NORTHWEST REGION AIR PROG	RAM MANAGER	





SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents Site Inventory List

Section B. General Title V Requirements

#001	Definitions
#001	Delinitions

- #002 Property Rights
- #003 Permit Expiration
- #004 Permit Renewal
- #005 Transfer of Ownership or Operational Control
- #006 Inspection and Entry
- #007 Compliance Requirements
- #008 Need to Halt or Reduce Activity Not a Defense
- #009 Duty to Provide Information
- #010 Reopening and Revising the Title V Permit for Cause
- #011 Reopening a Title V Permit for Cause by EPA
- #012 Significant Operating Permit Modifications
- #013 Minor Operating Permit Modifications
- #014 Administrative Operating Permit Amendments
- #015 Severability Clause
- #016 Fee Payment
- #017 Authorization for De Minimis Emission Increases
- #018 Reactivation of Sources
- #019 Circumvention
- #020 Submissions
- #021 Sampling, Testing and Monitoring Procedures
- #022 Recordkeeping Requirements
- #023 Reporting Requirements
- #024 Compliance Certification
- #025 Operational Flexibility
- #026 Risk Management
- #027 Approved Economic Incentives and Emission Trading Programs
- #028 Permit Shield

Section C. Site Level Title V Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

Section D. Source Level Title V Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

Page 2



SECTION A. Table of Contents

Section E. Source Group Restrictions

E-I: Restrictions

E-II: Testing Requirements

E-III: Monitoring Requirements

E-IV: Recordkeeping Requirements

E-V: Reporting Requirements

E-VI: Work Practice Standards

E-VII: Additional Requirements

Section F. Alternative Operating Scenario(s)

F-I: Restrictions

F-II: Testing Requirements

F-III: Monitoring Requirements

F-IV: Recordkeeping Requirements

F-V: Reporting Requirements

F-VI: Work Practice Standards

F-VII: Additional Requirements

Section G. Emission Restriction Summary

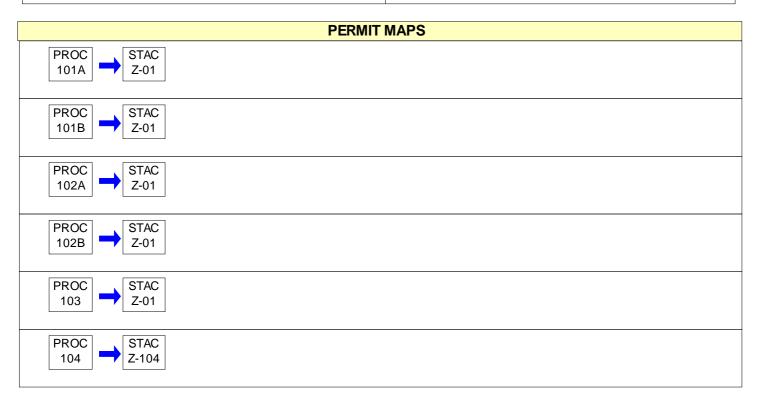
Section H. Miscellaneous





SECTION A. Site Inventory List

Source	ID Source Name	Capacity/Throughput	Fuel/Material
101A	CLOSED MOLD GEL COAT		
101B	CLOSED MOLD		
102A	OPEN MOLD GEL COAT		
102B	OPEN MOLD		
103	ADHESIVE, SOLVENTS, AND MISCELLANEOUS PROCESSES		
104	MISCELLANEOUS NATURAL GAS USAGE		
Z-01	FUGITIVE		
Z-104	FUGITIVE FROM MISC, NATURAL GAS USAGE		









#001 [25 Pa. Code § 121.1]

Definitions

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.512(c)(4)]

Property Rights

This permit does not convey property rights of any sort, or any exclusive privileges.

#003 [25 Pa. Code § 127.446(a) and (c)]

Permit Expiration

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#004 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

Permit Renewal

- (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
- (b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.
- (c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
- (d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#005 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

Transfer of Ownership or Operational Control

- (a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:
 - (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.







(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#006 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA] Inspection and Entry

- (a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
 - (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#007 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

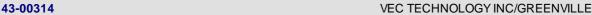
- (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:
 - (1) Enforcement action
 - (2) Permit termination, revocation and reissuance or modification
 - (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#008 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.





#009 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

Duty to Provide Information

- (a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- (b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#010 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

- (a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.
- (b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:
- (1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.
- (2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.
- (3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.
- (d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#011 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#012 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.







#013 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

- (a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.

#014 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

- (a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations thereunder from being processed as an administrative amendment.
- (b) Upon taking final action granting a request for an administrative permit amendment in accordance with § 127.450(c), the Department will allow coverage under 25 Pa. Code § 127.516 (relating to permit shield) for administrative permit amendments which meet the relevant requirements of 25 Pa. Code Article III, unless precluded by the Clean Air Act or the regulations thereunder.

#015 [25 Pa. Code § 127.512(b)]

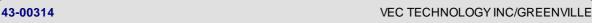
Severability Clause

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction, or US EPA to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#016 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).



#017 [25 Pa. Code §§ 127.14(b) & 127.449]

Authorization for De Minimis Emission Increases

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

The Department may disapprove or condition de minimis emission increases at any time.

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more

DEP Auth ID: 930083 Page 9





of the following:

- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#018 [25 Pa. Code §§ 127.11a & 127.215]

Reactivation of Sources

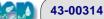
- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#019 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

- (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.







#020 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Office of Air Enforcement and Compliance Assistance (3AP20)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#021 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

Sampling, Testing and Monitoring Procedures

- (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#022 [25 Pa. Code §§ 127.511 & Chapter 135]

Recordkeeping Requirements

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.





(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#023 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

- (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.
- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code § 127.513]

Compliance Certification

- (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:
 - (1) The identification of each term or condition of the permit that is the basis of the certification.
 - (2) The compliance status.
 - (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
 - (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #020 of this section.

#025 [25 Pa. Code § 127.3]

Operational Flexibility

(a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:



- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)
- (b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit shield authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit condition and other applicable operational flexibility terms and conditions of this permit.

#026 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

Risk Management

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
 - (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation





of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
 - (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
- (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #24 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#027 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#028 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

Permit Shield

- (a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:
 - (1) The applicable requirements are included and are specifically identified in this permit.
- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.
- (b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
 - (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
 - (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.
- (c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department on minor or significant permit modifications, and operational flexibility changes shall be covered by the permit shield. Upon taking final action granting a request for an administrative permit amendment, the Department will allow coverage of the amendment by the permit shield in § 127.516 for administrative amendments which meet the relevant requirements of 25 Pa. Code Article III.
- (d) The permit shield authorized under § 127.516 is in effect for the permit terms and conditions in this Title V permit, including administrative operating permit amendments and minor operating permit modifications.







