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

September 30, 2022

PERMIT TO INSTALL
131-22

ISSUED TO
National Composites – Molded Plastic Industries, Inc.

LOCATED AT
2382 and 2345 Jarco Drive
Holt, Michigan 48842

IN THE COUNTY OF
Ingham

STATE REGISTRATION NUMBER
N0034

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: **September 8, 2022**	
DATE PERMIT TO INSTALL APPROVED: **September 30, 2022**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

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_2e	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_2S	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
EU-SPRAYBOOTHGL1	Spray booth for application of gel coat on open molds located at 2382 Jarco Drive.	11-1991 / TBD	FG-GELCOAT FGMACTWWWW
EU-EXPRS2	Spray booth for application of gel coat on open molds located at 2382 Jarco Drive.	TBD	FG-GELCOAT FGMACTWWWW
EU-EXPGEL2	Spray booth for application of gel coat on open molds located at 2382 Jarco Drive.	TBD	FG-GELCOAT FGMACTWWWW
EU-MANUAL	Work area where gelcoats and resins are hand applied located at 2345 Jarco Drive. Operations include clean-up solvents, mold releases, repair compounds and one acetone recycling system.	TBD	FGMACTWWWW
EU-XRTM	Resin transfer molding (RTM) operations located at 2345 Jarco Drive. A closed molding process involving two rigid half molds is used to produce FRP parts. Operations include the use of resin and catalyst materials.	TBD	FGMACTWWWW
EU-MISC2382	Mold releases, mold cleaning compounds, repair compounds, cleaning solvents and acetone used at 2382 Jarco Drive for open molding and gelcoat operations (i.e. EU-SPRAYBOOTHGL1, EU-EXPRS2, EU-EXPGEL2, EU-SPRAYBOOTHRS1).	TBD	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.

EU-MANUAL
EMISSION UNIT CONDITIONS

DESCRIPTION

Work area where gelcoats and resins are hand applied located at 2345 Jarco Drive. Operations include clean-up solvents, mold releases, repair compounds and one acetone recycling system.

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)	6.5 tpy	12-month rolling time period as determined at the end of each calendar month	EU-MANUAL	SC VI.2, SC VI.3	R 336.1702(a)
2. Acetone (CAS No. 64-67-1)	6.0 tpy[1]	12-month rolling time period as determined at the end of each calendar month	EU-MANUAL	SC VI.2, SC VI.3	R 336.1224, R 336.1225

II. MATERIAL LIMIT(S)

1. The styrene content of any resin or gelcoat used in EU-MANUAL shall not exceed 36.0 percent by weight. **(R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EU-MANUAL 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 VOC and/or HAPs containing materials 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))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EU-MANUAL with manual applicators or technology with equivalent or lower styrene emission rates. **(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 336.1224, 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 336.1224, R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information on a monthly basis for EU-MANUAL:
   a) The identity and amount (in pounds) of each material used.
   b) The styrene content (in percent by weight) of each material used.
   c) The acetone content (in precent by weight) of each material used.
   d) The amount (in pounds) of each clean-up solvent recovered and reclaimed.
   e) The VOC (including styrene) content of each 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. Alternate emission factors may be used with the approval of the AQD District Supervisor.
   f) 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.
   g) 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 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. SV-BUILDING2	30	25	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).

EU-XRTM
EMISSION UNIT CONDITIONS

DESCRIPTION

Resin transfer molding (RTM) operations located at 2345 Jarco Drive. A closed molding process involving two rigid half molds is used to produce FRP parts. Operations include the use of resin and catalyst materials.

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)	1.5 tpy	12-month rolling time period as determined at the end of each calendar month	EU-XRTM	SC VI.2, SC VI.3	R 336.1702(a)**

II. MATERIAL LIMIT(S)

1. The styrene content of any resin used in EU-XRTM shall not exceed 50.0 percent by weight. **(R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EU-XRTM 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 VOC and/or HAPs containing materials 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))**

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))**

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 336.1702(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 EU-XRTM:
   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 content (including styrene) of each material used.
   d) The appropriate emission factors for each raw material used:
      i. The emission factor of 3% by weight of styrene emitted (from EPA-AP-42 Section 4.4 for Polyester Resin Plastics Production Fabrication) shall be used for closed molding processes,
      ii. Mass balance used for non-styrene VOC emissions, or
      iii. Alternate emission factors may be used with the approval of the AQD District Supervisor
   e) 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.

