EPA Comments on Proposed Permit for Hexcel – Casa Grande
11/12/2004

1. Permit revision A20422.R03 (10/9/99) contains operational limitations for the emergency units, which are not included in the proposed permit. Specifically, the following conditions from the 10/99 permit revision appear to be missing:

a. Condition 4.C.1 – The emergency air compressor and emergency generator shall be equipped with a system to record the operational time of each unit;

This condition has previously been added to the current draft in section 4.B.1.b.

b. Condition 4.C.2 – The emergency units shall be operated only on diesel fuel.

This condition has previously been added to the current draft in section 6.F.2

2. Although it is Hexcel's current method of operation to vent the emissions from the Group 2 units to the RTO 25% of the time and to the atmosphere the remaining 75% of the time, language regarding this practice should be removed from section 5.C.2.a of the permit.

Because Hexcel has not demonstrated that all regulated emissions are liberated during the first 25% of the combined purge/cure oven cycle, it is not certain whether the facility can meet the required level of control for these units when venting them to the atmosphere 75% of the time. Language regarding the 25%/75% split should be removed to avoid any possible misinterpretation that it sanctions non-compliance with the actual emission control requirements.

Section 5.C.2.a of the permit has been revised accordingly.

3. According to Section 7 of the permit, Hexcel is required to conduct testing on the Group 1 and Group 3 emission units within 180 days and 12 months, respectively. However, the permit does not specify a deadline for the Group 2 testing requirements. Without a specified deadline, it is assumed that the required testing must be completed within 180 days of permit issuance (per Condition 7.A.1.c). However, that is not consistent with previous discussions between EPA and PCAQCD. For clarification, please specify when the testing requirements under 7.C.3.a.i and 7.C.3.a.ii must be completed.

On an e-mail from Joe Lapka from 6/1/04 it was agreed that 180 days would suffice and would be more acceptable than a longer term. I can't find any other correspondence where the issue was brought up or mentioned as unacceptable. Since Hexcel is already in the process of procuring a testing consultant, and getting their protocols ready, I believe 180 days after permit issuance is an appropriate testing time frame.

4. Section 7.C.3.a.ii requires that the facility quantify the emissions released during the atmospheric bypass portion of the curing cycle by A) testing the exhaust flow for each resin formulation used in the dip room, or B) justifying why testing of selected resin-formulation emissions would fairly characterize emissions from other resin formulations and then conducting corresponding tests to quantify emissions fairly reflecting all resin formulations.

The requirements that the facility "fairly" characterize and test selected resin formulations may be subject to interpretation and therefore may not be enforceable as a practical matter. Even though a justification for the selection of certain resin formulations must be included in the test protocol and

approved by EPA and the District, it is still recommended that the unenforceable language be removed from the permit.

The unenforceable language has been removed.

5. Section 5.H of the permit states, "Other than cure oven emissions occurring during the last 75% of the purge/cure cycle, bypassing emissions from any of the above-scheduled emission units around the oxidizers shall constitute a period of excess emissions."

   This condition is inappropriate because it contravenes the capture and control requirements of Section 5.C.2.b and 5.C.2.c and allows the facility to bypass the RTO for the last 75% of the curing cycle regardless of what the actual emissions are. Although the facility suspects that the emissions liberated during the last 75% of the cycle are minimal, they have not yet conducted actual testing to demonstrate that. This condition gives them a blanket exemption from the control requirements even if it is later discovered through testing that the emissions are greater than previously thought. The District should revise Condition 5.H so it is clear that the facility is in no way relieved of its obligation to control the emissions from the Group 2 units by at least 90%.

   Section 5.H. has been revised accordingly.

6. The particulate emission equations in conditions 6.B.4.b.1, 6.B.4.b.2, and 6.B.4.c were not accurately incorporated into the proposed permit. Please revise the permit so that the equations are correct. For example, the equation in 6.B.4.c should be E=1.02Q^0.769 rather than E=1.02Q0.769.

   Formatting changes in the electronic copy that was submitted to EPA, seem to show the wrong equation. In reality, the WordPerfect version that will be issued has the correct formatting on it.

7. Condition 7.B.1.b in the proposed permit requires that the Permittee maintain a rolling twelve month record of the NOx emissions from the emergency units. If the twelve month total exceeds twenty tons, the condition calls for performance testing of the units. If one unit contributed more than 75% of the observed emissions, the permit requires testing of that unit only. This condition is originates from permit A20422.R03, which authorized the installation of the emergency units. However, the original condition required testing of both units regardless of their relative contributions toward the testing trigger. If the District wishes to modify the testing requirements for the purposes of the Title V permit, it should process a permit revision to modify the underlying applicable requirement.

   A clarification of these changes has been added to the TSD.