

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION

October 26, 2023

PERMIT TO INSTALL
94-21B

ISSUED TO
Cecil Composites, LLC

LOCATED AT
151 Lafayette Street
Mt. Clemens, Michigan 48043

IN THE COUNTY OF
Macomb

STATE REGISTRATION NUMBER
B1772

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: August 9, 2023	
DATE PERMIT TO INSTALL APPROVED: October 26, 2023	SIGNATURE: 
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUFIBERGLASS	Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process. Acetone will be used as a clean-up solvent.	11-23-2021 / 4-13-2022 / PTI Date	FGMACTWWWW

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

**EUFIBERGLASS
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process. Acetone will be used as a clean-up solvent.

Flexible Group ID: FGMACTWWWW

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC (including styrene)	65.1 tpy	12-month rolling time period as determined at the end of each calendar month	EUFIBERGLASS	SC VI.2, SC VI.3	R 336.1702(a)
2. Acetone (CAS No. 67-64-1)	15.6 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUFIBERGLASS	SC VI.2, SC VI.3	R 336.1224, R 336.1225

II. MATERIAL LIMIT(S)

1. The styrene content of all resins used in EUFIBERGLASS shall not exceed 45.3 percent by weight as applied. **(R 336.1224, R 336.1225, R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUFIBERGLASS and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. The permittee shall handle all resins, catalysts, additives and cleaning solvents in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall store the finished composite poles inside the facility until they are transported off-site.¹ **(R 336.1901)**
4. The permittee shall submit, implement, and maintain a nuisance minimization plan (NMP) for odors. The NMP shall include at a minimum, but not be limited to:
 - a) Procedures for maintaining and operating EUFIBERGLASS in a manner that minimizes the release of odors to the outside air.
 - b) Procedures that shall be taken to address odor complaints.
 - c) A plan for corrective action to address any odor releases to the outside air.

If at any time the plan fails to address or inadequately addresses odor management, the permittee shall amend the plan within 30 days after such an event occurs. The permittee shall also amend the plan within 30 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 60 days of submittal, the plan or amended plan shall be considered approved.

Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to minimize odors.¹ **(R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Filament winding shall be carried out by use of the dual-spindle 4-axis system with an automated resin delivery system. **(R 336.1225, R 336.1702(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for EUFIBERGLASS:
 - a) The identity and amount (in pounds) of each material used.
 - b) The styrene content (in percent by weight) of each resin used.
 - c) The VOC (including styrene) content of each material used.
 - d) The acetone content of each material used.
 - e) The amount, in pounds, of acetone recovered and reclaimed.
 - f) The appropriate emission factors for each raw material used:
 - i. The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009, shall be used only for styrene and MMA emission calculations for open molding processes,
 - ii. Mass balance used for non-styrene, VOC emissions,
 - iii. Mass balance used for acetone emissions, or
 - iv. Alternate emission factors may be used with the approval of the AQD District Supervisor.
 - g) VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - h) Acetone mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using the UEF table, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVFIBERGLASS	42	63.75	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACTWWWW	Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785. Reinforced plastic composites production also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.	EUFIBERGLASS

**FGMACTWWWW
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Each existing or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790 that emit less than 100 tpy of HAP. Reinforced plastic composites production includes the following operations: filament winding, open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

Emission Units: EUFIBERGLASS

POLLUTION CONTROL EQUIPMENT

Dry fabric filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP from Open Molding – Corrosion Resistant and/or High Strength (CR/HS) Resin, Filament Application	171 lb/ton	12-month rolling average as determined at the end of each calendar month	Filament Application portion of FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
2. Organic HAP from Open Molding – Non CR/HS Resin, Filament Application	188 lb/ton	12-month rolling average as determined at the end of each calendar month	Filament Application portion of FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
3. Organic HAP from Open Molding – Low-flame spread/low-smoke products, Filament Application	270 lb/ton	12-month rolling average as determined at the end of each calendar month	Filament Application portion of FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
4. Organic HAP from Open Molding – Shrinkage controlled resins, Filament Application	215 lb/ton	12-month rolling average as determined at the end of each calendar month	Filament Application portion of FGMACTWWWW	SC V.1	40 CFR 63.5835(a)

5. The permittee must use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of 40 CFR Part 63, Subpart WWWW:
- a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5810(a))**
 - b) Demonstrate that, on average, the facility meets 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 of 40 CFR Part 63, Subpart WWWW that applies to the facility. **(40 CFR 63.5810(b))**
 - c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW that apply to the weighted average organic HAP emissions limit for all open molding operations. **(40 CFR 63.5810(c))**
 - d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. **(40 CFR 63.5810(d))**