I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
 - (1) Construction or demolition of buildings or structures.
 - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
 - (4) Clearing of land.
 - (5) Stockpiling of materials.
 - (6) Open burning operations.
 - (7) Not applicable.
 - (8) Not applicable.
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.
- (b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.
 - (c) See work practice standard requirements.
 - (d) Not applicable.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section 'C' Condition #001 (a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.



004 [25 Pa. Code §123.41]

Limitations

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

005 [25 Pa. Code §123.42]

Exceptions

The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in Section 'C', Condition #001 (a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
 - (4) Not Applicable

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Volatile organic compound (VOC) emissions from the facility, including all hazardous air pollutants (HAPs), shall not exceed 40 tons per year, based on a 12-month rolling total.

[From: Plan approval number PA 43314A, condition # 5]

II. TESTING REQUIREMENTS.

007 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Department reserves the right to require exhaust stack testing of any source as necessary to varify emissions for purpose including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirement.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.7]

Subpart A--General Provisions

Performance testing requirements.

[From 40 CFR 63.7]

The permittee shall comply with the performance testing requirement found in 40 CFR 63.7.

DEP Auth ID: 930083 Page 16



43-00314



SECTION C. Site Level Requirements

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall conduct weekly monitoring of the facility property, while the plant is in operation, to observe for the presence of fugitive emissions and visible emissions being emitted into the outdoor atmosphere.
- (b) All detected fugitive and visible emissions shall be reported to the shift supervisor.

IV. RECORDKEEPING REQUIREMENTS.

011 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The facility shall maintain records sufficient to demonstrate compliance with defined material usage and VOC emission limits in accordance with 25 Pa Code Chapter 135. At a minimum, the facility shall maintain monthly records of material usage on a process specific basis, including HAP content and type (based on data sheets or product testing). The records shall be maintained onsite for a minimum of five years, and shall be made available to the Department upon request.

[From Plan Approval # PA 43314A, condition # 11]

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep record of production for activities/operation subject to both boat NESHAP (Subpart VVVV) and reinforced plastic composites production (Subpart WWWW) based on any 12 consecutive months and submit to the Department.

013 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall maintain a record of the monitoring conducted to determine the presence of fugitive and visible emissions.
- (b) This recordkeeping shall contain a listing or notation of any and all sources of fugitive and visible emissions; the cause of fugitive or visible emissions; duration of the emissions; and the corrective action taken to abate the deviation and prevent future occurrences.

014 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall keep a monthly record of VOC emission from the facility. The present month emission shall be added with previous 11 month period to get 12 month rolling total.

015 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The permittee can modify the mixture of pollutants regulated under section 112 of the Clean Air Act (42 U.S.C.A. 7412) the permit shall contain a requirement that the permittee can modify the mixture of pollutants regulated under section 112 which are VOCs or PM10 so long as the emission limitations of the permit are not violated. The permittee shall keep a log which identifies the mixture of pollutants regulated under section 112 and report the changes in the mixture of pollutants regulated under section 112 with the next report required to be provided to the Department.

016 [25 Pa. Code §135.5]

Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with 135.21 (relating to reporting; and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other







information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

V. REPORTING REQUIREMENTS.

017 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Copies of all requests, reports, applications, submittals, and other communications related to 40 CFR compliance shall be forwarded to both the Department and the US EPA. The EPA copies shall be forwarded to:

> Director Air Protection Division (3AP00) U.S. EPA, Region III 1650 Arch Street Philadelphia, Pa 19103-2029

[From: Plan Approval # PA 43314A, Condition # 13]

018 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The facility shall report calculated HAP and VOC emissions to the Department on a semiannual basis, based on a calendar year. The report shall be in a format that shows material usage on process specific basis. Emission calculations shall be based on material usage and indicated emission factors on a process specific basis. The report shall be submitted within 30 days at the end of each semi-annual period.

[From Plan Approval # Pa 43314A, condition # 12]

019 [25 Pa. Code §135.21]

Emission statements

- (a) The owner or operator of each stationary source emitting oxides of nitrogen or VOC's shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.
- (b) Annual emission statements are due by March 1 for the preceding calendar year beginning with March 1, 1993, for calendar year 1992 and shall provide data consistent with requirements and guidance developed by the EPA. The guidance document is available from: United States Environmental Protection Agency, 401 M. Street, S.W., Washington, D.C. 20460. The Department may require more frequent submittals if the Department determines that one or more of the following applies:
 - (1) A more frequent submission is required by the EPA.
 - (2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the act.

020 [25 Pa. Code §135.3]

Reporting

- (a) The permittee shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the proceeding calendar year and sources modified during the same period which were not previously reported.
- (b) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.





021 [25 Pa. Code §135.4]

Report format

All source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.

022 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5]

Subpart A--General Provisions

Construction and reconstruction.

[From 40 CFR 63.5]

No person may construct a new affected source or reconstruct an affected source subject to 40 CFR Part 63, or reconstruct a source such that the source becomes an affected source subject to the standard, without notifying the Administrator of the intended construction or reconstruction. The notification shall be submitted in accordance with the procedures 40 CFR 63.9(b) and shall include all the information required for an application for approval of construction or reconstruction as specified in 40 CFR 63.5 (d). For major sources, the application for approval of construction or reconstruction may be used to fulfill the notification requirements of this paragraph.

023 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.9]

Subpart A--General Provisions

Notification requirements.

[From 40 CFR 63.9- Notification Requirements]

The owner or operator shall comply with the notification requirements contained in 40 CFR 63.9(b),(e)-(j).

VI. WORK PRACTICE REQUIREMENTS.

024 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in Section 'C', Condition 001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

[From: 25 Pa. Code §123.1 (c)]

025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a) Whenever the permittee conduct any activities/operations during any 12-month rolling period, that meet the applicability requirements of the boat NESHAP (40 C.F.R. §63, Subpart VVVV), then the boat NESHAP (Subpart VVVV) conditions will apply to all the reinforced plastic composite manufacturing activities/operations at the facility. When subject to the boat NESHAP, Subpart VVVV, the permit conditions in Section E, Source Group 1 & 2 shall apply.
- (b) Whenever the permittee does not conduct any activities/operation that is subject to the boat NESHAP (Subpart WWW) in any consecutive 12-month rolling period, then 40 C.F.R. §63, Subpart WWWW (Reinforced Plastic Composites Production) will apply to any plastic composite manufacturing activities at the facility the following month after the 12 consecutive months of non- boat manufacturing activities. When subject to 40 C.F.R. §63, Subpart WWWW, the alternative operating permit conditions in Section F shall apply.



