

RESPONSIVENESS SUMMARY FOR
L & M Laminates
Permit Number V97-001
Significant Revision S04-006
April 4, 2006

Comments from L & M Laminates**Comment # 1:**

Condition 22.A.1, The citation for this condition should be 40 C.F.R. § 63.5790(b).

Response #1:

The citation has been corrected.

Comment # 2:

Condition 22.A.2, The permit does not include all of the operations that are excluded from the NESHAP provision. See 40 C.F.R. § 63.5970(c). The following operations should be included in the list of operations specifically excluded from the requirements of the NESHAP provision.

- h) Application of putties, polyputties, and adhesives
- i) Polymer casting
- j) Closed molding operations (except for compression/injection molding).

Response #2:

The exclusion provisions for the NESHAP have been added to the permit conditions.

Comment # 3:

Condition 22.B.2, the citation for this condition should be to 40 C.F.R. § 63.5860 and 40 C.F.R. 63 Subpart WWW Table 8.

Response #3:

The citations have been corrected.

Comment #4:

Condition 22.B.3, in paragraph (a), "Tables" should be "Table".

Also, this condition should be revised to clarify that the Permittee need not comply with both paragraph (a) and (b). Under the NESHAP provision, a facility may demonstrate compliance by meeting emissions limits in 40 C.F.R. 63, Subpart WWW Table 3 or 5 or meeting the organic HAP content limits in 40 C.F.R. 63, Subpart WWW Table 7. See 40 C.F.R. § 63.5810; 63.5835. Table 3 is reproduced in the permit as Table 22.2 while Table 7 is reproduced in the permit as Table 22.4. Table 5 is inapplicable to L & M and is not included. As a result, L & M may demonstrate compliance through meeting the emissions limits in Table 22.2 or the organic HAP content limits in Table 22.4. However, condition 22.B.3 could be read to require L & M to meet both the emissions limits in Table 22.2 and the organic HAP content limits in Table 22.4. L & M proposes rectifying this problem through revising the condition to read:

- 3) The Permittee shall demonstrate continuous compliance with each standard that applies to the facility using the following methods;
- [40 CFR §63.5900][County Rule 370 §303.2]
- a) Compliance with organic HAP emissions limits in Table 22.2 or organic HAP content limits in Table 22.4, as applicable, is demonstrated by:
 - i) Compliance with organic HAP emissions limits in Table 22.2 is demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Tables 22.2 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits; or
 - ii) Compliance with organic HAP content limits in Table 22.4 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 22.4 to this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits.
 - b) Compliance with the work practice standards in Table 22.3 to this subpart is demonstrated by performing the work practice required for the affected source.
 - c) The Permittee must report each deviation from each permit condition that is applicable. The deviations must be reported according to the requirements in 40 CFR § 63.5910.
 - d) The Permittee shall meet the organic HAP emissions limits and work practice standards that are applicable.

Response #4:

Permit condition 22. B. 3) has been changed to reflect the comment. The new condition reads as follows;

- 3) *The Permittee shall demonstrate continuous compliance with each standard that applies to the facility using the following methods;*
- [40 CFR §63.5900][County Rule 370 §303.2]*
- a) *Compliance with organic HAP emissions limits in Table 22.2 or organic HAP content limits in Table 22.4, as applicable, is demonstrated by:*
 - (1) Compliance with the organic HAP emissions limits in Table 22.2 is demonstrated by maintaining an organic HAP emission factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 22.2 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits: or*
 - (2) Compliance with the organic HAP emissions limits in Table 22.4 is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 22.4 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP emissions limits*
 - b) Compliance with the work practice standards in Table 22.3 to these permit conditions is demonstrated by performing the work practice required for the affected source.*
 - c) The Permittee must report each deviation from each permit condition that is applicable. The deviations must be reported according to the requirements in 40 CFR § 63.5910.*
 - d) The Permittee shall meet the organic HAP emissions limits and work practice standards that are applicable.*

Comment #5:

Condition 22.C.1, Condition 22.C.1 reiterates that L & M must meet the emissions limits outlined in Table 22.2. However, as discussed in the comments to condition 22.B.3, L & M has the option to demonstrate compliance by meeting the organic HAP content limits outlined in Table 22.4. 40 C.F.R. § 63.5835. While at this time L & M will demonstrate compliance through meeting the emissions limits in Table 22.2, this condition should be revised to clarify that L & M could meet the organic HAP content limits in Table 22.4.

