

**Hexcel**  
**Draft Comments on Proposed Permit**  
**November 2004**

1. Please remove the language concerning unresolved applicability issues in section 10.K.3 of the proposed permit, as applicability of 40 CFR Part 63, subpart GG has been resolved. Also, the language in the TSD regarding the formal request for an applicability determination by OECA should be updated or removed. Because the applicant chose to accept applicability rather than submit the information needed to conduct the applicability determination, we are no longer treating the request as active. If the applicant would like a formal applicability determination they must provide the information requested by EPA in a timely manner. The applicant may also request a determination from OECA directly, if so desired.

*10.K.3 has been revised. TSD revised to indicate applicability determination not active.*

2. Section 5.e of the TSD states in regard to group 2 emissions units: "Over time, the facility operator has monitored operations to the extent that the operator has concluded that essentially all regulated emissions occur during the first 25% of the combined purge/cure oven cycle..." We would recommend clarifying this statement to reflect that the operator has no actual monitoring data to support this conclusion, and that this is why the capture efficiency testing is being required by the permit.

*Section 5.e clarified accordingly.*

3. Section 7.D.1 of the proposed permit describes the required monitoring for the NO<sub>x</sub> emission limit. It appears that the source will be using calculations to show compliance with the emissions limit in section 6.D. The permit should specify which emissions factors will be used in the compliance determination. In addition, the monitoring condition must specify how frequently this information needs to be recorded and calculated. As written ("...on a time-basis adequate to support an annual emission inventory...") the condition is much too broad. Similarly, condition 7.B.1.b prescribes a compliance calculation using the "maximum emission rate listed by the manufacturer." These types of values should be specified in the permit.

*Permit now indicates manufacturer emission factors should be used unless available, in which case AP42 or other Director-approved factors will be used.*

4. The TSD discussion of 40 CFR Part 63 subpart PPPP applicability could be clarified by including the explanation contained in a November 8, 2004 email from Barbara Cenalmor (PCAQCD) to Kathleen Stewart (US EPA). We would also recommend deleting the discussion of SIC codes and subcategories, as this discussion is not vital to the applicability determination.

*TSD clarified accordingly.*

5. The supplement to the TSD includes a brief discussion of modeling requirements for ovens #19, 20, and 21. This discussion is somewhat misleading. While EPA recognizes that modeling ozone for a point source of VOCs is problematic, any exemption must be supported by a quantitative (Scheffe Tables, RPM, UAM, etc) and/or qualitative analysis of the potential impact of VOC on ozone concentration.

*TSD clarified accordingly.*

6. Because 440 series ovens are included in both the group 2 and group 3 emissions units (see proposed permit sections 5.2.a and 5.3.a), it is unclear what the capture and control requirements are for individual ovens, such as 19, 20, and 21. Please clarify which units are group 2 and group 3. There is a similar problem with the 450 series. In addition, the table for group 3 emission units (section 5.3.a) refers to oxidizer #3. We believe this is meant to read oxidizer #1.

*The TSD provides a detailed narrative description of group 2 and group 3 emission units (see section 5.e, pages 21-28). Each is addressed separately below:*

*Group 2 Emission units*

*As stated in the TSD (page 28), "Group 2 emission units include the ovens that are controlled by the RTO units, but that also bypass heated air flow to the atmosphere." Control requirements for Group 2 emission units, which includes ovens 19-21, are clearly stated in section 5.2.b of the proposed permit, which reads, "VOC emissions from Group 2 emission units shall be reduced with a net control efficiency of 90%, and that control efficiency shall reflect the combination of capture efficiency, the extent of by-pass directly to the atmosphere, and destruction efficiency of the RTO systems." A detailed discussion of the regulatory basis behind these control requirements is located in section 7.a.1.B of the TSD.*

*Group 3 Emission units*

*Group 3 emissions units are described on page 28 of the TSD as being "the equipment and operations contributing to the fugitive emissions from within the dip room." A detailed narrative description of Group 3 units is also presented in the TSD beginning on page 21. Control requirements are clearly specified in sections 5.b&c of the proposed permit.*

*Due to formatting changes, the electronic copy of the permit you are reviewing seems to say Oxidizer #3. That is not the case. The number 3 indicates footer note #3. The final version of the permit in WordPerfect will show the correct formatting.*

7. Condition 7.C.7.c requires daily inspection of the RTOs for "proper travel." It is unclear what is meant by "travel" - could this term be explained in the TSD or permit?

*Permit clarified accordingly.*

8. Baghouse monitoring: It is unclear how the daily visual inspections and the semiannual opacity checks will assure compliance with the permit's emission limits, or the requirement that the baghouse meet a 99% control efficiency. The permit should require pressure drop monitoring or the TSD should discuss how the current monitoring will assure compliance.

*This issue has been discussed by PCAQCD and EPA in earlier reviews of this permit. On an e-mail from 12/12/03 to Joe Lapka, Don Gabrielson stated "...With respect to the baghouse and exhaust fans, I suggest that the permit be revised to include a 5% opacity screening requirement, with a corresponding requirement to implement a corrective action plan if visible emissions are observed." The e-mail went on to state the low emissions of PM10 relative to the major source threshold. On an 12/18/03 e-mail, Joe Lapka agreed to this language. An explanation of why this monitoring is sufficient has been added to the TSD.*

9. Condition 8.A: The phrase "of the" appears to have been accidentally deleted from the statement "within ten days deviation."

*Condition revised accordingly.*