Colorado Department of Public Health and Environment

OPERATING PERMIT

W.J. Whatley, Inc.

First Issued: October 1, 2004
Renewed: April 1, 2012

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME: W.J. Whatley, Inc

OPERATING PERMIT NUMBER

02OPAD250

FACILITY ID: 0010531

RENEWED: April 1, 2012
EXPIRATION DATE: April 1, 2017
MODIFICATIONS: See Appendix F of Permit

Issued in accordance with the provisions of Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq. and applicable rules and regulations.

ISSUED TO:

W.J. Whatley, Inc.

3550 Odessa Way
Aurora, CO 80011

PLANT SITE LOCATION:

3550 Odessa Way
Aurora, CO 80011
Adams County

INFORMATION RELIED UPON
Operating Permit Renewal Application Received: September 30, 2008
And Additional Information Received: December 2, 2009, June 2010 & October 2011

Nature of Business: Fiberglass Reinforced Plastics
Primary SIC: 3089

RESPONSIBLE OFFICIAL
Name: Scott Christensen
Title: Plant Manager

Phone: (877) 959-7678

FACILITY CONTACT PERSON
Name: David Spruce
Title: Facility Manager

Phone: (877) 959-7678 Extension 200

SUBMITTAL DEADLINES –
First Semi-Annual Monitoring Period: April 1 2012 – September 30, 2012
Subsequent Semi-Annual Monitoring Periods: October 1 – March 31, April 1 – September 30
Semi-Annual Monitoring Reports: Due Nov 1, 2012 & May 1, 2013 and subsequent years
First Annual Compliance Period: April 1, 2012 – September 30, 2012
Subsequent Annual Compliance Periods: October 1 to September 30
Annual Compliance Certification: Due Nov 1, 2012 and subsequent years

Note that the Semi-Annual Monitoring Reports and Annual Compliance report must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This facility is located at 3550 Odessa Way, Aurora, Adams County, Colorado. The plant produces fiberglass light poles. There is a process line for short poles and one for longer poles. The light poles are produced by passing fiberglass strands through a tray of polyester resin and winding the strands around a steel mandrel (mold). Steam from the boiler is pumped into the mold to cure (harden) the resin and the pole is then removed from the mandrels and either dry sanded or placed into a mold where resin is added to create a decorative cover on the pole. The poles are then painted on an automated trolley system in the paint booth. Wax, cellophane or liquid mold release is used as a mold release. Bases are created by either laying up resin-impregnated fiberglass inside external molds or casting polyurethane in closed molds. The bases are finished by spray application of paint.

This facility is located in the Denver Metro Area. The Denver Metro Area is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM_{10}) and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM_{10} and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. The Denver Metro Area is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.1.

There are no affected states within 50 miles of the plant. Rocky Mountain National Park is a Federal Class I designated area within 100 kilometers of the plant.

1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.

1.3 The Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this Operating Permit and shall survive reissuance. This permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits: 11AD154, 91AD411, 96AD675, 92AD1418 and 09AD0201.

1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:** Permit Condition Number(s): Section IV - Conditions 3.d, 3.g (last paragraph), 14 & 18 (as noted). Section II – Conditions 1.2, 2.3.

1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit. Either electronic or hard copy records are acceptable.

2. Alternative Operating Scenarios

2.1 The permittee shall be allowed to make the following changes to its method of operation without applying for a revision of this permit.

2.1.1 No separate operating scenarios have been specified.

3. Non-Attainment New Source Review (NANSR) and Prevention of Significant Deterioration (PSD)

3.1 Based on the information provided by the applicant, this source is categorized as a minor stationary source for both NANSR and PSD as of the issue date of this permit.

For NANSR, any future modification at this facility which is major by itself (i.e. a Potential to Emit of ≥ 100 TPY of either VOC or NO_x) may result in the application of the NANSR review requirements.

For PSD, any future modification at this facility for which is major by itself (Potential to Emit of ≥ 250 TPY) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements

3.2 There are no other Operating Permits associated with this facility for purposes of determining applicability of Prevention of Significant Deterioration regulations.

4. Accidental Release Prevention Program (112(r))

4.1 Based on information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. Compliance Assurance Monitoring (CAM)

5.1 The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV:

None.

6. Summary of Emission Units

6.1 The emissions units regulated by this permit are the following:

AIRS ID	Description	Pollution Control	Construction Permit
001	Chambers & Son Paint Spray Booth	Dry Filters	11AD154
002	Filament winding process	N/A	91AD411
003	Casting/laminating poles	N/A	96AD675
004	Viking Paint Spray Booth	Dry Filters	92AD1418
005	Dry Sanding Operation, including: Two (2) G&P Machinery Belt Sander (custom designed)[1] and Two (2) saws, One (1) Diamond Products Cutoff Saw (Model CC500M), and One (1) Husqvarana Cutoff Saw (Model MS51061M)	AQC Maxiflo Baghouse[2]	09AD0201

[1]Sander emissions are controlled by a second indoor baghouse that does not vent to the atmosphere
[2]Saw emissions are controlled by the AQC Maxiflo baghouse

SECTION II - Specific Permit Terms

1. Fiberglass Fabrication
Filament Winding Process (AIRS ID #002)
Casting/laminating Poles (AIRS ID #003)

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
Consumption Rate	1.1	Polyester Resins: 930,000 pounds per year Gelcoat: 12,500 pounds per year		Recordkeeping and Calculation 12 month rolling total	Monthly
Odor	1.2	Minimize odor		As appropriate	As Necessary
Fugitives	1.3	See Condition 1.3			
MACT – 40 CFR Part 63 Subpart WWWW Reinforced Plastic Composites Production	1.4	See Condition 1.4		Recordkeeping and Calculation	

1.1 The total consumption of polyester resins and gel coats shall not exceed the limitation stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part C, Section I.A.7 and Part C, Section III.B.7). The permittee shall record and report the facility-wide consumption of all resins and gelcoats used in the production of fiberglass reinforced plastic parts and the emissions generated from such use of the materials using the format shown in Appendix H of this Operating Permit. The reporting format shall include actual material usage and calculated emission rates based on manufacturer's data or Material Safety Data Sheets (MSDS) and Unified Emission Factors for Open Molding of Composites. Copies of MSDS and other supporting documents shall be maintained with the required emission reports. The record keeping shall be accomplished on a 12-month rolling total. The rolling 12-month records shall be made available to the Division upon request and shall be kept for five (5) years.

1.2 The plant is subject to Colorado Regulation No. 2, Part A, Odor requirements. (Construction Permits 91AD411 and 96AD675, as modified under the provisions of Section II, Condition 1.3). All odor complaints shall be recorded and made available to the Division upon request. The source shall employ such measures and operating procedures as are necessary to minimize odor emissions. **State-only enforceable.**

1.3 Fugitive emissions shall be controlled by the following practices: (Colorado Regulation No. 7, Section IX.A.7.)

1.3.1 Control techniques and work practices shall be implemented at all times to reduce volatile organic compound (VOC) emissions from fugitive sources. Control techniques and work practices include, but are not limited to:

1.3.1.1 tight-fitting covers for open tanks;

1.3.1.2 covered containers for solvent wiping cloths

1.3.1.3 proper disposal of dirty clean-up solvent.

1.3.2 Emissions of organic material released during clean-up operations, disposal, and other fugitive emissions shall be included when determining total emissions, unless the source owner or operator documents that the VOCs are collected and disposed of in a manner that prevents evaporation to the atmosphere.

1.4 This source is subject to 40 CFR Part 63 Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. The following requirements apply:

General Standards

1.4.1 §63.5805(b) - All operations at existing facilities must meet the organic HAP emission limitations in Table 3 to Subpart WWWW that apply, regardless of the quantity of HAP emitted. (See Appendix I for details on Table 3 to Subpart WWWW).