1) The Permittee shall meet the annual average organic HAP emissions limits in Table 22.2 or the organic HAP content limits in Table 22.4, as applicable.

Response #5:

Permit condition 22.C.1 has been changed to reflect the comment.

Comment #6:

Condition 22.E, On August 25, 2005 EPA published a direct final rule that revised the compliance options for open molding in 40 C.F.R. Part 63, Subpart WWWW. 70 Fed. Reg. 50,118 (Aug. 25, 2005). These revisions were effective on October 24, 2005. *Id.* Although the regulations have gone into effect, they have not been incorporated into the printed version of the C.F.R. Permit condition 22.E was based upon the compliance regulations no longer in effect. As a result, condition E must be revised to reflect the currently applicable regulations. L & M proposes that this condition be revised to read:

E. OPTIONS FOR MEETING STANDARDS

Permittee shall use one of the following methods in paragraphs 1) through 4) of this condition to meet the standards for open molding operations in Table 22.2 of this permit. Permittee may use different compliance options for the different operations listed in Table 22.2 of this permit. The necessary calculations must be completed within 30 days after the end of each month. Permittee may switch between the compliance options in paragraphs 1) through 4) of this condition. When Permittee changes to an option based on a 12-month rolling average, Permittee must base the average on the previous 12 months of data calculated using the compliance option Permittee changes to, unless Permittee was previously using an option that did not require Permittee to maintain records of resin and gel coat use. In this case, Permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

1) DEMONSTRATE THAT AN INDIVIDUAL RESIN OR GEL COAT, AS APPLIED, MEETS THE APPLICABLE EMISSION LIMIT IN TABLE 22.2 OF THIS PERMIT.

[40 C.F.R. § 63.5810(a)][County Rule 370 § 303.2]

a) Permittee shall calculate the 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. Permittee must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 22.1 to this permit for open molding or site-specific organic HAP emissions factors discussed in 40 C.F.R. § 63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If Permittee is using vapor suppressants to reduce HAP emissions, Permittee 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.

b) If the calculated emission factor is less than or equal to the appropriate emission limit, Permittee has demonstrated that this process stream complies with the emission limit in Table 22.2 to this permit. It is not necessary that all Permittee's process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat Permittee uses, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs 2) through 4) of this condition, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

2) DEMONSTRATE THAT, ON AVERAGE, PERMITTEE MEETS THE INDIVIDUAL ORGANIC HAP EMISSIONS LIMITS FOR EACH COMBINATION OF OPERATION TYPE AND RESIN APPLICATION METHOD OR GEL COAT TYPE.

[40 C.F.R. § 63.5810(b)][County Rule 370 § 303.2]

Demonstrate that on average Permittee meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 22.2 to this permit that applies to Permittee.

a)(i) Group the process streams described in paragraph (1) to this condition by operation type and resin application method or gel coat type listed in Table 22.2 to this permit and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (1)(a) of this condition and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 22.1 of this condition.

Equation 22.1:

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

Where:

Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i , lbs/ton;

Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i , tons;

n = number of process streams where you calculated an organic HAP emissions factor.

(ii) Permittee may, but is not required to, include process streams where Permittee has demonstrated compliance as described in paragraph (1) of this condition, subject to the limitations described in paragraph (1)(b) of this condition, and Permittee is not required to and should not include process streams for which Permittee will demonstrate compliance using the procedures in paragraph (4) of this condition.

(b) Compare each organic HAP emissions factor calculated in paragraph (2)(a) of this condition with its corresponding organic HAP emissions limit in Table 22.2 to this permit. If all emissions factors are equal to or less than their corresponding emission limits, then Permittee is in compliance.

3) DEMONSTRATE COMPLIANCE WITH A WEIGHTED AVERAGE EMISSION LIMIT.
 [40 C.F.R. § 63.5810(c)][County Rule 370 § 303.2]

Demonstrate each month that Permittee meets each weighted average of the organic HAP emissions limits in Table 22.2 to this permit that applies to it. When using this option, Permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all its open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all its centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

a) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for Permittee’s facility for the last 12-month period to determine the organic HAP emissions limit Permittee must meet. To do this, multiply the individual organic HAP emissions limits in Table 22.2 to this permit for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 22.2 of this section.