- (c) When subject to the requirements of boat NESHAP (Subpart VVVV), the permittee may use the compliance options described in 40 CFR §63.5701 to comply with the VOC limit. The permittee may also use the emission averaging option for all resins and gel coats used in open molding operation at the facility. The HAP emission limit as defined by 40 C.F.R. §63.5698 plus the VOC emission limit from closed mold resin use (101B), adhesive, solvents, and miscellaneous (103) may not exceed 40 tons per year based on any 12-month rolling total.
- (d) When subject to the 40 C.F.R. §63, Subpart WWWW (Reinforced Plastic Composites Production), the permittee may use the compliance option described in 40 C.F.R. §63.5810 to comply with the VOC limit. The permittee may also use the emission averaging option for all resins and gel coats used in open molding operation at the facility. The weighted average HAP emission limit as defined by 40 C.F.R. §63.5810(b)(1) plus the VOC emission limit from closed mold resin use (101B), adhesive, solvents, and miscellaneous (103) may not exceed 40 tons per year based on any 12-month rolling total.

026 [25 Pa. Code §129.14] Open burning operations

- (a) Not applicable.
- (b) No person may permit the open burning of material in an area outside of air basins in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
 - (c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
 - (4) Not applicable
 - (5) Not applicable.
 - (6) A fire set solely for recreational or ceremonial purposes.
 - (7) A fire set solely for cooking food.
 - (d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
 - (1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to







the process of construction. The term does not include demolition wastes and dirt laden roots.

- (2) Not applicable.
- (3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:
- (i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.
- (ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.
- (4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[This permit does not continue authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of Solid Waste Management Act.]

VII. ADDITIONAL REQUIREMENTS.

027 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.4]

Subpart A--General Provisions

Prohibited activities and circumvention.

Circumvention. No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to--

- (1) The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere;
 - (2) The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions; and
 - (3) The fragmentation of an operation such that the operation avoids regulation by a relevant standard.

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit within thirty days of 12/31/2012 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect ***



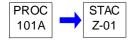


Source ID: 101A Source Name: CLOSED MOLD GEL COAT

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 1

2



This source occurs in alternate operation 101A SUBJECT TO NESAHP, SUBP. WWWW

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The weighted-average HAP content (weight percent) for closed mold operations shall not exceed the following:

- a) Pigmented Gel Coat: 35% (Weighted-Average HAP Content -weight percent)
- b) Clear Gel Coat: 48% (Weighted-Average HAP content -weight percent)

[This weighted average HAP content is applicable when the facility is not using emission averaging option for complying with the emission limit]

[From: Plan Approval # PA 43314A, condition 10]

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

VOC (Volatile Organic Compound) emissions from closed mold gel coat processes shall not exceed more than 17 tons in any consecutive 12-month period.

[From: Plan Approval 43314A, condition number 5]

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall not use more than 97,125 lbs of total VOC (Volatile Organic Compound) / HAP (Hazardous Air Pollutants) per year, based on 12-month rolling total, in closed mold gel coat application-production gel coat process.

[From: Plan Approval # Pa. 43314A,condition 7]

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) VOC emission limits defined in condition #002, above, shall allow for internal offsetting based on customer

DEP Auth ID: 930083 Page 22



SECTION D.



Source Level Requirements



requirements. Records detailing the offsetting shall be kept. At a minimum, the records shall detail the reason for internal offsetting of emissions and the amount in tons/year.

(b) Compliance with facility emission limits and material limitations shall be demonstrated by recordkeeping of material usage and application defined emission factor. The emission factor (% emitted of available HAP content, by weight) is provided in attachments 4 & 5 (See Attachments) for closed mold gelcoat application- Production Gelcoat process. [This newly revised emission factor was changed during the modification of the operating permit]

[From: Plan Approval # PA 43314A, conditions 6 & 8]

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall keep a monthly record of VOC (Volatile Organic Compound) emissions from this source. The present month record shall be added with previous 11-months records to get 12-month rolling total.
- (b) The permittee shall keep a monthly record of material usage in this process. Present month record shall be added with previous 11-months period to get 12-month rolling total.
- (c) The permittee shall keep a record of weighted-average HAP content (weight percent) in the process-raw material.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***



SECTION D.

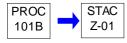
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Source Level Requirements

Source ID: 101B Source Name: CLOSED MOLD

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2



This source occurs in alternate operation NESHAP, SUBPART WWWW

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The weighted-average HAP content (weight percent) for closed mold operations shall not exceed 37% (Weighted-Average HAP Content-weight percent).

[From: Plan Approval # PA43314A, condition # 10]

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

VOC (Volatile Organic Compound) emissions from closed mold resin application shall not exceed more than 5 Tons in any consecutive 12-month period.

[From: Plan Approval # PA 43314A, condition # 5]

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall not use more than 999,250 lbs. of total VOC (Volatile Organic Compound) / HAP (Hazardous Air Pollutant) per year, based on 12-month rolling total, in closed mold resin application process.

[From: Plan Approval # PA 43314A, condition # 7]

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) VOC emission limits defined in condition #002, above, shall allow for internal offsetting based on customer requirements. Records detailing the offsetting shall be kept. At a minimum, the records shall detail the reason for internal offsetting of emissions and the amount in tons/year.







(b) Compliance with facility emission limits and material limitations shall be demonstrated by recordkeeping of material usage and application defined emission factors. Emission factor of Fiberglass resin application-closed mold production resins process is 1.0% (% emitted of available HAP content, by weight).

[From: Plan Approval # PA 43314A, conditions 6 & 8]

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall keep a monthly record of VOC (Volatile Organic Compound) emissions from this source. The present month record shall be added with previous 11-months records to get 12-month rolling total.
- (b) The permittee shall keep a monthly record of material usage in this process. Present month record shall be added with previous 11-months period to get 12-month rolling total.
- (c) The permittee shall keep a record of weighted-average HAP content (weight percent) in the process-raw material.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5728]

Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing Standards for Closed Molding Resin Operations

What standards must I meet for closed molding resin operations?

- (a) If a resin application operation meets the definition of closed molding specified in 63.5779, there is no requirement to reduce emissions from that operation.
- (b) & (c) Not Applicable

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***





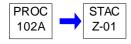


Source ID: 102A Source Name: OPEN MOLD GEL COAT

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 1

2



This source occurs in alternate operation NESHAP, SUBPART WWWW

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall not use more than 49,438 lbs of total VOC (Volatile Organic Compounds)/ HAP (Hazardous Air Pollutants) per year, based on 12-month rolling total, for open mold production and tooling gel coat process.