1.4.2 §63.5805(b) - All operations at existing facilities must meet the following work practice standards, regardless of the quantity of HAP emitted (Reference: Table 4 to Subpart WWWW of Part 63).

1.4.2.1 Cleaning Operations: You must not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

1.4.2.2 HAP-Containing Materials Storage Operations: You 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.

1.4.2.3 Mixing Operations:

a. You 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.

b. You 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.

c. You must keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

d. Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply

resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

Options for Meeting Standards

1.4.3 §63.5810 - You must use one of the following methods to meet the requirements of Condition 1.4.1. You may use different compliance options for the different operations listed in Table 3 to Subpart WWWW. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the following compliance options (changes to compliance options must be reported as per Condition 1.4.11). (See Appendix I for details on Compliance Options and Tables to Subpart WWWW).

1.4.3.1 §63.5810(a) - Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 to Subpart WWWW, using the methods described in Compliance Option 1 of Appendix I of this permit.

1.4.3.2 §63.5810(b) - 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 Subpart WWWW that applies to you, using the methods described in Compliance Option 2 of Appendix I of this permit.

1.4.3.3 §63.5810(c) - Demonstrate compliance with a weighted average emission limit in Table 3 to Subpart WWWW that applies to you, using the methods described in Compliance Option 3 of Appendix I of this permit.

1.4.3.4 §63.5810(d) - Meet the organic HAP emissions limit for one application method in Table 7 to Subpart WWWW that applies to you, using the methods described in Compliance Option 4 of Appendix I of this permit, 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 noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

General Compliance Requirements

1.4.4 §63.5835(a) - You must be in compliance at all times with the work practice standards in Condition 1.4.2, as well as the organic HAP emissions limits in Appendix I of this permit, as applicable.

1.4.5 §63.5835(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)

Continuous Compliance Requirements

1.4.6 §63.5895(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 Table 3 to Subpart WWWW. 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 Subpart WWWW 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. (See Appendix I for details on Compliance Options and Tables to Subpart WWWW).

1.4.7 §63.5900(a) - You must demonstrate continuous compliance with each standard in Conditions 1.4.1 and 1.4.2 that applies to you as follows:

1.4.7.1 Compliance with organic HAP emissions limits using Compliance Options 2 and/or 3 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 to Subpart WWW on a 12-month rolling average.

1.4.7.2 Compliance with the organic HAP emission limits using Compliance Option 1 is demonstrated by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits.

1.4.7.3 Compliance with organic HAP content limits in Table 7 to 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 to 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.

1.4.7.4 Compliance with the work practice standards of Condition 1.4.2 is demonstrated by performing the work practice required for your operation.

1.4.8 §63.5900(b) - You must report each deviation from each standard in Conditions 1.4.1 and 1.4.2 that applies to you. The deviations must be reported according to the requirements in Condition 1.4.11.

1.4.9 §63.5900(c) - During periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.

Notifications, Records and Reports

1.4.10 §63.5905(b) - If you change any information submitted in any notification, you must submit the changes in writing to the Division within 15 calendar days after the change.

1.4.11 §63.5910(a) - You must submit a Semiannual Compliance Report according to the submittal deadlines listed at the beginning of this permit (§63.5910(b)(5)). The report must contain the information specified in Table 14 to Subpart WWWW and the information listed in §§63.5910(c) & (d). 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 (§63.5910(i)).

1.4.12 §63.5915(a) - You must keep a copy of each notification and report that you submitted to comply with Subpart WWWW, 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).

1.4.13 §63.5915(c) - You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents used to determine compliance in accordance with the methods in Appendix I to this permit.

1.4.14 §63.5915(d) - You must keep a certified statement that you are in compliance with the work practice requirements in Condition 1.4.2, as applicable.

1.4.15 §63.5920(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).

1.4.16 §63.5920(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.

1.4.17 §63.5920(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.

1.4.18 §63.5920(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.

General Requirements

1.4.19 This emission source is subject to the requirements in 40 CFR part 63 Subpart A “General Provisions”, as adopted by reference in Colorado Regulation No. 8, Part E, Section I as specified in 40 CFR Part 63 Subpart WWWW § 63.5925. These requirements include, but are not limited to the following:

1.4.19.1 Prohibited activities and circumvention in § 63.4.

1.4.19.2 Operation and maintenance requirements in § 63.6(e)(1).

1.4.19.3 Notification requirements in § 63.9.

1.4.19.4 Recordkeeping and reporting requirements in § 63.10.

2. Paint Spray Booths
Chambers & Son Booth (AIRS ID #001)
Viking Booth (AIRS ID #004)

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
Paint Gun Use	2.1	High Volume Low Pressure (HVLP) guns required for large area applications		Inspection	As Necessary
Consumption Rate	2.2	Paint/Primer/ Catalyst/Reducer: 20,000 gal/year		Recordkeeping and Calculation 12 month rolling total	Monthly
Odor	2.3	Minimize odor		As appropriate	As Necessary
Opacity	2.4	Not to exceed 20%			
Exhaust Filters	2.5	Exhaust Filters Required		Visual Inspection	As Necessary
Fugitives	2.6	See Condition 2.6			
MACT – 40 CFR Part 63 Subpart PPPP Surface Coating of Plastic Parts and Products	2.7	See Condition 2.7		Recordkeeping and Calculation	Monthly

2.1 High Volume Low Pressure (HVLP) paint spray guns shall be used for any application of base coats and clear coats in general, and for any top coat applied to a large area. A large area is any area greater than nine (9) square feet. Conventional application methods may be used for top coat only in small area applications. The permittee shall obtain written approval from the Division prior to using any method other than HVLP application for base coats, clear coats or large area coats (Construction Permit 92AD1418 as modified under the provisions of Section I, Condition 1.3).

2.2 The total consumption of paint/primer/catalyst/reducer shall not exceed the limitation stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part C, Section I.A.7 and Part C, Section III.B.7). The permittee shall record and report the facility-wide consumption of all paint/primer/catalyst/reducer used and the emissions generated from such use of the materials using the format shown in Appendix H of this Operating Permit. The reporting format shall include actual material usage and calculated emission rates based on manufacturer's data or Material Safety Data Sheets (MSDS). Copies of MSDS and other supporting documents shall be maintained with the required emission reports. The record keeping shall be accomplished on a 12-month rolling total. The rolling 12-month records shall be made available to the Division upon request and shall be kept for five (5) years.

2.3 The plant is subject to Colorado Regulation No. 2, Part A, Odor requirements. (Construction Permit 92AD1418 as modified under the provisions of Section II, Condition 1.3). All odor complaints shall be

recorded and made available to the Division upon request. The source shall employ such measures and operating procedures as are necessary to minimize odor emissions. **State-only enforceable.**

2.4 No owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

In the absence of credible evidence to the contrary, compliance with the opacity limit shall be presumed provided the maintenance requirements specified in Condition 2.5 are met.

2.5 The paint booths shall be equipped with exhaust filters or over spray arresters to minimize emissions of particulate matter. These filters and arresters shall be maintained/renewed as per the manufacturer's recommendations, or more often if needed, to assure on-going performance of the control devices. If the manufacturer's recommendations are no longer available, a written document detailing the procedures to be followed in controlling emissions from the paint booths shall be submitted for Division approval. A record shall be kept of the maintenance/renewals performed. A copy of the manufacturer's recommendations or the Division approved operating procedure and copies of the maintenance/renewal records shall be maintained on-site and made available for Division review upon request. Evidence of paint penetration of the control devices shall be considered evidence of non-compliance (as provided for under the provisions of Section I, Condition 1.4 and Colorado Regulation No. 3, Part C, Section II.A.6 and Part C, Section X).