   The permittee shall keep the records using AP-42 emission factors, 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 336.1702(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. SV-BUILDING2	30	25	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).

EU-MISC2382
EMISSION UNIT CONDITIONS

DESCRIPTION

Mold releases, mold cleaning compounds, repair compounds, cleaning solvents and acetone used at 2382 Jarco Drive for open molding and gelcoat operations (i.e. EU-SPRAYBOOTHGL1, EU-EXPRS2, EU-EXPGEL2, EU-SPRAYBOOTHRS1).

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. Acetone (CAS No. 67-64-1)	16.2 tpy[1]	12 month rolling time period as determined at the end of each month	EU-MISC2382	SC VI.2, SC VI.3	**R336.1224**
2. VOC	4.1 tpy	12 month rolling time period as determined at the end of each month	EU-MISC2382	SC VI.2, SC VI.3	**R336.1225, R336.1702(a),**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EU-MISC2382 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 VOC and/or HAPs containing materials 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))**

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))**

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 end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (i.e. mold release, cleanup/purge solvent, etc.), including the weight percent of each component. The data may consist of Material 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 for a period of at least five years and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information for each calendar month for EU-MISC2382:
   a) The identity and amount (in pounds) of each material (mold release, mold cleaner, repair compound, cleaning solvent, etc.) used.
   b) The VOC content of each material used.
   c) The acetone content of each material used.
   d) 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.
   e) 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 mass balance or in a format acceptable to the AQD District Supervisor. The permittee shall keep all records and 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)

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).

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
FG-GELCOAT	Three spray booths located at 2382 Jarco Drive for application of gel coat on open molds.	EU-SPRAYBOOTHGL1 EU-EXPRS2 EU-EXPGEL2
FGMACTWWWW	Each new 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. 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.	EU-SPRAYBOOTHGL1 EU-SPRAYBOOTHRS1 EU-EXPRS2 EU-EXPGEL2 EU-MANUAL EU-XRTM EU-MISC2382

FG-GELCOAT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Three spray booths located at 2382 Jarco Drive for application of gel coat on open molds.

Emission Unit: EU-SPRAYBOOTHGL1, EU-EXPRS2, EU-EXPGEL2.

POLLUTION CONTROL EQUIPMENT

Fabric overspray filters in each booth.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	12.6 tpy	Per 12 month rolling time period as determined at the end of each month	FG-GELCOAT	SC VI.2, SC VI.3	**R 336.1702(a)**

II. MATERIAL LIMIT(S)

1. The permittee shall not exceed the styrene monomer and methyl methacrylate (MMA) content limits listed in the following table for FG-GELCOAT. **(R 336.1702(a))**

Material ID	Maximum Styrene Content (% wt)	Maximum (MMA) (% wt)
a. Tooling Gelcoats	45.0	0.0
b. Production-type Gelcoats	39.0	10.0

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste gelcoats and solvents used in FG-GELCOAT and store them in closed containers. The permittee shall dispose of all 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 dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**

3. The permittee shall handle all VOC and/or HAPs containing materials 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))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any booth in FG-GELCOAT unless its exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1331)**

2. The permittee shall equip and maintain each booth in FG-GELCOAT with mechanical applicators or technology with equivalent or lower styrene emission rates. **(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 end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each gelcoat including the weight percent of each component. The data may consist of Material 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 for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information for each calendar month for FG-GELCOAT:
   a) The identity and amount (in pounds) of each material used.
   b) The styrene content (in percent by weight) of each gelcoat used determined as supplied, plus any extra styrene added by the permittee, but before the addition of other additives such as powders, fillers, glass, catalysts, etc.
   c) The MMA content (in percent by weight) of each gelcoat used.
   d) The VOC (including styrene and MMA) content of each material used.
   e) 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, non-MMA VOC emissions, or
      iii. Alternate emission factors may be used with the approval of the AQD District Supervisor.
   f) 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.

   The permittee shall keep the records using mass balance or in a format acceptable to the AQD District Supervisor. The permittee shall keep all records and make them available to the Department upon request. **(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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSTACKVENTGEL01	40	27	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-EXPRS2	30	35	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-EXPGEL2	30	35	R 336.1225, 40 CFR 52.21(c) & (d)

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).