[From: Plan Approval # PA 43314A, condition 7]

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

VOC (Volatile Organic Compound) from open mold gel coat processes shall not exceed more than, 11 tons in any consecutive 12-month period.

[From: Plan Approval # 43314A, condition # 5]

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) VOC emission limits defined in condition #002, above, shall allow for internal offsetting based on customer requirements. Records detailing the offsetting shall be kept. At a minimum, the records shall detail the reason for internal offsetting of emissions and the amount in tons/year.
- (b) Compliance with facility emission limits and material limitations shall be demonstrated by recordkeeping of material usage and application defined emission factors. Emission factor of open mold gelcoat application- production gelcoat (% emitted of available HAP content, by weight) is provided in attachments 3 & 5 [See Attachments].[This newly revised emission factor was changed during the modification of the operating permit]

[From: Plan Approval # PA 43314A, conditions 6 & 8]







V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***

DEP Auth ID: 930083 Page 27



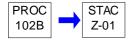


Source ID: 102B Source Name: OPEN MOLD

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 1

2



This source occurs in alternate operation NESHAP, SUBPART WWWW

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

VOC (Volatile Organic Compound) from open mold resin application shall not exceed more than 5 tons in any consecutive 12-month period.

[From: Plan Approval # Pa 43314A, condition # 5]

Throughput Restriction(s).

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The VOC emission from production & tooling resins process shall not exceed 5 ton per year, based on 12-month rolling total.

Formula:

(11% x AN x non-atomized resin (lb)) + (17% x AA x atomized resin (lbs)) = 10,000 lbs (VOC emission)

Where:

AN = average non-atomized resin VOC/HAP content AA = average atomized resin VOC/HAP content

10,000 lbs = 5 ton/year limit

[From: Plan Approval # PA 43314A, condition # 7]

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).







IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) VOC emission limits defined in condition #001, above, shall allow for internal offsetting based on customer requirements. Records detailing the offsetting shall be kept. At a minimum, the records shall detail the reason for internal offsetting of emissions and the amount in tons/year.
- (b) Compliance with facility emission limits and material limitations shall be demonstrated by recordkeeping of material usage and application defined emission factors. The emission factor (% emitted of available HAP content by weight) is provided in attachments 3 and 5 (See Attachments) for open mold resin and gel coat application. [This newly revised emission factor was incorporated during the modification of this operating permit]

[From: Plan Approval # Pa. 43314A, conditions 6 & 8]

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

Page 29

*** Permit Shield in Effect. ***



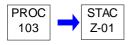


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SECTION D. Source Level Requirements

Source ID: 103 Source Name: ADHESIVE, SOLVENTS, AND MISCELLANEOUS PROCESSES

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) VOC (Volatile Organic Compound) from Adhesives, Solvents, and miscellaneous processes shall not exceed more than 2 tons in any consecutive 12-month period.
- (b) VOC emission limits defined in condition (a) above, for individual processes shall allow for internal offsetting based on customer requirements. Records detailing the offsetting shall be kept. At a minimum, the records shall detail the reason for internal offsetting of emissions and the amount in tons/year.

[From: Plan Approval # PA 43314A, conditions 5 & 6]

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall keep a monthly record of VOC emission from this source. The present month emission shall be added with previous 11-month period to get 12-month rolling total.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).





*** Permit Shield in Effect. ***

DEP Auth ID: 930083

Page 31



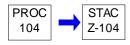


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SECTION D. Source Level Requirements

Source ID: 104 Source Name: MISCELLANEOUS NATURAL GAS USAGE

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

Fuel Restriction(s).

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall use only natural gas as a fuel for this source.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

*** Permit Shield in Effect. ***







SECTION E. Source Group Restrictions.

Group Name:

Group Description: Open Mold Sources included in this group

ID	Name
101A	CLOSED MOLD GEL COAT
102A	OPEN MOLD GEL COAT
102B	OPEN MOLD

I. RESTRICTIONS.

Emission Restriction(s).

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5698]

Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing Standard for Open Molding Resin and Gel Coat Operations

What emission limit must I meet for open molding resin and gel coat operations?

- (a) You must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.
 - (1) Production resin.
 - (2) Pigmented gel coat.
 - (3) Clear gel coat.
 - (4) Tooling resin.
 - (5) Tooling gel coat.
- (b) You must limit organic HAP emissions from open molding operations to the limit specified by equation 1 (See Appendix A for for equation 1) of this section, based on a 12-month rolling average.
- (c) The open molding emission limit is the same for both new and existing sources.
- (d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.
- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other lifesaving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption.
- (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.
- (3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.







SECTION E. Source Group Restrictions.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall keep a monthly record of VOC emission from this source. The present month record shall be added with previous 11-month record to get 12-month rolling total.
- (b) The permittee shall keep a monthly record of material usage for this process. The present month record shall be added with previous 11-month record to get 12-month rolling total.
- (c) The permittee shall keep a record of HAP content in process raw material in terms of weighted average (weight percent).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5701]
Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing What are my options for complying with the open molding emission limit?

You must use one or more of the options listed in paragraphs (a) through (c) of this section to meet the emission limit in 63.5698 for the resins and gel coats used in open molding operations at your facility.

- (a) Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.
- (1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in 63.5698 using the procedures described in 63.5710. Compliance with this option is based on a 12-month rolling average.
- (2) Those operations and materials not included in the emissions average must comply with either paragraph (b) or (c) of this section.
- (b) Compliant materials option.

Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to this subpart. Compliance with this option is based on a 12-month rolling average.

[From: Table 2]

Open molding resin HAP content shall not exceed the weighted-average (Weight Percent), as follows:

- 1) Production resin operations, atomized spray operation, 28%.
- 2) Production resin operations, non-spray operation, 35%.
- 3) Tooling resin operations, atomized spray, 30%.



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SECTION E. Source Group Restrictions.

4) Tooling resin operation, non-spray, 39%.

[The resin used to produce trench/channel is exempted from the organic HAP content limits in paragraph(b), above, until August 22, 2004. RFD dated 10/9/2001]

(c) Not Applicable

[Compliance with the requirement (b) in this streamlined permit condition assures compliance with the provisions found in Plan Approval # PA 43314A, condition # 9].

Also

[The HAP content listed in condition (b) is applicable when the facility is not using the emission averaging option for the emission limit]

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5704]
Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing What are the general requirements for complying with the open molding emission limit?