2.6 Fugitive emissions shall be controlled by the following practices: (Colorado Regulation No. 7, Section IX.A.7.)

2.6.1 Control techniques and work practices shall be implemented at all times to reduce volatile organic compound (VOC) emissions from fugitive sources. Control techniques and work practices include, but are not limited to:

2.6.1.1 tight-fitting covers for open tanks;

2.6.1.2 covered containers for solvent wiping cloths

2.6.1.3 proper disposal of dirty clean-up solvent.

2.6.2 Emissions of organic material released during clean-up operations, disposal, and other fugitive emissions shall be included when determining total emissions, unless the source owner or operator documents that the VOCs are collected and disposed of in a manner that prevents evaporation to the atmosphere.

2.7 This source is subject to 40 CFR Part 63 Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The following requirements apply:

Emission Limitations

2.7.1 §63.4490(b)(1) – For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Options for Meeting Standards

2.7.2 §63.4491 - You must include all coatings (as defined in §63.4581), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Condition 2.7.1. To make this determination, you must use at least one of the compliance options listed below. You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by Condition 2.7.10 and you must report it in the next semiannual compliance report required in Condition 2.7.7.

2.7.2.1 §63.4491(a) – *Compliant material option*. Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Condition 2.7.1, and that each thinner and/or additive, and cleaning material used contains no organic HAP using the methods described in Compliance Option 1 of Appendix J.

2.7.2.2 §63.4491(b) – *Emission rate without add-on controls option*. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in Condition 2.7.1, calculated as a rolling 12-month emission rate and determined on a monthly basis, using the methods described in Compliance Option 2 of Appendix J of this permit.

General Compliance Requirements

2.7.3 §63.4500(a)(1) - You must be in compliance with the applicable emission limitations in Condition 2.7.1 at all times.

2.7.4 §63.4500(b) - 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)

Continuous Compliance Requirements

2.7.5 If you are meeting the standards using the Compliant Material Option of Condition 2.7.2.1, you must demonstrate continuous compliance as follows:

2.7.5.1 §63.4542(a) - For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content exceeds the applicable emission limit calculated in Condition 2.7.1 and use no thinner and/or other additive, or cleaning material that contains organic HAP. A compliance period consists of 12 months. Each month, after the end of the initial compliance period, is the end of a

compliance period consisting of that month and the preceding 11 months. You must also perform the calculation in Condition 2.7.1 on a monthly basis using the data from the previous 12 months of operation.

2.7.5.2 §63.4542(b) - If you choose to comply with the emission limitations by using the compliant material option described in Compliance Option 1 of Appendix J of this permit, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in Condition 2.7.5.1 is a deviation from the emission limitations that must be reported as specified in Condition 2.7.7

2.7.5.3 §63.4542(c) - As part of each semiannual compliance report required by Condition 2.7.7 you must identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the applicable emission limit calculated in Condition 2.7.1, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in Condition 2.7.1, and you used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to the methods described in Compliance Option 1 of Appendix J of this permit.

2.7.6 If you are meeting the standards using the Emission Rate Without Add-On Controls Option of Condition 2.7.2.2, you must demonstrate continuous compliance as follows:

2.7.6.1 §63.4552(a) - To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to Compliance Option 2 in Appendix J of this permit, must be less than or equal to the applicable emission limit calculated in Condition 2.7.1. A compliance period consists of 12 months. Each month after the end of the initial compliance period is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in Compliance Option 2 in Appendix J of this permit on a monthly basis using data from the previous 12 months of operation. You must also perform the calculation in Condition 2.7.1 on a monthly basis using the data from the previous 12 months of operation.

2.7.6.2 §63.4552(b) - If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit calculated in Condition 2.7.1, this is a deviation from the emission limitation for that compliance period and must be reported as specified in Condition 2.7.7

2.7.6.3 §63.4552(c) - As part of each semiannual compliance report required by Condition 2.7.7, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit calculated in Condition 2.7.1, determined according to methods in Compliance Option 2 of Appendix J of this permit.

Notifications, Reports and Records

2.7.7 §63.4520(a) – You must submit semiannual compliance reports according to the submittal deadlines listed at the beginning of this permit (§63.4520(a)(1)(iv)). The report must contain the information specified in §63.4520(a)(3) through (a)(6). If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by Condition 2.7.7 and you must report it in the next semiannual compliance report.

2.7.8 §63.4530(a) – You must keep a copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. You must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. You must also keep records of any data used in each calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

2.7.9 §63.4530(b) – You must keep a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or mass fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

2.7.10 §63.4530(c) – For each compliance period, you must keep the following records:

2.7.10.1 A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

2.7.10.2 For the compliant material option, a record of the calculation of the organic HAP content for each coating, using the methods described in Compliance Option 1 of Appendix J of this permit.

2.7.10.3 For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using the calculations described in Compliance Option 2 of Appendix J of this permit and, if applicable, the calculation used to determine mass of organic HAP in waste materials; the calculation of the total mass of coating solids used each month; and the calculation of each 12-month organic HAP emission rate.

2.7.10.4 §63.4530(d) - A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the mass used.

2.7.10.5 §63.4530(e) -A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

2.7.10.6 §63.4530(f) -A record of the mass fraction of coating solids for each coating used during each compliance period.

2.7.10.7 §63.4530(g) -If you use an allowance in Compliance Option 2 of Appendix J of this permit for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF), you must keep records of the information specified in paragraphs §§ 63.4530(g)(1) through (3) of Subpart PPPP.

2.7.10.8 §63.4530(h) -You must keep records of the date, time, and duration of each deviation.

2.7.11 §63.4531(a) -Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

2.7.12 §63.4531(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.

2.7.13 §63.4531(c) -You must keep each record on-site 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 may keep the records off-site for the remaining 3 years.

General Requirements

2.7.14 This emission source is subject to the requirements in 40 CFR part 63 Subpart A “General Provisions”, as adopted by reference in Colorado Regulation No. 8, Part E, Section I as specified in 40 CFR Part 63 Subpart PPPP § 63.4501. These requirements include, but are not limited to the following:

2.7.14.1 Prohibited activities and circumvention in § 63.4.

2.7.14.2 Operation and maintenance requirements in § 63.6(e)(1).

2.7.14.3 Notification requirements in § 63.9.

2.7.14.4 Recordkeeping and reporting requirements in § 63.10.

3. One (1) Dry Sanding Operation, Consisting of Two Belt Sanders and Two Cut Off Saw (AIRS ID #005)

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
PM	3.1	0.04 tons per year	0.00122 lb/pole (controlled)	Recordkeeping and Calculation	Monthly
	3.4	Hourly Limit: See Condition 3.4			
PM_{10}	3.1	0.04 tons per year	0.00122 lb/pole (controlled)		
	3.5	RACT: baghouse			
Production Rate	3.2	70,080 light poles per year		Recordkeeping	Monthly
Opacity	3.3	Not to exceed 20%		Visual Observations & Method 9	As required
		For certain operational activities – not to exceed 30%			
Control Equipment	3.6	Maintain Control Equipment		Maintenance & Inspection	As specified in O&M Plan

3.1 Total Particulate Matter (PM), and Particulate Matter < 10 μm (PM_{10}) emission to the atmosphere from the dry sanding operation shall not exceed the limitations stated above (Colorado Construction Permit 09AD0201).

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month. A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

3.2 Production of light poles shall not exceed the limitation shown above. (Colorado Construction Permit 09AD0201). A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

3.3 The dry sanding operation is subject to the following opacity requirements:

3.3.1 Except as provided for in Condition 3.3.2 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity (Colorado Construction Permit 09AD0201 and Colorado Regulation No. 1, Section II.A.1).

