

## Ciavattone, Deborah (EGLE)

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**From:** Woolley, Lillian <lwoolley@fishbeck.com>  
**Sent:** Sunday, June 25, 2023 9:14 PM  
**To:** EGLE-ROP  
**Cc:** Zhu, Joyce (EGLE); Ahammod, Shamim (EGLE)  
**Subject:** B1772 Initial ROP Application  
**Attachments:** B1772\_Initial ROP Application.pdf

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Attached you will find an electronic copy of the Cecil Composites Initial ROP application (B1772). Files included in the pdf file include: a) the ROP Initial Application Forms and b) a copy of PTI 94-21A on which the initial ROP will be based along with the WWW ROP template c) MAERS forms and potential criteria and HAP emission tables and d) the Nuisance or Odor Management Plan that was previously submitted. We are mailing a hard copy of the signed application and we understand that the ROP application cannot be considered administratively complete without a hard copy including an original signature. Please let me know if you have any questions.



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION ASC-001 APPLICATION SUBMITTAL AND CERTIFICATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

Source Name: Cecil Composites	SRN: B1772	Section Number (if applicable):
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Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. A Responsible Official must sign and date this form.

<b>Listing of ROP Application Contents. See the initial application instructions for guidance regarding which forms and attachments are required for your source. Check the box for the items included with your application.</b>	
<input checked="" type="checkbox"/> Completed ROP Initial Application Forms (required)	<input type="checkbox"/> Copies of all Consent Orders/Consent Judgments
<input checked="" type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input checked="" type="checkbox"/> Compliance Plan/Schedule of Compliance
<input checked="" type="checkbox"/> HAP/Criteria Pollutant Potential to Emit Calculations	<input type="checkbox"/> Acid Rain Initial Permit Application
<input checked="" type="checkbox"/> Stack information	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input checked="" type="checkbox"/> Copies of all active Permit(s) to Install (required)	<input type="checkbox"/> Additional Information (AI-001) Forms
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input checked="" type="checkbox"/> Paper copy of all documentation provided (required)
<input checked="" type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input checked="" type="checkbox"/> Electronic documents provided (optional)
<input type="checkbox"/> Confidential Information	<input checked="" type="checkbox"/> Other, explain: AI-Plan, AI-PTE

### Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in Permits to Install, this application and other applicable requirements that the source is subject to.  Yes  No

This source will continue to be in compliance with all of its applicable requirements, including those contained in Permits to Install, this application and other applicable requirements that the source is subject to.  Yes  No

This source will meet, in a timely manner, applicable requirements that become effective during the permit term.  Yes  No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing Permits to Install, this application and all other applicable requirements that the source is subject to.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

### Name and Title of the Responsible Official (Print or Type)

Jeff Kirby, Plant Manager

**As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.**

Signature of Responsible Official

Date

6-23-2023





## RENEWABLE OPERATING PERMIT INITIAL APPLICATION S-001 STATIONARY SOURCE INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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<b>SOURCE INFORMATION</b>		SIC Code 3648	NAICS Code 335129
Source Name Cecil Composites			
Street Address 151 Lafayette Street			
City Mt. Clemens	State MI	ZIP Code 48043	County Macomb
Section/Town/Range (if street address not available)			
Source Description Pole Manufacturer / Reinforced Plastic Composites Production			

<b>OWNER INFORMATION</b>				
Owner Name DWM Holdings				
Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country

<input type="checkbox"/>	Check if an AI-001 Form is attached to provide more information for S-001. Enter AI-001 Form ID: <b>AI-</b>
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## RENEWABLE OPERATING PERMIT INITIAL APPLICATION FORM

### S-002 CONTACT AND RESPONSIBLE OFFICIAL INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772

Section Number (if applicable):

At least one contact and one Responsible Official must be identified. Additional contacts and Responsible Officials may be included if necessary.

**CONTACT INFORMATION**

Contact 1 Name Jeff Kirby		Title Plant Managerr		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address) Cecil Composites 151 Lafayette Street				
City Mt. Clemens	State MI	ZIP Code 48043	County Macomb	Country
Phone number 586.484.0142		E-mail address jeffk@polemfg.com		

Contact 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

**RESPONSIBLE OFFICIAL INFORMATION**

Responsible Official 1 Name Jeff Kirby		Title Plant Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address) Cecil Composites				
City Mt. Clemens	State MI	ZIP Code 48043	County Macomb	Country
Phone number 586.484.0142		E-mail address jeffk@polemfg.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

Check if an AI-001 Form is attached to provide more information for S-002. Enter AI-001 Form ID: **AI-**



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION S-003 SOURCE REQUIREMENT INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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### SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject. Refer to the ROP Initial Application Instructions for additional information.

1. Actual emissions and associated data from <b>all</b> emission units with applicable requirements are required to be reported in MAERS. Are there any emissions and associated data that have <b>not</b> been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. a. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. b. Has an updated RMP been submitted to the USEPA?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
4. Does the source belong to one of the source categories that require quantification of fugitive emissions? If Yes, identify the category on an AI-001 Form and include the fugitive emissions in the PTE calculations for the source. <i>See ROP Initial Application instructions.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Does this stationary source have the potential to emit (PTE) of 100 tons per year or more of any criteria pollutant (PM-10, PM 2.5, VOC, NOx, SO <sub>2</sub> , CO, lead)? If Yes, include potential emission calculations for each identified pollutant on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6. Does this stationary source emit any hazardous air pollutants (HAPs) regulated by the federal Clean Air Act, Section 112? If Yes, include potential and actual emission calculations for HAPs, <b>including fugitive emissions</b> on an AI-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7. a. Are any emission units subject to Compliance Assurance Monitoring (CAM)? If Yes, identify the specific emission unit(s) and pollutant(s) subject to CAM on an AI-001 Form. b. Is a CAM plan included with this application on an AI-001 Form?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
8. Does the source have any active Consent Orders/Consent Judgments (CO/CJ)? If Yes, attach a copy of each CO/CJ on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9. Are any emission units subject to the federal Cross State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. a. Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the Federal Acid Rain Program on an AI-001 Form. b. Is an Acid Rain Permit Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
11. Does the source have any required plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, startup/shutdown plans or any other monitoring plan? If Yes, then the plan(s) must be submitted with this application on an AI-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
12. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then the requirement and justification must be submitted on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/> Check if an AI-001 Form is attached to provide more information for S-003. Enter AI-001 Form ID: <b>AI-PTE</b>	



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION EU-001 PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNITS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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Review all emission units at the source and answer the question below.

1. Does the source have any emission units that are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules, not including Rules 281(2)(h), 287(2)(c), and 290?  Yes  No

If Yes, identify the emission units in the table below. If No, go to the EU-002 Form.

*Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either an EU-002 or EU-004 Form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).*

Emission Unit ID	Emission Unit Description	PTI Exemption Rule Citation <small>[e.g. Rule 282(2)(b)(i)]</small>	Rule 212(4) Citation <small>[e.g. Rule 212(4)(c)]</small>
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			

Comments:

Check if an AI-001 Form is attached to provide more information for EU-001. Enter AI-001 Form ID: AI-



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION EU-002 EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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Review all emission units and applicable requirements at the source and provide the following information.

1. Does the source have any emission units which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.  Yes  No

If Yes, identify the emission units in the table below. If No, go to the EU-003 Form.

*Note: If several emission units were installed under the same rule above, provide a description of each and an installation date for each.*

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input type="checkbox"/> Rule 287(2)(c) surface coating line		
<input type="checkbox"/> Rule 290 process with limited emissions		

Comments:

Check if an AI-001 Form is attached to provide more information for EU-002. Enter AI-001 Form ID: **AI-**





## RENEWABLE OPERATING PERMIT INITIAL APPLICATION EU-003 EMISSION UNITS WITH PERMITS TO INSTALL

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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Review all emission units at the source and fill in the information in the following table for **all** emission units with Permits to Install (PTI). Any PTI(s) identified below must be attached to the application.

Permit to Install Number	Emission Unit ID	Description <i>(Include Process Equipment, Control Devices and Monitoring Devices)</i>	Date Emission Unit was Installed/ Modified/ Reconstructed
94-21A	EU-FIBERGLASS	Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process.	7/1/2022
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		
<p>1. Are you proposing changes to any emission unit names, descriptions or control devices in the PTIs listed above? If Yes, describe the proposed changes on an AI-001 Form. <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>2. Are you proposing additions or clarifications to any permit conditions? If Yes, describe the proposed changes on an AI-001 Form. <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>3. Are you proposing monitoring, testing, recordkeeping and/or reporting necessary to demonstrate compliance with any applicable requirements? If Yes, describe the proposed conditions on an AI-001 Form. <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p>			
<p><input checked="" type="checkbox"/> Check if an AI-001 Form is attached to provide more information for EU-003. Enter AI-001 Form ID: <b>AI-PTI</b></p>			



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION EU-004 OTHER EMISSION UNITS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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Complete an EU-004 Form for **all** emission units with applicable requirements that have **not** been addressed on an EU-001, EU-002 or EU-003 Form. This would include grandfathered emission units or PTI exempt emission units subject to applicable requirements in the AQD Rules, and emission units subject to a MACT, NESHAP, NSPS, or other federal requirement.

1. Does the source have emission units with applicable requirements that have not been addressed on the EU-001, EU-002 and/or EU-003 Forms? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  If Yes, provide the required information below. Complete the AR-001 and/or AR-002 Form(s) to identify all applicable requirements and all monitoring, testing, recordkeeping and/or reporting to demonstrate compliance with the applicable requirements.			
Emission Unit ID <b>EU-</b>	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – <i>If different from S-001 Form</i>
Emission Unit Description – <i>Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms).</i>			
Emission Unit ID <b>EU-</b>	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – <i>If different from S-001 Form</i>
Emission Unit Description – <i>Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms).</i>			
Emission Unit ID <b>EU-</b>	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – <i>If different from S-001 Form</i>
Emission Unit Description – <i>Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms).</i>			
<input type="checkbox"/> Check if an AI-001 Form is attached to provide more information for EU-004. Enter AI-001 Form ID: <b>AI-</b>			



# RENEWABLE OPERATING PERMIT INITIAL APPLICATION

## FG-001: FLEXIBLE GROUPS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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Complete the FG-001 Form for all Emission Units (EUs) that you want to combine into a Flexible Group (FG). Create a descriptive ID for the FG and description, and list the IDs for the EUs to be included in the FG. See instructions for FG examples.

Flexible Group ID <b>FG-WWWW</b>			
Flexible Group Description Subject to 40 CFR Part 63, Subpart WWWW			
<b>Emission Unit IDs</b>			
EU-FIBERGLASS	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
Flexible Group ID <b>FG-</b>			
Flexible Group Description			
<b>Emission Unit IDs</b>			
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
<input type="checkbox"/> Check if an AI-001 Form is attached to provide more information for FG-001. Enter AI-001 Form ID: <b>AI-</b>			



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION AR-001 APPLICABLE REQUIREMENTS FROM MACT, NESHAP OR NSPS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Proposed Section Number (if applicable):
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Answer the question below for emission units subject to a MACT, NESHAP or NSPS regulation and provide either an existing Permit to Install, an existing template table\*, or a newly created table\*\* that contains the applicable requirements for each subject emission unit with the application, including associated monitoring, testing, recordkeeping and reporting necessary to demonstrate compliance.

1. Is any emission unit subject to a Maximum Achievable Control Technology (MACT) standard in 40 CFR Part 63, National Emission Standard for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61, or New Source Performance Standard (NSPS) in 40 CFR Part 60?  Yes  No

If yes, identify the emission units and applicable MACT, NESHAP or NSPS in the table below.

**Note:** If several emission units are subject to the same regulation, list all of the emission unit IDs together. Attach the applicable requirements (PTI, template table or newly created table) in the selected format to the application using an AI-001 Form.

MACT NESHAP or NSPS Subpart and Name	Emission Unit ID – Provide the Emission Unit ID you created on the EU-003 or EU-004 Form	Applicable Requirements Attached in Which Format?
40 CFR Part 63 Subpart WWWW Reinforced Plastic Composites Production	EUFIBERGLASS	<input checked="" type="checkbox"/> PTI No. 94-21A <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
		<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
		<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
		<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
		<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**

**STREAMLINED REQUIREMENTS**

2. Are you proposing to streamline any requirements?  Yes  No

If yes, identify the streamlined and subsumed requirements and provide the EU ID and a justification for streamlining the applicable requirement on an AI-001 Form.

\*MACT and NSPS template tables (available at the link below)  
 \*\*Blank EU or FG template tables (available at the link below)  
<http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits(ROP)/Title V", then "ROP Forms & Templates")

Check if an AI-001 Form is attached to provide more information for AR-001. Enter AI-001 Form ID: **AI-**



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION

### AR-002 OTHER APPLICABLE REQUIREMENTS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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### APPLICABLE REQUIREMENTS NOT INCLUDED IN A PTI, MACT, NESHAPS, NSPS, OR PERMIT EXEMPTION

Answer the questions below and create an EU table to identify terms and conditions for each emission unit identified on an EU-004 Form (other than MACT, NESHAP, or NSPS requirements). This would include emission units that are grandfathered or exempt from PTI requirements but subject to state rules, federal rules or consent orders/consent judgments. Blank EU template tables are available on the EGLE Internet at: <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates")

<p>1. Is there an emission unit identified on an EU-004 Form that is subject to <b>emission limit(s)</b>? If Yes, fill out an EU table to identify the emission limit(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>2. Is there an emission unit identified on an EU-004 Form that is subject to <b>material limit(s)</b>? If Yes, fill out an EU table to identify the material limit(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>3. Is there an emission unit identified on an EU-004 Form that is subject to <b>process/operational restriction(s)</b>? If Yes, fill out an EU table to identify the process/operational restriction(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>4. Is there an emission unit identified on an EU-004 Form that is subject to <b>design/equipment parameter(s)</b>? If Yes, fill out an EU table to identify the design/equipment parameter(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>5. Is there an emission unit identified on an EU-004 Form that is subject to <b>testing/sampling requirement(s)</b>? If Yes, fill out an EU table to identify the testing/sampling requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>6. Is there an emission unit identified on an EU-004 Form that is subject to <b>monitoring/recordkeeping requirement(s)</b>? If Yes, fill out an EU table to identify the monitoring/recordkeeping requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>7. Is there an emission unit identified on an EU-004 Form that is subject to <b>reporting requirement(s)</b>? If Yes, fill out an EU table to identify reporting requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>8. Is there an emission unit identified on an EU-004 Form that is subject to <b>stack/vent restriction(s)</b>? If Yes, fill out an EU table to identify stack/vent restriction(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>9. Are there any other requirements that you would like to <b>add</b> for an emission unit identified on an EU-004 Form? If Yes, fill out an EU table to identify the requirements, and provide the EU ID and a justification for the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>10. Are you proposing to streamline any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Check if an AI-001 Form is attached to provide more information for AR-002. Enter AI-001 Form ID: <b>AI-</b>	



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION AR-003 SOURCE-WIDE APPLICABLE REQUIREMENTS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772

Section Number (if applicable):

Complete a Source-wide table for any conditions that apply to the entire source. A blank Source-wide template table is available on the EGLE Internet at:

<http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates")

1. Are there any applicable requirements that apply to the entire source?

Yes

No

If Yes, identify the conditions by utilizing a Source-wide template table and include all of the appropriate applicable requirements, including associated monitoring, testing, recordkeeping and reporting necessary to demonstrate compliance. Provide information regarding the applicable requirements in the comment field below.

Comments

Check if an AI-001 Form is attached to provide more information for AR-003. Enter AI-001 Form ID: **AI-**



## RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.*

SRN: B1772

Section Number (if applicable):

1. Additional Information ID

AI-PTI

### Additional Information

2. Is This Information Confidential?

Yes  No

Attached is a copy of PTI 94-21A which can be used to develop the initial renewable operating permit. A WWWW flexible group form detailing the WWWW applicable conditions is also included.

Cecil will submit a request to modify PTI 94-21A by July 15, 2023 which will resolve any compliance issues and will serve as the compliance plan.



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

April 13, 2022

**PERMIT TO INSTALL**  
94-21A

**ISSUED TO**  
Cecil Composites, LLC

**LOCATED AT**  
151 Lafayette Street  
Mt. Clemens, Michigan 48043

**IN THE COUNTY OF**  
Macomb

**STATE REGISTRATION NUMBER**  
B1772

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: <b>January 26, 2022</b>	
DATE PERMIT TO INSTALL APPROVED: <b>April 13, 2022</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

## PERMIT TO INSTALL

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### COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

### POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO <sub>2</sub>	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

## GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

### EMISSION UNIT SPECIAL CONDITIONS

#### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EUFIBERGLASS	Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process. Acetone will be used as a clean-up solvent.	TBD	FGMACTWWW W

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

**EUFIBERGLASS  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process. Acetone will be used as a clean-up solvent.

**Flexible Group ID:** FGMACTWWWW

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC (including styrene)	65.1 tpy	12-month rolling time period as determined at the end of each calendar month	EUFIBERGLASS	SC VI.2, SC VI.3	R 336.1702(a)
2. Acetone (CAS No. 67-64-1)	15.6 tpy	12-month rolling time period as determined at the end of each calendar month	EUFIBERGLASS	SC VI.2, SC VI.3	R 336.1224, R 336.1225

**II. MATERIAL LIMIT(S)**

1. The styrene content of all resins used in EUFIBERGLASS shall not exceed 45.3 percent by weight as applied. **(R 336.1224, R 336.1225, R 336.1702(a))**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not produce more than 300 composite poles per month as determined at the end of the calendar month during the initial low production period. The initial low production period for EUFIBERGLASS shall last until SVFIBERGLASS is installed and operational; and shall not extend past December 31, 2022. **(R 336.1702(a))**
2. The permittee shall capture all waste materials used in EUFIBERGLASS and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
3. The permittee shall handle all resins, catalysts, additives and cleaning solvents in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**
4. The permittee shall store the finished composite poles inside the facility until they are transported off-site.<sup>1</sup> **(R 336.1901)**



5. No later than 45 days after permit issuance, the permittee shall submit, implement, and maintain a nuisance minimization plan (NMP) for odors. The NMP shall include at a minimum, but not be limited to:
  - a) Procedures for maintaining and operating EUFIBERGLASS in a manner that minimizes the release of odors to the outside air.
  - b) Procedures that shall be taken to address odor complaints.
  - c) A plan for corrective action to address any odor releases to the outside air.

If at any time the plan fails to address or inadequately addresses odor management, the permittee shall amend the plan within 30 days after such an event occurs. The permittee shall also amend the plan within 30 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 60 days of submittal, the plan or amended plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to minimize odors.<sup>1</sup> **(R 336.1901)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. Filament winding shall be carried out by use of the dual-spindle 4-axis system with an automated resin delivery system. **(R 336.1225, R 336.1702(a))**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for EUFIBERGLASS:
  - a) The identity and amount (in pounds) of each material used.
  - b) The styrene content (in percent by weight) of each resin used.
  - c) The VOC (including styrene) content of each material used.
  - d) The acetone content of each material used.
  - e) The amount, in pounds, of acetone recovered and reclaimed.
  - f) The appropriate emission factors for each raw material used:
    - i. The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009, shall be used only for styrene and MMA emission calculations for open molding processes,
    - ii. Mass balance used for non-styrene, VOC emissions,
    - iii. Mass balance used for acetone emissions, or
    - iv. Alternate emission factors may be used with the approval of the AQD District Supervisor.
  - g) VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

- h) Acetone mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using the UEF table, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**

- 4. The permittee shall keep the following information on a monthly basis for EUFIBERGLASS during the initial low production period, as specified in SC III.1:
  - a) The number of composite poles manufactured.

The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(a))**

**VII. REPORTING**

- 1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUFIBERGLASS. **(R 336.1201(7)(a))**
- 2. The permittee or the authorized agent pursuant to Rule 204 shall send written notification to the AQD District Supervisor within 30 days after installation of stack SVFIBERGLASS and the end of the initial low production period of EUFIBERGLASS, as specified in SC III.1. **(R 336.1201(7)(a))**

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVFIBERGLASS*	44	82	R 336.1225, 40 CFR 52.21(c) & (d)
* Stack requirement not applicable during the initial low production period of EUFIBERGLASS, as specified in SC III.1.			