FGMACTWWWW
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each new 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. 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.

Emission Units: EU-SPRAYBOOTHGL1, EU-SPRAYBOOTHRS1, EU-EXPRS2, EU-EXPGEL2, EU-MANUAL, EU-XRTM, EU-MISC2382.

POLLUTION CONTROL EQUIPMENT

NA

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, Mechanical Application	113 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
2. Organic HAP from Open Molding – Non CR/HS Resin, Mechanical Application	88 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
3. Organic HAP from Open Molding – Tooling Resin, Mechanical Application	254 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
4. Organic HAP from Open Molding – Low-flame spread/low-smoke products	497 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
5. Organic HAP from Open Molding – Shrinkage controlled resins	354 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
6. Organic HAP from Open Molding – Tooling gel coat	440 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
7. Organic HAP from Open Molding – White/off white pigmented gel coat	267 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
8. Organic HAP from Open Molding – All other pigmented gel coat	377 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
9. Organic HAP from Open Molding – CR/HS or high performance gel coat	605 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
10. Organic HAP from Open Molding – Fire retardant gel coat	854 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
11. Organic HAP from Open Molding – Clear production gel coat	522 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**

12. The permittee shall use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of Subpart WWWW of Part 63. **(40 CFR 63.5810)**
    a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of Subpart WWWW of Part 63. **(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 to this subpart 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 to this subpart 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))**

13. The permittee may switch between the compliance options in SC I.12.a through 12.d. When changing to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option the facility is changing to, unless the facility previously used an option that did not require the facility to maintain records of resin or gel coat. In this case, the facility 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. 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 63.5805, Table 4)**

2. For each HAP-containing materials storage operation, the permittee shall 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 63.5805, Table 4)**

3. For each mixing operation, the permittee shall 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 63.5805, Table 4)**

4. For each mixing operation, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement. **(40 CFR 63.5805, Table 4)**

5. For each mixing operation, the permittee shall keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR 63.5805, Table 4)**

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. The permittee shall determine the HAP content of any resin(s) as received and as applied, using manufacturer's formulation data and safety data sheets, using the procedures outlined in 40 CFR 63.5797 (a) through (c) as applicable. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(40 CFR 63.5797)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.5840 and 40 CFR 63.5860. **(40 CFR 63.5840, 40 CFR 63.5860)**

2. The permittee shall demonstrate continuous compliance with the applicable standards according to the procedures outlined in 40 CFR 63.5895 and 40 CFR 63.5900. **(40 CFR 63.5895, 40 CFR 63.5900)**

3. The permittee shall keep all records required by 40 CFR 63.5915 in the format and timeframes outlined in 40 CFR 63.5920. The records must be kept onsite for a period of at least two years. The records must be kept for a total of at least five years. **(40 CFR 63.5915, 40 CFR 63.5920)**

4. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date:[2]
   a) A copy of each notification and report that is submitted to comply with 40 CFR Part 63 Subpart WWWW, and the documentation supporting each notification as specified in 40 CFR 63.5915(a)(1). **(40 CFR 63.5915(a))**
   b) Records of all data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for operations listed in Table 3 to 40 CFR Part 63 Subpart WWWW. **(40 CFR 63.5915(c))**
   c) A certified statement demonstrating compliance with all applicable work practice standards identified in Table 4 of 40 CFR Part 63 Subpart WWWW. **(40 CFR 63.5915(d))**

5. The permittee shall keep records documenting that the resin(s) used in FGMACTWWWW meet(s) the requirements for corrosion-resistant resin, non-corrosion-resistant resin, or tooling resin as outlined in 40 CFR 63.5935. **(40 CFR 63.5935)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336. 1201(3))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336. 1201(3))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336. 1201(3))**

4. The permittee shall submit the applicable notifications specified in, and according to the timeframes in 40 CFR 63.5905. **(40 CFR 63.5905)**

5. The permittee shall submit all applicable reports identified in, and according to the timeframes in 40 CFR 63.5910. **(40 CFR 63.5910)**

6. The permittee shall submit semiannual reporting of compliance as required in 40 CFR 63.5910(c). The report shall include the following:
   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 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. **(40 CFR 63.5910(c)(5))**

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, Subpart 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).