The permittee may switch between the compliance options in (a) through (d). When changing to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously used an option that did not require the permittee to maintain records of resin or gel coat. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.5835(c))**
2. The permittee must be in compliance at all times with the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW as follows: **(40 CFR 63.5805(c), 40 CFR 63.5835(a))**
 - a) For closed molding operation using compression/injection molding, uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting. **(40 CFR Part 63, Subpart WWWW, Table 4.1)**
 - b) The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. **(40 CFR Part 63, Subpart WWWW, Table 4.2)**
 - c) For each HAP-containing materials storage operation, the permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. **(40 CFR Part 63, Subpart WWWW, Table 4.3)**
 - d) For each mixing operation, the permittee must use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. **(40 CFR Part 63, Subpart WWWW, Table 4.6)**

- e) For each mixing operation, the permittee must close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. **(40 CFR Part 63, Subpart WWWW, Table 4.7)**
- f) For each mixing operation, the permittee must keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR Part 63, Subpart WWWW, Table 4.8)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336. 1201(3))**

1. In order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in (a) through (c), as applicable. **(40 CFR 63.5797)**
 - a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. **(40 CFR 63.5797(a))**
 - b) If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of Appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance. **(40 CFR 63.5797(b))**
 - c) If the organic HAP content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee must use the measured organic HAP content to determine compliance. **(40 CFR 63.5797(c))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336. 1201(3))**

1. The permittee must monitor and collect data as specified in (a) through (d): **(40 CFR 63.5895(b))**
 - a) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating. **(40 CFR 63.5895(b)(1))**
 - b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system. **(40 CFR 63.5895(b)(2))**
 - c) At all times, the permittee must maintain necessary parts for routine repairs of the monitoring equipment. **(40 CFR 63.5895(b)(3))**
 - d) 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. **(40 CFR 63.5895(b)(4))**

2. The permittee must monitor and collect data to demonstrate continuous compliance as follows:
(40 CFR 63.5895, 40 CFR 63.5900)
 - a) The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW if averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. **(40 CFR 63.5895(c))**
 - b) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 of 40 CFR Part 63, Subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in 40 CFR 63.5895(d). **(40 CFR 63.5900(a)(2))**
 - c) Compliance with organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 of 40 CFR Part 63, Subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW, as discussed in 40 CFR 63.5895(d). **(40 CFR 63.5900(a)(3))**
 - d) The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in 40 CFR 63.5810(a) through (d). When change to an option based on a 12-month rolling average, base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously using an option that did not require records of resin and gel coat use. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**
3. The permittee must keep the following records: **(40 CFR 63.5915)**
 - a) A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status. **(40 CFR 63.5915(a)(1))**
 - b) Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2). **(40 CFR 63.5915(a)(3))**
 - c) All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3 and 7 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5915(c))**
 - d) A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable. **(40 CFR 63.5915(d))**
4. The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1) and keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.5920(a) and (b))**
5. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept offsite for the remaining 3 years. **(40 CFR 63.5920(c))**

6. The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. Any records required to be maintained and are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the AQD or the EPA as part of an on-site compliance evaluation. **(40 CFR 63.5920(d) and (e))**

VII. REPORTING

1. The permittee must submit all of the notifications in Table 13 of 40 CFR Part 63, Subpart WWWW that apply by the dates specified in Table 13 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5905(a))**
2. The permittee must submit semiannual compliance reports. The compliance report must contain the following information: **(40 CFR 63.5910(b) and (c))**
 - a) Company name and address. **(40 CFR 63.5910(c)(1))**
 - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.5910(c)(2))**
 - c) Date of the report and beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(3))**
 - d) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. **(40 CFR 63.5910(c)(5))**
 - e) For each deviation from an organic HAP emissions limitation or operating limit and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report must contain the information in (i) through (ii). **(40 CFR 63.5910(d))**
 - i. The total operating time of each affected source during the reporting period. **(40 CFR 63.5910(d)(1))**
 - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. **(40 CFR 63.5910(d)(2))**
3. The permittee must submit semiannual compliance reports to the EPA via CEDRI, which can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic report template on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri>). The report must be submitted by the deadline specified in 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5912(d))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).