- (a) Emissions averaging option. For those open molding operations and materials complying using the emissions averaging option, you must demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section.
 - (1) Use the methods specified in 63.5758 to determine the organic HAP content of resins and gel coats.
- (2) Complete the calculations described in 63.5710 to show that the organic HAP emissions do not exceed the limit specified in 63.5698.
 - (3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat.
 - (i) Hazardous air pollutant content.
 - (ii) Amount of material used per month.
- (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
 - (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in 63.5710.
 - (4) Prepare and submit the implementation plan described in 63.5707 to the Administrator and keep it up to date.
 - (5) Submit semiannual compliance reports to the Administrator as specified in 63.5764.
- (b) Compliant materials option. For each open molding operation complying using the compliant materials option, you must demonstrate compliance by performing the steps in paragraphs (b)(1) through (4) of this section.
 - (1) Use the methods specified in 63.5758 to determine the organic HAP content of resins and gel coats.
- (2) Complete the calculations described in 63.5713 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 to this subpart.
 - (3) Keep records as specified in paragraphs (b)(3)(i) through (iv) of this section for each resin and gel coat.
 - (i) Hazardous air pollutant content.
- (ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.





SECTION E. Source Group Restrictions.

- (iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.
- (iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in 63.5713.
 - (4) Submit semiannual compliance reports to the Administrator as specified in 63.5764.
- (c) Not Applicable

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5707]

Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing What is an implementation plan for open molding operations and when do I need to prepare one?

- (a) You must prepare an implementation plan for all open molding operations for which you comply by using the emissions averaging option described in 63.5704(a).
- (b) The implementation plan must describe the steps you will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, your implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section.
 - (1) A description of each operation included in the average.
- (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
- (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in 63.5698.
- (c) You must submit the implementation plan to the Administrator with the notification of compliance status specified in 63.5761.
- (d) You must keep the implementation plan on site and provide it to the Administrator when asked.
- (e) If you revise the implementation plan, you must submit the revised plan with your next semiannual compliance report specified in 63.5764.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

*** Permit Shield in Effect. ***







SECTION E. Source Group Restrictions.

Group Name: 2

Group Description: Subpart VVVV General Requirements

Sources included in this group

ID	Name
101A	CLOSED MOLD GEL COAT
101B	CLOSED MOLD
102A	OPEN MOLD GEL COAT
102B	OPEN MOLD

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5758]
Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing Methods for Determining Hazardous Air Pollutant Content

How do I determine the organic HAP content of materials?

- (a) Determine the organic HAP content for each material used. To determine the organic HAP content for each material used in your open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, you must use one of the options in paragraphs (a)(1) through (6) of this section.
- (1) Method 311 (appendix A to 40 CFR part 63). You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when determining organic HAP content by Method 311.
- (i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).
- (ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
- (2) Method 24 (appendix A to 40 CFR part 60). You may use Method 24 to determine the mass fraction of nonaqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.
- (3) ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins). You may use ASTM D1259-85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
- (4) Alternative method. You may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Administrator. You must follow the procedure in 63.7(f) to submit an alternative test method for approval.
- (5) Information from the supplier or manufacturer of the material. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section.
- (i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.





SECTION E. Source Group Restrictions.

- (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section 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.
- (iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you 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.
- (6) Solvent blends. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart. You may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to this subpart, then the test results must be used for determining compliance.
- (b) Not Applicable
- (c) Not Applicable

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5767]
Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing What records must I keep?

You must keep the records specified in paragraphs (a) through (d) of this section in addition to records specified in individual sections of this subpart.

- (a) You must keep a copy of each notification and report that you submitted to comply with this subpart.
- (b) You must keep all documentation supporting any notification or report that you submitted.
- (c) If your facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), you must keep the records specified in paragraphs (c)(1) through (3) of this section.
- (1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight percent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.
 - (2) & (3) Not Applicable
- (d) Not Applicable

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5770]
Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing In what form and for how long must I keep my records?





SECTION E. Source Group Restrictions.



- (a) Your records must be readily available and in a form so they can be easily inspected and reviewed.
- (b) You must keep each record for 5 years following the date that each record is generated.
- (c) You must keep each record on site for at least 2 years after the date that each record is generated. You can keep the records offsite for the remaining 3 years.
- (d) You can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

V. REPORTING REQUIREMENTS.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5761] Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

What notifications must I submit and when?

Notifications, Reports, and Records

- (a) You must submit all of the notifications in Table 7 to this subpart that apply to you by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to this subpart.
- (b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5764] Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing What reports must I submit and when?

- (a) You must submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.
- (b) Unless the Administrator has approved a different schedule for submission of reports under 63.10(a), you must submit each report by the dates in paragraphs (b)(1) through (5) of this section.
- (1) If your source is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for your source in 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for your source in 63.5695. If your source is controlled by an add-on control device, the first compliance report must cover the period beginning on the compliance date specified for your source in 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in 63.5695.
- (2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of this section.
- (3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
- (4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
- (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting



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SECTION E. **Source Group Restrictions.**

authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

- (c) The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section.
 - (1) Company name and address.
- (2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
 - (3) The date of the report and the beginning and ending dates of the reporting period.
 - (4) A description of any changes in the manufacturing process since the last compliance report.
- (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
- (6) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.
- (7) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section in the semiannual compliance report.
 - (i) A description of the operation involved in the deviation.
 - (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
- (iii) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.
- (iv) A statement of whether or not your facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.
- (d) & (e) Not Applicable

VI. WORK PRACTICE REQUIREMENTS.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5710] Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing How do I demonstrate compliance using emissions averaging?

- (a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in 63.5695.
- (b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in 63.5698 calculated for the same 12-month period. (Include terms in equation 1 of 63.5698 and equation 1 of this section for only those operations and materials included in the average.) [See Appendix A for The Equation]
- (c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average. (See Appendix "B" for equation 1)
- (d) You must use the equations in Table 3 to this subpart to calculate the MACT model point value (PVi) for each resin and gel coat used in each operation in the past 12 months.
- (e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit







SECTION E. **Source Group Restrictions.**

calculated in 63.5698(b) for the same 12-month period, then you are in compliance with the emission limit in 63.5698 for those operations and materials included in the average.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5713] Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing How do I demonstrate compliance using compliant materials?

- (a) Compliance using the organic HAP content requirements listed in Table 2 to this subpart is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in 63.5695. If you are using filled material (production resin or tooling resin), you must comply according to the procedure described in 63.5714.
- (b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2 to this subpart, then you are in compliance with the emission limit specified in 63.5698 for that 12-month period for that operation. In addition, you do not need to complete the weighted-average organic HAP content calculation contained in paragraph (c) of this section for that operation.
- (c) At the end of every month, you must use equation 1 of this section to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months (See Appendix B for Equation 1)
- (d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 to this subpart, then you are in compliance with the emission limit specified in 63.5698.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5714] Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing How do I demonstrate compliance if I use filled resins?