**IX. OTHER REQUIREMENT(S)**

- 1. The permittee shall operate EUFIBERGLASS according to the restrictions of the initial low production period, as specified in SC III.1, until stack SVFIBERGLASS is installed and operational. **(R 336.1702(a))**
- 2. The permittee shall not operate EUFIBERGLASS after January 1, 2023, unless stack SVFIBERGLASS is installed and operational. **(R 336.1702(a))**

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

### FLEXIBLE GROUP SPECIAL CONDITIONS

#### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGMACTWWWW	Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785. Reinforced plastic composites production also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.	EUFIBERGLASS

**FGMACTWWWW  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785. Reinforced plastic composites production also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

**Emission Units:** EUFIBERGLASS

**POLLUTION CONTROL EQUIPMENT**

Dry fabric filters

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/ Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring/ Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. Organic HAP from Open Molding – Corrosion Resistant and/or High Strength (CR/HS) Resin, Mechanical Application	113 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
2. Organic HAP from Open Molding – Non CR/HS Resin, Mechanical Application	88 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
3. Organic HAP from Open Molding – Tooling Resin, Mechanical Application	254 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
4. Organic HAP from Open Molding – Low-flame spread/low-smoke products	497 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
5. Organic HAP from Open Molding – Shrinkage controlled resins	354 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
6. Organic HAP from Open Molding – Tooling gel coat	440 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>

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

12. The permittee shall use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of Subpart WWWW of Part 63. **(40 CFR 63.5810)**
- Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of Subpart WWWW of Part 63. **(40 CFR 63.5810(a))**
  - Demonstrate that, on average, the facility meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to the facility. **(40 CFR 63.5810(b))**
  - Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 to this subpart that apply the weighted average organic HAP emissions limit for all open molding operations. **(40 CFR 63.5810(c))**
  - Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. **(40 CFR 63.5810(d))**
13. The permittee may switch between the compliance options in SC I.12.a through 12.d. When changing to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option the facility is changing to, unless the facility previously used an option that did not require the facility to maintain records of resin or gel coat. In this case, the facility must immediately begin collecting resin and gel coat and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**

**II. MATERIAL LIMIT(S)**

NA

### **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. **(40 CFR 63.5805, Table 4)**
2. For each HAP-containing materials storage operation, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. **(40 CFR 63.5805, Table 4)**
3. For each mixing operation, the permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. **(40 CFR 63.5805, Table 4)**
4. For each mixing operation, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement. **(40 CFR 63.5805, Table 4)**
5. For each mixing operation, the permittee shall keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR 63.5805, Table 4)**

### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

### **V. TESTING/SAMPLING**

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

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

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.5840 and 40 CFR 63.5860. **(40 CFR 63.5840, 40 CFR 63.5860)**
2. The permittee shall demonstrate continuous compliance with the applicable standards according to the procedures outlined in 40 CFR 63.5895 and 40 CFR 63.5900. **(40 CFR 63.5895, 40 CFR 63.5900)**
3. The permittee shall keep all records required by 40 CFR 63.5915 in the format and timeframes outlined in 40 CFR 63.5920. The records must be kept onsite for a period of at least two years. The records must be kept for a total of at least five years. **(40 CFR 63.5915, 40 CFR 63.5920)**
4. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date:<sup>2</sup>
  - a) A copy of each notification and report that is submitted to comply with 40 CFR Part 63 Subpart WWWW, and the documentation supporting each notification as specified in 40 CFR 63.5915(a)(1). **(40 CFR 63.5915(a))**
  - b) Records of all data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for operations listed in Table 3 to 40 CFR Part 63 Subpart WWWW. **(40 CFR 63.5915(c))**
  - c) A certified statement demonstrating compliance with all applicable work practice standards identified in Table 4 of 40 CFR Part 63 Subpart WWWW. **(40 CFR 63.5915(d))**

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

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336. 1201(3))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336. 1201(3))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336. 1201(3))**
4. The permittee shall submit the applicable notifications specified in, and according to the timeframes in 40 CFR 63.5905. **(40 CFR 63.5905)**
5. The permittee shall submit all applicable reports identified in, and according to the timeframes in 40 CFR 63.5910. **(40 CFR 63.5910)**
6. The permittee shall submit semiannual reporting of compliance as required in 40 CFR 63.5910(c). The report shall include the following:
  - a) Company name and address. **(40 CFR 63.5910(c)(1))**
  - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.5910(c)(2))**
  - c) Date of the report and beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(3))**
  - d) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. **(40 CFR 63.5910(c)(5))**

## **VIII. STACK/VENT RESTRICTION(S)**

NA

## **IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production by the initial compliance date. **(40 CFR Part 63, Subparts A and WWWW)**

### **Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**FGMACTWWWW**  
**FLEXIBLE GROUP CONDITIONS**

Blue text is guidance or notes on the use of the template. Delete all blue text prior to issuing the final permit or submitting it with a permit application. Read through all conditions. If the permittee has control equipment, use all the conditions in this template, selecting the appropriate control type for the tables. If there is currently no control or no plans to add control, eliminate the conditions that reference use of control (red conditions) and renumber appropriately.

If this template is being used for an ROP Reopening or Renewal, and the MACT conditions were established in a PTI, the appropriate footnotes which reference enforceability must be added to each applicable condition in the template.

This template is for the following as it applies to the source that does not have emission controls. A reinforced plastic composites production facility is a new affected source if it meets all the criteria in 40 CFR 63.5795(a)(1) and (2).

(1) You commence construction of the source after August 2, 2001.

(2) You commence construction, and no other reinforced plastic composites production source exists at that site.

OR:

An existing affected source which is any affected source that is not a new affected source (40 CFR 63.5795(b)).

AND:

40 CFR 63.5805(b) or (c) – An existing or new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply.

**DESCRIPTION**

Each **new or reconstructed** affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production includes the following operations: open molding, **closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing,** mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

**Emission Units:** EUFIBERGLASS

**POLLUTION CONTROL EQUIPMENT**

Dry fabric filters

**I. EMISSION LIMIT(S)**



Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. Organic HAP from Open Molding – corrosion-resistant and/or high strength (CR/HS), Filament application	171 lb/ton	12-month rolling average or as applied	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
2. Organic HAP from Open Molding – non-CR/HS, Filament application	188 lb/ton	12-month rolling average or as applied	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
3. Organic HAP from Open Molding – low-flame spread/low-smoke products, Filament application	270 lb/ton	12-month rolling average or as applied	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
4. Organic HAP from Open Molding – shrinkage controlled resins, Filament application	215 lb/ton	12-month rolling average or as applied	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)

12. The permittee must use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of 40 CFR Part 63, Subpart WWWW:

- a. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5810(a))**
- b. Demonstrate that, on average, the facility meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 of 40 CFR Part 63, Subpart WWWW that applies to the facility. **(40 CFR 63.5810(b))**
- c. Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW that apply to the weighted average organic HAP emissions limit for all open molding operations. **(40 CFR 63.5810(c))**
- d. Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. **(40 CFR 63.5810(d))**

13. The permittee may switch between the compliance options in SC I.12a through 12.d. When changing to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously used an option that did not require the permittee to maintain records of resin or gel coat. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**

## II. MATERIAL LIMIT(S)

NA

### **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. **(40 CFR 63.5805, Table 4)**
2. For each HAP-containing materials storage operation, the permittee 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. **(40 CFR 63.5805, Table 4)**
3. For each mixing operation, the permittee 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. **(40 CFR 63.5805, Table 4)**
4. For each mixing operation, the permittee 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. Vents routed to a 95 percent efficient control device are exempt from this requirement. **(40 CFR 63.5805, Table 4)**
5. For each mixing operation, the permittee must keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR 63.5805, Table 4)**

### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

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

### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee must monitor and collect data as specified in (a) through (d): **(40 CFR 63.5895(b))**
  - a. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating. **(40 CFR 63.5895(b)(1))**
  - b. The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system. **(40 CFR 63.5895(b)(2))**
  - c. At all times, the permittee must maintain necessary parts for routine repairs of the monitoring equipment. **(40 CFR 63.5895(b)(3))**
  - d. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 63.5895(b)(4))**
2. The permittee must monitor and collect data to demonstrate continuous compliance as follows: **(40 CFR 63.5895, 40 CFR 63.5900)**

- a. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW if averaging organic HAP contents. Resin use records may be based on purchase records if the permittee 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. **(40 CFR 63.5895(c))**
  - b. Compliance with organic HAP emissions limits 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 of 40 CFR Part 63, Subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in 40 CFR 63.5895(d). **(40 CFR 63.5900(a)(2))**
  - c. Compliance with organic HAP content limits in Table 7 of 40 CFR Part 63, 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 of 40 CFR Part 63, 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 of 40 CFR Part 63, Subpart WWWW, as discussed in 40 CFR 63.5895(d). **(40 CFR 63.5900(a)(3))**
  - d. The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in 40 CFR 63.5810(a) through (d). When change to an option based on a 12-month rolling average, base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously using an option that did not require records of resin and gel coat use. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**
3. The permittee must keep the following records: **(40 CFR 63.5915)**
    - a. A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status. **(40 CFR 63.5915(a)(1))**
    - b. Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2). **(40 CFR 63.5915(a)(3))**
    - c. All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3 and 7 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5915(c))**
    - d. A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable. **(40 CFR 63.5915(d))**
  4. The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1) and keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.5920(a) and (b))**
  5. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept offsite for the remaining 3 years. **(40 CFR 63.5920(c))**
  6. The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. Any records required to be maintained and are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the AQD or the EPA as part of an on-site compliance evaluation. **(40 CFR 63.5920(d) and (e))**

## **VII. REPORTING**

**Permit Staff – SC VII.1, 2, and 3, references to Rule 213 are ROP only. Remove before putting into a PTI. Renumber as appropriate.**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee must submit all of the notifications in Table 13 of 40 CFR Part 63, Subpart WWWW that apply by the dates specified in Table 13 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5905(a))**
5. The permittee shall submit all applicable reports identified in, and according to the timeframes in 40 CFR 63.5910. **(40 CFR 63.5910)**
6. The permittee must submit semiannual compliance reports. The compliance report must contain the following information: **(40 CFR 63.5910(b) and (c))**
  - a. Company name and address. **(40 CFR 63.5910(c)(1))**
  - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.5910(c)(2))**
  - c. Date of the report and beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(3))**
  - d. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. **(40 CFR 63.5910(c)(5))**
  - e. For each deviation from an organic HAP emissions limitation or operating limit and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report must contain the information in (i) through (ii). **(40 CFR 63.5910(d))**
    - i. The total operating time of each affected source during the reporting period. **(40 CFR 63.5910(d)(1))**
    - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. **(40 CFR 63.5910(d)(2))**

See Appendix 8 - **Permit Staff: Remove if PTI since this is ROP only.**

#### **VIII. STACK/VENT RESTRICTION(S)**

NA

#### **IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

**Remove these footnotes if no PTIs are associated with this flexible group.**

#### **Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).



## RENEWABLE OPERATING PERMIT APPLICATION

### AI-001: ADDITIONAL INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.*

SRN: B1772	Section Number (if applicable):
------------	---------------------------------

1. Additional Information ID <b>AI-PTE</b>
---

<b>Additional Information</b>
-------------------------------

2. Is This Information Confidential? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
---

Attached is Table 1 providing the PTE for the facility and Table 2 which provides the actual emissions for RY2022. The appropriate MAERS forms are included and reflect emissions from limited operation during 2022.

Emissions from clean-up are from the use of acetone and it can be assumed that 100% of the material evaporates. For example, in 2022 the facility used 4,380 pounds of acetone resulting in 4,380 pounds of acetone emissions (or 2.19 tpy).

Emissions from the composites operation are calculated using the UEF Factors. A copy of the UEF factor table is attached. For example, when using resin with a styrene content of 45% (XG-7692), an emission factor for filament application of 188 lb/ton VOCs (styrene) is appropriate according to the UEF table. The facility used 8448 pounds of resin resulting in 794.11 pounds VOCs (styrene).

**Table 1 - VOC and HAP/TAC Potential Emission Estimates  
Cecil Composites**

Raw Material	Purpose	Weekly Use (lbs)	Annual Use (pounds)	Emission Factor	Units	Annual Emissions (tpy)	HAP/TAC
779-4772 Unsaturated Polyester Resin (40% styrene)	Styrene monomer resin	30,769	1,600,000	160	lb/ton	64	styrene
18% UV-9 Solution (82% styrene)	Styrene monomer resin (as additive)	154	8,000	390.74	lb/ton	0.78	styrene
TBPP Initiator (100% tert-Butyl perbenzoate)	Low vapor pressure catalyst	628	32,653			-	
Titanium Dioxide	Solid used for color	400	16,000			-	
Norox 600 CL2 (100% Bis (4-tert-butylcyclohexyl) peroxydicarbonate)	Low vapor pressure catalyst	628	32,653			-	
Acetone (600 lbs is equivalent to)	Clean-up solvent	600	31,200	100%		15.6	acetone
Cadox- M50 Catalyst	Low vapor pressure catalyst	628	32,653				
HT VIPEL F421 Resin (38% styrene) (as an alternate if the original material is unavailable) - also XG-2762	Styrene monomer resin	26,187	1,361,702	149	lb/ton	51	styrene

**65 tpy VOCs (as styrene)**

UEF Factor - see Appendix for 40% and 45% styrene listed under filament application

UEF Table 82% styrene and filament application -  $(0.2746 \times \text{styrene}\%) - 0.0298$  x 2000

390.744 lb/ton

Acetone usage is usage (measured by make-up additions) is equivalent to emissions

Styrene monomer is used for viscosity adjustments during times of low volume productions. Emissions are accounted for in the total tpy styrene.

**Table 2- Actual VOC and HAP/TAC Emission Estimates  
Cecil Composites - RY2022**

Raw Material	Purpose	Annual Use (pounds)	Emission Factor	Units	Annual Emissions (tpy)	HAP/TAC
779-4772 Unsaturated Polyester Resin (40% styrene)	Styrene monomer resin	178	160	lb/ton	0.00712	styrene
18% UV-9 Solution (82% styrene)	Styrene monomer resin (as additive)		390.74	lb/ton	0.00	styrene
TBPB Initiator (100% tert-Butyl perbenzoate)	Low vapor pressure catalyst				-	
Titanium Dioxide	Solid used for color				-	
Norox 600 CL2 (100% Bis (4-tert-butylcyclohexyl) peroxydicarbonate)	Low vapor pressure catalyst	180			-	
Acetone (600 lbs is equivalent to)	Clean-up solvent	4,380	100%		2.19	acetone
Cadox- M50 Catalyst	Low vapor pressure catalyst					
HT VIPEL F421 Resin (38% styrene) (as an alternate if the original material is unavailable) also XG-2762	Styrene monomer resin	8,448	149	lb/ton	0.31	styrene

**total VOCs (as styrene)**

644 lbs

UEF Factor - see Appendix for 38% and 40% styrene listed under filament application

UEF Table 82% styrene and filament application -  $(0.2746 \times \text{styrene\%}) - 0.0298$  x 2000      390.744 lb/ton

Acetone usage is usage (measured by make-up additions) is equivalent to emissions

Styrene monomer is used for viscosity adjustments during times of low volume productions. Emissions are accounted for in the total tpy styrene.



**EU-101 EMISSION UNIT**

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS Paper Forms and Instructions Booklet. This MAERS form is used to report emission units used in a specific inventory year. Enter the inventory year for which the emission units are being reported in field 1.

<b>FORM REFERENCE</b>	
2. Form Type <b>EU-101</b>	3. AQD Source ID (SRN)

<b>OPERATOR'S EMISSION UNIT IDENTIFICATION</b>		<input type="checkbox"/> Change	<input type="checkbox"/> Add
4. AQD Emission Unit ID	5. Emission Unit ID	6. Emission Unit Type	
7. NAICS Code (if different from S-101 #5)	8. Installation Date MM/DD/YYYY	9. Dismantle Date MM/DD/YYYY	
10. Operator's Emission Unit Description – (Include process equipment and control devices)			
11. Combustion Source <input type="checkbox"/> Yes <input type="checkbox"/> No		12. Design Capacity	
13. Design Capacity Unit Numerator		14. Design Capacity Unit Denominator	
15. Is this combustion source used to generate electricity <input type="checkbox"/> Yes <input type="checkbox"/> No		16. Maximum Nameplate Capacity Megawatts	

<b>RULE 201 APPLICABILITY</b>	
17. Grandfathered? <input type="checkbox"/> Yes <input type="checkbox"/> No	
18. Exempt from Rule 201? <input type="checkbox"/> Yes <input type="checkbox"/> No	19. If Yes, Rule Number
20. If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. Permit? <input type="checkbox"/> Yes <input type="checkbox"/> No	22. If Yes, Enter the Permit Number
23. Is this emission unit required to report emissions to MAERS for this reporting year (inventory year)? <input type="checkbox"/> Yes <input type="checkbox"/> No	

<b>CONTROL DEVICE(S)</b>			
24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete	24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete
24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete	24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete
24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete	24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete

<b>EMISSION UNIT STACK(S)</b>			
25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete	25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete
25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete	25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete
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25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete	25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete





**A-101 ACTIVITY**

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable, with additions or corrections as necessary. For more detailed instructions, refer to the MAERS Paper Forms and Instructions Booklet. This MAERS form is used to report emission unit activities for a **specific inventory year**. Enter the **specific inventory year** in field 1.

<b>FORM REFERENCE</b>		
2. Form Type <b>A-101</b>	3. AQD Source ID (SRN)	4. Emission Unit (EU) OR Reporting Group (RG) ID

<b>ACTIVITY INFORMATION</b>				<input type="checkbox"/> Change		<input type="checkbox"/> Add	
5. Source Classification Code (SCC)		6. SCC Description			7. Remove from MAERS <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>SEASONAL MATERIAL USAGE SCHEDULE</b> IF THROUGHPUT IS > 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%				<b>OPERATING SCHEDULE</b>			
8. WINTER (JAN, FEB & DEC)	9. SPRING (MAR - MAY)	10. SUMMER (JUN - AUG)	11. FALL (SEP - NOV)	12. Hours per Day	13. Days per Week	14. Days per Year	
<b>MATERIAL INFORMATION</b>							
15A. Material Code			15B. Material Throughput			15C. Unit Code	
16. Operator's Material Description							
17. VOC Content (coatings or solvent) _____ . _____ Weight Percent				18. Density _____ . _____ <input type="checkbox"/> lb / gallon <input type="checkbox"/> lb / ft <sup>3</sup>			
19. BTUs (fuel) <input type="checkbox"/> lb <input type="checkbox"/> gallon <input type="checkbox"/> ft <sup>3</sup>		20. Sulfur Content (fuel) _____ . _____ Weight Percent			21. Ash Content (fuel) _____ . _____ Weight Percent		

<b>ACTIVITY INFORMATION</b>				<input type="checkbox"/> Change		<input type="checkbox"/> Add	
5. Source Classification Code (SCC)		6. SCC Description			7. Remove from MAERS <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>SEASONAL MATERIAL USAGE SCHEDULE</b> IF THROUGHPUT IS > 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%				<b>OPERATING SCHEDULE</b>			
8. WINTER (JAN, FEB & DEC)	9. SPRING (MAR - MAY)	10. SUMMER (JUN - AUG)	11. FALL (SEP - NOV)	12. Hours per Day	13. Days per Week	14. Days per Year	
<b>MATERIAL INFORMATION</b>							
15A. Material Code			15B. Material Throughput			15C. Unit Code	
16. Operator's Material Description							
17. VOC Content (coatings or solvent) _____ . _____ Weight Percent				18. Density _____ . _____ <input type="checkbox"/> lb / gallon <input type="checkbox"/> lb / ft <sup>3</sup>			
19. BTUs (fuel) <input type="checkbox"/> lb <input type="checkbox"/> gallon <input type="checkbox"/> ft <sup>3</sup>		20. Sulfur Content (fuel) _____ . _____ Weight Percent			21. Ash Content (fuel) _____ . _____ Weight Percent		



**E-101 EMISSIONS**

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS Paper Forms and Instructions Booklet. This MAERS form is used to report each activity's emissions for a specific inventory year. Enter the specific inventory year in field 1.

<b>FORM REFERENCE</b>			
2. Form Type <b>E-101</b>	3. AQD Source ID (SRN)	4. Emission Unit (EU) OR Reporting Group (RG) ID	
5. Source Classification Code (SCC)		6. Material Code	

<b>EMISSION INFORMATION</b>				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				Pounds
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model						
(Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code			10. Control Efficiency	
_____	_____	_____			_____ Weight Percent	
11. Comment						

<b>EMISSION INFORMATION</b>				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				Pounds
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model						
(Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code			10. Control Efficiency	
_____	_____	_____			_____ Weight Percent	
11. Comment						

<b>EMISSION INFORMATION</b>				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				Pounds
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model						
(Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code			10. Control Efficiency	
_____	_____	_____			_____ Weight Percent	
11. Comment						

<b>EMISSION INFORMATION</b>				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				Pounds
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model						
(Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code			10. Control Efficiency	
_____	_____	_____			_____ Weight Percent	
11. Comment						



Michigan Department of Environmental Quality - Air Quality Division  
Michigan Air Emissions Reporting System (MAERS)  
**SV-101 STACK**

<b>1. INVENTORY YEAR</b>

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report stacks for a specific inventory year. Enter the specific inventory year in field 1.

<b>FORM REFERENCE</b>	
2. Form Type <b>SV-101</b>	3. AQD Source ID (SRN)

<b>STACK IDENTIFICATION</b>		<input type="checkbox"/> Change	<input type="checkbox"/> Add
4. AQD Stack ID	5. Stack ID <b>SV</b>	6. Remove from MAERS <input type="checkbox"/> Yes <input type="checkbox"/> No	7. Dismantle Date (MM/DD/YYYY)
8. Stack Description			
9. Actual Stack Height Above Ground	feet	10. Inside Stack Diameter	inches
11. Exit Gas Temperature	degrees Fahrenheit	12. Actual Exit Gas Flow Rate	cubic feet per minute
13. Stack Orientation <input type="checkbox"/> Vertical <input type="checkbox"/> Vertical with No Loss Sleeve <input type="checkbox"/> Vertical with Conical Cap <input type="checkbox"/> Horizontal <input type="checkbox"/> Goose Neck Downward			
14. Latitude	15. Longitude	16. Horizontal Collection Method	
___ . ___ Decimal Degrees	___ . ___ Decimal Degrees		
17. Source Map Scale Number	18. Horizontal Accuracy Measure		
	Meters		
19. Horizontal Reference Datum Code		20. Reference Point Code	
21A. Bypass Stack Only <input type="checkbox"/> Yes <input type="checkbox"/> No		21B. If yes, operator ID of main stack	

<b>STACK IDENTIFICATION</b>		<input type="checkbox"/> Change	<input type="checkbox"/> Add
4. AQD Stack ID	5. Stack ID <b>SV</b>	6. Remove from MAERS <input type="checkbox"/> Yes <input type="checkbox"/> No	7. Dismantle Date (MM/DD/YYYY)
8. Operator's Stack Description			
9. Actual Stack Height Above Ground	feet	10. Inside Stack Diameter	inches
11. Exit Gas Temperature	degrees Fahrenheit	12. Actual Exit Gas Flow Rate	cubic feet per minute
13. Stack Orientation <input type="checkbox"/> Vertical <input type="checkbox"/> Vertical with No Loss Sleeve <input type="checkbox"/> Vertical with Conical Cap <input type="checkbox"/> Horizontal <input type="checkbox"/> Goose Neck Downward			
14. Latitude	15. Longitude	16. Horizontal Collection Method	
___ . ___ Decimal Degrees	___ . ___ Decimal Degrees		
17. Source Map Scale Number	18. Horizontal Accuracy Measure		
	Meters		
19. Horizontal Reference Datum Code		20. Reference Point Code	
21A. Bypass Stack Only <input type="checkbox"/> Yes <input type="checkbox"/> No		21B. If yes, operator ID of main stack	

## EF Table I: Unified Emission Factors for Open Molding of Composites

Revised and Approved: 10/13/2009

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

Styrene content in resin/gel coat, % <sup>(1)</sup>	<33 <sup>(1)</sup>	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 <sup>(2)</sup>
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 <sup>(3)</sup>	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	264	268	283	297	311	325	340	354	((0.714 x % styrene) - 0.18) x 2000
Mechanical atomized with VSR <sup>(3)</sup>	Mechanical Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized Controlled Spray <sup>(4)</sup>	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 Atomized 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 <sup>(3)</sup>	Mechanical Non-Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Non-Atomized application of resins that contain Methyl Styrene monomer <sup>(10)</sup>	Mechanical Non-Atomized Styrene monomer emission Factor (listed above) x .55																			
Mechanical Non-Atomized Filled DCPD resins <sup>(11)</sup>	0.144 x % styrene x 2000	95	98	101	104	108	111	114	117	120	124	127	130	133	136	140	143	146	149	((0.1603 x % styrene) - 0.0055) x 2000
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 <sup>(3)</sup>	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
Gel coat Application	0.445 x % styrene x 2000	294	315	336	358	377	398	418	439	460	481	501	522	543	564	584	605	628	646	((1.03646 x % styrene) - 0.195) x 2000
Gel coat Controlled Spray Application <sup>(4)</sup>	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
Gel coat Non-Atomized Application <sup>(6)</sup>	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
Lesser Atomized Gel coat Application <sup>(12)</sup>	for < 30: 0.323 x % styrene x 2000	229	241	252	264	276	287	299	311	322	334	346	357	369	381	392	404	416	428	((0.5842 x % styrene) - 0.07825) 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 Gel Coat Processed

MMA content in gel coat, % <sup>(6)</sup>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	≥20
Gel coat application <sup>(7)</sup>	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% styrene content by weight.
- 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, glasses, etc.
- 7 Based on the gel coat data from NMMA Emission Study.
- 8 SEE the July 17, 2001 EECs report Emission Factors for Non-Atomized Application on Gel Coats used in the Open Molding of Composites for a detailed description of the non-atomized gel coat testing.
- 9 Use the equation ((0.4506 x % styrene) - 0.0505) x 2000 for gel coats with styrene contents between 19% and 32% by wt; use the equation 0.185 x % styrene x 2000 for gel coats with less than 19% styrene content by wt.
- 10 Refer to Section 3.0, Instructions and Examples for the Emission Factor table, 3.2 Calculation of the methylstyrene factor.
- 11 Use this factor for the non-atomized application of DCPD or DCPD-blend resin, when filled to 30% or more by weight.
- 12

Table from 30% TO 32% styrene content:	30	31	32
	194	206	217



## RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.*

SRN: B1772

Section Number (if applicable):

1. Additional Information ID

AI-Plan

### Additional Information

2. Is This Information Confidential?

Yes  No

Attached is a copy of the Odor Management Plan submitted for Cecil Composites.