Equation 22.2:

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

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Table 22.2 to this permit;

Material_i = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n = number of operations.

b) Each month calculate Permittee’s weighted average organic HAP emissions factor for open molding. To do this, multiply Permittee’s actual open molding operation organic HAP emissions factors calculated in paragraph (2)(a) of this condition and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 22.3 of this section.

Equation 22.3:

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

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 during the last 12 calendar months for operation type i, tons;

n = number of operations.

c) Compare the values calculated in paragraphs (3)(a) and (b) of this condition. 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 Permittee is in compliance.

4) MEET THE ORGANIC HAP EMISSIONS LIMIT FOR ONE APPLICATION METHOD AND USE THE SAME RESIN(S) FOR ALL APPLICATION METHODS OF THAT RESIN TYPE.

[40 C.F.R. § 63.5810(d)][County Rule 370 § 303.2]

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.

a) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, Permittee 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 (4)(a). Table 22.4 to this permit 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 22.4 to this permit, the resin is in compliance.

b) Permittee may also use a weighted average organic HAP content for each application method described in paragraph (4)(a) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 1 in paragraph (2)(a) of this condition except substitute organic HAP content for organic HAP emissions factor. Permittee is 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 22.4 to this permit.

c) Permittee may simultaneously use the averaging provisions in paragraph (2) or (3) of this condition to demonstrate compliance for any operations and/or resins Permittee does not include in its compliance demonstrations in paragraphs (4)(a) and (b) of this condition. However, any resins for which Permittee claims compliance under the option in paragraphs (4)(a) and (b) of this section may not be included in any of the averaging calculations described in paragraph (2) or (3) of this condition.

d) Permittee does not have to keep records of resin use for any of the individual resins where Permittee demonstrates compliance under the option in paragraph (4)(a) of this condition unless permittee elects to include that resin in the averaging calculations described in paragraph (4)(b) of this condition.

Response #6:

Permit condition 22.E has been changed to reflect the final version of subpart WWWW.

Comment #7:

Condition 22.F.2, The citation for condition 22.F.2(d) should be 40 C.F.R. § 63.5920(c). The citation for condition 22.F.2(e) should be 40 C.F.R. § 63.5920(d).

Response #7:

The citations have been corrected.

Comment #8:

Condition 22.G.1, An affected facility under 40 C.F.R. 63 Subpart WWWW demonstrating compliance through organic HAP emission limits other than averaging must provide its Notification of Compliance status no later than 30 calendar days after the compliance date. 40 C.F.R. § 63.5905(a); 40 C.F.R. 63 Subpart WWWW, Table 13. However, the date 30 calendar days from L & M's compliance date, May 21, 2006, falls on a Sunday. As a result, L & M must submit the Notification of Compliance by May 22, 2006. Consequently, L & M proposes that the date "May 22, 2006" replace "April 21, 2006" in the first sentence of this condition. In addition, the citation for this condition should be changed to 40 C.F.R. § 63.5905.

Response #8:

MCAQD does not have the authority to extend a deadline required by a NESHAP requirement. The timing of the notification submittal is clearly defined by the permit conditions and must be submitted no later than 30 days after the facility's compliance date. The notification of compliance must be postmarked on or before the day the compliance notification is due. The previous permit condition requiring the compliance notification of April 21, 2006 has been removed. Condition **22.G.2)b)** and **c)** replace this requirement outlining the reporting timeline.

b) If the Permittee using the organic HAP emissions limit averaging option to comply with the standard, the notification of compliance status requirements must be submitted no later than 1 year plus 30 days after the facility's compliance date.

[40 CFR §63.5905(a)]/County Rule 370 §303.2

c) If the Permittee is complying by using the organic HAP content limits, application equipment requirements, or the organic HAP emissions limits other than the organic HAP emissions limit averaging to comply with the standard, the notification of compliance requirements must be submitted no later than 30 days after the facility's compliance date.

[40 CFR §63.5905(a)]/County Rule 370 §303.2

Comment #9:

There was an incomplete sentence added as condition (e). This should be removed.

Response #9:

This sentence has been removed.

Comment #10:

Also, L & M has replaced all but one of the open mixers with two autocasters. The autocasters mix the resins and thus fall under the regulatory definition of "mixing." See 40 C.F.R. § 63.5935. As a result, there are two additional work practice standards in Table 9 to 40 C.F.R. 63 Part WWWW that are applicable to L & M. See 70 Fed. Reg. at 50,136. These should be added to this condition as (d) and (e). Specifically, the Department should add conditions (d) and (e) to read:

- (d) That all mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.

