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January 30, 2013

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TCEQ Air Quality Division MC 170 Po Box 13087 Austin, TX 78711-3087 FEB 04 2013

Dear TCEQ Division Administrator:

Please find enclosed a revised Semi-Annual Compliance Report for the period of July 1st to December 31st 2012 for Chase Industries, Inc. composite facility located in Brownsville, Texas (Chem-pruf Door). The original report was sent to you yesterday (1/29/2012), which by today's date you should have received it, we kindly request that you disregard that report, we found that due to an error during its preparation wrong dates were used.

We thank you in advance for your important consideration to this letter.

Should you have any questions please feel free to contact Isaac Escorza at (956) 544-1000 or <u>isaac@chem-pruf.com</u>.

Sincerely

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RECEIVED

Isaac Escorza Engineering Group

Attachment

Copy of Semi-Annual Compliance Report for the period of July 1st to December 31st 2012

7-1 12-31-12

7/1/2012 AIR CO/ REPORTS 12-31-12 1st: CD0215T 2nd: Vol: 001 BBC: 100541605 IBC: 100541615

January 30, 2013

TCEQ Air Quality Division MC 170 PO Box 13087 Austin, TX 78711-3087

RE: 40 CFR 63 Subpart WWWW – National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production Semi-annual Compliance Report for Compliance Period: July 1, 2012 through December 31, 2012 Chem-Pruf Door Company, LLC Brownsville, Cameron County, Texas

Dear TCEQ Division Administrator

This submittal serves as a Semi-annual Compliance Report pursuant to 40 Code of Federal Register (CFR) §63.5910(d) for Chase Industries, Inc.'s (Chase)'s composite door manufacturing facility located in Brownsville, Texas (Chem-Pruf Door). This Semi-annual Compliance Report is provided for compliance with National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (40 CFR 63 Subpart WWWW).

Please feel free to contact Mr. Isaac Escorza at (956)-544-1000 or <u>isaac@chem-pruf.com</u> if you have any question or require further information.

Sincerely,

CHASE INDUSTRIES, INC.

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Isaac Escorza Engineering Group

Attachment

cc: Mr. Jaime A. Garza, Air Section Manager, TCEQ-Region 15

SEMI-ANNUAL COMPLIANCE REPORT JULY 1, 2012 – DECEMBER 31, 2012

<u>Applicable Rule</u>: 40 CFR Part 63, Subpart WWWW—National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production.

DEVIATION REPORTING OBLIGATIONS

40 CFR § 63.5910 (d) explicitly states the information that is required as part of each deviation report:

40 CFR § 63.5910 (d): For each deviation from an organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.

▲ 40 CFR § 63.5910 (c)(1). Company name and address;

Source Address Chem-Pruf Door Company, Ltd. 5224 FM 802 Brownsville, TX 78526 Mailing Address Chem-Pruf Door Company, Ltd. PO Box 4560 Brownsville, TX 78523-4560

▲ 40 CFR § 63.5910 (c)(2). 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;

Refer to the section titled "Certification Statement" below.

▲ 40 CFR § 63.5910 (c)(3). Date of report and beginning and ending dates of the reporting period;

The reporting period for this report is July 1, 2012 through December 31, 2012. This report is being submitted on January 30, 2013, which on the reporting deadline of January 30, 2013.

▲ 40 CFR § 63.5910 (c)(4). If there was a startup, shutdown, or malfunction during the reporting period and an action consistent with the startup, shutdown, and malfunction plan (SSMP) was taken, the compliance report must include the information specified in 40 CFR § 63.10 (d)(5)(i).

Pursuant to 40 CFR § 63.5835 (d), an SSMP is required if the Facility chooses to comply with the organic HAP emission limits using an add-on control. Chem-Pruf did not use an

add-on control to comply with the emission limits. Therefore, the SSMP was not required and 40 CFR § 63.5910 (c)(4) does not apply.

▲ 40 CFR § 63.5910 (d)(1). The total operating time of each affected source during the reporting period.

There were no deviations during the reporting period; therefore this section does not apply.

40 CFR § 63.5910 (d)(2). Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

As demonstrated by the attachment to this letter, there were no deviations of any HAP standards during the reporting period. Option (a) was utilized to demonstrate compliance with the applicable HAP standards. In addition, Chase is certifying that there were no deviations of any work practice standard; therefore this section does not apply.

CERTIFICATION STATEMENT

In accordance with 40 CFR § 63.5910 (c)(2), I herby declare that, based on information and belief formed after reasonable inquiry, the statements and information contained within this report are true, accurate and complete.

CHASE INDUSTRIES, INC.

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Isaac Escorza Engineering Group

ATTACHMENT

HAP STANDARD COMPLIANCE DEMONSTRATION

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Option 1 (40 CFR § 63.5810 (a)): Maximum Emission Factors

(a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.