January 7, 2022  
Project No. 210058

Joyce Zhu  
Air Quality Division – Permit Section  
Michigan Department of Environment, Great Lakes, and Energy  
Warren District Office  
27700 Donald Court  
Warren, MI 48092-2793

**Submittal of Nuisance Management Plan by Cecil Composites, LLC – Permit to Install (PTI) No. 94-21**

Dear Ms. Zhu:

On behalf of Cecil Composites, LLC (Cecil), located at 151 Lafayette Street, Mount Clemens, Michigan 48043, Fishbeck has prepared the attached Nuisance Management Plan (NMP) as required by PTI No. 94-21, issued on November 23, 2021.

Preparing this plan was difficult, as the facility has not yet started operating and construction is not yet complete. Cecil has produced poles at the Mount Clemens site for destructive testing in our laboratory in the Warren facility, but no poles are being produced for sale. Prior to startup, the manufacturing process must be perfected, and the required testing must be completed. Production is tentatively projected to begin in July 2022, but because of company staff changes, shortage of qualified contractors, and supply chain issues, this schedule may change. As required by the permit, Cecil will notify EGLE upon initial startup.

Although production has not begun, Cecil has prepared a Nuisance Management Plan, as required by Section III.5 in the EUFIBERGLASS Emission Unit Conditions of the Permit (Page 7 of 14). A copy of the Nuisance Management Plan is attached. The NMP is being submitted to EGLE in advance of startup with the caveat that edits may need to be made as production begins and then increases. Even though the facility is not yet manufacturing poles, Cecil is still establishing the maintenance and housekeeping practices that will ensure that no nuisance occurs because of activities at the site.

If you have any questions or require additional information, please contact me at 248.324.4785 or email [lwoolley@fishbeck.com](mailto:lwoolley@fishbeck.com).

Sincerely,



**Lillian L. Woolley, PE**  
Senior Chemical Engineer

Attachment

By email

Copy: Ryan MacVoy, Chief Executive Officer – Cecil Composites, LLC  
Jessica Black, CHMM – Fishbeck



# Nuisance Minimization Plan Composite Utility Pole Manufacturing

Cecil Composites  
Mt. Clemens, Michigan

Project No. 210058  
January 2022

## **Nuisance Minimization Plan**

## **Composite Utility Pole Manufacturing**

## **Cecil Composites Mt. Clemens, Michigan**

**Prepared For:  
DWM Holdings  
Warren, Michigan**

**January 7, 2022  
Project No. 210058**



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Appendix 1 Complaint Form

**List of Abbreviations/Acronyms**

4W	40 CFR Part 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
EGLE	Michigan Department of Environment, Great Lakes, and Energy
HAP	hazardous air pollutant
hr/day	hours per day

IR	infrared
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
lb	pound(s)
lb/hr	pounds per hour
lb/month	pounds per month
MACT	Maximum Achievable Control Technology
MMBtu/hr	million Btus per hour
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSR	New Source Review
PM	particulate matter
PM <sub>10</sub>	fine particulate matter less than 10 microns
PM <sub>2.5</sub>	fine particulate matter less than 2.5 microns
PSD	Prevention of Significant Deterioration
PTE	potential to emit
PTI	Permit to Install
ROP	Renewable Operating Permit
SDS	Safety Data Sheet(s)
SER	significant emission rate
SO <sub>2</sub>	sulfur dioxide
TAC	toxic air contaminant
T-BACT	Best Available Control Technology for Toxics
tpy	tons per year
UEF	Unified Emission Factors
USEPA	U.S. Environmental Protection Agency
VOC	volatile organic compound

## 1.0 Introduction

Cecil Composites, LLC (Cecil) was issued air Permit to install (PTI) No. 94-21 on November 23, 2021, in preparation for the manufacture of composite poles at their new facility in Mount Clemens, Michigan. Cecil Composites, owned by parent company DWM Holdings, proposed to use approximately 1.6 million pounds of resin per year in manufacturing composite utility poles. Styrene content of the resins will be restricted to keep emissions low. The proposed facility will also be subject to the NESHAP WWW (4W). Acetone will be used as a clean-up solvent to reduce VOC emissions and will be recycled whenever possible. This PTI was not subject to review under the PSD Regulations, as potential emissions do not exceed the PSD thresholds. The facility will be required to apply for a Renewable Operating Permit (ROP) within 12 months of beginning operation.

Cecil expects that it will take approximately one year to achieve full production volumes. The initial installation and engineering will require multiple runs of small volumes of resin in order to perfect the setup of the machines before full production volumes can be achieved. During a portion of this ramp-up time, the ventilation system will not be operational. Production is limited to the equivalent of 100,000 pounds of resin during this ramp-up period to lower the potential for odors. In addition, the plant production will only require one shift per day (8 hrs/day), with hopes of expanding operation to two shifts per day (16 hrs/day) in the next three years.

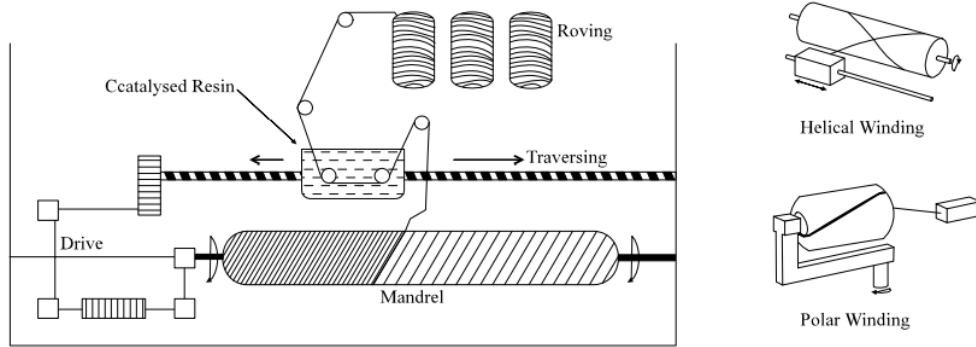
## 2.0 Background

Odors have been identified with the use of styrene. The purpose of this Nuisance Management Plan (NMP) is to describe site-specific provisions that will be established by Cecil to manage and minimize potential odors for their pole production facility. A process description is included in this NMP, identifying potential sources of odor as well as the specific work practices and air pollution control that will be used to minimize odors.

### 2.1 Process Description

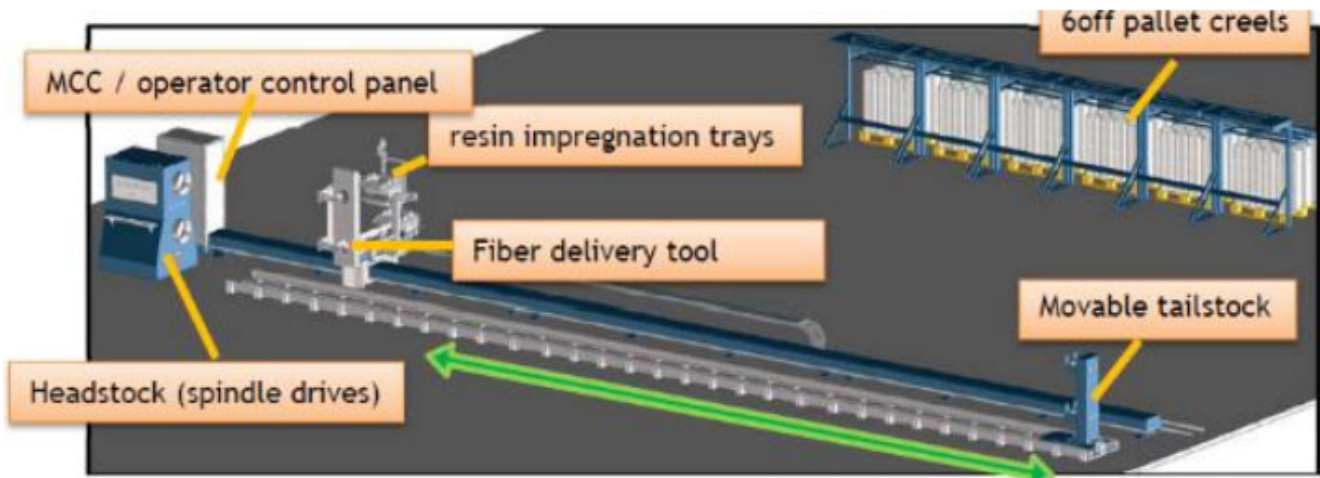
Cecil Composites will manufacture fiber-reinforced composite materials into poles for a variety of uses. These poles are used for sports lighting, parking lots, and utility poles. DWM Holdings currently manufactures metal light poles at an existing facility also located in Warren, Michigan. When customers have requested light poles manufactured from composite materials, DWM Holdings had purchased these poles from a manufacturer out of state for its customers. This new facility, called Cecil Composites, will manufacture its own light poles and use an existing infrastructure to ship these poles to customers. The site location map is included as Figure 7 and a site plan is included as Figure 8.

Filament winding is used to manufacture composite poles. Filament winding is the process of laying a band of resin impregnated fibers onto a rotating mandrel surface in a precise geometric pattern and curing them to form the product. This is an efficient method of producing cylindrical parts with optimum strength characteristics suited to the specific design and application. Glass fiber is most often used for the filament, but aramid, graphite, and sometimes boron and various metal wires may be used. The filament can be wetted during fabrication, or previously impregnated filament ("prepreg") can be used. The illustration below shows the filament winding process and indicates the three most common winding patterns. The process illustration depicts circumferential winding, while the two smaller pictures show helical and polar winding. The various winding patterns can be used alone or in combination to achieve the desired strength and shape characteristics.



**Figure 1. Typical Filament Winding Machine Set-Up**

The filament winder that will be in use at Cecil Composites is a dual-spindle (two poles wound simultaneously) 4-axis system with the resin delivery system mounted on the carriage. The dual spindle winder is fully automatic; however, the system as a whole is semi-automatic, as the mandrels will be moved between stations manually and the other equipment in the system (e.g., slitter, extractor) are operated manually. The system is primed for fully automatic operation in the future with the addition of a manipulator system for mandrel transfer and automation upgrades to the other equipment.



**Figure 2. Main Components of a Dual-Spindle Winder**

Emissions are generated when the resin and catalyst are exposed to the environment. By automating the resin and catalyst delivery process and using smaller resin trays, emissions are minimized by improving transfer efficiency. Two wet out trays will supply each spindle and are mounted on an arm as illustrated below:

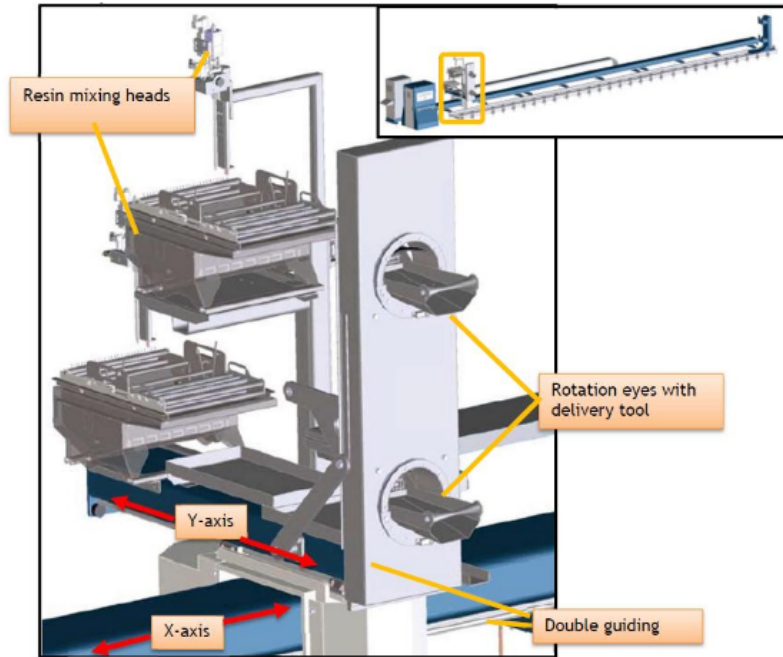


Figure 3. Resin Trays

The two trays are mounted on the y-axis of the machine and the trays traverse with the machine in the x-axis of the winder. The glass fiber rovings are pulled, impregnated with resin as they are pulled through the resin tray, prior to being applied to the mandrel. Resin supply from the trays is provided by the mixing head, which constantly replenishes the bath with catalyzed resin. A pivoting frame allows the mixing head to be moved away from the resin tray, after winding is done, for cleaning. A level sensor is mounted on the mixing head to regulate resin in the tray. By using these small trays, emissions are reduced.

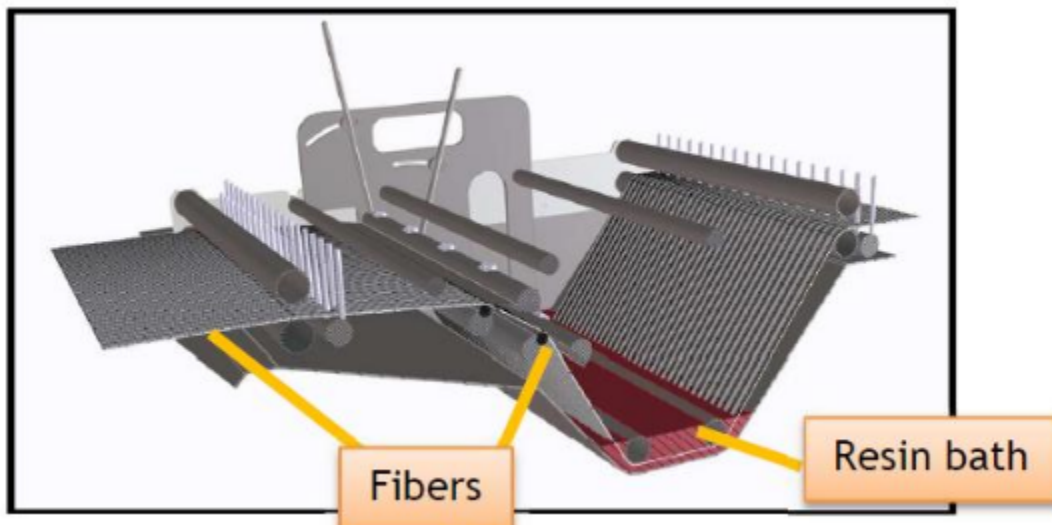


Figure 4. Cross-Section of the Resin Tray

The ANSI Standard 136.2 “Roadways and Area Lighting Equipment” includes specifications for light poles, and Cecil Composites has selected raw materials that will ensure its poles meet these ANSI specifications.

After winding, the composite pole products are transferred to the gelling station to be cured or hardened. During this gelling step, a rotation chain will continuously rotate the poles to prevent dripping or sagging of the wet material. The gelling station has a capacity for eight poles

As this station is flexible, the tailstock can be moved forward/backwards to suit the mandrel length. As the winder is a dual spindle, two gelling spots share a common adjustable tailstock.

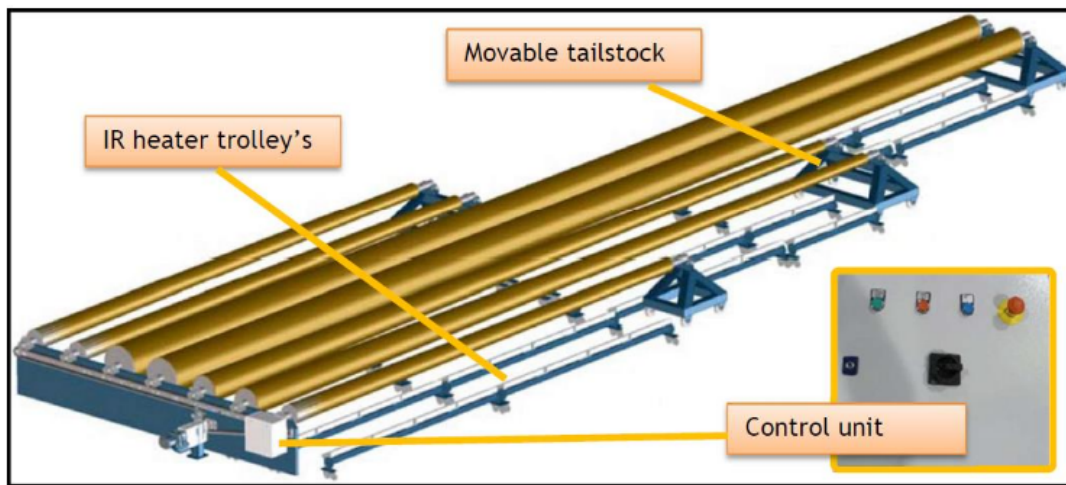


Figure 5. Overview of Gelling Station

The gelling station will also include IR heaters to boost the temperature and decrease the curing time.

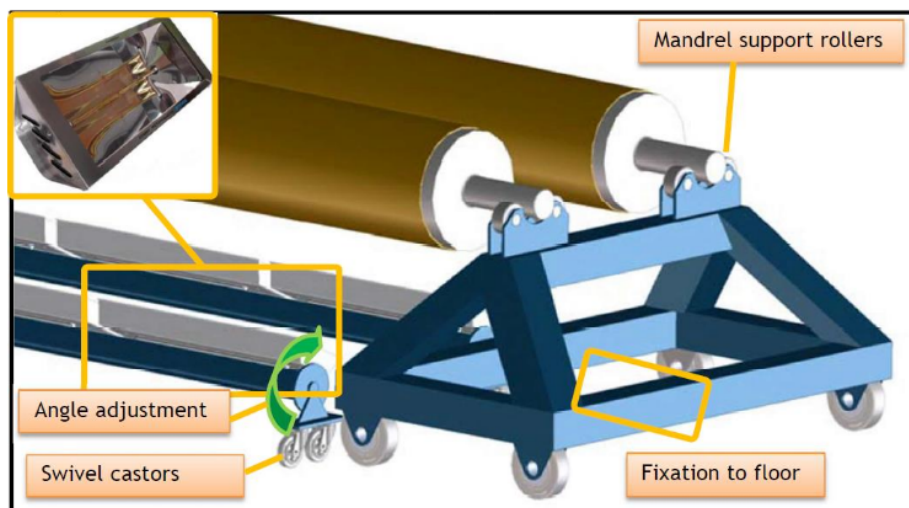


Figure 6. IR Heaters Mounted on Trolleys at a Gelling Station

No additional emissions are generated from use of the IR heaters. Acetone will be used as the clean-up solvent. A system will be established to allow reuse or recycling of acetone and ensure that emissions will be low. Styrene monomer may occasionally be used to adjust the viscosity of the resin back to its original viscosity when use rates are low. The use will be included in the tracking.

## 2.2 Facility Location

The Cecil facility is located at 151 Lafayette Street, Mt. Clemens, Michigan. The leased building is bounded by J.F. Frailey Drive to the west. To the southwest lies a residential neighborhood, and further west a public park complex. The residential neighborhood lies primarily along North Wilson Road, bounded by Lafayette Street on the north and Gallup Avenue to the south. To the north, east, and south are various light industrial and transportation carriers, including DHL, Axalta Coating Systems. A rail line lies further to the east, running roughly northeast-southwest. It should be noted that the prevailing wind direction is towards the northeast or, in this case, towards industrial land use. Figure 7 shows a basic overview map.

## 2.3 Air Pollution Control

VOCs like styrene are emitted from fresh resin surfaces during the fabrication process and from the use of solvents (usually acetone) for cleanup. Organic vapor emissions from polyester resin/fiberglass fabrication processes occur when the cross-linking agent (monomer) contained in the liquid resin evaporates into the air during resin application and curing. Since emissions result from evaporation of monomer from the uncured resin, they depend upon the amount of resin surface exposed to the air and the time of exposure. Thus, the potential for emissions varies with the manner in which the resin is mixed, applied, handled, and cured. These factors vary among the different fabrication processes and are fairly low for filament winding when compared to some other processes. Use of resins with a lower styrene content also lowers overall emissions. As the process becomes more automated, emissions should be lower still.