- (a) If you are using a filled production resin or filled tooling resin, you must demonstrate compliance for the filled material on an as-applied basis using equation 1 (See Appendix "D" for Equation 1) of this section.
- (b) If the filled resin is used as a production resin and the value of PVF calculated by equation 1 of this section does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
- (c) If the filled resin is used as a tooling resin and the value of PVF calculated by equation 1 of this section does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
- (d) If you are including a filled resin in the emissions averaging procedure described in 63.5710, then use the value of PVF calculated using equation 1 of this section for the value of PVi in equation 2 of 63.5710.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5731]

Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing Standards for Resin and Gel Coat Mixing Operations

What standards must I meet for resin and gel coat mixing operations?

- (a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for onsite mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
- (b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, you must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.







SECTION E. **Source Group Restrictions.**

(d) You must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5734] Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing Standards for Resin and Gel Coat Application Equipment Cleaning Operations

What Standards must I meet for resin and gel coat application equipment cleaning operations?

- (a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), you must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
- (b) You must store organic HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5737] Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

How do I demonstrate compliance with the resin and gel coat application equipment cleaning standards?

- (a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in 63.5734 using the methods specified in 63.5758.
- (b) If you recycle cleaning solvents on site, you may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in 63.5758 for demonstrating compliance with organic HAP content limits.
- (c) At least once per month, you must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

VII. ADDITIONAL REQUIREMENTS.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5773]

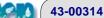
Subpart VVVV -- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing Other Information You Need To Know

Provisions apply to me?

You must comply with the requirements of the General Provisions in 40 CFR part 63, subpart A, as specified in Table 8 to this subpart [See Appendix C for the list of Tables].

*** Permit Shield in Effect. ***







Alternative Operation Name: 101A SUBJECT TO NESAHP, SUBP. WWWW

#001 CHANGES FROM NORMAL OPERATION

This source will be subject to 40 CFR Subpart WWWW as an alternative requirement

Sources included in this Alternative Operation:

ID	Name	Source Type
101A	CLOSED MOLD GEL COAT	Process

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5840]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

By what date must I conduct a performance test or other initial compliance demonstration?

You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet a organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date.

III. MONITORING REQUIREMENTS.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5895]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I monitor and collect data to demonstrate continuous compliance?

- (a) Not Applicable
- (b) You must monitor and collect data as specified in paragraphs (b)(1) through (4) of this section.
- (1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.
- (2) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.
 - (3) At all times, you must maintain necessary parts for routine repairs of the monitoring equipment.
- (4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- (c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are averaging organic HAP contents. Resin use records may be based on purchase records if you 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.
- (d) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, you must retain the records of resin and gel





coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or you change the application method or controls, then you again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 or 5 of this subpart, you must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

(e) Not Applicable

IV. RECORDKEEPING REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5915]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What records must I keep?

- (a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.
- (1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you 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).
- (b) Not Applicable
- (c) You 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, 5, and 7 to this subpart.
- (d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.
- (e) Not Applicable

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5920]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

In what form and how long must I keep my records?

- (a) You must maintain all applicable records 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) You 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 §63.10(b)(1). You can keep the records offsite for the remaining 3 years.
- (d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

V. REPORTING REQUIREMENTS.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5905]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production







What notifications must I submit and when?

- (a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.
- (b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5910]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What reports must I submit and when?

- (a) You must submit each report in Table 14 to this subpart that applies to you. [See Appendix B for the list of Tables]
- (b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.
- (1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800.
- (2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800.
- (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 (b)(1) through (4) of this section.
- (c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:
 - (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 §63.10(d)(5)(i).
- (5) 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.
 - (6) Not Applicable
- (d) 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 this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section.







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.
- (e) & (f) Not Applicable
- (g) 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 in this subpart 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 to this subpart 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.
- (h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in §63.999.
- (i) 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.

VI. WORK PRACTICE REQUIREMENTS.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5799]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of \$63.5805\$ apply?

To calculate your facility's organic HAP emissions in tpy for purposes of determining which paragraphs in §63.5805 apply to you, you must use the procedures in either paragraph (a) of this section for new facilities prior to startup, or paragraph (b) of this section for existing facilities and new facilities after startup. You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations, or a new facility that does not have any of the following operations: Open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing. Emissions calculation and emission reporting procedures in other sections of this subpart still apply. Calculate organic HAP emissions prior to any add-on control device, and do not include organic HAP emissions from any resin or gel coat used in operations subject to the Boat Manufacturing NESHAP, 40 CFR part 63, subpart VVVV, or from the manufacture of large parts as defined in §63.5805(d)(2). For centrifugal casting operations at existing facilities, do not include any organic HAP emissions where resin or gel coat is applied to an open centrifugal mold using open molding application techniques. Table 1 and the Table 1 footnotes to this subpart present more information on calculating centrifugal casting organic HAP emissions. The timing and reporting of these calculations is discussed in paragraph (c) of this section.

- (a) Not Applicable
- (b) For existing facilities and new facilities after startup, you may use the procedures in either paragraph (b)(1) or (2) of this section. If the emission factors for an existing facility have changed over the period of time prior to their initial compliance date due to incorporation of pollution-prevention control techniques, existing facilities may base the average emission factor on their operations as they exist on the compliance date. If an existing facility has accepted an enforceable permit limit of less than 100 tons per year of HAP, and can demonstrate that they will operate at that level subsequent to the compliance date, they can be deemed to be below the 100 tpy threshold.
- (1) Use a calculated emission factor. Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic



HAP emissions factor by resin and gel coat use over the same period. You may calculate this organic HAP emissions factor based on the equations in Table 1 to this subpart, or you may use any organic HAP emissions factor approved by us, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.

- (2) Conduct performance testing. Conduct performance testing using the test procedures in §63.5850 to determine a site-specific organic HAP emissions factor in units of lbs/ton of resin and gel coat used. Conduct the test under conditions expected to result in the highest possible organic HAP emissions. Multiply this factor by annual resin and gel coat use to determine annual organic HAP emissions. This calculation must be repeated and reported annually.
- (c) Existing facilities must initially perform this calculation based on their 12 months of operation prior to April 21, 2003, and include this information with their initial notification report. Existing facilities must repeat the calculation based on their resin and gel coat use in the 12 months prior to their initial compliance date, and submit this information with their initial compliance report. After their initial compliance date, existing and new facilities must recalculate organic HAP emissions over the 12-month period ending June 30 or December 31, whichever date is the first date following their compliance date specified in §63.5800. Subsequent calculations should cover the periods in the semiannual compliance reports.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5800]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

When do I have to comply with this subpart?

You must comply with the standards in this subpart by April 21, 2006 or you must accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 26, 2006. Facilities meeting a organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5805]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What standards must I meet to comply with this subpart?