- (e) That the mixers are closed except when adding materials to the mixing vessels.

Response #10:

The suggested condition language has been added into the permit.

Comment #10:

Condition 22.G.2, this condition outlines an existing facility's requirement to provide an initial notification pursuant to 40 C.F.R. § 63.9(b)(2) and 40 C.F.R. § 63.5905(a). L & M provided its initial notification on October 24, 2003. As a result, this condition is no longer relevant and may create confusion. Including it in the permit implies that L & M needs to provide another initial notification. As a result, L & M proposes striking this condition from the permit.

Response #10:

This is a necessary requirement of subpart WWWW. MCAQD has been notified and assumes that the Administrator (USEPA) has been notified as required.

Comment #11:

Condition 22.G.3, condition (a) should include a citation to 40 C.F.R. § 63.9(h). In conditions (b) and (c), "facilities" should be replaced with "facility's".

Response #11:

The suggested citation and spelling corrections have been added into the permit.

Comment #12:

Condition 22.G.4, L & M proposes that condition (a) specify that the initial semi-annual compliance report shall cover the period ending December 31, "2006". Also, the beginning date of the compliance period should be revised to read "April 21, 2006".

Likewise, condition (b) should specify that the initial semi-annual compliance report must be postmarked or delivered no later than January 31, "2007".

Response #12:

The dates have been changes so that the year has been specified.

Comment #13:

Table 22.1, table 22.1 in the permit corresponds to Table 1 of 40 C.F.R. 63, Subpart WWWW. However, the version of Table 1 in the permit was copied from the regulations prior to the direct final rule that corrected some typographical errors and made other minor corrections. *See* 70 Fed. Reg. at 50,121. L & M proposes that the Department replace Table 22.1 in the permit with the corrected Table 1 of 40 C.F.R. 63, Subpart WWWW. A complete version of this revised table is available at 70 Fed. Reg. at 50,130-31.

Table 22.2, table 22.2 in the permit corresponds to Table 3 of 40 C.F.R. 63, Subpart WWWW. This table also underwent revision as part of the direct final rule. *See* 70 Fed. Reg. at 50,121. L & M proposes that the Department replace Table 22.2 in the permit with the applicable sections of Table 3 from 40 C.F.R. 63, Subpart WWWW. Importantly, L & M does not use mechanical resin application at this time. L & M proposes that the Department adopt the corrected Table 3 available at 70 Fed. Reg. 50,132. Alternatively, the Department could instead include all

the “open molding” operations from Table 3 of the revised regulations and insert a table 22.2 that would be as follows:

Operation	Use	Organic HAP Emission Limit ¹
Open Molding: corrosion resistant and/or high strength (CR/HS)	Mechanical resin application	113 lb/ton
	Filament application	171 lb/ton
	Manual resin application	123 lb/ton
Open Molding: non-CR/HS	Mechanical resin application	88 lb/ton
	Filament application	188 lb/ton
	Manual resin application	87 lb/ton
Open Molding: Tooling	Mechanical resin application	254 lb/ton
	Manual resin application	157 lb/ton
Open Molding: Low-flame spread/low-smoke products	Mechanical resin application	497 lb/ton
	Filament application	270 lb/ton
	Manual resin application	238 lb/ton
Open Molding: Shrinkage controlled resins ²	Mechanical resin application	354 lb/ton
	Filament application	215 lb/ton
	Manual resin application	180 lb/ton
Open Molding: Gel Coat ³	Tooling gel coating	440 lb/ton
	White/off white gel coating	267 lb/ton
	All other pigmented gel coating	377 lb/ton
	CR/HS or high performance gel coating	605 lb/ton
	Fire retardant gel coating	854 lb/ton
	Clear production gel coating	522 lb/ton

1. Organic HAP emissions limits for open molding and centrifugal casting 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.

Table 22.4, Table 22.4 in the permit corresponds to Table 4 of 40 C.F.R. 63, Subpart WWWW. However, it appears this version of Table 4 was copied from the regulations prior to the direct final rule that corrected some typographical errors and made other minor corrections. *See* 70 Fed. Reg. at 50,121. L & M proposes that the Department replace Table 22.4 in the permit with the corrected Table 4 of 40 C.F.R. 63, Subpart WWWW. A complete version of this revised table is available at 70 Fed. Reg. at 50,133.

Response #13:

The tables have been corrected to reflect the tables in subpart WWWW specified in the final rule.