Most plants, including Cecil, use forced ventilation techniques to reduce worker exposure to styrene vapors, but they vent the vapors directly to the atmosphere through a particulate filter. Emissions from cleanup solvents can be controlled through good housekeeping and use practices, reclamation of spent solvent, and substitution with water-based solvent substitutes. Acetone will be used at Cecil Composites for clean-up.

As part of its waste minimization program, Cecil will periodically review the list of raw materials and communicate with vendors about the possibility of using lower styrene or lower VOC materials, as well as the possibility of using resins with vapor suppression. The need to have a constant supply of raw materials may preclude the use of different raw materials that may not be routinely available.

## 3.0 Regulatory and Permit Analysis

Cecil uses a resin that contains styrene to produce its product. The use of a styrene resin can create an unpleasant odor that could be noted by neighbors and other tenants in the industrial park where the facility is located. Figure 7 includes a site location map indicating that the facility is located in an industrial park, while Figures 8 and 9 include additional details on the building and stack.

### 3.1 Michigan Air Pollution Control Regulations

In Michigan, odors are regulated as a nuisance under Michigan Air Pollution Control Rule (Rule) 901. Rule 901 states that:

*Notwithstanding the provisions of any other department rule, a person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:*

- (a) Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.*
- (b) Unreasonable interference with the comfortable enjoyment of life and property.*

### **3.2 Air Quality Policy and Procedure 21**

Michigan Air Policy and Procedure 21, “Application of Rule 901(b) in the Permit to Install Review Process” (AQD-21) outlines requirements for reviewing the potential for a nuisance in a prospective project, as well as provides information on developing a NMP. Recommended elements include:

- A. Introduction, including process description, permit number, and background information
- B. Potential sources of odor and control equipment, if applicable
- C. Maintenance schedule
- D. Housekeeping measures
- E. Odor notification, investigation, and response

### **3.3 Michigan PTI No. 94-21**

PTI 94-21 EUFIBERGLASS, Section III.5 requires Cecil to develop and implement this NMP. The PTI also specifies that it must contain, at a minimum:

- a) Procedures for maintaining and operating EUFIBERGLASS in a manner that minimizes the release of odors to the outside air;*
- b) Procedures that shall be taken to address outdoor complaints; and,*
- c) A plan for corrective action to address any releases to outside air.*

### **3.4 Amendment of the NMP**

If the NMP fails to address or inadequately addresses odor management, Cecil will amend this plan within 30 days. Cecil will also update the plan if new equipment installation may affect odor, or if requested to do so by the EGLE Air Quality Department (AQD) District Supervisor.

### **3.5 Submittal of the NMP**

Cecil will submit a copy of this NMP to the AQD District Supervisor for review and approval within 45 days of permit issuance, which is by January 7, 2022. If the plan is subsequently amended, such amendments will also be submitted to the AQD District Supervisor. The NMP will be deemed approved if no notification to Cecil occurs within 60 days of submittal. In the interim, between plan submittal and approval, Cecil will implement appropriate corrective measures and operational controls to minimize odors.

## **4.0 Odor Control Measures**

At a facility like this, the primary source of odors would be expected from handling of the styrene-containing resin. Good housekeeping and maintenance will ensure that styrene odors and emissions do not become a nuisance. Proper operation of the ventilation system will ensure that emissions are properly dispersed.

VOCs are emitted from fresh resin surfaces during the fabrication process (EUFIBERGLASS) and from the use of solvents (usually acetone) for cleanup. Organic vapor emissions from polyester resin/fiberglass fabrication processes occur when the cross-linking agent (monomer) contained in the liquid resin evaporates into the air during resin application and curing. Styrene, methyl methacrylate, and vinyl toluene are three of the principal monomers used as cross-linking agents. Styrene is by far the most common.



Since emissions and, therefore, odors result from evaporation of monomer from the uncured resin, they depend upon the amount of resin surface exposed to the air and the time of exposure. Thus, the potential for emissions varies with the manner in which the resin is mixed, applied, handled, and cured. These factors vary among the different fabrication processes and are fairly low for filament winding when compared to some other processes, such as spray applications. Proper operation of the equipment will ensure that odors are minimal from the filament winding process.

#### **4.1 Ventilation System (SVFIBERGLASS)**

Styrene has a sweet odor that can be detected at levels as low as 0.04 ppm<sup>1</sup>. General ventilation is a common engineering control measure and can be used to minimize odors from resin. An exhaust system (referred to in the permit as SVFIBERGLASS) will be installed servicing the filament winding operations. A filter fabric with at least 98% particulate removal efficiency will be utilized in the exhaust unit. The system will have a particulate matter filtering system to ensure that resin is not exhausted to the outside air. The filtering system will have a 20,000-cfm exhaust fan and will exhaust to the outdoors from a stack out of the side wall of the building, and at the height specified by the Permit. It will be turned on during production activities and turned off when the filament winding operations are not being performed.

#### **4.2 Maintenance**

The exhaust system for the EUFIBERGLASS process will be regularly maintained as recommended by the manufacturer. Regular maintenance includes daily monitoring of the equipment to ensure that adequate flow occurs. Filters will be replaced periodically to ensure pressure drop is not too large. On a quarterly basis, the following are inspected and performed:

- Inspect for obstructions and deterioration.
- Repair all leaks and cracks.
- Verify fan performance.
- Inspect and grease bearings.
- Check fan belts for tension and wear. Replace as necessary.
- Check sheaves for alignment. Adjust as necessary.
- Check fan shaft and wheel. Adjust as necessary.
- Balance fan wheel, if required.
- Check draw at hoods.
- Check steel base for corrosion.

Filter changes and monitoring of differential pressure will occur more frequently.

#### **4.3 Container Management**

Styrene is reactive with strong acids and metal salts. Styrene attacks rubber, copper, and copper alloys, so it should be stored in steel containers that are tightly closed and properly grounded to ensure static electricity will not accumulate. One of the best ways to mitigate odor is to ensure that chemical containers stay closed unless directly in use. As production increases, resin may be purchased and stored in larger bulk storage tanks which would reduce the potential from styrene odors in handling the resin.

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<sup>1</sup> <https://nj.gov/health/eoh/rtkweb/documents/fs/1748.pdf>

Drums, totes, or tanks will be tightly closed containers and will be stored with secondary containment to catch leaks or drips, and away from spark, sunlight, or heat sources. Explosion-proof electrical equipment and non-sparking tools should be used in and near styrene and storage areas. Spill pallets will be used under drums to capture any potential leaks and spills.

#### **4.4 Housekeeping**

Cecil will employ a safety program similar to the 5S Program whose foundation is that organizing your workplace in a safe, clean, and efficient manner will enhance safety and environmental performance, as well as improve productivity. By introducing standard operational practices that include efficient, repeatable, safe ways to work, safety and environmental incidents can be eliminated. From the very beginning of production, Cecil has adopted a highly visual workplace where tools, raw materials, and equipment are properly placed and maintained. By keeping materials where they are used and always returning tools to their proper place, defects like spills can be easily identified and remedied. Inventory will be easy to maintain which will improve required recordkeeping. Accidents are less likely to happen.

In particular, to best control odors, several specific routine housekeeping procedures will be followed including:

- Storage of all raw materials and waste in their proper areas on spill pallets, as needed
- Disposal of resin-containing debris and rags in labeled closed containers
- Ensuring product chemical drums and buckets are closed when not in use
- Keeping waste in closed containers and recycling or disposing of it quickly
- Immediate cleanup of any spills or leaks

#### **5.0 Addressing Complaints**

Odors associated with handling styrene monomer and styrene-based polyester resin are well documented. While the air permit issued by the Michigan Department of the Environment, Great Lakes and Energy – Air Quality Division (EGLE) will ensure that styrene emissions meet the appropriate health-based standards, odors can be subjective and even emissions that meet health-based standards may still present a nuisance to neighbors. Odors that present a nuisance can be eliminated or mitigated in a number of ways, beginning with an odor investigation.

Maintaining a good relationship with our neighbors is important to Cecil and the key to this relationship is ensuring that odors do not bother the neighbors. Cecil is establishing a program where if odors are noted, they can be quickly addressed. This will help maintain a good relationship with the neighbors and ensure that odor complaints are not lodged with EGLE. As a side note, we understand that the new facility is adjacent to an Axalta facility that manufactures paint and, solvents associated with paint manufacturing can also be odorous; therefore, it would be unfair to immediately associate odor complaints with activities at Cecil Composites.

To facilitate ready communication with the facility, the name of the facility and its phone number will be posted on each door. In addition, a second number available in the case of an emergency during off-hours will also be included.

The following numbers will be posted initially and updated if needed:

During Business Hours: 586.774.5650

After Hours Phone: 303.516.7024

This will enable complainants to speak with a facility representative in the event that they have an odor complaint and will also help eliminate the source of odors.

If a complaint is registered, the following information will be collected from the complainant, where possible:

- Time of the odor
- Location of the odor
- Description of the odor
- Severity of the odor
- Return phone number and/or email of the complainant

Appendix 1 includes a form that can be used to record information on the odor and will allow follow-up by Cecil. Subsequent to the report, Cecil will undergo an internal investigation to attempt to validate the report and evaluate the need for corrective actions. This would be especially useful in the event that the complaint was also logged by EGLE.

In the event that complaints are received by Cecil, Fishbeck proposes a phased approach where additional measures are taken until it appears that the odors have been addressed.

First, a complete investigation will be initiated for each complaint and results will be documented. The following information can be used to assess the odor:

- Production processes and materials usage at the time of the report.
- Meteorological data at the time of the report, such as wind speed and direction, precipitation, etc.
- Any unusual projects or work being completed at the time of the report.
- A visual inspection of the ventilation system.
- A visual inspection of adjacent properties from public right of ways, to observe if any unusual operations or conditions exist.

In the event that odors are confirmed, several options are available to Cecil to reduce odors from the resin. These include improving housekeeping, raising the stack height, upgrading the ventilation system, or the use of masking agents. If necessary, this NMP will be updated.

## 6.0 Malfunction Reporting

Under Rule 912, Cecil must have a system to report startup, shutdowns, or malfunctions that result in excess emissions. As the ventilation system will be installed primarily for odor control, there is not likely a scenario in which failure to operate the control equipment will result in excess emissions. To ensure compliance with Rule 901, Cecil will monitor the process for a bypass or failure of its ventilation systems. If that bypass or failure lasts more than two hours and results in excess emissions, Cecil will report the malfunction to the EGLE District Office in Warren (586.753.3700). This report can be phoned in, emailed, or faxed and should be made as soon as possible, and **must** be made within two days of the incident or discovery. Information regarding the incident must include the date, time, and specific process equipment operating, as well as control equipment operating, nature of the issue, and corrective measures being taken. Within ten days of the incident or its discovery, a written report must be submitted to:

Michigan Department of Environment, Great Lakes and Energy  
Air Quality Division – Warren District Office  
27700 Donald Court  
Warren, MI 48092-2793

(586) 753-3700

24-hour Pollution Emergency Alert System (800) 292-4706

The report must include:

- Date and time of incident
- Probable causes or reasons for the incident
- Information regarding the process equipment operating at the time of incident and an estimate of excess emissions, if possible
- Summary of actions taken to correct and prevent a recurrence

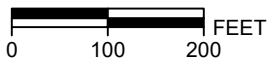
# Figures

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PLOT INFO: Z:\2021\1210058\CAD\GIS\mapdoc\FIG02-SiteMap.mxd Date: 3/25/2021 11:33:45 PM User: bahamamah



# SITE MAP



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors

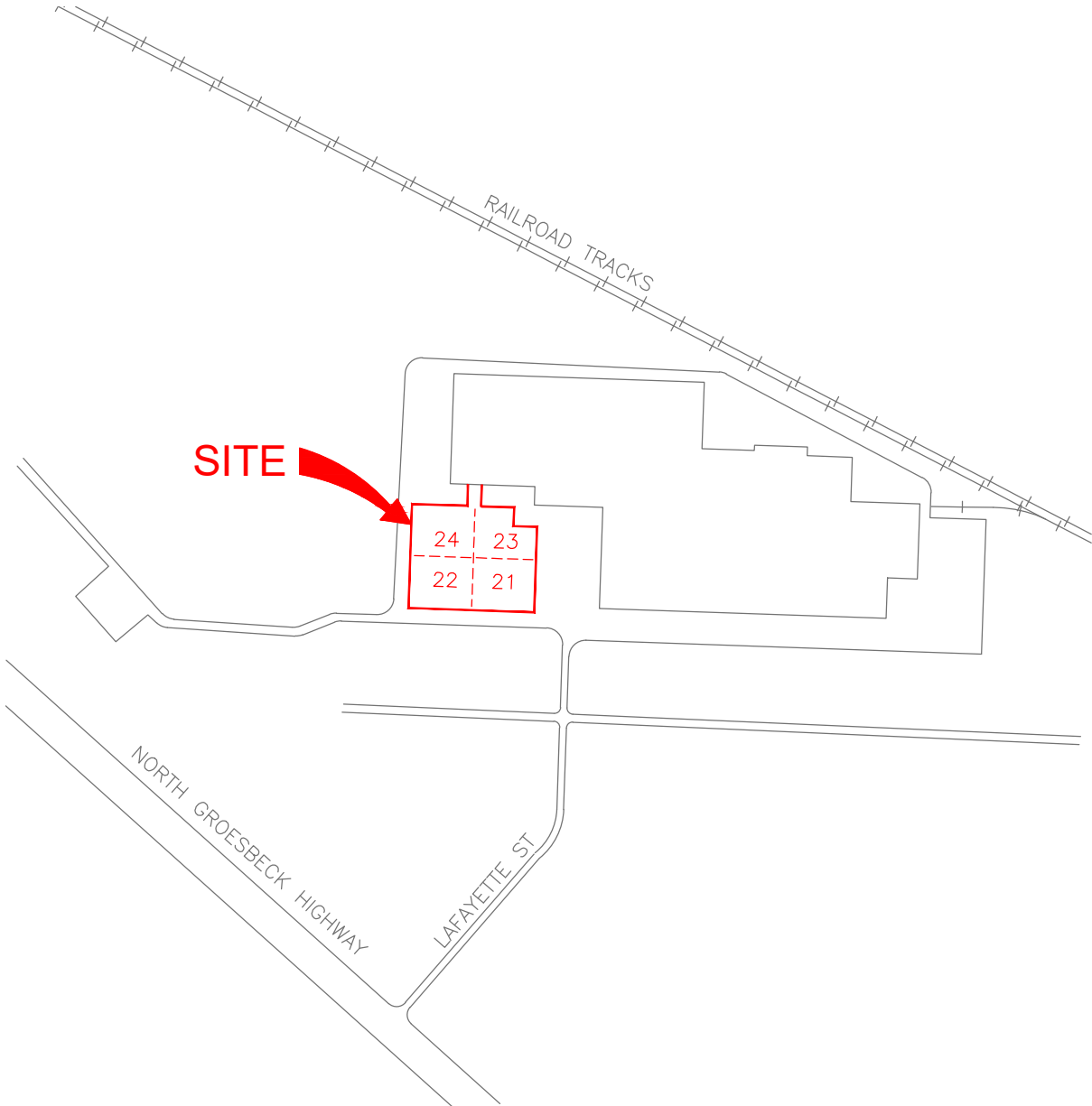


Hard copy is intended to be 8.5"x11" when plotted. Scale(s) indicated and graphic quality may not be accurate for any other size.

## Cecil Composites 151 Lafayette Street, Mt. Clemens, Michigan Nuisance Management Plan

PROJECT NO.  
210058

FIGURE NO.  
**7**



NORTH

# SITE PLAN

SCALE: 1" = 500'

PROJECT NO.

210058

FIGURE NO.

8

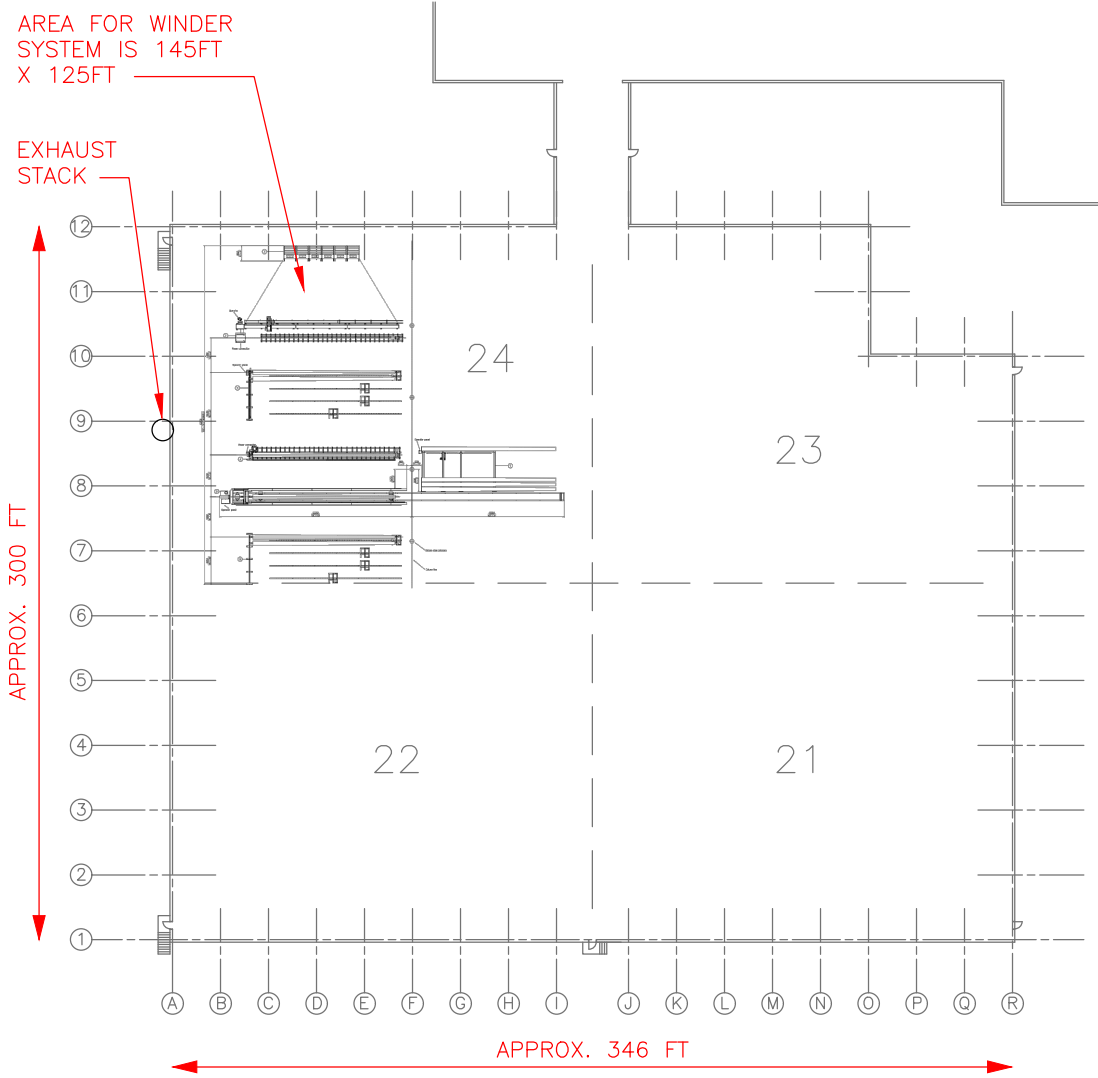
## Cecil Composites

151 Lafayette St, Mt. Clemens, Michigan

Nuisance Management Plan



Hard copy is intended to be 8.5"x11" when plotted. Scale(s) indicated and graphic quality may not be accurate for any other size.



# EQUIPMENT LOCATION

SCALE: 1" = 80'

Hard copy is intended to be 8.5"x11" when plotted. Scale(s) indicated and graphic quality may not be accurate for any other size.

**Cecil Composites**  
 151 Lafayette St, Mt. Clemens, Michigan  
 Nuisance Management Plan

PROJECT NO.

210058

FIGURE NO.

9



# Appendix 1

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## ODOR COMPLAINT LOGGING FORM

*For internal use only.*

**To be completed by the Plant Manager when receiving a complaint**

Date _____		Time of Report _____		Complainant _____	
Address and Phone Number of Complainant _____					
Description of Odor _____					
Time Incident was Detected _____		a.m./p.m.		Duration of Event _____	
Has this happened before? How often? _____					
Weather Conditions		Sunny/Overcast/Other _____		Temperature _____	
Weather Conditions		Precipitation _____		Wind Direction/Speed _____	
Are there weather conditions or times the odor seems more noticeable? _____					
Are there certain days of the week its more noticeable? _____					
<b>Plant Conditions</b>					
Current Production _____					
Materials in Use _____					
Housekeeping and Maintenance Proper? _____					
Ventilation System Operating Properly? _____					
Actions Taken and Time _____					
Comments or Recommendations _____					
Form Completed by and date _____					
Follow-up with Complainant and date _____					

**From:** [Ahammod, Shamim \(EGLE\)](#)  
**To:** [Orent, Kelly \(EGLE\)](#)  
**Subject:** FW: Revised Initial ROP Application (B1772)  
**Date:** Monday, January 29, 2024 12:02:15 PM  
**Attachments:** [B1772 InitialROP\\_r1\\_2024\\_0125.pdf](#)

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**From:** Woolley, Lillian <llwoolley@fishbeck.com>  
**Sent:** Friday, January 26, 2024 3:17 PM  
**To:** Ahammod, Shamim (EGLE) <AhammodS@michigan.gov>; Zhu, Joyce (EGLE) <ZHUI@michigan.gov>; Owens, Caryn (EGLE) <OwensC1@michigan.gov>  
**Cc:** Jeff Kirby <jeffk@polemfg.com>; Mahoney, Shannon <smahoney@fishbeck.com>  
**Subject:** Revised Initial ROP Application (B1772)

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hi,

Attached is a revised initial ROP application for Cecil Composites (B1772). A hard copy is being mailed with an original signature to the Warren District Office. The application simply incorporates a PTI modification with a change in stack height. We included emissions information and other required information. Please let me know if you need any additional information or have any questions.