During operation of the dry sanding equipment, the baghouse exhaust to atmosphere shall be inspected daily for visible emissions. The results of the visual inspections shall be recorded in a logbook kept on-site. If visible emissions are noted, the operation shall immediately shut down and appropriate repairs and/or maintenance performed and recorded in the logbook. If visible emissions are noted for two (2) successive days of operation, a Method 9 observation shall be performed during the third day of operation.

All Method 9 observations shall be performed by an observer with a current and valid certification. A clear and readable copy of the observer's certificate shall be retained with the copies of the observations and made available to the Division upon request. Results of Method 9 readings and a copy of the certified Method 9 reader's certification shall be made available to the Division upon request.

If the Method 9 observation indicates an exceedance of the opacity limit, additional Method 9 observations shall be performed at least daily while the dry sanding equipment is in operation, until a subsequent reading shows compliance with the opacity limit. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of any credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows that the opacity is less than the opacity limit.

3.3.2 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from start-up, process modifications, or adjustment or occasional cleaning of control equipment which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Construction Permit 09AD0201 and Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the opacity limit shall be presumed provided the baghouse operating and maintenance requirements specified in Condition 3.4 are met.

3.4 During any consecutive sixty (60) minute period, PM emissions from the dry sanding operation shall not exceed the following limitation (Colorado Construction Permit 09AD0201 and Colorado Regulation No. 1, III.C.1.b):

$$E = 3.59\ (P)^{0.62}$$

Where:
E is the allowable particulate emissions in lbs/hr
P is the process weight rate in tons/hr

In the absence of credible evidence to the contrary compliance with the particulate matter limit is presumed provided the baghouse operating and maintenance requirements specified in Condition 3.4 are met.

3.5 This source is located in a PM_{10} attainment/maintenance area and is subject to the Reasonably Available Control Technology (RACT) requirements of Regulation No. 3, Part B, Section III.D.2.a. RACT has been determined to be the following for this source: Baghouse (99.9% PM_{10} Reduction). (Colorado Construction Permit 09AD0201)

3.6 The air pollution control equipment shall be operated and maintained as per good engineering practices and the most recent Division-approved Operation and Maintenance Plan. Modifications to the Operation and Maintenance Plan shall be submitted to the Division for approval. A record shall be kept

of the maintenance performed. A copy of the current Division-approved Operation and Maintenance Plan and copies of the maintenance shall be maintained on-site and made available for Division review upon request (Colorado Construction Permit 09AD0201, as modified under the provisions of Section I Condition 1.3.)

4. Facility-Wide Volatile Organic Compound Emission Limitations

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
VOC	4.1	80 tons/year	See Condition 4.1	Recordkeeping and Calculation 12 month rolling total	Monthly

4.1 Facility-wide emissions of air pollutants from fiberglass fabrication and the paint booths shall not exceed the limit listed above. Compliance with the annual limits shall be determined on a rolling (12) calendar month total. By the end of each calendar month the estimated emissions from fiberglass fabrication shall be calculated for the previous month and summed to provide a facility-wide total, and a new twelve month total calculated based on the previous twelve calendar months of data. Records of the calculations and the compliance determinations shall be kept on-site and made available for Division review upon request (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part C, Section I.A.7 and Part C, Section II.B.7).

For Fiberglass Fabrication: Emissions shall be calculated using the Unified Emission Factors for Open Molding Composites information (see Appendix G), amount of materials used and Material Safety Data Sheet (MSDS) information.

For Paint Booths: Emissions shall be calculated using the VOC and HAP contents and density of each material used as stated on the Material Safety Data Sheet (MSDS) supplied by the manufacturer or supplier or other equivalent composition data and the amount of material used in a mass balance. Current copies of the MSDS or other equivalent composition data for the materials used shall be kept with the calculations.

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, §§ I.A.4, V.D. & XIII.B; § 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based on the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modifications or reconstruction on which construction commenced prior to permit issuance.

None.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;

2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;

2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to §25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;

2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.

2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

3. Stream-lined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

Permit Condition	Streamlined (subsumed) requirements
Section II, Condition 3.4	Regulation No. 6, Part B, Section III.C.2 [particulate matter standard] – State-only provision.
Section II, Conditions 1.1 and 4.1	40 CFR 63.5895(d) 40 CFR 63.5810(d)(4) These requirements allow that resin and gel coat use records are not required to be maintained under some of the compliance options of Subpart WWWW. These requirements are streamlined out because consumption of materials is required for emission calculation requirements and compliance demonstration with material consumption limits (Section II, 1.1 and 4.1)

SECTION IV - General Permit Conditions (ver 11/16/2010)

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.1. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.& e. and V.C.17.

a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.

c. Compliance certifications shall contain:

(i) the identification of each permit term and condition that is the basis of the certification;

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

(iv) method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.

d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II.E., II.F., II.I, and II.J

a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations.

Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

(i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;

(ii) approves the use of an equivalent method;

(iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or

(iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

(i) Sampling ports adequate for test methods applicable to such facility;

(ii) Safe sampling platform(s);

(iii) Safe access to sampling platform(s); and

(iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Affirmative Defense Provision for Excess Emissions during Malfunctions

Note that until such time as the U.S. EPA approves this provision into the Colorado State Implementation Plan (SIP), it shall be enforceable only by the State.

An affirmative defense to a claim of violation under these regulations is provided to owners and operators for civil penalty actions for excess emissions during periods of malfunction. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of evidence that:

(i) The excess emissions were caused by a sudden, unavoidable breakdown of equipment, or a sudden, unavoidable failure of a process to operate in the normal or usual manner, beyond the reasonable control of the owner or operator;

(ii) The excess emissions did not stem from any activity or event that could have reasonably been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;

(iii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded;

(iv) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;

(v) All reasonably possible steps were taken to minimize the impact of the excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence;

(viii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

(ix) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This section is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement; and

(x) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in the Commissions' Regulations that could be attributed to the emitting source.

The owner or operator of the facility experiencing excess emissions during a malfunction shall notify the division verbally as soon as possible, but no later than noon of the Division's next working day, and shall submit written notification following the initial occurrence of the excess emissions by the end of the source's next reporting period. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to failures to meet federally promulgated performance standards or emission limits, including, but not limited to, new source performance standards and national emission standards for hazardous air pollutants. The affirmative defense provision does not apply to state implementation plan (sip) limits or permit limits that have been set taking into account potential emissions during malfunctions, including, but not necessarily limited to, certain limits with 30-day or longer averaging times, limits that indicate they apply during malfunctions, and limits that indicate they apply at all times or without exception.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement, the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

(i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;

(ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;

(iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;

(v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,

(viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards or national emissions standards for hazardous air pollutants, or any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment.

4. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d. and § 25-7-122.1(2), C.R.S.

a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.

b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.

d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division 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. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.

e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.

f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

5. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.E

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. the permitted facility was at the time being properly operated;

c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

6. Emission Controls for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, “asbestos control.”

7. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

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

8. Fee Payment

C.R.S §§ 25-7-114.1(6) and 25-7-114.7

a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.

b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

10. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;

b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;

d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

11. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

12. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

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

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.- II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.

b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to malfunction conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

"Prompt" is defined as follows:

a. Any definition of "prompt" or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or

b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;

(ii) For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and

(iii) For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.

c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. *[Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.]* A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

"Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:

(i) date, place as defined in the Operating Permit, and time of sampling or measurements;

(ii) date(s) on which analyses were performed;

(iii) the company or entity that performed the analysis;

(iv) the analytical techniques or methods used;

(v) the results of such analysis; and

(vi) the operating conditions at the time of sampling or measurement.

b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.

c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.

d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the compliance assurance monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.

e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.

b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.

c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.

d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, § III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.

b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

The requirements in paragraphs a, b and e apply to sources located in an ozone non-attainment area or the Denver 1-hour ozone attainment/maintenance area. The requirements in paragraphs c and d apply statewide.

a. All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

   Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

b. Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be

transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

c. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

d. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.

e. Beer production and associated beer container storage and transfer operations involving volatile organic compounds with a true vapor pressure of less than 1.5 PSIA actual conditions are exempt from the provisions of paragraph b, above.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

OPERATING PERMIT APPENDICES

*DISCLAIMER:

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise provided in the permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A - Inspection Information

1. **Directions to Plant:**

   The facility is located at 3550 Odessa Way, Aurora, Colorado.