NOTE:

Comments 14 through 17 are only specific to L & M Laminates and will not be included in other responsiveness summaries.

Comment #14:

Appendix A: List of Equipment.

The three spray booths on the equipment list (numbers 2, 3, and 8) are each listed as “Gel Coat.” The spray booths should be listed as “spray coat.” L & M’s permit refers to “spray coating” operations and not “gel coating” operations. In addition, only two of the spray booths are used to apply gel coat (numbers 2 and 8). The third spray booth is used to apply adhesives in laminate shop.

On the equipment list, number 20 is a “mitre saw.”

L & M also operates a stationary belt sander that is not included on the equipment list in Appendix A. Unfortunately, L & M is not able to obtain the make and model number of this sander. Nevertheless, it should be included on the equipment list.

Response #14:

40 CFR Section 70.5(c)(3) requires a permit application to describe all emissions of pollutants for which a source is major and all emissions of regulated air pollutants. It also authorizes the permitting authority to obtain additional information as needed to verify which requirements are applicable to the source. This provides the regulatory authority for MCAQD to require a description of all process and control equipment for which permits are required including the name, make, model, serial number, date of manufacture, size/production capacity and type. The equipment list, including detailed descriptions, is necessary in order for MCAQD to ensure the public that the permitted facilities are complying with all the applicable requirements. A designation, such as gel coat is considered by MCAQD to be the designation as the “type” of spray booth and an appropriate designation of the equipment list. MCAQD includes detailed descriptions in order to establish that the permit accurately reflects the equipment on site and to ensure that L & M is complying with all applicable requirements. Without the detailed equipment list, MCAQD could not verify whether or not changes were made at the facility that would trigger a modification as defined in County Rule 100 § 200.65. Modifications can trigger new applicable requirements such as County Rule 240 or County Rule 241 requirements. In addition, without the detailed equipment list, the requirements of County Rule 210 § (405 & 406) would not be enforceable and compliance could not be determined. The equipment descriptions, such as gel coat, chopper or grinding, are considered to be the designation of the “type” of spray booth and a requirement of the equipment list.

Comment #15:

In the “Description of Permit Revision”, the third sentence should say “methyl methacrylate” instead of “methyl ethacrylate”.

Response #15:

The suggested spelling correction has been added into the permit.

Comment #16:

In the second full paragraph, L & M proposes that the Department revise the first sentence to begin: “Operations at L & M include resins and gel coats that are applied manually and/or with mechanical, non-atomized spray equipment . . .” L & M utilizes a non-atomized application of its gel coats and thus this better represents activities at the facility.

Response #16:

“Operations at L & M include resins and gel coats that are applied manually and/or with mechanical, non-atomized spray equipment . . .” has been added into the TSD language.

Comment #17:

L & M objects to the first full paragraph on this page regarding the installation and operation of the Gruber Autocaster Ultra. On May 21, 2004, L & M submitted a Notice of Source Change Allowed Without a Permit Revision regarding the replacement of several open mixers with the autocaster. The AQD requested additional information on October 27, 2004 and L & M supplied the additional information on November 15, 2004. The Department has had ample opportunity to object to the Notice of Source Change but instead has taken no action. It is past the time in which the Department can object to the installation of the autocaster. As L & M has shown, replacement of the open mixers with the autocaster was properly allowed as a Notice of Source Change Allowed Without a Permit Revision. During this Title V permit revision to include the NESHAP provisions, the Department requested that the autocaster be added to the equipment list. As a result, L & M proposes that the Department strike this paragraph from the TSD.

Response #17:

On May 21, 2004, L & M submitted a seven day notice to replace many (how many?) open mixers with an autocaster. The make and model is a Gruber Autocaster Ultra, serial number 349 with a production capacity of 3600 pounds per hour. The information provided by L&M was insufficient to determine if the physical change at the facility met all the permitting requirements of a seven day notice as stated in County Rules, the State Implementation Plan and Federal Requirements. In order to resolve this outstanding issue, L & M requested (January 20, 2006) that the autocaster, installed under the May 21, 2004 seven day notice, be incorporated into the significant permit revision that is currently being processed to add for the NESHAP requirements to the permit.