**Lillian L. Woolley, PE | Senior Chemical Engineer**

Fishbeck | w: 248.324.4785 | c: 586.489.6876 | [Fishbeck.com](http://Fishbeck.com)



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION ASC-001 APPLICATION SUBMITTAL AND CERTIFICATION

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.

Source Name: Cecil Composites	SRN: B1772	Section Number (if applicable):
-------------------------------	------------	---------------------------------

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. A Responsible Official must sign and date this form.

Listing of ROP Application Contents. See the initial application instructions for guidance regarding which forms and attachments are required for your source. Check the box for the items included with your application.	
<input checked="" type="checkbox"/> Completed ROP Initial Application Forms (required)	<input type="checkbox"/> Copies of all Consent Orders/Consent Judgments
<input checked="" type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Compliance Plan/Schedule of Compliance
<input checked="" type="checkbox"/> HAP/Criteria Pollutant Potential to Emit Calculations	<input type="checkbox"/> Acid Rain Initial Permit Application
<input checked="" type="checkbox"/> Stack information	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input checked="" type="checkbox"/> Copies of all active Permit(s) to Install (required)	<input type="checkbox"/> Additional Information (AI-001) Forms
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input checked="" type="checkbox"/> Paper copy of all documentation provided (required)
<input checked="" type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input checked="" type="checkbox"/> Electronic documents provided (optional)
<input type="checkbox"/> Confidential Information	<input checked="" type="checkbox"/> Other, explain: AI-Plan, AI-PTE

### Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in Permits to Install, this application and other applicable requirements that the source is subject to.  Yes  No

This source will continue to be in compliance with all of its applicable requirements, including those contained in Permits to Install, this application and other applicable requirements that the source is subject to.  Yes  No

This source will meet, in a timely manner, applicable requirements that become effective during the permit term.  Yes  No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing Permits to Install, this application and all other applicable requirements that the source is subject to.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

### Name and Title of the Responsible Official (Print or Type)

Jeff Kirby, Plant Manager

**As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.**

Signature of Responsible Official

Date

01-25-2024



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION

### SI-001 SECTION INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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<b>SECTION INFORMATION</b>	
Section Name Cecil Composites	
Section Description (Including address if different from Source address identified on the S-001 Form) Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process. Acetone will be used as a clean-up solvent.	
<b>Emission Units Included In This Section</b>	
EU-FIBERGLASS	EU-
EU-	EU-
EU-	EU-
EU-	EU-
EU-	EU-
EU-	EU-
EU-	EU-
EU-	EU-
EU-	EU-
EU-	EU-
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EU-	EU-

Check if an AI-001 Form is attached to provide more information for SI-001. Enter AI-001 Form ID: **AI-**



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION

### S-001 STATIONARY SOURCE INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
------------	---------------------------------

<b>SOURCE INFORMATION</b>		SIC Code 3648	NAICS Code 335129
Source Name Cecil Composites			
Street Address 151 Lafayette Street			
City Mt. Clemens	State MI	ZIP Code 48043	County Macomb
Section/Town/Range (if street address not available)			
Source Description Pole Manufacturer / Reinforced Plastic Composites Production			

<b>OWNER INFORMATION</b>				
Owner Name DWM Holdings				
Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country

<input type="checkbox"/>	Check if an AI-001 Form is attached to provide more information for S-001. Enter AI-001 Form ID: <b>AI-</b>
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## RENEWABLE OPERATING PERMIT INITIAL APPLICATION FORM S-002 CONTACT AND RESPONSIBLE OFFICIAL INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772

Section Number (if applicable):

At least one contact and one Responsible Official must be identified. Additional contacts and Responsible Officials may be included if necessary.

### CONTACT INFORMATION

Contact 1 Name Jeff Kirby		Title Plant Managerr		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address) Cecil Composites 151 Lafayette Street				
City Mt. Clemens	State MI	ZIP Code 48043	County Macomb	Country
Phone number 586.484.0142		E-mail address jeffk@polemfg.com		

Contact 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number	E-mail address			

### RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name Jeff Kirby		Title Plant Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address) Cecil Composites				
City Mt. Clemens	State MI	ZIP Code 48043	County Macomb	Country
Phone number 586.484.0142		E-mail address jeffk@polemfg.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number	E-mail address			

Check if an AI-001 Form is attached to provide more information for S-002. Enter AI-001 Form ID: **AI-**



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION S-003 SOURCE REQUIREMENT INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772

Section Number (if applicable):

### SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject. Refer to the ROP Initial Application Instructions for additional information.

<p>1. Actual emissions and associated data from <b>all</b> emission units with applicable requirements are required to be reported in MAERS. Are there any emissions and associated data that have <b>not</b> been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>3. a. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. b. Has an updated RMP been submitted to the USEPA?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
<p>4. Does the source belong to one of the source categories that require quantification of fugitive emissions? If Yes, identify the category on an AI-001 Form and include the fugitive emissions in the PTE calculations for the source. <i>See ROP Initial Application instructions.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>5. Does this stationary source have the potential to emit (PTE) of 100 tons per year or more of any criteria pollutant (PM-10, PM 2.5, VOC, NOx, SO<sub>2</sub>, CO, lead)? If Yes, include potential emission calculations for each identified pollutant on an AI-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>6. Does this stationary source emit any hazardous air pollutants (HAPs) regulated by the federal Clean Air Act, Section 112? If Yes, include potential and actual emission calculations for HAPs, <b>including fugitive emissions</b> on an AI-001 Form.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>7. a. Are any emission units subject to Compliance Assurance Monitoring (CAM)? If Yes, identify the specific emission unit(s) and pollutant(s) subject to CAM on an AI-001 Form. b. Is a CAM plan included with this application on an AI-001 Form?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
<p>8. Does the source have any active Consent Orders/Consent Judgments (CO/CJ)? If Yes, attach a copy of each CO/CJ on an AI-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>9. Are any emission units subject to the federal Cross State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>10. a. Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the Federal Acid Rain Program on an AI-001 Form. b. Is an Acid Rain Permit Application included with this application?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
<p>11. Does the source have any required plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, startup/shutdown plans or any other monitoring plan? If Yes, then the plan(s) must be submitted with this application on an AI-001 Form.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>12. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then the requirement and justification must be submitted on an AI-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/> Check if an AI-001 Form is attached to provide more information for S-003. Enter AI-001 Form ID: <b>AI-PTE</b>	





## RENEWABLE OPERATING PERMIT INITIAL APPLICATION EU-001 PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNITS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
------------	---------------------------------

Review all emission units at the source and answer the question below.

1. Does the source have any emission units that are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules, not including Rules 281(2)(h), 287(2)(c), and 290?  Yes  No

If Yes, identify the emission units in the table below. If No, go to the EU-002 Form.

*Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either an EU-002 or EU-004 Form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).*

Emission Unit ID	Emission Unit Description	PTI Exemption Rule Citation <small>[e.g. Rule 282(2)(b)(i)]</small>	Rule 212(4) Citation <small>[e.g. Rule 212(4)(c)]</small>
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			

Comments:

Check if an AI-001 Form is attached to provide more information for EU-001. Enter AI-001 Form ID: AI-



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION EU-002 EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
------------	---------------------------------

Review all emission units and applicable requirements at the source and provide the following information.

1. Does the source have any emission units which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.  Yes  No

If Yes, identify the emission units in the table below. If No, go to the EU-003 Form.

*Note: If several emission units were installed under the same rule above, provide a description of each and an installation date for each.*

Origin of Applicable Requirements	Emission Unit Description – <i>Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices</i>	Date Emission Unit was Installed/ Modified/ Reconstructed
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input type="checkbox"/> Rule 287(2)(c) surface coating line		
<input type="checkbox"/> Rule 290 process with limited emissions		

Comments:

Check if an AI-001 Form is attached to provide more information for EU-002. Enter AI-001 Form ID: **AI-**



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION EU-003 EMISSION UNITS WITH PERMITS TO INSTALL

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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Review all emission units at the source and fill in the information in the following table for **all** emission units with Permits to Install (PTI). Any PTI(s) identified below must be attached to the application.

Permit to Install Number	Emission Unit ID	Description <i>(Include Process Equipment, Control Devices and Monitoring Devices)</i>	Date Emission Unit was Installed/Modified/Reconstructed
94-21B	EU-FIBERGLASS	Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process.	7/1/2022
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		
<p>1. Are you proposing changes to any emission unit names, descriptions or control devices in the PTIs listed above? If Yes, describe the proposed changes on an AI-001 Form. <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>2. Are you proposing additions or clarifications to any permit conditions? If Yes, describe the proposed changes on an AI-001 Form. <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>3. Are you proposing monitoring, testing, recordkeeping and/or reporting necessary to demonstrate compliance with any applicable requirements? If Yes, describe the proposed conditions on an AI-001 Form. <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p><input checked="" type="checkbox"/> Check if an AI-001 Form is attached to provide more information for EU-003. Enter AI-001 Form ID: <b>AI-PTI</b></p>			



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION EU-004 OTHER EMISSION UNITS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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Complete an EU-004 Form for **all** emission units with applicable requirements that have **not** been addressed on an EU-001, EU-002 or EU-003 Form. This would include grandfathered emission units or PTI exempt emission units subject to applicable requirements in the AQD Rules, and emission units subject to a MACT, NESHAP, NSPS, or other federal requirement.

1. Does the source have emission units with applicable requirements that have not been addressed on the EU-001, EU-002 and/or EU-003 Forms? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  If Yes, provide the required information below. Complete the AR-001 and/or AR-002 Form(s) to identify all applicable requirements and all monitoring, testing, recordkeeping and/or reporting to demonstrate compliance with the applicable requirements.			
Emission Unit ID <b>EU-</b>	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – <i>If different from S-001 Form</i>
Emission Unit Description – <i>Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms).</i>			
Emission Unit ID <b>EU-</b>	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – <i>If different from S-001 Form</i>
Emission Unit Description – <i>Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms).</i>			
Emission Unit ID <b>EU-</b>	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – <i>If different from S-001 Form</i>
Emission Unit Description – <i>Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms).</i>			
<input type="checkbox"/> Check if an AI-001 Form is attached to provide more information for EU-004. Enter AI-001 Form ID: <b>AI-</b>			



# RENEWABLE OPERATING PERMIT INITIAL APPLICATION

## FG-001: FLEXIBLE GROUPS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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Complete the FG-001 Form for all Emission Units (EUs) that you want to combine into a Flexible Group (FG). Create a descriptive ID for the FG and description, and list the IDs for the EUs to be included in the FG. See instructions for FG examples.

Flexible Group ID <b>FG-WWWW</b>			
Flexible Group Description Subject to 40 CFR Part 63, Subpart WWWW			
<b>Emission Unit IDs</b>			
EU-FIBERGLASS	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
Flexible Group ID <b>FG-</b>			
Flexible Group Description			
<b>Emission Unit IDs</b>			
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
EU-	EU-	EU-	EU-
<input type="checkbox"/> Check if an AI-001 Form is attached to provide more information for FG-001. Enter AI-001 Form ID: <b>AI-</b>			



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION AR-001 APPLICABLE REQUIREMENTS FROM MACT, NESHAP OR NSPS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Proposed Section Number (if applicable):
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Answer the question below for emission units subject to a MACT, NESHAP or NSPS regulation and provide either an existing Permit to Install, an existing template table\*, or a newly created table\*\* that contains the applicable requirements for each subject emission unit with the application, including associated monitoring, testing, recordkeeping and reporting necessary to demonstrate compliance.

1. Is any emission unit subject to a Maximum Achievable Control Technology (MACT) standard in 40 CFR Part 63, National Emission Standard for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61, or New Source Performance Standard (NSPS) in 40 CFR Part 60? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>
If yes, identify the emission units and applicable MACT, NESHAP or NSPS in the table below.

**Note:** If several emission units are subject to the same regulation, list all of the emission unit IDs together. Attach the applicable requirements (PTI, template table or newly created table) in the selected format to the application using an AI-001 Form.

MACT NESHAP or NSPS Subpart and Name	Emission Unit ID – Provide the Emission Unit ID you created on the EU-003 or EU-004 Form	Applicable Requirements Attached in Which Format?
40 CFR Part 63 Subpart WWWW Reinforced Plastic Composites Production	EUFIBERGLASS	<input checked="" type="checkbox"/> PTI No. 94-21B <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
		<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
		<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
		<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
		<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**

<b>STREAMLINED REQUIREMENTS</b> 2. Are you proposing to streamline any requirements? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> If yes, identify the streamlined and subsumed requirements and provide the EU ID and a justification for streamlining the applicable requirement on an AI-001 Form.
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\*MACT and NSPS template tables (available at the link below)  
 \*\*Blank EU or FG template tables (available at the link below)  
<http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits(ROP)/Title V", then "ROP Forms & Templates")

Check if an AI-001 Form is attached to provide more information for AR-001. Enter AI-001 Form ID: **AI-**



## RENEWABLE OPERATING PERMIT INITIAL APPLICATION AR-002 OTHER APPLICABLE REQUIREMENTS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772	Section Number (if applicable):
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### APPLICABLE REQUIREMENTS NOT INCLUDED IN A PTI, MACT, NESHAPS, NSPS, OR PERMIT EXEMPTION

Answer the questions below and create an EU table to identify terms and conditions for each emission unit identified on an EU-004 Form (other than MACT, NESHAP, or NSPS requirements). This would include emission units that are grandfathered or exempt from PTI requirements but subject to state rules, federal rules or consent orders/consent judgments. Blank EU template tables are available on the EGLE Internet at: <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates")

1. Is there an emission unit identified on an EU-004 Form that is subject to <b>emission limit(s)</b> ? If Yes, fill out an EU table to identify the emission limit(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. Is there an emission unit identified on an EU-004 Form that is subject to <b>material limit(s)</b> ? If Yes, fill out an EU table to identify the material limit(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. Is there an emission unit identified on an EU-004 Form that is subject to <b>process/operational restriction(s)</b> ? If Yes, fill out an EU table to identify the process/operational restriction(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. Is there an emission unit identified on an EU-004 Form that is subject to <b>design/equipment parameter(s)</b> ? If Yes, fill out an EU table to identify the design/equipment parameter(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>5. Is there an emission unit identified on an EU-004 Form that is subject to <b>testing/sampling requirement(s)</b>? If Yes, fill out an EU table to identify the testing/sampling requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>6. Is there an emission unit identified on an EU-004 Form that is subject to <b>monitoring/recordkeeping requirement(s)</b>? If Yes, fill out an EU table to identify the monitoring/recordkeeping requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>7. Is there an emission unit identified on an EU-004 Form that is subject to <b>reporting requirement(s)</b>? If Yes, fill out an EU table to identify reporting requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>8. Is there an emission unit identified on an EU-004 Form that is subject to <b>stack/vent restriction(s)</b>? If Yes, fill out an EU table to identify stack/vent restriction(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>9. Are there any other requirements that you would like to <b>add</b> for an emission unit identified on an EU-004 Form? If Yes, fill out an EU table to identify the requirements, and provide the EU ID and a justification for the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>10. Are you proposing to streamline any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below. Do not include requirements identified on an AR-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Check if an AI-001 Form is attached to provide more information for AR-002. Enter AI-001 Form ID: <b>AI-</b>	





## RENEWABLE OPERATING PERMIT INITIAL APPLICATION AR-003 SOURCE-WIDE APPLICABLE REQUIREMENTS

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to "Renewable Operating Permit Initial Application Instructions" for additional information to complete the application.*

SRN: B1772

Section Number (if applicable):

Complete a Source-wide table for any conditions that apply to the entire source. A blank Source-wide template table is available on the EGLE Internet at:

<http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates")

1. Are there any applicable requirements that apply to the entire source?

Yes

No

If Yes, identify the conditions by utilizing a Source-wide template table and include all of the appropriate applicable requirements, including associated monitoring, testing, recordkeeping and reporting necessary to demonstrate compliance. Provide information regarding the applicable requirements in the comment field below.

Comments

Check if an AI-001 Form is attached to provide more information for AR-003. Enter AI-001 Form ID: AI-



## RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.*

SRN: B1772

Section Number (if applicable):

1. Additional Information ID

AI-PTI

### Additional Information

2. Is This Information Confidential?

Yes  No

Attached is a copy of PTI 94-21B which can be used to develop the initial renewable operating permit. A WWWW flexible group form detailing the WWWW applicable conditions is also included.

A permit application was submitted and PTI 94-21B was approved on October 23, 2023 to change the stack height and diameter. That was the only change made.

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

October 26, 2023

**PERMIT TO INSTALL  
94-21B**

**ISSUED TO  
Cecil Composites, LLC**

**LOCATED AT  
151 Lafayette Street  
Mt. Clemens, Michigan 48043**

**IN THE COUNTY OF  
Macomb**

**STATE REGISTRATION NUMBER  
B1772**

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: <b>August 9, 2023</b>	
DATE PERMIT TO INSTALL APPROVED: <b>October 26, 2023</b>	SIGNATURE: 
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**

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## COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

### POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO <sub>2</sub>	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

## GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**



### EMISSION UNIT SPECIAL CONDITIONS

#### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EUFIBERGLASS	Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process. Acetone will be used as a clean-up solvent.	11-23-2021 / 4-13-2022 / PTI Date	FGMACTWWWW

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

**EUFIBERGLASS  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Composite pole manufacturing using filament winding process and styrene-based polyester resins. Infrared heaters are used in the resin curing process. Acetone will be used as a clean-up solvent.

**Flexible Group ID:** FGMACTWWWW

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC (including styrene)	65.1 tpy	12-month rolling time period as determined at the end of each calendar month	EUFIBERGLASS	SC VI.2, SC VI.3	R 336.1702(a)
2. Acetone (CAS No. 67-64-1)	15.6 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	EUFIBERGLASS	SC VI.2, SC VI.3	R 336.1224, R 336.1225

**II. MATERIAL LIMIT(S)**

1. The styrene content of all resins used in EUFIBERGLASS shall not exceed 45.3 percent by weight as applied. **(R 336.1224, R 336.1225, R 336.1702(a))**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall capture all waste materials used in EUFIBERGLASS and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. The permittee shall handle all resins, catalysts, additives and cleaning solvents in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall store the finished composite poles inside the facility until they are transported off-site.<sup>1</sup> **(R 336.1901)**
4. The permittee shall submit, implement, and maintain a nuisance minimization plan (NMP) for odors. The NMP shall include at a minimum, but not be limited to:
  - a) Procedures for maintaining and operating EUFIBERGLASS in a manner that minimizes the release of odors to the outside air.
  - b) Procedures that shall be taken to address odor complaints.
  - c) A plan for corrective action to address any odor releases to the outside air.

If at any time the plan fails to address or inadequately addresses odor management, the permittee shall amend the plan within 30 days after such an event occurs. The permittee shall also amend the plan within 30 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 60 days of submittal, the plan or amended plan shall be considered approved.

Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to minimize odors.<sup>1</sup> **(R 336.1901)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. Filament winding shall be carried out by use of the dual-spindle 4-axis system with an automated resin delivery system. **(R 336.1225, R 336.1702(a))**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for EUFIBERGLASS:
  - a) The identity and amount (in pounds) of each material used.
  - b) The styrene content (in percent by weight) of each resin used.
  - c) The VOC (including styrene) content of each material used.
  - d) The acetone content of each material used.
  - e) The amount, in pounds, of acetone recovered and reclaimed.
  - f) The appropriate emission factors for each raw material used:
    - i. The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009, shall be used only for styrene and MMA emission calculations for open molding processes,
    - ii. Mass balance used for non-styrene, VOC emissions,
    - iii. Mass balance used for acetone emissions, or
    - iv. Alternate emission factors may be used with the approval of the AQD District Supervisor.
  - g) VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
  - h) Acetone mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using the UEF table, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**

#### **VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVFIBERGLASS	42	63.75	R 336.1225, 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

### FLEXIBLE GROUP SPECIAL CONDITIONS

#### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGMACTWWWW	Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785. Reinforced plastic composites production also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.	EUFIBERGLASS

**FGMACTWWWW  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Each existing or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790 that emit less than 100 tpy of HAP. Reinforced plastic composites production includes the following operations: filament winding, open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

**Emission Units:** EUFIBERGLASS

**POLLUTION CONTROL EQUIPMENT**

Dry fabric filters

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/ Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring/ Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. Organic HAP from Open Molding – Corrosion Resistant and/or High Strength (CR/HS) Resin, Filament Application	171 lb/ton	12-month rolling average as determined at the end of each calendar month	Filament Application portion of FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
2. Organic HAP from Open Molding – Non CR/HS Resin, Filament Application	188 lb/ton	12-month rolling average as determined at the end of each calendar month	Filament Application portion of FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
3. Organic HAP from Open Molding – Low-flame spread/low-smoke products, Filament Application	270 lb/ton	12-month rolling average as determined at the end of each calendar month	Filament Application portion of FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
4. Organic HAP from Open Molding – Shrinkage controlled resins, Filament Application	215 lb/ton	12-month rolling average as determined at the end of each calendar month	Filament Application portion of FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>

5. The permittee must use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of 40 CFR Part 63, Subpart WWWW:
- a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5810(a))**
  - b) Demonstrate that, on average, the facility meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 of 40 CFR Part 63, Subpart WWWW that applies to the facility. **(40 CFR 63.5810(b))**
  - c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW that apply to the weighted average organic HAP emissions limit for all open molding operations. **(40 CFR 63.5810(c))**
  - d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. **(40 CFR 63.5810(d))**

The permittee may switch between the compliance options in (a) through (d). When changing to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously used an option that did not require the permittee to maintain records of resin or gel coat. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**

## **II. MATERIAL LIMIT(S)**

NA

## **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.5835(c))**
2. The permittee must be in compliance at all times with the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW as follows: **(40 CFR 63.5805(c), 40 CFR 63.5835(a))**
  - a) For closed molding operation using compression/injection molding, uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting. **(40 CFR Part 63, Subpart WWWW, Table 4.1)**
  - b) The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. **(40 CFR Part 63, Subpart WWWW, Table 4.2)**
  - c) For each HAP-containing materials storage operation, the permittee 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. **(40 CFR Part 63, Subpart WWWW, Table 4.3)**
  - d) For each mixing operation, the permittee 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. **(40 CFR Part 63, Subpart WWWW, Table 4.6)**