You must meet the requirements of paragraphs (a) through (h) of this section that apply to you. You may elect to comply using any options to meeting these standards described in §§63.5810 through 63.5830. Use the procedures in §63.5799 to determine if you meet or exceed the 100 tpy threshold.

- (a) Not Applicable
- (b) All operations at existing facilities not listed in paragraph (a) of this section must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.
- (c) (h) Not Applicable

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5835]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What are my general requirements for complying with this subpart?

- (a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls.
- (b) Not Applicable
- (c) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).
- (d) Not Applicable







011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5860]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I demonstrate initial compliance with the standards?

(a) You demonstrate initial compliance with each organic HAP emissions standard in paragraphs (a) through (h) of §63.5805 that applies to you by using the procedures shown in Tables 8 and 9 to this subpart.

(b) Not Applicable

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5900]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I demonstrate continuous compliance with the standards?

- (a) You must demonstrate continuous compliance with each standard in §63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.
 - (1) Not Applicable
- (2) Compliance with organic HAP emissions limits is demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Tables 3, or 5 to this subpart, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).
- (3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits, as discussed in §63.5895(d).
- (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 §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910.
- (c) Except as provided in paragraph (d) of this section, during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.
- (d) Not Applicable
- (e) Consistent with §§63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources and standards specified in paragraph (d) of this section are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with the startup, shutdown, and malfunction plan. The Administrator will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in §63.6(e).

VII. ADDITIONAL REQUIREMENTS.

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5925]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What parts of the General Provisions apply to me?

Table 15 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you. [See Appendix A for the list of Tables]

*** Permit Shield in Effect. ***







Alternative Operation Name: NESHAP, SUBPART WWWW

#001 CHANGES FROM NORMAL OPERATION

This source will be subject to 40 CFR 63, Subpart WWWW as an alternativ requirements

Sources included in this Alternative Operation:

IDNameSource Type102A OPEN MOLD GEL COATProcess

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5840]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

By what date must I conduct a performance test or other initial compliance demonstration?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Testing Requirements for condition]

III. MONITORING REQUIREMENTS.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5895]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I monitor and collect data to demonstrate continuous compliance?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Monitoring Requirements for condition]

IV. RECORDKEEPING REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5915]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What records must I keep?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Recordkeeping Requirements for condition]

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5920]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

In what form and how long must I keep my records?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Recordkeeping Requirements for condition]

V. REPORTING REQUIREMENTS.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5905]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What notifications must I submit and when?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Reporting Requirements for condition]

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5910]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What reports must I submit and when?



43-00314



SECTION F. Alternative Operation Requirements.

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Reporting Requirements for condition]

VI. WORK PRACTICE REQUIREMENTS.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5799]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5800]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

When do I have to comply with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A Workpractice Requirements for condition]

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5805]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What standards must I meet to comply with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5810]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

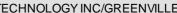
You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

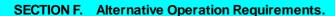
- (a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.
- (1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. If you are using an add-on control device to reduce HAP emissions, you must determine the

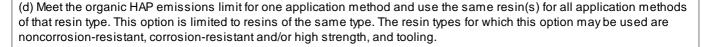


add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of 40 CFR Section 63.5810(a) to calculate the add-on control factor used in the organic HAP emissions factor equations.

- (2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.
- (b) Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type. Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.
- (1)(i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of 40 CFR Section 63.5810(b).
- (ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.
- (2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.
- (c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.
- (1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of 40 CFR Section 63.5810(c).
- (2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of 40 CFR Section 63.5810(c).
- (3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. 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.







- (1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.
- (2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.
- (3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.
- (4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5835] # 011

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites

What are my general requirements for complying with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5860]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites **Production**

How do I demonstrate initial compliance with the standards?

The permittee shall comply with the applicable requirements. See Section F, Source 101A, Workpractice Requirements for condition]

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5900]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites **Production**

How do I demonstrate continuous compliance with the standards?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition1

VII. ADDITIONAL REQUIREMENTS.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5925]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites

What parts of the General Provisions apply to me?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Additional Requirements for condition]

*** Permit Shield in Effect. ***



43-00314



SECTION F. Alternative Operation Requirements.

Alternative Operation Name: NESHAP, SUBPART WWWW

#001 CHANGES FROM NORMAL OPERATION

This source will be subject to 40 CFR 63, Subpart WWWW as an alternative requirements

Sources included in this Alternative Operation:

ID	Name	Source Type
102B	OPEN MOLD	Process

I. RESTRICTIONS.

Emission Restriction(s).

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5800]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites **Production**

When do I have to comply with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5805]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites **Production**

What standards must I meet to comply with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Testing Requirements for condition]

II. TESTING REQUIREMENTS.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5840]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites **Production**

By what date must I conduct a performance test or other initial compliance demonstration?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Testing Requirements for condition1

III. MONITORING REQUIREMENTS.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5895]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites **Production**

How do I monitor and collect data to demonstrate continuous compliance?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Monitoring Requirements for condition]

IV. RECORDKEEPING REQUIREMENTS.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5915] # 005

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites **Production**

What records must I keep?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Recordkeeping Requirements for condition]

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5920] # 006

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites **Production**

In what form and how long must I keep my records?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Recordkeeping Requirements for condition]







V. REPORTING REQUIREMENTS.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5905]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What notifications must I submit and when?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Reporting Requirements for condition]

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5910]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What reports must I submit and when?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Reporting Requirements for condition]

VI. WORK PRACTICE REQUIREMENTS.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5799]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5810]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

The permittee shall comply with the applicable requirements [See Section F, Source 102A, Workpractice Requirements for condition]

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5835]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What are my general requirements for complying with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5860]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I demonstrate initial compliance with the standards?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5900]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I demonstrate continuous compliance with the standards?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

VII. ADDITIONAL REQUIREMENTS.

014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5925]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What parts of the General Provisions apply to me?







The permittee shall comply with the applicable requirements [See Section F, Source 101A, Additional Requirements for condition]

*** Permit Shield in Effect. ***







Alternative Operation Name: NESHAP, SUBPART WWWW

#001 CHANGES FROM NORMAL OPERATION

This source will be subject to 40 CFR 63, Subpart WWWW as an alternative requirements

Sources included in this Alternative Operation:

ID	Name	Source Type
101B	CLOSED MOLD	Process

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5840]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

By what date must I conduct a performance test or other initial compliance demonstration?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Testing Requirements for condition]

III. MONITORING REQUIREMENTS.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5895]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I monitor and collect data to demonstrate continuous compliance?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Monitoring Requirements for condition]

IV. RECORDKEEPING REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5915]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What records must I keep?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Recordkeeping Requirements for condition]

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5920]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

In what form and how long must I keep my records?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Recordkeeping Requirements for condition]

V. REPORTING REQUIREMENTS.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5905]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What notifications must I submit and when?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Reporting Requirements for condition]

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5910]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What reports must I submit and when?