In processing the permit revision, MCAQD assessed the installation of the autocaster for County Rule 240 applicability. Since the auto caster was installed during the time period that the facility was a major source for VOC's in a serious nonattainment area, MCAQD determined it necessary to assess the installation for County Rule 240 (NSR) applicability. The "past actual" emissions were calculated using the average of the 2002 and 2003 reported emissions. The average annual VOC emissions were calculated to be 39.7 ton per year. The "future potential" annual VOC emissions are equal to the maximum allowable VOC emissions under the current permit - 56.0 tons per year. The maximum potential increase in emissions is ~~would be~~ equal to the difference between the maximum allowable VOC emissions (under the current permit) and the past actual annual emissions. The difference 16.3 tons per year, which is less than the 25 ton per year increase significance level.

County Rule 240 § 307 also requires a five year aggregation of all creditable increases and decreases in emissions. The seven day notice and the installation of the autocaster took place in the 2004 calendar year, therefore the five year aggregation exercise must include the previous five consecutive calendar years, including the calendar year in which the increase is proposed. This period would be from 2000 to 2004. The oldest and only modification submitted during that timeline according to County records was submitted in May 2003. The baseline using 2001 and 2002 calendar years are calculated to be 33.7 tons per year. The difference between the baseline emission rate over these two years (past actual emissions) and permitted limit (future potential emissions) is 22.3 tons per year. The difference (22.3 tpy) is less than the significance level (25tpy which triggers County Rule 240 applicability. Therefore County Rule 240 is not an applicable requirement for the installation of the autocaster.

The authorization of Gruber Autocaster Ultra will be performed through the permitting process of this significant revision.

DESERT SUN FIBERGLASS (DSF) COMMENTS:

Comment # 1:

The page number listed for Appendix A should be corrected from 27 to 43.

Response # 1:

Table of contents page number for Appendix A has been changed.

Comment # 2:

Specific Permit Condition 22.B.3) has several errors:

The referenced 40CFR§63.805 appears to be incorrect; it should be 40CFR§63.5805.

The “methods specified in permit conditions 22.B.3)a through 22.B.3)b)” should be corrected to read “methods... 22.B.3)d”).

In 22.B.3)a) “Tables” should be corrected to “Table” for correct grammatical usage.

Response #2:

The regulatory authority that was cited, 40CFR§63.805, was an incorrect citation. The rule citation has been changed to 40CFR§63.5900 to reflect the more accurate regulatory authority. The reference referring to the specific methods for compliance have been changed to “*The Permittee shall demonstrate continuous compliance with each standard that applies to the facility using the following methods;*” to encompass all the requirements for continuous compliance. The grammatical error concerning the word “Tables” has been changed to “Table”.

Comment # 3:

Specific Condition 22.B.3)b) cites reporting requirements per 40CFR§63.5835(d). This section pertains to development and implementation of “*a written start-up, shutdown, and malfunction plan according to the provisions of §63.6(e)(3) for any organic HAP emission limits you meet using an add-on control*”. **Desert Sun does not have any add-on control for HAP emissions, making this condition not applicable.** Should the reference be 40CFR§63.5895(d)?

Response # 3:

The regulatory authority that was cited, 40CFR§63.5835(d)5, was an incorrect citation. This citation does in fact refer to requirements for an add on control which is not an applicable requirement for DSF. The rule citation has been changed to 40CFR§63.5900 to reflect accurately the proper regulatory authority of the permit conditions.

Comment # 4:

E. Options for meeting Standards correctly cites 40CFR§63.5810 as providing the options for meeting the standards for open molding and centrifugal casting operations, but the County has opted to redefine Table 1 from Subpart WWWW as Table 22.1; Table 3 from Subpart WWWW as Table 22.2; Table 4 of Subpart WWWW as Table 22.3; Table 7 of Subpart WWWW as Table 22.4. Please note the discussion later in these comments regarding errors and missing entries from these redefined Tables from those in the most current version of Subpart WWWW. **The Tables should be corrected to correctly reflect the current requirements of Subpart WWWW.**

Response #4:

The tables in the permit have been corrected to address the inconsistencies in regard to the tables in the final rules. The corrections include the addition of missing footnotes. However, standards in the tables in subpart WWW that are not applicable to current operations have not been included in the Tables of the permit.

Comment # 5:

Equation 22.1 appears to correspond to Equation (2) in 40CFR§63.5810; Equation 22.2 appears to correspond to Equation (3) in 40CFR§63.5810; and Equation 3 (Page 31) appears to correspond to Equation (4) in 40CFR§63.5810. Should Equation 3 be re-named Equation 22.3 in order to be consistent with the other designations? **The equations cited should include the correct rule reference.**

Response #5

The rule citations have been added to the 3 equations in the permit conditions. Equation 3 has also been re-named equation 22.3 to remain consistent with the previous 2 equations designations.