- e) For each mixing operation, the permittee 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. **(40 CFR Part 63, Subpart WWWW, Table 4.7)**
- f) For each mixing operation, the permittee must keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR Part 63, Subpart WWWW, Table 4.8)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

#### **V. TESTING/SAMPLING**

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

1. In order to determine the organic HAP content of resins and gel coats, the permittee 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 (a) through (c), as applicable. **(40 CFR 63.5797)**
  - a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. **(40 CFR 63.5797(a))**
  - b) If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of Appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance. **(40 CFR 63.5797(b))**
  - c) If the organic HAP content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee must use the measured organic HAP content to determine compliance. **(40 CFR 63.5797(c))**

#### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee must monitor and collect data as specified in (a) through (d): **(40 CFR 63.5895(b))**
  - a) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating. **(40 CFR 63.5895(b)(1))**
  - b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system. **(40 CFR 63.5895(b)(2))**
  - c) At all times, the permittee must maintain necessary parts for routine repairs of the monitoring equipment. **(40 CFR 63.5895(b)(3))**
  - d) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 63.5895(b)(4))**



2. The permittee must monitor and collect data to demonstrate continuous compliance as follows: **(40 CFR 63.5895, 40 CFR 63.5900)**
  - a) The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW if averaging organic HAP contents. Resin use records may be based on purchase records if the permittee 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. **(40 CFR 63.5895(c))**
  - b) Compliance with organic HAP emissions limits 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 of 40 CFR Part 63, Subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in 40 CFR 63.5895(d). **(40 CFR 63.5900(a)(2))**
  - c) Compliance with organic HAP content limits in Table 7 of 40 CFR Part 63, 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 of 40 CFR Part 63, 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 of 40 CFR Part 63, Subpart WWWW, as discussed in 40 CFR 63.5895(d). **(40 CFR 63.5900(a)(3))**
  - d) The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in 40 CFR 63.5810(a) through (d). When change to an option based on a 12-month rolling average, base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously using an option that did not require records of resin and gel coat use. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**
3. The permittee must keep the following records: **(40 CFR 63.5915)**
  - a) A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status. **(40 CFR 63.5915(a)(1))**
  - b) Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2). **(40 CFR 63.5915(a)(3))**
  - c) All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3 and 7 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5915(c))**
  - d) A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable. **(40 CFR 63.5915(d))**
4. The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1) and keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.5920(a) and (b))**
5. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept offsite for the remaining 3 years. **(40 CFR 63.5920(c))**

6. The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. Any records required to be maintained and are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the AQD or the EPA as part of an on-site compliance evaluation. **(40 CFR 63.5920(d) and (e))**

## **VII. REPORTING**

1. The permittee must submit all of the notifications in Table 13 of 40 CFR Part 63, Subpart WWWW that apply by the dates specified in Table 13 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5905(a))**
2. The permittee must submit semiannual compliance reports. The compliance report must contain the following information: **(40 CFR 63.5910(b) and (c))**
  - a) Company name and address. **(40 CFR 63.5910(c)(1))**
  - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.5910(c)(2))**
  - c) Date of the report and beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(3))**
  - d) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. **(40 CFR 63.5910(c)(5))**
  - e) For each deviation from an organic HAP emissions limitation or operating limit and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report must contain the information in (i) through (ii). **(40 CFR 63.5910(d))**
    - i. The total operating time of each affected source during the reporting period. **(40 CFR 63.5910(d)(1))**
    - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. **(40 CFR 63.5910(d)(2))**
3. The permittee must submit semiannual compliance reports to the EPA via CEDRI, which can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic report template on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri>). The report must be submitted by the deadline specified in 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5912(d))**

## **VIII. STACK/VENT RESTRICTION(S)**

NA

## **IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

### **Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<b>FGMACTWWWW FLEXIBLE GROUP CONDITIONS</b>
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Blue text is guidance or notes on the use of the template. Delete all blue text prior to issuing the final permit or submitting it with a permit application. Read through all conditions. If the permittee has control equipment, use all the conditions in this template, selecting the appropriate control type for the tables. If there is currently no control or no plans to add control, eliminate the conditions that reference use of control (red conditions) and renumber appropriately.

If this template is being used for an ROP Reopening or Renewal, and the MACT conditions were established in a PTI, the appropriate footnotes which reference enforceability must be added to each applicable condition in the template.

This template is for the following as it applies to the source that does not have emission controls. A reinforced plastic composites production facility is a new affected source if it meets all the criteria in 40 CFR 63.5795(a)(1) and (2).

(1) You commence construction of the source after August 2, 2001.

(2) You commence construction, and no other reinforced plastic composites production source exists at that site.

OR:

An existing affected source which is any affected source that is not a new affected source (40 CFR 63.5795(b)).

AND:

40 CFR 63.5805(b) or (c) – An existing or new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply.

### DESCRIPTION

Each **new or reconstructed** affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production includes the following operations: open molding, **closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing,** mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

**Emission Units: EUFIBERGLASS**  
**POLLUTION CONTROL EQUIPMENT**

Dry fabric filters

### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. Organic HAP from Open Molding – corrosion-resistant and/or high strength (CR/HS), Filament application	171 lb/ton	12-month rolling average or as applied	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
2. Organic HAP from Open Molding – non-CR/HS, Filament application	188 lb/ton	12-month rolling average or as applied	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
3. Organic HAP from Open Molding – low-flame spread/low-smoke products, Filament application	270 lb/ton	12-month rolling average or as applied	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>
4. Organic HAP from Open Molding – shrinkage controlled resins, Filament application	215 lb/ton	12-month rolling average or as applied	FGMACTWWWW	SC V.1	<b>40 CFR 63.5835(a)</b>

12. The permittee must use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of 40 CFR Part 63, Subpart WWWW:

- a. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5810(a))**
- b. Demonstrate that, on average, the facility meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 of 40 CFR Part 63, Subpart WWWW that applies to the facility. **(40 CFR 63.5810(b))**
- c. Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW that apply to the weighted average organic HAP emissions limit for all open molding operations. **(40 CFR 63.5810(c))**
- d. Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. **(40 CFR 63.5810(d))**

13. The permittee may switch between the compliance options in SC I.12a through 12.d. When changing to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously used an option that did not require the permittee to maintain records of resin or gel coat. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**

## II. MATERIAL LIMIT(S)

NA

### **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. **(40 CFR 63.5805, Table 4)**
2. For each HAP-containing materials storage operation, the permittee 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. **(40 CFR 63.5805, Table 4)**
3. For each mixing operation, the permittee 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. **(40 CFR 63.5805, Table 4)**
4. For each mixing operation, the permittee 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. Vents routed to a 95 percent efficient control device are exempt from this requirement. **(40 CFR 63.5805, Table 4)**
5. For each mixing operation, the permittee must keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR 63.5805, Table 4)**

### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

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

### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee must monitor and collect data as specified in (a) through (d): **(40 CFR 63.5895(b))**
  - a. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating. **(40 CFR 63.5895(b)(1))**
  - b. The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system. **(40 CFR 63.5895(b)(2))**
  - c. At all times, the permittee must maintain necessary parts for routine repairs of the monitoring equipment. **(40 CFR 63.5895(b)(3))**
  - d. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 63.5895(b)(4))**
2. The permittee must monitor and collect data to demonstrate continuous compliance as follows: **(40 CFR 63.5895, 40 CFR 63.5900)**

- a. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if meeting any organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW if averaging organic HAP contents. Resin use records may be based on purchase records if the permittee 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. **(40 CFR 63.5895(c))**
  - b. Compliance with organic HAP emissions limits 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 of 40 CFR Part 63, Subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in 40 CFR 63.5895(d). **(40 CFR 63.5900(a)(2))**
  - c. Compliance with organic HAP content limits in Table 7 of 40 CFR Part 63, 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 of 40 CFR Part 63, 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 of 40 CFR Part 63, Subpart WWWW, as discussed in 40 CFR 63.5895(d). **(40 CFR 63.5900(a)(3))**
  - d. The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in 40 CFR 63.5810(a) through (d). When change to an option based on a 12-month rolling average, base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously using an option that did not require records of resin and gel coat use. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**
3. The permittee must keep the following records: **(40 CFR 63.5915)**
    - a. A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status. **(40 CFR 63.5915(a)(1))**
    - b. Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2). **(40 CFR 63.5915(a)(3))**
    - c. All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3 and 7 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5915(c))**
    - d. A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable. **(40 CFR 63.5915(d))**
  4. The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1) and keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.5920(a) and (b))**
  5. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept offsite for the remaining 3 years. **(40 CFR 63.5920(c))**
  6. The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. Any records required to be maintained and are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the AQD or the EPA as part of an on-site compliance evaluation. **(40 CFR 63.5920(d) and (e))**

## **VII. REPORTING**

**Permit Staff – SC VII.1, 2, and 3, references to Rule 213 are ROP only. Remove before putting into a PTI. Renumber as appropriate.**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee must submit all of the notifications in Table 13 of 40 CFR Part 63, Subpart WWWW that apply by the dates specified in Table 13 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5905(a))**
5. The permittee shall submit all applicable reports identified in, and according to the timeframes in 40 CFR 63.5910. **(40 CFR 63.5910)**
6. The permittee must submit semiannual compliance reports. The compliance report must contain the following information: **(40 CFR 63.5910(b) and (c))**
  - a. Company name and address. **(40 CFR 63.5910(c)(1))**
  - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.5910(c)(2))**
  - c. Date of the report and beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(3))**
  - d. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. **(40 CFR 63.5910(c)(5))**
  - e. For each deviation from an organic HAP emissions limitation or operating limit and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report must contain the information in (i) through (ii). **(40 CFR 63.5910(d))**
    - i. The total operating time of each affected source during the reporting period. **(40 CFR 63.5910(d)(1))**
    - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. **(40 CFR 63.5910(d)(2))**

See Appendix 8 - **Permit Staff: Remove if PTI since this is ROP only.**

#### **VIII. STACK/VENT RESTRICTION(S)**

NA

#### **IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

**Remove these footnotes if no PTIs are associated with this flexible group.**

#### **Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).



## RENEWABLE OPERATING PERMIT APPLICATION

### AI-001: ADDITIONAL INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.*

SRN: B1772	Section Number (if applicable):
------------	---------------------------------

1. Additional Information ID <b>AI-PTE</b>
---

<b>Additional Information</b>
-------------------------------

2. Is This Information Confidential? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
---

Attached is Table 1 providing the PTE for the facility and Table 2 which provides the actual emissions for RY2022. The appropriate MAERS forms are included and reflect emissions from limited operation during 2022.

Emissions from clean-up are from the use of acetone and it can be assumed that 100% of the material evaporates. For example, in 2022 the facility used 4,380 pounds of acetone resulting in 4,380 pounds of acetone emissions (or 2.19 tpy).

Emissions from the composites operation are calculated using the UEF Factors. A copy of the UEF factor table is attached. For example, when using resin with a styrene content of 45% (XG-7692), an emission factor for filament application of 188 lb/ton VOCs (styrene) is appropriate according to the UEF table. The facility used 8448 pounds of resin resulting in 794.11 pounds VOCs (styrene).



**Table 1 - VOC and HAP/TAC Potential Emission Estimates  
Cecil Composites**

Raw Material	Purpose	Weekly Use (lbs)	Annual Use (pounds)	Emission Factor	Units	Annual Emissions (tpy)	HAP/TAC
779-4772 Unsaturated Polyester Resin (40% styrene)	Styrene monomer resin	30,769	1,600,000	160	lb/ton	64	styrene
18% UV-9 Solution (82% styrene)	Styrene monomer resin (as additive)	154	8,000	390.74	lb/ton	0.78	styrene
TBPP Initiator (100% tert-Butyl perbenzoate)	Low vapor pressure catalyst	628	32,653			-	
Titanium Dioxide	Solid used for color	400	16,000			-	
Norox 600 CL2 (100% Bis (4-tert-butylcyclohexyl) peroxydicarbonate)	Low vapor pressure catalyst	628	32,653			-	
Acetone (600 lbs is equivalent to)	Clean-up solvent	600	31,200	100%		15.6	acetone
Cadox- M50 Catalyst	Low vapor pressure catalyst	628	32,653				
HT VIPEL F421 Resin (38% styrene) (as an alternate if the original material is unavailable) - also XG-2762	Styrene monomer resin	26,187	1,361,702	149	lb/ton	51	styrene

**65 tpy VOCs (as styrene)**

UEF Factor - see Appendix for 40% and 45% styrene listed under filament application

UEF Table 82% styrene and filament application -  $(0.2746 \times \text{styrene\%}) - 0.0298$  x 2000

390.744 lb/ton

Acetone usage is usage (measured by make-up additions) is equivalent to emissions

Styrene monomer is used for viscosity adjustments during times of low volume productions. Emissions are accounted for in the total tpy styrene.

**Table 2- Actual VOC and HAP/TAC Emission Estimates  
Cecil Composites - RY2022**

Raw Material	Purpose	Annual Use (pounds)	Emission Factor	Units	Annual Emissions (tpy)	HAP/TAC
779-4772 Unsaturated Polyester Resin (40% styrene)	Styrene monomer resin	178	160	lb/ton	0.00712	styrene
18% UV-9 Solution (82% styrene)	Styrene monomer resin (as additive)		390.74	lb/ton	0.00	styrene
TBPB Initiator (100% tert-Butyl perbenzoate)	Low vapor pressure catalyst				-	
Titanium Dioxide	Solid used for color				-	
Norox 600 CL2 (100% Bis (4-tert-butylcyclohexyl) peroxydicarbonate)	Low vapor pressure catalyst	180			-	
Acetone (600 lbs is equivalent to)	Clean-up solvent	4,380	100%		2.19	acetone
Cadox- M50 Catalyst	Low vapor pressure catalyst					
HT VIPEL F421 Resin (38% styrene) (as an alternate if the original material is unavailable) also XG-2762	Styrene monomer resin	8,448	149	lb/ton	0.31	styrene

**total VOCs (as styrene)**

644 lbs

UEF Factor - see Appendix for 38% and 40% styrene listed under filament application

UEF Table 82% styrene and filament application -  $(0.2746 \times \text{styrene\%}) - 0.0298$  x 2000                      390.744 lb/ton

Acetone usage is usage (measured by make-up additions) is equivalent to emissions

Styrene monomer is used for viscosity adjustments during times of low volume productions. Emissions are accounted for in the total tpy styrene.



**EU-101 EMISSION UNIT**

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS Paper Forms and Instructions Booklet. This MAERS form is used to report emission units used in a specific inventory year. Enter the inventory year for which the emission units are being reported in field 1.

<b>FORM REFERENCE</b>	
2. Form Type <b>EU-101</b>	3. AQD Source ID (SRN)

<b>OPERATOR'S EMISSION UNIT IDENTIFICATION</b>		<input type="checkbox"/> Change	<input type="checkbox"/> Add
4. AQD Emission Unit ID	5. Emission Unit ID	6. Emission Unit Type	
7. NAICS Code (if different from S-101 #5)	8. Installation Date MM/DD/YYYY	9. Dismantle Date MM/DD/YYYY	
10. Operator's Emission Unit Description – (Include process equipment and control devices)			
11. Combustion Source <input type="checkbox"/> Yes <input type="checkbox"/> No		12. Design Capacity	
13. Design Capacity Unit Numerator		14. Design Capacity Unit Denominator	
15. Is this combustion source used to generate electricity <input type="checkbox"/> Yes <input type="checkbox"/> No		16. Maximum Nameplate Capacity Megawatts	

<b>RULE 201 APPLICABILITY</b>	
17. Grandfathered? <input type="checkbox"/> Yes <input type="checkbox"/> No	
18. Exempt from Rule 201? <input type="checkbox"/> Yes <input type="checkbox"/> No	19. If Yes, Rule Number
20. If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. Permit? <input type="checkbox"/> Yes <input type="checkbox"/> No	22. If Yes, Enter the Permit Number
23. Is this emission unit required to report emissions to MAERS for this reporting year (inventory year)? <input type="checkbox"/> Yes <input type="checkbox"/> No	

<b>CONTROL DEVICE(S)</b>			
24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete	24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete
24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete	24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete
24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete	24. Control Device Code	<input type="checkbox"/> Add <input type="checkbox"/> Delete

<b>EMISSION UNIT STACK(S)</b>			
25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete	25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete
25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete	25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete
25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete	25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete
25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete	25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete
25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete	25. Operator's Stack ID <b>SV</b>	<input type="checkbox"/> Add <input type="checkbox"/> Delete



**A-101 ACTIVITY**

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable, with additions or corrections as necessary. For more detailed instructions, refer to the MAERS Paper Forms and Instructions Booklet. This MAERS form is used to report emission unit activities for a **specific inventory year**. Enter the **specific inventory year** in field 1.

<b>FORM REFERENCE</b>		
2. Form Type <b>A-101</b>	3. AQD Source ID (SRN)	4. Emission Unit (EU) OR Reporting Group (RG) ID

<b>ACTIVITY INFORMATION</b>				<input type="checkbox"/> Change		<input type="checkbox"/> Add	
5. Source Classification Code (SCC)		6. SCC Description			7. Remove from MAERS <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>SEASONAL MATERIAL USAGE SCHEDULE</b> IF THROUGHPUT IS > 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%				<b>OPERATING SCHEDULE</b>			
8. WINTER (JAN, FEB & DEC)	9. SPRING (MAR - MAY)	10. SUMMER (JUN - AUG)	11. FALL (SEP - NOV)	12. Hours per Day	13. Days per Week	14. Days per Year	
<b>MATERIAL INFORMATION</b>							
15A. Material Code			15B. Material Throughput			15C. Unit Code	
16. Operator's Material Description							
17. VOC Content (coatings or solvent) _____ . _____ Weight Percent				18. Density _____ . _____ <input type="checkbox"/> lb / gallon <input type="checkbox"/> lb / ft <sup>3</sup>			
19. BTUs (fuel) <input type="checkbox"/> lb <input type="checkbox"/> gallon <input type="checkbox"/> ft <sup>3</sup>		20. Sulfur Content (fuel) _____ . _____ Weight Percent			21. Ash Content (fuel) _____ . _____ Weight Percent		

<b>ACTIVITY INFORMATION</b>				<input type="checkbox"/> Change		<input type="checkbox"/> Add	
5. Source Classification Code (SCC)		6. SCC Description			7. Remove from MAERS <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>SEASONAL MATERIAL USAGE SCHEDULE</b> IF THROUGHPUT IS > 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%				<b>OPERATING SCHEDULE</b>			
8. WINTER (JAN, FEB & DEC)	9. SPRING (MAR - MAY)	10. SUMMER (JUN - AUG)	11. FALL (SEP - NOV)	12. Hours per Day	13. Days per Week	14. Days per Year	
<b>MATERIAL INFORMATION</b>							
15A. Material Code			15B. Material Throughput			15C. Unit Code	
16. Operator's Material Description							
17. VOC Content (coatings or solvent) _____ . _____ Weight Percent				18. Density _____ . _____ <input type="checkbox"/> lb / gallon <input type="checkbox"/> lb / ft <sup>3</sup>			
19. BTUs (fuel) <input type="checkbox"/> lb <input type="checkbox"/> gallon <input type="checkbox"/> ft <sup>3</sup>		20. Sulfur Content (fuel) _____ . _____ Weight Percent			21. Ash Content (fuel) _____ . _____ Weight Percent		



**E-101 EMISSIONS**

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS Paper Forms and Instructions Booklet. This MAERS form is used to report each activity's emissions for a specific inventory year. Enter the specific inventory year in field 1.

<b>FORM REFERENCE</b>			
2. Form Type <b>E-101</b>	3. AQD Source ID (SRN)	4. Emission Unit (EU) OR Reporting Group (RG) ID	
5. Source Classification Code (SCC)		6. Material Code	

<b>EMISSION INFORMATION</b>				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				Pounds
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model						
(Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code			10. Control Efficiency	
_____	_____	_____			_____ Weight Percent	
11. Comment						

<b>EMISSION INFORMATION</b>				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				Pounds
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model						
(Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code			10. Control Efficiency	
_____	_____	_____			_____ Weight Percent	
11. Comment						

<b>EMISSION INFORMATION</b>				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				Pounds
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model						
(Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code			10. Control Efficiency	
_____	_____	_____			_____ Weight Percent	
11. Comment						

<b>EMISSION INFORMATION</b>				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				Pounds
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model						
(Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code			10. Control Efficiency	
_____	_____	_____			_____ Weight Percent	
11. Comment						



Michigan Department of Environmental Quality - Air Quality Division  
Michigan Air Emissions Reporting System (MAERS)  
**SV-101 STACK**

<b>1. INVENTORY YEAR</b>

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report stacks for a specific inventory year. Enter the specific inventory year in field 1.