2. **Safety Equipment Required:**

   Hearing Protection, Safety Glasses, Gloves

3. **Facility Plot Plan:**

   The figure attached at the end of Appendix A shows the plot plan as provided to the Division on October 24, 2011.

4. **List of Insignificant Activities**:

   The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

   Noncommercial (in-house) experimental and analytical laboratory equipment which is bench scale in nature including quality control/quality assurance laboratories, process support laboratories, environmental laboratories supporting a manufacturing or industrial facility, and research and development laboratories.

   Each individual piece of fuel burning equipment, other than smokehouse generators and internal combustion engines, which uses gaseous fuel, and which has a design rate less than or equal to 5 million Btu per hour. (See definition of fuel burning equipment, Common Provisions Regulation).

   Chemical storage tanks or containers that hold less than 500 gallons, and which have a daily throughput less than 25 gallons.

   Landscaping and site housekeeping devices equal to or less than 10 H.P. in size (lawnmowers, trimmers, snow blowers, etc.).

   Chemical storage areas where chemicals are stored in closed containers, and where total storage capacity does not exceed 5000 gallons. This exemption applies solely to storage of such chemicals. This exemption does not apply to transfer of chemicals from, to, or between such containers.

   Storage of butane, propane, or liquefied petroleum gas in a vessel with a capacity of less than 60,000 gallons, provided the requirements of Colorado Regulation No. 7, Section IV are met, where applicable.

   Storage tanks of capacity < 40,000 gallons of lubricating oils.

Storage tanks meeting all of the following criteria:
(i) annual throughput is less than 400,000 gallons; and
(ii) the liquid stored is one of the following:
(A) diesel fuels 1-D, 2-D, or 4-D;
(B) fuel oils #1 through #6;
(C) gas turbine fuels 1-GT through 4-GT;
(D) an oil/water mixture with a vapor pressure lower than that of diesel fuel (Reid vapor pressure of .025 PSIA).

Each individual piece of fuel burning equipment which uses gaseous fuel, and which has a design rate less than or equal to 10 million Btu per hour, and which is used solely for heating buildings for personal comfort.

Brazing, soldering and welding operations used for maintenance purposes.

Aerosol can usage

Janitorial activities and products

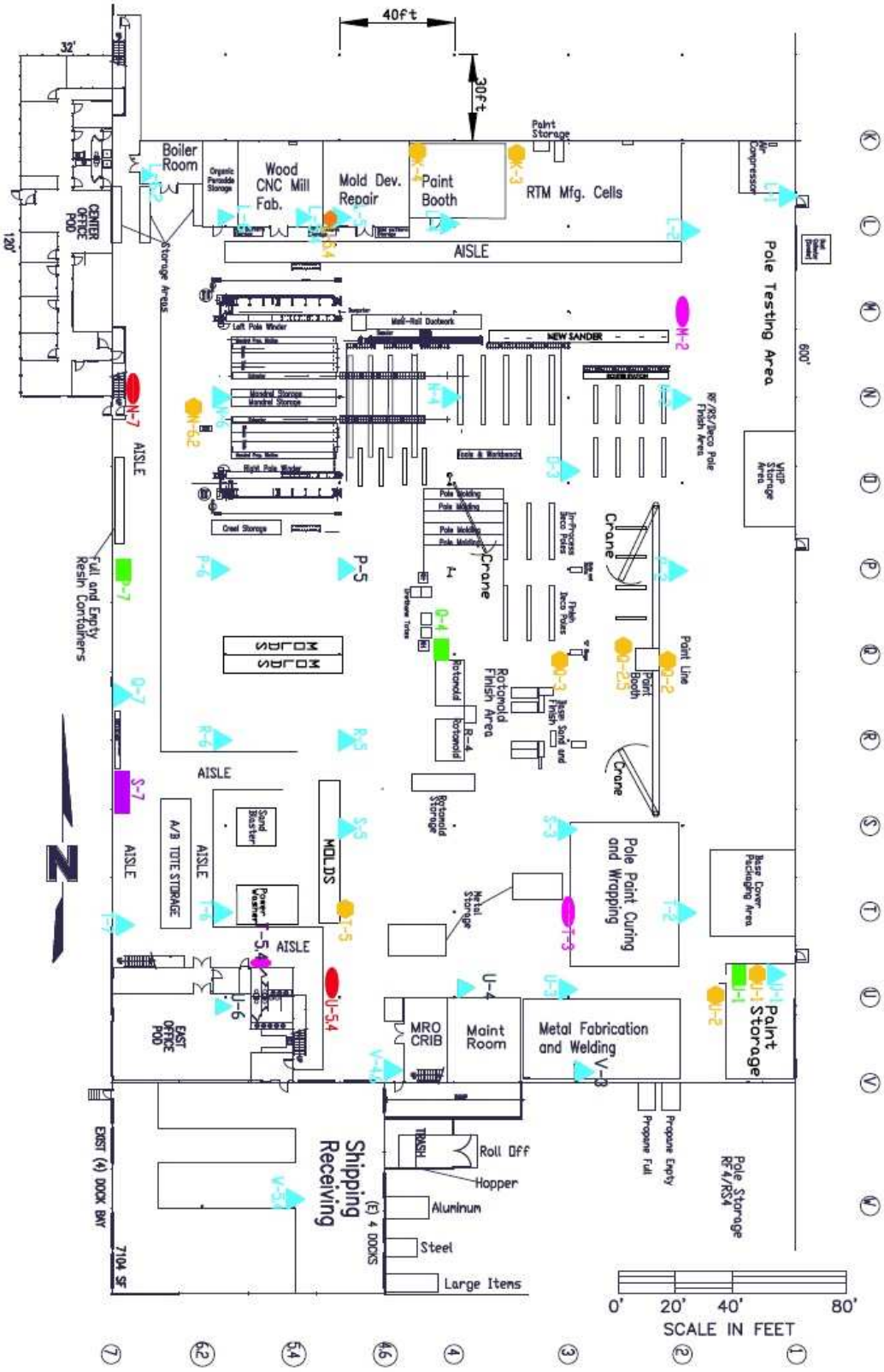
Forklifts

Sandblast equipment where the blast media is recycled and the blasted media is collected.

Air pollution emission units, operations or activities with emissions less than the appropriate de minimis reporting level.

Specific equipment:
Parker Boiler, Serial Number 57957
Four (4) Hand-Sanding Tables
Stand-mounted plunge router and mortise stand with pneumatic drills

40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants from Industrial, Commercial, and Institutional Boilers and Process Heaters:
The effective date for the provisions in 40 CFR Part 63 Subpart DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters have been delayed (see 76 FR 28662, May 18, 2011). These provisions will be included when the rules are in effect.


Pole Testing Area
Pole Storage RF4/RS4
Paint Storage
Paint Line
Paint Booth
Crane
Pole Paint Curing and Wrapping
Metal Fabrication and Welding
Maint Room
MRO CRIB
Shipping Receiving
Roll Off
Hopper
Aluminum
Steel
Large Items
Rotomold Finish Area
Rotomold Storage
Metal Storage
MOLDS
AISLE
NEW SANDER
RTM Mfg. Cells
Mold Dev. Repair
Wood CNC Mill Fab.
Boiler Room
CENTER OFFICE POD
EAST OFFICE POD
Full and Empty Resin Containers
Storage Areas
40ft
30ft
SCALE IN FEET
0'
20'
40'
80'

APPENDIX B

Reporting Requirements and Definitions

with codes ver 2/20/07

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

(A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);

(B) fails to notify or report as required under the Act; or

(C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits.