Comment # 6:

Table 22.1: Equations to Calculate Organic HAP Emission Factors for Specific Open Molding (and Centrifugal Casting Process Streams) corresponds to Table 1 from Subpart WWW. Factors for centrifugal casting have been omitted from this table, and its title has been shortened to reflect this content reduction. **Table 22.1 should be revised to correspond with Table 1 of Subpart WWW.**

Response #6:

Currently DSF does not manufacturer centrifugal casted products nor do they currently have equipment at the facility to be able to manufacture centrifugal casted products. In order for DSF to manufacturer this type of product, new equipment will need to be added to the facility which meets the MCAQD definition of a modification per County Rule 100 § 200.65. Therefore, a permit revision will be necessary in order to add centrifugal casting abilities to the facility. After approval of the permit revision would be the appropriate time to incorporate these types of changes, including the emission factors for centrifugal casting, into the permit. It is MCAQD's position that non applicable NESHAP requirements for Title V sources do not need to be included in the Title V permit.

Comment # 7:

Table 22.1 does not reflect changes made in the August 25, 2005 Direct Final Rule revisions to Subpart WWW, and incorrectly lists Item "h." as "Manual gel coat application". This should be re-designated as "atomized spray gel coat application using robotic or automated spray". None of the footnotes from Table 1 from 40CFR§63 Subpart WWW have been included with Table 22.1. The missing footnotes include significant contextual information that enables correct use of factors in the table. This comment was also provided in writing in Desert Sun's letter of January 9, 2006, but no action was taken by Maricopa County between that date and the January 24, 2006 public posting date. **Table 22.1 should be revised to correspond with Table 1 of Subpart WWW, including footnotes.**

Response #7:

Manual gel coat application was removed from section "h" has been changed to reflect the final rule. The applicable footnotes have been added to table 22.1. The footnotes that are not applicable to DSF have not been added to Table 22.1.

Comment # 8:

Table 22.2: Organic HAP Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion and Continuous Lamination/Casting Operations corresponds to Table 3 from Subpart WWW.

Written comments (again due to the August 25, 2005 Direct Final Rule changes) provided to Maricopa County in Desert Sun's letter of January 9, 2006, noted errors in this table but no action was taken by Maricopa County between that date and the January 24, 2006 public posting date. Those, still present, errors include:

1. Elimination of the right-hand column entirely;
2. Revision of three emission factors:
 - a. 1a from 112 to 113
 - b. 2a from 87 to 88, and
 - c. 6a from 437 to 440

Not all of the footnotes from Table 3 from 40CFR§63 Subpart WWWW have been included with Table 22.2. The missing footnotes include significant contextual information that enables correct use of factors in the table. **Table 22.2 should be revised to correspond with Table 3 of Subpart WWWW, including footnotes.**

Response #8:

As requested, the right hand column has been eliminated completely from Table 22.2. The three incorrect emission limits have been updated to reflect the final rule. The applicable footnotes (1 and 2 from Table 3 of Subpart WWWW) have been added to Table 22.2. However, footnotes 4, 5 and 6 from Table 3 in subpart WWWW could not be added because centrifugal casting, pultrusion and continuous lamination are not applicable to DSF since this work is not performed at the facility nor is the equipment installed to be able to use these processes. In order to make the permit conditions more reflective of DSF operations, part 7, 8, 9 and ten have been removed from Table 22.2.

Comment # 9:

Table 22.3: Work Practice Standards corresponds to Table 4 from Subpart WWWW.

Footnote 1, relating to open containers of 5-gallons or less, for BMC operations, and containers with a surface area of 500 square inches or less for polymer casting operations has also been omitted. **Table 22.3 should be revised to correspond with Table 4 of Subpart WWWW, including footnotes.**

Response #9:

Please refer to Response #4.

Comment # 10:

Table 22.4: Options Allowing the Same Resin across Different Operations that use the same resin type, corresponds to Table 7 from Subpart WWWW. The entry in the seventh row from the top of the right-hand column, 38.4, should be deleted from the table. All footnotes from Table 7 of Subpart WWWW have been omitted from Table 22.4. **Table 22.4 should be revised to correspond with Table 7 of Subpart WWWW, including footnotes.**

Response #10:

Please refer to Response #4.