<b>FORM REFERENCE</b>	
2. Form Type <b>SV-101</b>	3. AQD Source ID (SRN)

<b>STACK IDENTIFICATION</b>		<input type="checkbox"/> Change	<input type="checkbox"/> Add
4. AQD Stack ID	5. Stack ID <b>SV</b>	6. Remove from MAERS <input type="checkbox"/> Yes <input type="checkbox"/> No	7. Dismantle Date (MM/DD/YYYY)
8. Stack Description			
9. Actual Stack Height Above Ground	feet	10. Inside Stack Diameter	inches
11. Exit Gas Temperature	degrees Fahrenheit	12. Actual Exit Gas Flow Rate	cubic feet per minute
13. Stack Orientation <input type="checkbox"/> Vertical <input type="checkbox"/> Vertical with No Loss Sleeve <input type="checkbox"/> Vertical with Conical Cap <input type="checkbox"/> Horizontal <input type="checkbox"/> Goose Neck Downward			
14. Latitude	15. Longitude	16. Horizontal Collection Method	
Decimal Degrees	Decimal Degrees		
17. Source Map Scale Number	18. Horizontal Accuracy Measure		
	Meters		
19. Horizontal Reference Datum Code		20. Reference Point Code	
21A. Bypass Stack Only <input type="checkbox"/> Yes <input type="checkbox"/> No		21B. If yes, operator ID of main stack	

<b>STACK IDENTIFICATION</b>		<input type="checkbox"/> Change	<input type="checkbox"/> Add
4. AQD Stack ID	5. Stack ID <b>SV</b>	6. Remove from MAERS <input type="checkbox"/> Yes <input type="checkbox"/> No	7. Dismantle Date (MM/DD/YYYY)
8. Operator's Stack Description			
9. Actual Stack Height Above Ground	feet	10. Inside Stack Diameter	inches
11. Exit Gas Temperature	degrees Fahrenheit	12. Actual Exit Gas Flow Rate	cubic feet per minute
13. Stack Orientation <input type="checkbox"/> Vertical <input type="checkbox"/> Vertical with No Loss Sleeve <input type="checkbox"/> Vertical with Conical Cap <input type="checkbox"/> Horizontal <input type="checkbox"/> Goose Neck Downward			
14. Latitude	15. Longitude	16. Horizontal Collection Method	
Decimal Degrees	Decimal Degrees		
17. Source Map Scale Number	18. Horizontal Accuracy Measure		
	Meters		
19. Horizontal Reference Datum Code		20. Reference Point Code	
21A. Bypass Stack Only <input type="checkbox"/> Yes <input type="checkbox"/> No		21B. If yes, operator ID of main stack	

## EF Table I: Unified Emission Factors for Open Molding of Composites

Revised and Approved: 10/13/2009

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

Styrene content in resin/gel coat, % <sup>(1)</sup>	<33 <sup>(1)</sup>	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 <sup>(2)</sup>
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 <sup>(3)</sup>	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	264	268	283	297	311	325	340	354	((0.714 x % styrene) - 0.18) x 2000
Mechanical atomized with VSR <sup>(3)</sup>	Mechanical Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized Controlled Spray <sup>(4)</sup>	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 Atomized 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 <sup>(3)</sup>	Mechanical Non-Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Non-Atomized application of resins that contain Methyl Styrene monomer <sup>(10)</sup>	Mechanical Non-Atomized Styrene monomer emission Factor (listed above) x .55																			
Mechanical Non-Atomized Filled DCPD resins <sup>(11)</sup>	0.144 x % styrene x 2000	95	98	101	104	108	111	114	117	120	124	127	130	133	136	140	143	146	149	((0.1603 x % styrene) - 0.0055) x 2000
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 <sup>(3)</sup>	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
Gel coat Application	0.445 x % styrene x 2000	294	315	336	358	377	398	418	439	460	481	501	522	543	564	584	605	628	646	((1.03646 x % styrene) - 0.195) x 2000
Gel coat Controlled Spray Application <sup>(4)</sup>	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
Gel coat Non-Atomized Application <sup>(6)</sup>	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
Lesser Atomized Gel coat Application <sup>(12)</sup>	for < 30: 0.323 x % styrene x 2000	229	241	252	264	276	287	299	311	322	334	346	357	369	381	392	404	416	428	((0.5842 x % styrene) - 0.07825) 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 Gel Coat Processed

MMA content in gel coat, % <sup>(6)</sup>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	≥20
Gel coat application <sup>(7)</sup>	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% styrene content by weight.
- 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, glasses, etc.
- 7 Based on the gel coat data from NMMA Emission Study.
- 8 SEE the July 17, 2001 EECs report Emission Factors for Non-Atomized Application on Gel Coats used in the Open Molding of Composites for a detailed description of the non-atomized gel coat testing.
- 9 Use the equation ((0.4506 x % styrene) - 0.0505) x 2000 for gel coats with styrene contents between 19% and 32% by wt; use the equation 0.185 x % styrene x 2000 for gel coats with less than 19% styrene content by wt.
- 10 Refer to Section 3.0, Instructions and Examples for the Emission Factor table, 3.2 Calculation of the methylstyrene factor.
- 11 Use this factor for the non-atomized application of DCPD or DCPD-blend resin, when filled to 30% or more by weight.

12	Table from 30% TO 32% styrene content:	30	31	32
		194	206	217



## RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.*

SRN: B1772

Section Number (if applicable):

1. Additional Information ID

AI-Plan

### Additional Information

2. Is This Information Confidential?

Yes  No

Attached is a copy of the Odor Management Plan submitted for Cecil Composites.



January 7, 2022  
Project No. 210058

Joyce Zhu  
Air Quality Division – Permit Section  
Michigan Department of Environment, Great Lakes, and Energy  
Warren District Office  
27700 Donald Court  
Warren, MI 48092-2793

**Submittal of Nuisance Management Plan by Cecil Composites, LLC – Permit to Install (PTI) No. 94-21**

Dear Ms. Zhu:

On behalf of Cecil Composites, LLC (Cecil), located at 151 Lafayette Street, Mount Clemens, Michigan 48043, Fishbeck has prepared the attached Nuisance Management Plan (NMP) as required by PTI No. 94-21, issued on November 23, 2021.

Preparing this plan was difficult, as the facility has not yet started operating and construction is not yet complete. Cecil has produced poles at the Mount Clemens site for destructive testing in our laboratory in the Warren facility, but no poles are being produced for sale. Prior to startup, the manufacturing process must be perfected, and the required testing must be completed. Production is tentatively projected to begin in July 2022, but because of company staff changes, shortage of qualified contractors, and supply chain issues, this schedule may change. As required by the permit, Cecil will notify EGLE upon initial startup.

Although production has not begun, Cecil has prepared a Nuisance Management Plan, as required by Section III.5 in the EUFIBERGLASS Emission Unit Conditions of the Permit (Page 7 of 14). A copy of the Nuisance Management Plan is attached. The NMP is being submitted to EGLE in advance of startup with the caveat that edits may need to be made as production begins and then increases. Even though the facility is not yet manufacturing poles, Cecil is still establishing the maintenance and housekeeping practices that will ensure that no nuisance occurs because of activities at the site.

If you have any questions or require additional information, please contact me at 248.324.4785 or email [lwoolley@fishbeck.com](mailto:lwoolley@fishbeck.com).

Sincerely,



**Lillian L. Woolley, PE**  
Senior Chemical Engineer

Attachment

By email

Copy: Ryan MacVoy, Chief Executive Officer – Cecil Composites, LLC  
Jessica Black, CHMM – Fishbeck



# Nuisance Minimization Plan Composite Utility Pole Manufacturing

Cecil Composites  
Mt. Clemens, Michigan

Project No. 210058  
January 2022

## **Nuisance Minimization Plan**

## **Composite Utility Pole Manufacturing**

## **Cecil Composites Mt. Clemens, Michigan**

**Prepared For:  
DWM Holdings  
Warren, Michigan**

**January 7, 2022  
Project No. 210058**

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Appendix 1 Complaint Form

**List of Abbreviations/Acronyms**

4W	40 CFR Part 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
EGLE	Michigan Department of Environment, Great Lakes, and Energy
HAP	hazardous air pollutant
hr/day	hours per day

IR	infrared
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
lb	pound(s)
lb/hr	pounds per hour
lb/month	pounds per month
MACT	Maximum Achievable Control Technology
MMBtu/hr	million Btus per hour
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSR	New Source Review
PM	particulate matter
PM <sub>10</sub>	fine particulate matter less than 10 microns
PM <sub>2.5</sub>	fine particulate matter less than 2.5 microns
PSD	Prevention of Significant Deterioration
PTE	potential to emit
PTI	Permit to Install
ROP	Renewable Operating Permit
SDS	Safety Data Sheet(s)
SER	significant emission rate
SO <sub>2</sub>	sulfur dioxide
TAC	toxic air contaminant
T-BACT	Best Available Control Technology for Toxics
tpy	tons per year
UEF	Unified Emission Factors
USEPA	U.S. Environmental Protection Agency
VOC	volatile organic compound

## 1.0 Introduction

Cecil Composites, LLC (Cecil) was issued air Permit to install (PTI) No. 94-21 on November 23, 2021, in preparation for the manufacture of composite poles at their new facility in Mount Clemens, Michigan. Cecil Composites, owned by parent company DWM Holdings, proposed to use approximately 1.6 million pounds of resin per year in manufacturing composite utility poles. Styrene content of the resins will be restricted to keep emissions low. The proposed facility will also be subject to the NESHAP WWW (4W). Acetone will be used as a clean-up solvent to reduce VOC emissions and will be recycled whenever possible. This PTI was not subject to review under the PSD Regulations, as potential emissions do not exceed the PSD thresholds. The facility will be required to apply for a Renewable Operating Permit (ROP) within 12 months of beginning operation.

Cecil expects that it will take approximately one year to achieve full production volumes. The initial installation and engineering will require multiple runs of small volumes of resin in order to perfect the setup of the machines before full production volumes can be achieved. During a portion of this ramp-up time, the ventilation system will not be operational. Production is limited to the equivalent of 100,000 pounds of resin during this ramp-up period to lower the potential for odors. In addition, the plant production will only require one shift per day (8 hrs/day), with hopes of expanding operation to two shifts per day (16 hrs/day) in the next three years.

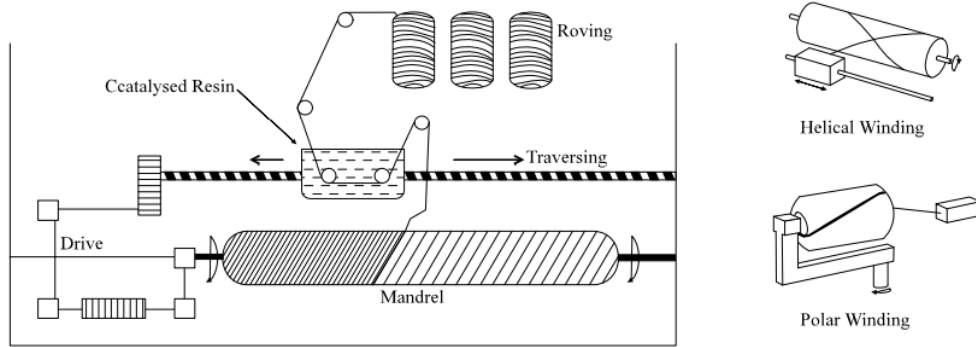
## 2.0 Background

Odors have been identified with the use of styrene. The purpose of this Nuisance Management Plan (NMP) is to describe site-specific provisions that will be established by Cecil to manage and minimize potential odors for their pole production facility. A process description is included in this NMP, identifying potential sources of odor as well as the specific work practices and air pollution control that will be used to minimize odors.

### 2.1 Process Description

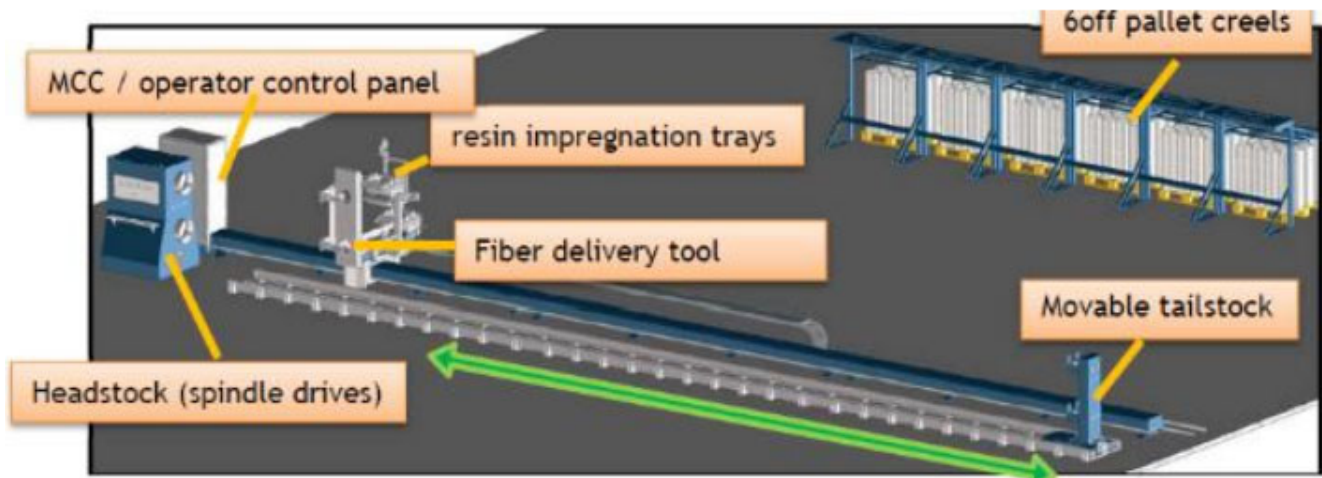
Cecil Composites will manufacture fiber-reinforced composite materials into poles for a variety of uses. These poles are used for sports lighting, parking lots, and utility poles. DWM Holdings currently manufactures metal light poles at an existing facility also located in Warren, Michigan. When customers have requested light poles manufactured from composite materials, DWM Holdings had purchased these poles from a manufacturer out of state for its customers. This new facility, called Cecil Composites, will manufacture its own light poles and use an existing infrastructure to ship these poles to customers. The site location map is included as Figure 7 and a site plan is included as Figure 8.

Filament winding is used to manufacture composite poles. Filament winding is the process of laying a band of resin impregnated fibers onto a rotating mandrel surface in a precise geometric pattern and curing them to form the product. This is an efficient method of producing cylindrical parts with optimum strength characteristics suited to the specific design and application. Glass fiber is most often used for the filament, but aramid, graphite, and sometimes boron and various metal wires may be used. The filament can be wetted during fabrication, or previously impregnated filament ("prepreg") can be used. The illustration below shows the filament winding process and indicates the three most common winding patterns. The process illustration depicts circumferential winding, while the two smaller pictures show helical and polar winding. The various winding patterns can be used alone or in combination to achieve the desired strength and shape characteristics.



**Figure 1. Typical Filament Winding Machine Set-Up**

The filament winder that will be in use at Cecil Composites is a dual-spindle (two poles wound simultaneously) 4-axis system with the resin delivery system mounted on the carriage. The dual spindle winder is fully automatic; however, the system as a whole is semi-automatic, as the mandrels will be moved between stations manually and the other equipment in the system (e.g., slitter, extractor) are operated manually. The system is primed for fully automatic operation in the future with the addition of a manipulator system for mandrel transfer and automation upgrades to the other equipment.



**Figure 2. Main Components of a Dual-Spindle Winder**

Emissions are generated when the resin and catalyst are exposed to the environment. By automating the resin and catalyst delivery process and using smaller resin trays, emissions are minimized by improving transfer efficiency. Two wet out trays will supply each spindle and are mounted on an arm as illustrated below:

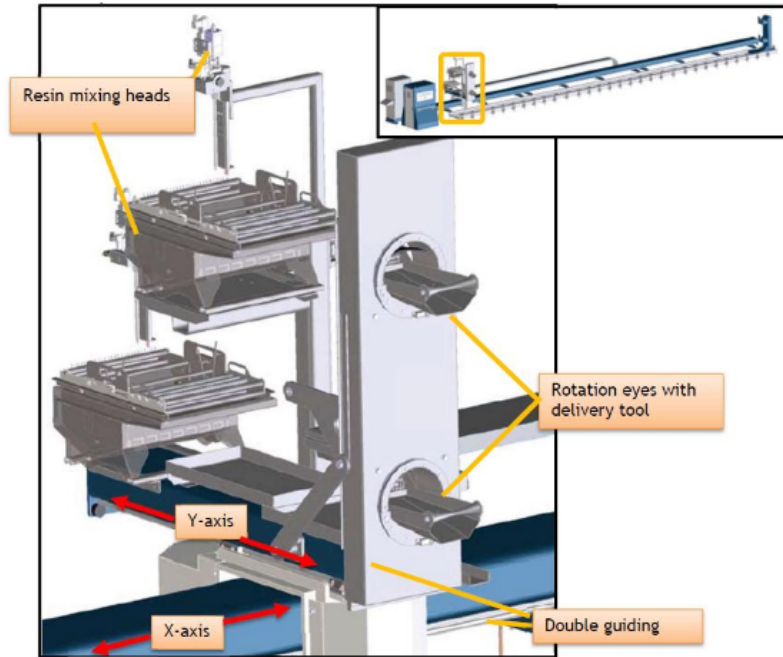


Figure 3. Resin Trays

The two trays are mounted on the y-axis of the machine and the trays traverse with the machine in the x-axis of the winder. The glass fiber rovings are pulled, impregnated with resin as they are pulled through the resin tray, prior to being applied to the mandrel. Resin supply from the trays is provided by the mixing head, which constantly replenishes the bath with catalyzed resin. A pivoting frame allows the mixing head to be moved away from the resin tray, after winding is done, for cleaning. A level sensor is mounted on the mixing head to regulate resin in the tray. By using these small trays, emissions are reduced.

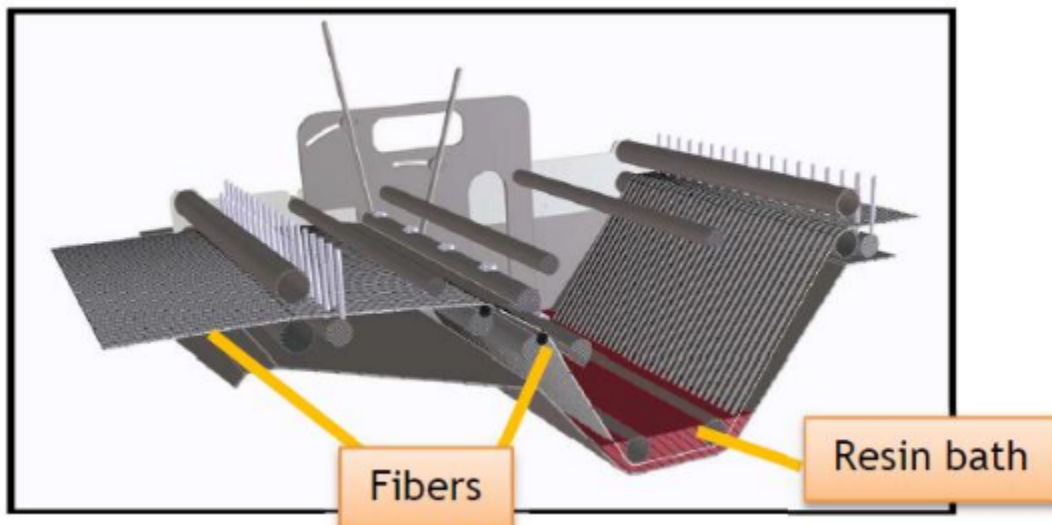


Figure 4. Cross-Section of the Resin Tray



The ANSI Standard 136.2 “Roadways and Area Lighting Equipment” includes specifications for light poles, and Cecil Composites has selected raw materials that will ensure its poles meet these ANSI specifications.

After winding, the composite pole products are transferred to the gelling station to be cured or hardened. During this gelling step, a rotation chain will continuously rotate the poles to prevent dripping or sagging of the wet material. The gelling station has a capacity for eight poles

As this station is flexible, the tailstock can be moved forward/backwards to suit the mandrel length. As the winder is a dual spindle, two gelling spots share a common adjustable tailstock.

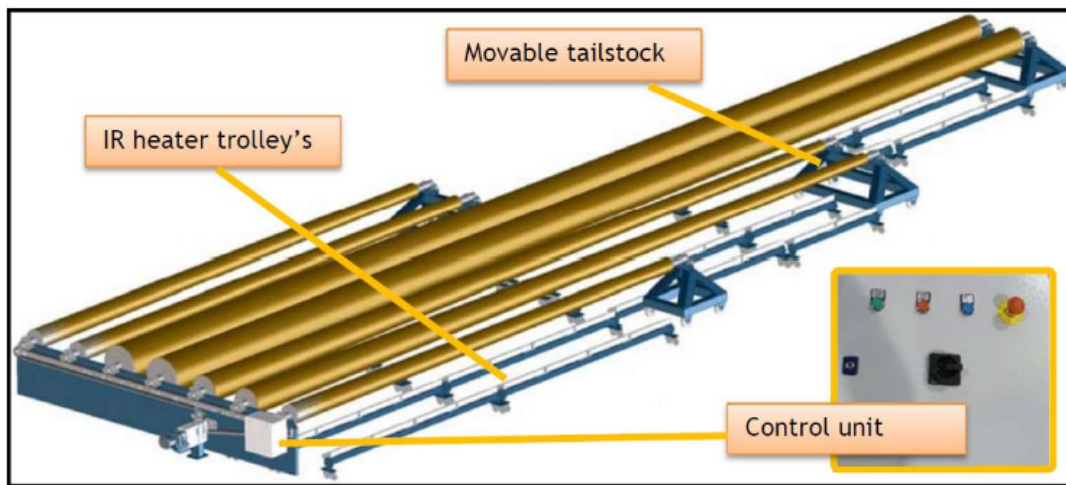


Figure 5. Overview of Gelling Station

The gelling station will also include IR heaters to boost the temperature and decrease the curing time.

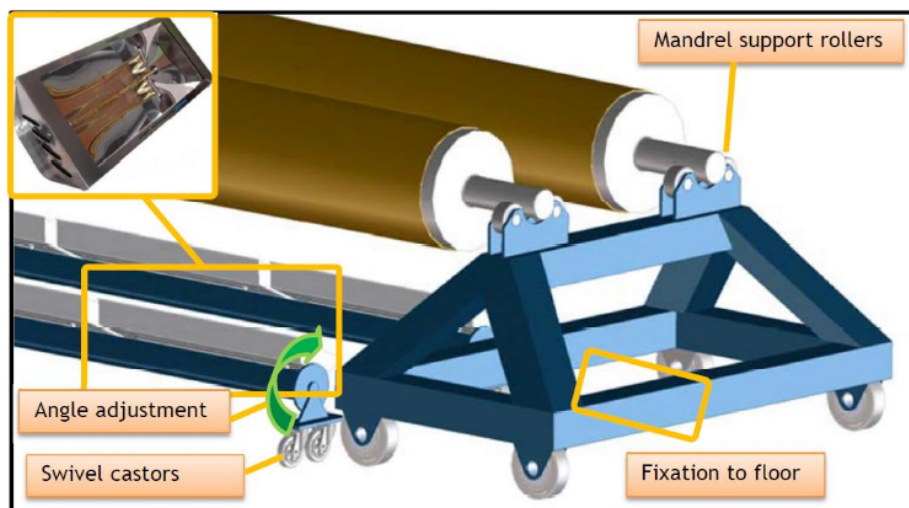


Figure 6. IR Heaters Mounted on Trolleys at a Gelling Station

No additional emissions are generated from use of the IR heaters. Acetone will be used as the clean-up solvent. A system will be established to allow reuse or recycling of acetone and ensure that emissions will be low. Styrene monomer may occasionally be used to adjust the viscosity of the resin back to its original viscosity when use rates are low. The use will be included in the tracking.