All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported "promptly")

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to malfunctions as defined in this Appendix, the probable cause of

such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, "malfunction" shall refer to both emergency conditions and malfunctions. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

(1) A situation where emissions exceed an emission limitation or standard contained in the permit;

(2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;

(3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,

(4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard:	When the requirement is an emission limit or standard
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is recordkeeping
7 = Report:	When the requirement is reporting
8 = CAM:	A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other:	When the deviation is not covered by any of the above categories

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the

permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.[1]
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

[1] For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event.

Startup, Shutdown, Malfunctions and Emergencies

Understanding the application of Startup, Shutdown, Malfunctions and Emergency Provisions, is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergency Provisions

Under the Emergency provisions of Part 70 certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Monitoring and Permit Deviation Report - Part I

1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: W.J. Whatley, Inc.
OPERATING PERMIT NO: 02OPAD250
REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Malfunction/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
002/003	Fiberglass Fabrication					
001/004	Paint Spray Booths					
005	Dry Sanding Operation					
General Conditions						
Insignificant Activities						

[1] See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

[2] Use the following entries, as appropriate

1 = Standard: When the requirement is an emission limit or standard
2 = Process: When the requirement is a production/process limit
3 = Monitor: When the requirement is monitoring
4 = Test: When the requirement is testing
5 = Maintenance: When required maintenance is not performed
6 = Record: When the requirement is recordkeeping
7 = Report: When the requirement is reporting
8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other: When the deviation is not covered by any of the above categories

Monitoring and Permit Deviation Report - Part II

FACILITY NAME: W.J. Whatley, Inc.
OPERATING PERMIT NO: 02OPAD250
REPORTING PERIOD:

Is the deviation being claimed as an: Emergency _____ Malfunction_____ N/A _____

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction ____

Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Malfunctions/Emergencies Reported (if applicable)

Deviation Code _____ Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/04 - 6/30/06

Is the deviation being claimed as an: Emergency _____ Malfunction __XX____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/06
END- 1800 4/10/06

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Malfunction/Emergencies Reported (if applicable)

5/30/06 to H. Pockets, APCD

Deviation Code _____ Division Code QA: _____

Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: W.J. Whatley, Inc.

FACILITY IDENTIFICATION NUMBER: 0010531

PERMIT NUMBER: 02OPAD250

REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

Printed or Typed Name | Title

Signature of Responsible Official | Date Signed

Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.

APPENDIX C

Required Format for Annual Compliance Certification Reports

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: W.J. Whatley, Inc.
OPERATING PERMIT NO: 02OPAD250
REPORTING PERIOD:

I. Facility Status

___ During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the Permit.

___ With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
002/003	Fiberglass Fabrication						
001/004	Paint Spray Booths						
005	Dry Sanding Operation						
General Conditions							
Insignificant Activities [4]							

[1] If deviations were noted in a previous deviation report , put an “X” under “previous”. If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an “X” under “current”. Mark both columns if both apply.

[2] Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark “no” and attach additional information/explanation.

[3] Note whether the compliance status with each term and condition provided was continuous or intermittent. “Intermittent Compliance” can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

[4] Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II. Status for Accidental Release Prevention Program:

A. This facility _____ is subject _____ is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act)

B. If subject: The facility _____ is _____ is not in compliance with all the requirements of section 112(r).

1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by the required date.

III. Certification

All information for the Annual Compliance Certification must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

_____

Printed or Typed Name Title

_____

Signature Date Signed

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

APPENDIX D

Notification Addresses

1. **Air Pollution Control Division**

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive S.
Denver, CO 80246-1530

ATTN: Matt Burgett

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, Colorado 80202-1129

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance
Air and Radiation Programs, 8P-AR
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, Colorado 80202-1129

APPENDIX E

Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/mmBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions
PM -	Particulate Matter
PM_{10} -	Particulate Matter Under 10 Microns

PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F

Permit Modifications

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION

APPENDIX G

Emission Factors

Unified Emission Factors for Open Molding of Composites

July 23, 2001

Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed

Styrene content in resin/gelcoat, % [1]	<33 [2]	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 [2]
Manual	0.126 x %styrene x 2000	83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180	((0.286 x %styrene) - 0.0529) x 2000
Manual w/ Vapor Suppressed Resin VSR [3]	**Manual emission factor** [listed above] x (1 - (0.50 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized	0.169 x %styrene x 2000	111	126	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354	((0.714 x %styrene) - 0.18) x 2000
Mechanical Atomized with VSR [3]	**Mechanical Atomized emission factor** [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized Controlled Spray [4]	0.130 x %styrene x 2000	86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273	0.77 x ((0.714 x %styrene) - 0.18) x 2000
Mechanical Controlled Spray with VSR	**Mechanical Atomized Controlled Spray emission factor** [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Non-Atomized	0.107 x %styrene x 2000	71	74	77	80	83	86	89	93	96	99	102	105	108	111	115	118	121	124	((0.157 x %styrene) - 0.0165) x 2000
Mechanical Non-Atomized with VSR [3]	**Mechanical Non-Atomized emission factor** [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Filament application	0.184 x %styrene x 2000	122	127	133	138	144	149	155	160	166	171	177	182	188	193	199	204	210	215	((0.2746 x %styrene) - 0.0298) x 2000
Filament application with VSR [3]	0.120 x %styrene x 2000	79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	136	140	0.65 x ((0.2746 x %styrene) - 0.0298) x 2000
Gelcoat Application	0.445 x %styrene x 2000	294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646	((1.03646 x %styrene) - 0.195) x 2000
Gelcoat Controlled Spray Application [4]	0.325 x %styrene x 2000	215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472	0.73 x ((1.03646 x %styrene) - 0.195) x 2000
Gelcoat Non-Atomized Application [8]	SEE **Note 9** below	196	205	214	223	232	241	250	259	268	278	287	296	305	314	323	332	341	350	((0.4506 x %styrene) - 0.0505) x 2000
Covered-Cure after Roll-Out	**Non-VSR process emission factor** [listed above] x (0.80 for Manual <or> 0.85 for Mechanical)																			
Covered-Cure without Roll-Out	**Non-VSR process emission factor** [listed above] x (0.50 for Manual <or> 0.55 for Mechanical)																			

Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed

MMA content in gelcoat, % [6]	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	≥20
Gel coat application [7]	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	240	255	270	285	0.75 x %MMA x 2000

Notes

1 Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders, fillers, glass,...etc.

2 Formulas for materials with styrene content < 33% are based on the emission rate at 33% (constant emission factor expressed as percent of available styrene), and for styrene content > 50% on the emission rate based on the extrapolated factor equations; these are not based on test data but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.

3 The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the ***CFA Vapor Suppressant Effectiveness Test.***

4 SEE the ***CFA Controlled Spray Handbook*** for a detailed description of the controlled spray procedures.

5 The effect of vapor suppressants on emissions from filament winding operations is based on the ***Dow Filament Winding Emissions Study.***

6 Including MMA monomer content as supplied, plus any extra MMA monomer added by the molder, but before addition of other additives such as powders, fillers, glass,...etc.

7 Based on gelcoat data from ***NMMA Emission Study.***

8 SEE the July 17, 2001 EECS report ***Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites*** for a detailed description of the non-atomized gelcoat testing.

9 Use the equation **((0.4506 x %styrene) - 0.0505) x 2000** for gelcoats with styrene contents between 19% and 32% by wt.; use the equation **0.185 x %styrene x 2000** for gelcoats with less than 19% styrene content by wt.