43-00314



SECTION F. Alternative Operation Requirements.

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Reporting Requirements for condition]

VI. WORK PRACTICE REQUIREMENTS.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5799]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Testing Requirements for condition]

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5800]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

When do I have to comply with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A for condition]

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5805]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What standards must I meet to comply with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A Workpractice Requirements for condition]

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5835]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What are my general requirements for complying with this subpart?

The permittee shall comply with the applicable requirements [See Section F, Source 101A Workpractice Requirements for condition]

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5860]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I demonstrate initial compliance with the standards?

The permittee shall comply with the applicable requirements [See Section F, Source 101A Workpractice Requirements for condition]

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5900]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

How do I demonstrate continuous compliance with the standards?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Workpractice Requirements for condition]

VII. ADDITIONAL REQUIREMENTS.

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5925]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What parts of the General Provisions apply to me?

The permittee shall comply with the applicable requirements [See Section F, Source 101A, Additional Requirements for condition]

*** Permit Shield in Effect. ***

DEP Auth ID: 930083

Page 57







SECTION G. Emission Restriction Summary.

Source	ld	Source Description		
101A		CLOSED MOLD GEL	COAT	
Emiss	ion Limit			Pollutant
	17.000	Tons/Yr	Based on 12-month rolling total.	VOC
101B		CLOSED MOLD		
Emiss	ion Limit			Pollutant
	5.000	Tons/Yr	Based on 12-month rolling total	VOC
102A		OPEN MOLD GEL CO	DAT	
Emiss	ion Limit			Pollutant
	11.000	Tons/Yr	Based on 12-month rollig total	VOC
102B		OPEN MOLD		
Emiss	ion Limit			Pollutant
	5.000	Tons/Yr	Based on 12-month rolling total.	VOC
103		ADHESIVE, SOLVEN	TS, AND MISCELLANEOUS PROCESSES	
Emiss	ion Limit			Pollutant
	2.000	Tons/Yr	Based on 12-month rolling total.	VOC
104		MISCELLANEOUS NA	ATURAL GAS USAGE	
Emiss	ion Limit			Pollutant
	4.000	Lbs/MMBTU	Heat input over one hour period.	SOX

Site Emission Restriction Summary

Emission Limit		Pollutant	
40.000 Tons/Yr	Based on 12-month rolling total.	VOC	

Alternative Operation Emission Restriction Summary





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SECTION H. Miscellaneous.

- 1) Closed Mold Gel Coat comprised of following sources:
 - a) 14 Production Gelcoat -1
 - b) 15 Production Gelcoat -2
 - c) 16 Production Gelcoat -3
 - d) 17 Production Gelcoat- 4
 - e) 18 Production Gelcoat-5
 - f) 12 Production Barrier 1
 - g) 19 Portable production Gelcoat
 - h) 13 Production Barrier -2
- 2) Source ID #101B: Closed Mold comprised with following sources:
- a) 6 VEC 1 Cell Lift 1
- b) 7 VEC 1 Cell Lift 2
- c) 4 Production Lift 6
- d) 5 Production Lift 7
- e) 1 Zurn Lift #1
- f) 2 Zurn Lift # 2
- g) 29 VEC-Lite work station
- h) 8 VEC 2 Cell Lift 1
- i) 9 VEC 2 Cell Lift 2
- 3) Open Mold Gel Coat comprised with the following source:
- a) 21 Mold Gelcoat -1 (Tooling)
- b) BU Mold Gelcoat-3(Tooling)
- c) 23 Pattern Barrier Coat -1 (Tooling)
- d) 11 Production Zurn Gelcoat-1 (Production))
- e) 22 Mold Gelcoat-2 (Tooling)
- f) BU Pattern Barrier Coat-2 (Tooling)
- g) Spray application system in the booths or in pattern shop.
- 4) Open Mold comprised of following sources:
- a) 10 Production Resin Chopper (Zurn)
- b) 20 Mold Resin Chopper-1 (Tooling)
- c) 24 Pattern Resin Chopper-1 (Tooling)
- d) BU Mold Resin Chopper-2(Tooling)
- d) BU Pattern Resin Chopper -2 (Tooling)
- 5) Adhesive, Solvents and Miscellaneous Processes comprised of following sources:
- a) 31 R & D Compression Mold Work Station
- b) Research and Development Facilities
- c) Bulk Resin Storage Tanks
- d) 25 Pattern Foam Spray Gun
- e) 26 Plexus Glue Gun (5-gal)
- f) 28 Miscellaneous Pot Spray Equipment
- g) 30 Perform Chopper Gun
- h) 27 Plexus Glue Gun (55-gallons)
- (6) The following sources are insignificant and do not require any restriction, recordkeeping, reporting and work practice standard requirements.
- a) 037 CNC Unit PAR XR 225
- b) 038 CNC Unit Thermwood C70
- c) 039 DC-1 Torit, DFT 2-8
- d) DC-2 Torit DFT4-3Z





SECTION H. Miscellaneous.

- e) Robotic Trim Work Station.
- (7) The terms, , unit of measurements, abbreviations and definitions described in 40 CFR §§ 63.2, 63.3 and 63.5779 shall be used to interpret any applicable requirements from 40 CFR Part 63 that are included in this permit.
- 8) The capacities listed in Section D of this permit are typical operational capacities and are included for informational purposes. The listed capacities are not to be constructed as enforceable limits or maximum capacities. All enforceable limits which apply to any source included in this permit are included in the conditions of this permit.
- 9) The emission limitations listed in Section G of this permit are provided for informational purposes. The actual emission limits for each source are provided in Section D of this permit.
- 10) The Source ID # 104: Misc. Natural Gas Usage (used for human comfort) is comprised with:
- a) ATO-1: 0.75 MMBTU/Hr (Capacity)
- b) RAU-1: 2.5 MMBTU/Hr
- c) RAU-2: 2.5 MMBTU/Hr
- d) RAU-3: 1.9 MMBTU/Hr
- e) RAU-4: 2.3 MMBTU/Hr.
- f) Sterling Indoor MAU, 38,000 CFM, 4214 MBH Heater
- g) Bananza Air Management Systems, Inc. Model B-2000, 2.2 MMBTU/Hr.
- 11) The permit #43-00314 was issued on February 11, 2003, effective immediately and expires on January 31, 2008. Revision 1. The permit was modified on January 11, 2007, for the incorporation of federal regulations NESHAP, Subpart WWWW.
- 12) This permit was renewed on January 29, 2013.





***** End of Report ******