## 2.2 Facility Location

The Cecil facility is located at 151 Lafayette Street, Mt. Clemens, Michigan. The leased building is bounded by J.F. Frailey Drive to the west. To the southwest lies a residential neighborhood, and further west a public park complex. The residential neighborhood lies primarily along North Wilson Road, bounded by Lafayette Street on the north and Gallup Avenue to the south. To the north, east, and south are various light industrial and transportation carriers, including DHL, Axalta Coating Systems. A rail line lies further to the east, running roughly northeast-southwest. It should be noted that the prevailing wind direction is towards the northeast or, in this case, towards industrial land use. Figure 7 shows a basic overview map.

## 2.3 Air Pollution Control

VOCs like styrene are emitted from fresh resin surfaces during the fabrication process and from the use of solvents (usually acetone) for cleanup. Organic vapor emissions from polyester resin/fiberglass fabrication processes occur when the cross-linking agent (monomer) contained in the liquid resin evaporates into the air during resin application and curing. Since emissions result from evaporation of monomer from the uncured resin, they depend upon the amount of resin surface exposed to the air and the time of exposure. Thus, the potential for emissions varies with the manner in which the resin is mixed, applied, handled, and cured. These factors vary among the different fabrication processes and are fairly low for filament winding when compared to some other processes. Use of resins with a lower styrene content also lowers overall emissions. As the process becomes more automated, emissions should be lower still.

Most plants, including Cecil, use forced ventilation techniques to reduce worker exposure to styrene vapors, but they vent the vapors directly to the atmosphere through a particulate filter. Emissions from cleanup solvents can be controlled through good housekeeping and use practices, reclamation of spent solvent, and substitution with water-based solvent substitutes. Acetone will be used at Cecil Composites for clean-up.

As part of its waste minimization program, Cecil will periodically review the list of raw materials and communicate with vendors about the possibility of using lower styrene or lower VOC materials, as well as the possibility of using resins with vapor suppression. The need to have a constant supply of raw materials may preclude the use of different raw materials that may not be routinely available.

## 3.0 Regulatory and Permit Analysis

Cecil uses a resin that contains styrene to produce its product. The use of a styrene resin can create an unpleasant odor that could be noted by neighbors and other tenants in the industrial park where the facility is located. Figure 7 includes a site location map indicating that the facility is located in an industrial park, while Figures 8 and 9 include additional details on the building and stack.

### 3.1 Michigan Air Pollution Control Regulations

In Michigan, odors are regulated as a nuisance under Michigan Air Pollution Control Rule (Rule) 901. Rule 901 states that:

*Notwithstanding the provisions of any other department rule, a person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:*

- (a) Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.*
- (b) Unreasonable interference with the comfortable enjoyment of life and property.*

### **3.2 Air Quality Policy and Procedure 21**

Michigan Air Policy and Procedure 21, “Application of Rule 901(b) in the Permit to Install Review Process” (AQD-21) outlines requirements for reviewing the potential for a nuisance in a prospective project, as well as provides information on developing a NMP. Recommended elements include:

- A. Introduction, including process description, permit number, and background information
- B. Potential sources of odor and control equipment, if applicable
- C. Maintenance schedule
- D. Housekeeping measures
- E. Odor notification, investigation, and response

### **3.3 Michigan PTI No. 94-21**

PTI 94-21 EUFIBERGLASS, Section III.5 requires Cecil to develop and implement this NMP. The PTI also specifies that it must contain, at a minimum:

- a) Procedures for maintaining and operating EUFIBERGLASS in a manner that minimizes the release of odors to the outside air;*
- b) Procedures that shall be taken to address outdoor complaints; and,*
- c) A plan for corrective action to address any releases to outside air.*

### **3.4 Amendment of the NMP**

If the NMP fails to address or inadequately addresses odor management, Cecil will amend this plan within 30 days. Cecil will also update the plan if new equipment installation may affect odor, or if requested to do so by the EGLE Air Quality Department (AQD) District Supervisor.

### **3.5 Submittal of the NMP**

Cecil will submit a copy of this NMP to the AQD District Supervisor for review and approval within 45 days of permit issuance, which is by January 7, 2022. If the plan is subsequently amended, such amendments will also be submitted to the AQD District Supervisor. The NMP will be deemed approved if no notification to Cecil occurs within 60 days of submittal. In the interim, between plan submittal and approval, Cecil will implement appropriate corrective measures and operational controls to minimize odors.

## **4.0 Odor Control Measures**

At a facility like this, the primary source of odors would be expected from handling of the styrene-containing resin. Good housekeeping and maintenance will ensure that styrene odors and emissions do not become a nuisance. Proper operation of the ventilation system will ensure that emissions are properly dispersed.

VOCs are emitted from fresh resin surfaces during the fabrication process (EUFIBERGLASS) and from the use of solvents (usually acetone) for cleanup. Organic vapor emissions from polyester resin/fiberglass fabrication processes occur when the cross-linking agent (monomer) contained in the liquid resin evaporates into the air during resin application and curing. Styrene, methyl methacrylate, and vinyl toluene are three of the principal monomers used as cross-linking agents. Styrene is by far the most common.

Since emissions and, therefore, odors result from evaporation of monomer from the uncured resin, they depend upon the amount of resin surface exposed to the air and the time of exposure. Thus, the potential for emissions varies with the manner in which the resin is mixed, applied, handled, and cured. These factors vary among the different fabrication processes and are fairly low for filament winding when compared to some other processes, such as spray applications. Proper operation of the equipment will ensure that odors are minimal from the filament winding process.

#### **4.1 Ventilation System (SVFIBERGLASS)**

Styrene has a sweet odor that can be detected at levels as low as 0.04 ppm<sup>1</sup>. General ventilation is a common engineering control measure and can be used to minimize odors from resin. An exhaust system (referred to in the permit as SVFIBERGLASS) will be installed servicing the filament winding operations. A filter fabric with at least 98% particulate removal efficiency will be utilized in the exhaust unit. The system will have a particulate matter filtering system to ensure that resin is not exhausted to the outside air. The filtering system will have a 20,000-cfm exhaust fan and will exhaust to the outdoors from a stack out of the side wall of the building, and at the height specified by the Permit. It will be turned on during production activities and turned off when the filament winding operations are not being performed.

#### **4.2 Maintenance**

The exhaust system for the EUFIBERGLASS process will be regularly maintained as recommended by the manufacturer. Regular maintenance includes daily monitoring of the equipment to ensure that adequate flow occurs. Filters will be replaced periodically to ensure pressure drop is not too large. On a quarterly basis, the following are inspected and performed:

- Inspect for obstructions and deterioration.
- Repair all leaks and cracks.
- Verify fan performance.
- Inspect and grease bearings.
- Check fan belts for tension and wear. Replace as necessary.
- Check sheaves for alignment. Adjust as necessary.
- Check fan shaft and wheel. Adjust as necessary.
- Balance fan wheel, if required.
- Check draw at hoods.
- Check steel base for corrosion.

Filter changes and monitoring of differential pressure will occur more frequently.

#### **4.3 Container Management**

Styrene is reactive with strong acids and metal salts. Styrene attacks rubber, copper, and copper alloys, so it should be stored in steel containers that are tightly closed and properly grounded to ensure static electricity will not accumulate. One of the best ways to mitigate odor is to ensure that chemical containers stay closed unless directly in use. As production increases, resin may be purchased and stored in larger bulk storage tanks which would reduce the potential from styrene odors in handling the resin.

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<sup>1</sup> <https://nj.gov/health/eoh/rtkweb/documents/fs/1748.pdf>

Drums, totes, or tanks will be tightly closed containers and will be stored with secondary containment to catch leaks or drips, and away from spark, sunlight, or heat sources. Explosion-proof electrical equipment and non-sparking tools should be used in and near styrene and storage areas. Spill pallets will be used under drums to capture any potential leaks and spills.

#### **4.4 Housekeeping**

Cecil will employ a safety program similar to the 5S Program whose foundation is that organizing your workplace in a safe, clean, and efficient manner will enhance safety and environmental performance, as well as improve productivity. By introducing standard operational practices that include efficient, repeatable, safe ways to work, safety and environmental incidents can be eliminated. From the very beginning of production, Cecil has adopted a highly visual workplace where tools, raw materials, and equipment are properly placed and maintained. By keeping materials where they are used and always returning tools to their proper place, defects like spills can be easily identified and remedied. Inventory will be easy to maintain which will improve required recordkeeping. Accidents are less likely to happen.

In particular, to best control odors, several specific routine housekeeping procedures will be followed including:

- Storage of all raw materials and waste in their proper areas on spill pallets, as needed
- Disposal of resin-containing debris and rags in labeled closed containers
- Ensuring product chemical drums and buckets are closed when not in use
- Keeping waste in closed containers and recycling or disposing of it quickly
- Immediate cleanup of any spills or leaks

#### **5.0 Addressing Complaints**

Odors associated with handling styrene monomer and styrene-based polyester resin are well documented. While the air permit issued by the Michigan Department of the Environment, Great Lakes and Energy – Air Quality Division (EGLE) will ensure that styrene emissions meet the appropriate health-based standards, odors can be subjective and even emissions that meet health-based standards may still present a nuisance to neighbors. Odors that present a nuisance can be eliminated or mitigated in a number of ways, beginning with an odor investigation.

Maintaining a good relationship with our neighbors is important to Cecil and the key to this relationship is ensuring that odors do not bother the neighbors. Cecil is establishing a program where if odors are noted, they can be quickly addressed. This will help maintain a good relationship with the neighbors and ensure that odor complaints are not lodged with EGLE. As a side note, we understand that the new facility is adjacent to an Axalta facility that manufactures paint and, solvents associated with paint manufacturing can also be odorous; therefore, it would be unfair to immediately associate odor complaints with activities at Cecil Composites.

To facilitate ready communication with the facility, the name of the facility and its phone number will be posted on each door. In addition, a second number available in the case of an emergency during off-hours will also be included.

The following numbers will be posted initially and updated if needed:

During Business Hours: 586.774.5650

After Hours Phone: 303.516.7024

This will enable complainants to speak with a facility representative in the event that they have an odor complaint and will also help eliminate the source of odors.

If a complaint is registered, the following information will be collected from the complainant, where possible:

- Time of the odor
- Location of the odor
- Description of the odor
- Severity of the odor
- Return phone number and/or email of the complainant

Appendix 1 includes a form that can be used to record information on the odor and will allow follow-up by Cecil. Subsequent to the report, Cecil will undergo an internal investigation to attempt to validate the report and evaluate the need for corrective actions. This would be especially useful in the event that the complaint was also logged by EGLE.

In the event that complaints are received by Cecil, Fishbeck proposes a phased approach where additional measures are taken until it appears that the odors have been addressed.

First, a complete investigation will be initiated for each complaint and results will be documented. The following information can be used to assess the odor:

- Production processes and materials usage at the time of the report.
- Meteorological data at the time of the report, such as wind speed and direction, precipitation, etc.
- Any unusual projects or work being completed at the time of the report.
- A visual inspection of the ventilation system.
- A visual inspection of adjacent properties from public right of ways, to observe if any unusual operations or conditions exist.

In the event that odors are confirmed, several options are available to Cecil to reduce odors from the resin. These include improving housekeeping, raising the stack height, upgrading the ventilation system, or the use of masking agents. If necessary, this NMP will be updated.

## 6.0 Malfunction Reporting

Under Rule 912, Cecil must have a system to report startup, shutdowns, or malfunctions that result in excess emissions. As the ventilation system will be installed primarily for odor control, there is not likely a scenario in which failure to operate the control equipment will result in excess emissions. To ensure compliance with Rule 901, Cecil will monitor the process for a bypass or failure of its ventilation systems. If that bypass or failure lasts more than two hours and results in excess emissions, Cecil will report the malfunction to the EGLE District Office in Warren (586.753.3700). This report can be phoned in, emailed, or faxed and should be made as soon as possible, and **must** be made within two days of the incident or discovery. Information regarding the incident must include the date, time, and specific process equipment operating, as well as control equipment operating, nature of the issue, and corrective measures being taken. Within ten days of the incident or its discovery, a written report must be submitted to:

Michigan Department of Environment, Great Lakes and Energy  
Air Quality Division – Warren District Office  
27700 Donald Court  
Warren, MI 48092-2793

(586) 753-3700

24-hour Pollution Emergency Alert System (800) 292-4706

The report must include:

- Date and time of incident
- Probable causes or reasons for the incident
- Information regarding the process equipment operating at the time of incident and an estimate of excess emissions, if possible
- Summary of actions taken to correct and prevent a recurrence

# Figures

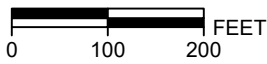
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PLOT INFO: Z:\2021\1210058\CAD\GIS\mapdoc\FIG02-SiteMap.mxd Date: 3/25/2021 11:33:45 PM User: bahamamah



# SITE MAP



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors

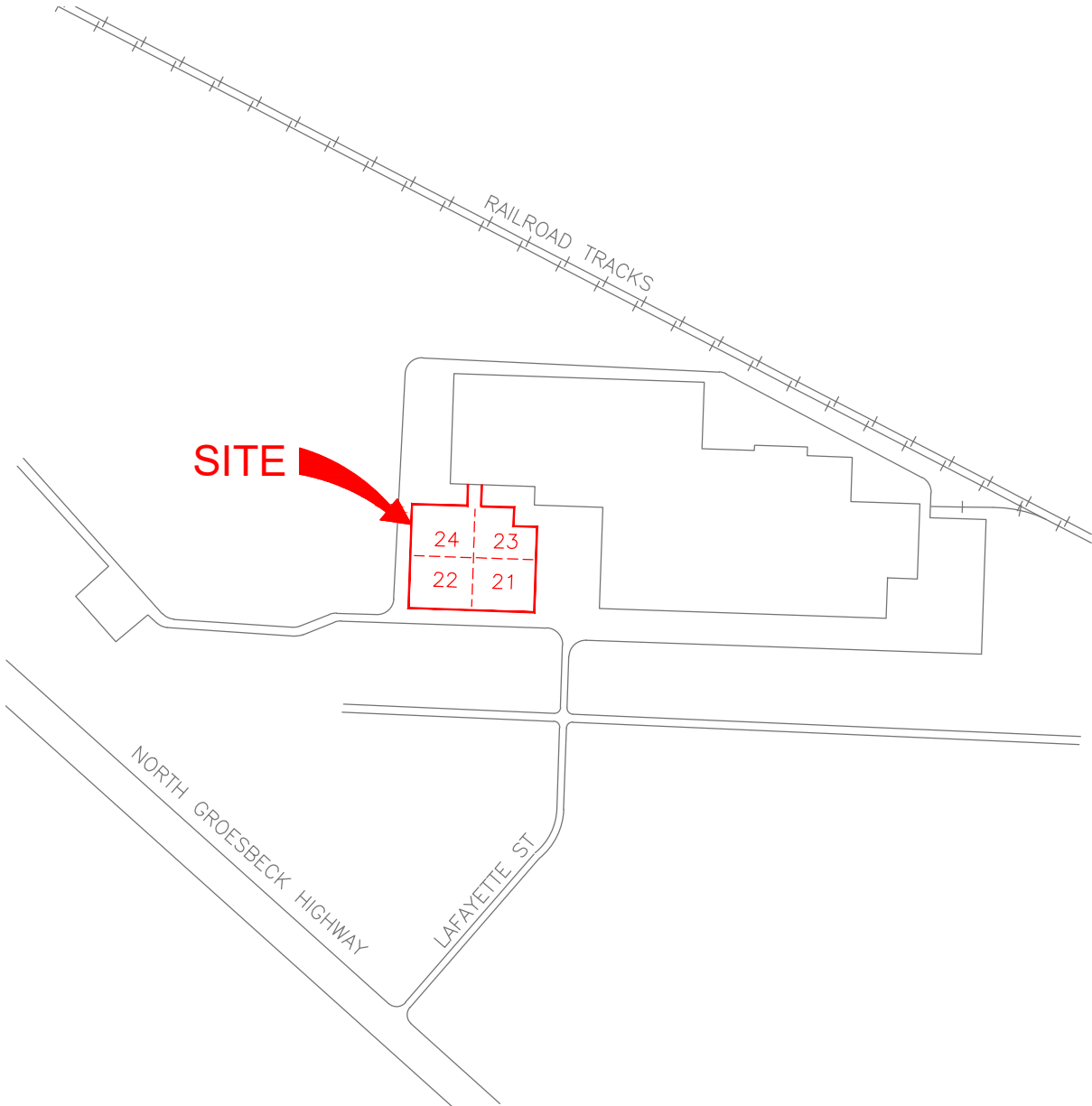


Hard copy is intended to be 8.5"x11" when plotted. Scale(s) indicated and graphic quality may not be accurate for any other size.

## Cecil Composites 151 Lafayette Street, Mt. Clemens, Michigan Nuisance Management Plan

PROJECT NO.  
210058

FIGURE NO.  
**7**



NORTH

# SITE PLAN

SCALE: 1" = 500'

PROJECT NO.

210058

FIGURE NO.

8

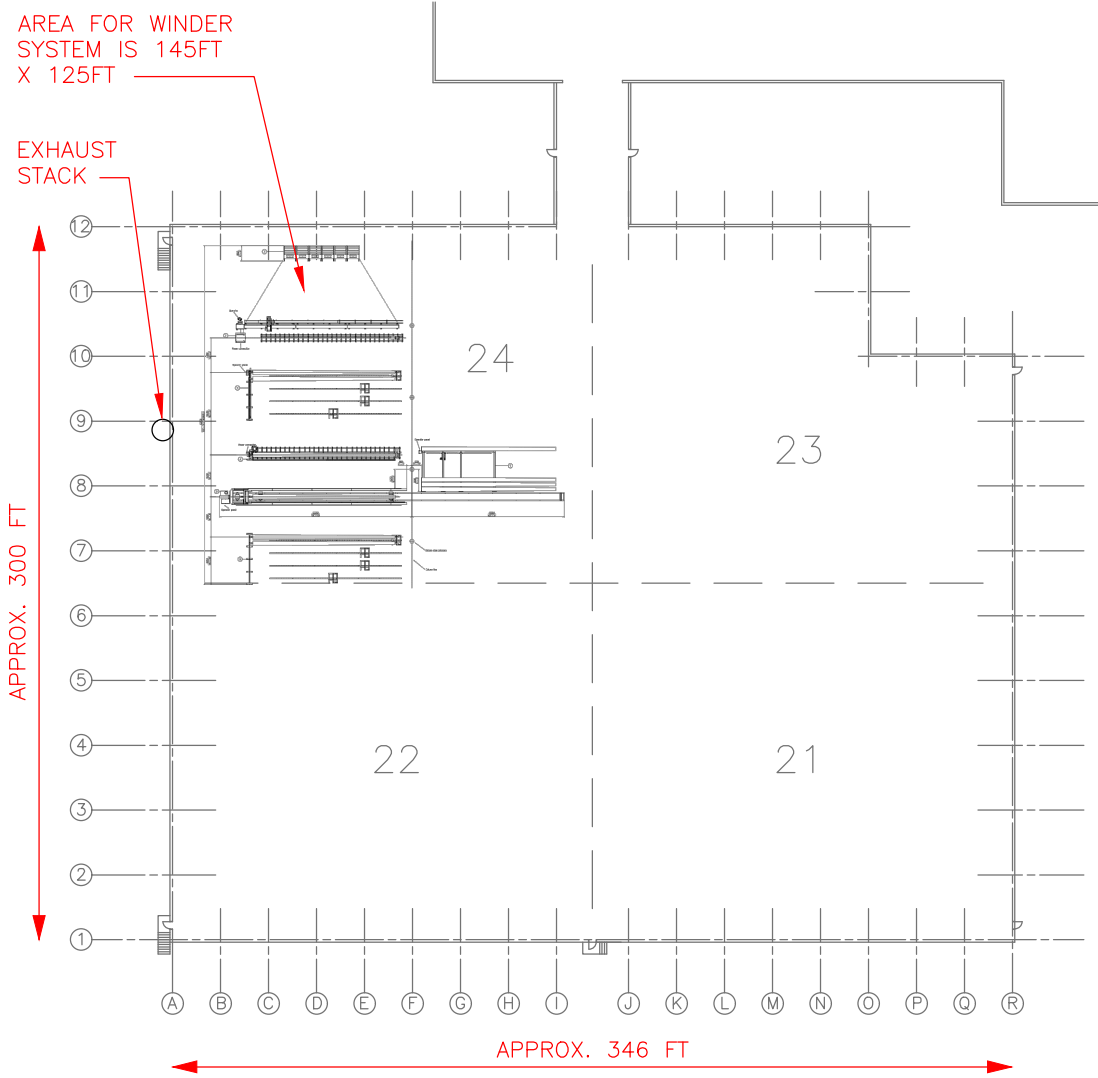
## Cecil Composites

151 Lafayette St, Mt. Clemens, Michigan

Nuisance Management Plan

Hard copy is intended to be 8.5"x11" when plotted. Scale(s) indicated and graphic quality may not be accurate for any other size.





# EQUIPMENT LOCATION

SCALE: 1" = 80'

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**Cecil Composites**  
 151 Lafayette St, Mt. Clemens, Michigan  
 Nuisance Management Plan

PROJECT NO.  
 210058  
 FIGURE NO.  
**9**

# Appendix 1

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## ODOR COMPLAINT LOGGING FORM

*For internal use only.*

**To be completed by the Plant Manager when receiving a complaint**

Date _____		Time of Report _____		Complainant _____	
Address and Phone Number of Complainant _____					
Description of Odor _____					
Time Incident was Detected _____		a.m./p.m.		Duration of Event _____	
Has this happened before? How often? _____					
Weather Conditions		Sunny/Overcast/Other _____		Temperature _____	
Weather Conditions		Precipitation _____		Wind Direction/Speed _____	
Are there weather conditions or times the odor seems more noticeable? _____					
Are there certain days of the week its more noticeable? _____					
<b>Plant Conditions</b>					
Current Production _____					
Materials in Use _____					
Housekeeping and Maintenance Proper? _____					
Ventilation System Operating Properly? _____					
Actions Taken and Time _____					
Comments or Recommendations _____					
Form Completed by and date _____					
Follow-up with Complainant and date _____					