APPENDIX H

Recordkeeping Format

FORMAT FOR MAINTAINING RECORDS OF

CONSUMPTION OF MATERIALS AND TRACKING EMISSIONS

CALENDAR MONTH:					POLLUTANTS					
MATERIALS CONSUMED	CONSUMPTION				VOLATILE ORGANIC COMPOUNDS (VOCs)		NON-CRITERIA REPORTABLE POLLUTANTS (HAPs)*			
							POLLUTANT_____ CAS No: _____ BIN:____		POLLUTANT_____ CAS No: _____ BIN:____	
	QUANTITY	UNIT	DENSITY (Lbs./Gal.)	TOTAL (Lbs.)	WEIGHT PERCENT	EMISSIONS (Tons)	WEIGHT PERCENT	EMISSIONS (Lbs.)	WEIGHT PERCENT	EMISSIONS (Lbs.)
TOTAL			- - - -		- - - -		- - - -		- - - -	

1. *INCLUDE ALL NON-CRITERIA REPORTABLE POLLUTANTS, EVEN THOSE THAT MAY BE BELOW REPORTABLE THRESHOLDS.
2. EMISSION FACTORS MUST BE BASED ON MATERIAL SAFETY DATA SHEETS (MSDS) OR OTHER DOCUMENTS SUCH AS CERTIFIED ANALYSIS REPORTS.
3. MATERIAL SAFETY DATA SHEETS AND/OR VOC DATA MUST BE AVAILABLE AT THE SITE FOR ALL MATERIALS USED DURING THE REPORTING PERIOD.
4. EMISSION TOTALS SHALL NOT EXCEED THE EMISSION LIMITS CONTAINED IN THIS PERMIT
5. GIVE PRODUCT NAME AND COMPLETE IDENTIFICATION OF ALL MATERIALS CONSUMED

APPENDIX I

Compliance Plan for 40 CFR 63 Subpart WWWW

Version: April 1, 2012

Table 3 to Subpart WWWW : Organic HAP Emissions Limits for Existing Open Molding Sources

If your operation type is…	**And you use…**	**[1]Your organic HAP emissions limit is…**
1. open molding – corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application	113 lb/ton
	b. filament application	171 lb/ton
	c. manual resin application	123 lb/ton
2. open molding – non-CR/HS	a. mechanical resin application	88 lb/ton
	b. filament application	188 lb/ton
	c. manual resin application	87 lb/ton
3. open molding – tooling	a. mechanical resin application	254 lb/ton
	c. manual resin application	157 lb/ton
4. open molding – low-flame spread/low-smoke products	a. mechanical resin application	497 lb/ton
	b. filament application	270 lb/ton
	c. manual resin application	238 lb/ton
5. open molding – shrinkage controlled resins[2]	a. mechanical resin application	354 lb/ton
	b. filament application	215 lb/ton
	c. manual resin application	180 lb/ton
6. open molding – gel coat[3]	a. tooling gel coating	440 lb/ton
	b. white/off white pigmented gel coating	267 lb/ton
	c. all other pigmented gel coating	377 lb/ton
	d. CR/HS or high performance gel coat	605 lb/ton
	e. fire retardant gel coat	854 lb/ton
	f. clear production gel coat	522 lb/ton

[1]Organic HAP emissions limits for open molding are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

[2]This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

[3]If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

Source: 70 FR 50131, August 25, 2005.

Table 1 to Subpart WWWW : Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding Process Streams[1]

If you use…	**With…**	**Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33% organic HAP (19 % organic HAP for nonatomized gel coat)[2] [3]…**	**Use this organic HAP Emissions Factor (EF) Equation for materials with 33% or more organic HAP (19 % for nonatomized gel coat)[2] [3]…**
a. manual resin application	i. nonvapor-suppressed resin	EF = 0.126 x %HAP x 2000	EF = ((0.286 x %HAP) – 0.0529) x 2000
	ii. vapor-suppressed resin	EF = 0.126 x %HAP x 2000 x (1 – (0.5 X VSE factor))	EF = ((0.286 x %HAP) – 0.0529) X 2000 x (1-(0.5 x VSE factor))
b. atomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000	EF = ((0.714 x %HAP) – 0.18) x 2000
	ii. vapor-suppressed resin	EF = 0.169 x %HAP x 2000 x (1 – (0.45 x VSE factor))	EF = ((0.714 x %HAP) – 0.18) X 2000 x (1-(0.45 x VSE factor))
c. nonatomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.107 x %HAP x 2000	EF = ((0.157 x %HAP) – 0.0165) x 2000
	ii. vapor-suppressed resin	EF = 0.107 x %HAP x 2000 x (1 – (0.45 x VSE factor))	EF = ((0.157 x %HAP) – 0.0165) X 2000 x (1-(0.45 x VSE factor))
e. filament application[4]	i. nonvapor-suppressed resin	EF = 0.184 x %HAP x 2000	EF = ((0.2746 x %HAP) – 0.0298) x 2000
	ii. vapor-suppressed resin	EF = 0.12 x %HAP x 2000	EF = ((0.2746 x %HAP) – 0.0298) X 2000 x 0.65
f. atomized spray gel coat application	Nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000	EF = ((1.03646 x %HAP) – 0.195) x 2000
g. nonatomized spray gel coat application	Nonvapor-suppressed gel coat	EF = 0.185 x %HAP x 2000	EF =((0.4506 x %HAP) – 0.0505) x 2000

[1]The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in Subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

[2]Percent HAP means total weight percent of organic HAP (styrene, methyl metharcrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 3.

[3]The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of Appendix A to Subpart WWWW.

[4]Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

Source: 70 FR 50129, August 26, 2005

Table 7 to Subpart WWWW : Options Allowing Use of the Same Resin Across Different Operations that Use the Same Resin Type

If your facility has the following resin type and application method…	**The highest resin weight is * * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for…**	**Is…**
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.4
	b. CR/HS manual	46.4
3. CR/HS resins, filament application	CR/HS manual	42.0
4. non-CR/HS resins, filament application	a. non-CR/HS mechanical	45.0[1]
	b. non-CR/HS manual	45.0
5. non-CR/HS resins, nonatomized mechanical	a. non-CR/HS manual	38.5
7. tooling resins, nonatomized mechanical	Tooling manual	91.4
8. tooling resins, manual	Tooling atomized mechanical	45.9

[1]Nonatomized mechanical application must be used

Source: 70 FR50133, August 25, 2005

Compliance Plan for Determining Compliance with Organic HAP Emissions Limits of 40 CFR 63 Subpart WWWW for Existing Open Molding Sources

In order to determine the organic HAP content of resins and gel coats in the Compliance Options presented below, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in 40 CFR §63.5797(a), (b) and (c), as applicable.

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 (§63.5810(a)). Equations in Table 1 that account for VSE in emission factor calculations may not be used unless the VSE has been determined accordingly.

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 (§63.5810(a)).

Compliance Option 1

Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of Subpart WWWW (§63.5810(a)).

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 of Subpart WWWW (above). 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. 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 Compliance Options 2 – 3 below, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

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 Compliance Option 1 of Appendix I. 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 of Appendix I, 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 (§63.5895(d)).

Compliance Option 2

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 of Subpart WWWW that applies to you (§63.5810(b)).

Group the process streams by operation type and resin application method or gel coat type listed in Table 3 (above) 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. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. To do this, sum the product of each individual organic HAP emissions factor calculated using Table 1 (above) 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 the following equation (Equation 2):

$$\text{Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}\left(\text{Actual Process Stream EF}i * \text{Material}i\right)}{\sum_{i=1}^{n}\text{Material}i} \qquad \text{(Eqn 2)}$$

Where : Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i,(lb/ton)
$Material_i$ = neat resin plus or neat gel coat plus used in last 12 calendar months for process stream i, tons
n = number of process streams where you calculated an organic HAP emission factor

You may, but are not required to, include process streams where you have demonstrated compliance as described under Compliance Option 1, subject to the limitations described under that option, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in Compliance Option 4.

Compare each organic HAP emissions factor calculated in this compliance option with its corresponding organic HAP emissions limit in Table 3, above. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

Compliance Option 3

Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 (above) 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 (§63.5810(c)).

Each month calculate the weighted average organic HAP emissions limit for all open molding 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 above for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in the following equation:

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n}(\text{EL}i * \text{Material}i)}{\sum_{i=1}^{n}\text{Material}i} \quad \text{(Eqn 3)}$$

Where : EL_i = organic HAP emissions limit for operation type i, lbs/ton from Table 3
$Material_i$ = neat resin plus or neat gel coat plus used in last 12 calendar months for operation type i, tons
n = number of operations

Each month calculate your weighted average organic HAP emissions factor for open molding. To do this, multiply your actual open molding operation organic HAP emissions factors calculated in Compliance Option 2 and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in the following equation:

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

Where : Actual Individual EF_i = Actual organic HAP emissions factor for operation type i, lbs/ton
$Material_i$ = neat resin plus or neat gel coat plus used in last 12 calendar months for operation type i, tons
n = number of operations

Compare the values calculated in Equations 3 and 4. 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.

<u>Compliance Option 4</u>

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 noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling (§63.5810(d)).

Compliance Option 4.1: For any combination of manual resin application, mechanical resin application or filament application, 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. Table 7 (above) 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, the resin is in compliance.

Compliance Option 4.2: You may also use a weighted average organic HAP content for each application method described in the previous paragraph. Calculate the weighted average organic HAP content monthly. Use Equation 2 from Compliance Option 2 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.

You may simultaneously use the averaging provisions in Compliance Options 2 or 3 to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations under Compliance Option 4. However, any resins for which you claim compliance under Compliance Option 4 may not be included in any of the averaging calculations described in Compliance Options 2 or 3 of this section.

APPENDIX J

Compliance Plan for 40 CFR 63 Subpart PPPP

Version: April 1, 2012

Compliance Plan for Determining Compliance with Emission Limits of 40 CFR 63 Subpart PPPP for New Surface Coating Operations of Plastic Parts and Products

Compliance Option 1 – Compliant Material Option

Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit calculated in Condition 2.7.1 of Section II, and that each thinner and/or other additive, and cleaning material used contains no organic HAP (§63.4491(a)).

You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use Compliance Option 2 (the emission rate without add-on controls) for any coating operation in the affected source for which you do not use this Compliance Option 1. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limit calculated in Condition 2.7.1 of Section II, and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to the methods detailed below. You must demonstrate that all coating operations included in the facility-specific emission limit comply with that limit. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. (§63.4541)

Determine the mass fraction of organic HAP for each material used (§63.4541(a)).
You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period.

You may rely on information such as manufacturer's formulation data, if it represents 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 count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to §§ 63.4541(a)(1) through (3) of Subpart PPP, then the test method results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

As an alternative to manufacturer’s formulation data, you may also rely on test methods described in §§ 63.4541(a)(1) through (a)(3) and (a)(5) of Subpart PPPP.

Determine the mass fraction of coating solids for each coating (§63.4541(b)).
You must determine the mass fraction of coating solids (lb of coating solids per lb of coating) for each coating used during the compliance period.

You may obtain the mass fraction of coating solids for each coating from the supplier or manufacturer. If there is disagreement between such information and the test method results, then the test method results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

As an alternative to information provided by a coating supplier or manufacturer, you may also rely on test methods described in §§ 63.4541(b)(1) through (b)(2) of Subpart PPPP.

Calculate the organic HAP content of each coating (§63.4541(c)).
Calculate the organic HAP content, kg (lb) organic HAP emitted per kg (lb) coating solids used, of each coating used during the compliance period using the following equation:

$$H_c = \frac{W_c}{S_c} \qquad \text{Equation 1}$$

Where: H_c = organic HAP content of the coating (lb of organic HAP emitted per lb coating solids used)
W_c = Mass fraction of organic HAP in the coating (lb of organic HAP per lb of coating)
S_c = Mass fraction of coating solids (lb coating solids per lb coating)

Compliance Demonstration (§63.4541(d)).
The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit calculated in Condition 2.7.1 of Section II; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined as described above. You must keep all records required by Conditions 2.7.8 through 2.7.10.8 of Section II.

Compliance Option 2 – Emission Rate Without Add-On Controls

Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit calculated in Condition 2.7.1 of Section II, calculated as a rolling 12-month emission rate and determined on a monthly basis. (§63.4491(b)).

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use the compliant material option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit calculated in Condition 2.7.1of Section II. You must demonstrate that all coating operations included in the calculation of the facility-specific emission limit comply with that limit. When calculating the organic HAP emission rate according to the requirements described below, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning

materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. (§63.4551)

Determine the mass fraction of organic HAP for each material §63.4551(a)
Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.4541(a) (see Option 1, above).

Determine the mass fraction of coating solids §63.4551(b)
Determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during each month according to the requirements in §63.4541(b). (see Option 1, above).

Determine the density of each material §63.4551(c)
Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475–98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 2 and 3 of this section.

Determine the volume of each material used §63.4551(d)
Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 2 and 3 of this section.

Calculate the mass of organic HAP emissions §63.4551(e)
The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using the following equation:

$$H_e = A + B + C - R_W \qquad \text{Equation 1}$$

Where:
H_e = Total mass of organic HAP emissions during the month
A = Total mass of organic HAP in the coatings used during the month
B = Total mass of organic HAP in the thinners and/or other additives used during the month
C = Total mass of organic HAP in the cleaning materials used during the month
R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month

The mass of organic HAP in the coatings, thinners and/or other additives or cleaning materials (A or B or C in Equation 1) is calculated using the following equation:

$$\text{Total mass of organic HAP} = \sum_{i=1}^{m} Vol_i \times D_i \times W_i \qquad \text{Equation 2}$$

Where: Vol_i= Total volume of material, i, used during the month (gal)
D_i = Density of material, i, used during the month (lb/gal)
W_i = Mass fraction of organic HAP in material, i
m = number of different materials (coatings, thinners, additives or cleaning materials) used during the month

If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 above, then you must determine the mass according to §63.4551(e)(4) of Subpart PPPP.

Calculate the total mass of coating solids used §63.4551(f)

Determine the total mass of coating solids used, which is the combined mass of coating solids for all the coatings used during each month, using the following equation:

$$M_{st} = \sum_{i=1}^{m} Vol_{c,i} \times D_{c,i} \times M_{s,i} \qquad \text{Equation 3}$$

Where: M_{st} = Total mass of coating solids used during the month (lb)
$Vol_{c,i}$ = Total volume of coating, i, used during the month (gal)
$D_{c,i}$ = Density of coating, i, used during the month (lb/gal)
$M_{s,i}$ = Mass fraction of coating solids for coating i
m = number of coatings used during the month

Calculate the organic HAP emission rate §63.4551(g)

Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per kg (lb) coating solids used, using the following equation:

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} M_{st}} \qquad \text{Equation 4}$$

Where: H_{yr} = Average organic HAP emission rate for the compliance period (lb HAP emitted per lb coating solids used)
H_e = Total mass of organic HAP emissions from all materials used during month, y (lb), as calculated using Equation 1 of this section
M_{st} = Total mass of coating solids used during month, y (lb) as calculated by Equation 3 of this section
y = identifier for months
n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12)

Compliance Demonstration §63.4551(h)

The organic HAP emission rate for the initial compliance period calculated using Equation 4 of this section must be less than or equal to the applicable emission limit calculated in Condition 2.7.1 of Section II. You must keep all records as required by Conditions 2.7.8 through 2.7.10.8 of Section II.