Operation	Type/Application	Maximum Org HAP EF	MACT Organic HAP EF Limit	In Compliance?
Normal	CR/HS Gelcoat	335.12	605	Yes
Normal	Tooling Gelcoat	259.39	440	Yes
Normal	CR/HS Resin, Manually applied	116.78	123	Yes
Normal	non CR/HS Resin, Manually applied	64.73	87	Yes
Simon	CR/HS Gelcoat plus	330.91	605	Yes

Summary of All Operation type Resin Application and Gelcoat Type

Normal Operations CR/HS Gelcoats

					Adjusted Usage	Adj HAP EF ³
Process		Total Organic	Usage (lbs) ¹	Adjusted Total	(lbs) ²	(lb/ton of
Stream		HAP	. January 1,2012 -	Organic HAP ²	January 1,2012 -	material
Name	Material	%	December 31,2012	%	December 31.2012	applied)
	Camel Tan	31	14,195.00	30.74	14316.57	176.00
	Std Gray	34.99	20,805.00	34.98	20812.19	214.22
	Dark Brown 23	37.54	8,057.00	37.54	8057.00	237.31
ıť	UV White	29	32,800.00	29.00	32800.00	160.35
lcoz	Dragon Red 19	35.6	358.00	35.60	358.00	219.83
Ge	Sandstone 10	37.79	406.00	37.79	406.00	239.56
gth	Smoky Blue 13	39.24	928.00	39.24	928.00	252.63
ren	Cancun Blue 14	38.07	347.00	38.07	347.00	242.09
ı St	Royal Blue 15	40.14	1,307.00	40.14	1307.00	260.74
ligh	Seafoam Green 16	36.09	0.00	36.09	0.00	224.24
t/E	Forest Green 17	39.74	578.00	39.74	578.00	257.14
itan	Safety Orange18	37.47	521.00	37.47	521.00	236.68
n Resis	Deep Red 20	38.05	562.00	35.04	610.30	214.77
	Light Brown 22	36.89	225.00	33.62	246.89	201.97
osio	Med Bronze 24	40.29	254.00	36.72	278.71	229.90
orre	CUSTOM COLOR ⁵	48.49	2,026.00	47.95	2049.01	331.08
Ŭ	Dark Gray 21	38.42	0.00	38.42	0.00	245.24
1	Safety Yellow 12	37.66	17,069.00	37.60	17095.13	237.87
、	Hi UV Clear	48.49	521.00	48.39	522.04	335.12
	Chem-Pruf Green	38.56	279.00	38.48	279.56	245.81
Additives	HDP 75	78	1,340.00	••		
	MEC	68	832.00			
	Cobalt 6% Naphthenate	0	35.00			
			Maximum HA	P Factor (lb/ton of l	Material applied) ⁶	335.12

¹ The usage data was estimated using purchase order information.

 2 An additive is mixed with the Simon Operations gelcoats, and so in order to compensate for the added HAP, an adjusted usage and adjusted HAP % was calculated. The HAP Emission Factor is then calculated off these adjusted values.

³ The organic HAP Emission Factor was calculated using equation 1(g) from Table 1 of 40 CFR 63 Subpart WWWW, which applies to nonatomized, nonvapor surpressed spray of gelcoat in an open molding operation.

⁴ All of the gelcoats in this process stream are applied by a nonatomized, nonvapor surpressed spray gun.

⁵Custom Color is a mix of several gelcoats, and thus a reliable total HAP % is not available. It is conservatively assumed that it consists completely of the worst gelcoat that Chem-Pruf has used in the 12 month period.

⁶ Weighted Average HAP Factor = Σ(Actual Process Stream EF_i*Material_i)/ΣMaterial_i.

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Normal Operations Tooling Gelcoat

Process		Total Organic	HAP EF ¹
Stream		HAP	(lb/ton of material
Name	Material	%	applied)
Tooling ²	Black tooling gelcoat	39.99	259.39

¹ The Equation used to calculate the organic HAP Emission Factor was equation 1(g) from Table 1 of 40 CFR 63 Subpart WWWW, which applies to the nonatomized, non vapor surpressed spray of a gelcoat in an open molding operation.

 2 Due to the fact that there is only one gelcoat in this process stream, the usage is irrelavant, and the maximum HAP EF is equal to the HAP EF of the one gelcoat.

Normal Operations CR/HS Resins, Manually Applied

Process Stream Name	Material	Total Organic HAP %	Usage (lbs) ¹ January 1,2012 - December 31,2012	HAP EF ² (lb/ton of material applied)
ų	Hetron 99P	36.6	10,868.00	81.92
l/ Hij	COR75-AQ-3935	47.5	30,059.00	116.15
Corrossion Resistant Strength Resin	Vinyl Ester 510b-400	40	122,063.00	92.60
	Putty PA 130	20	13,345.00	42.80
	SIL 44BA-2306	29.7	4,600.00	63.56
	SIL 90BA-585	31.9	15,455.00	68.27
	AOC R937-UPF-11	34	39,200.00	73.76
Maximum HAP Factor (lb/ton of Material applied) ⁴				116.78

¹ The Usage data was approximated using purchase order information.

² The Equation used to calculate the organic HAP Emission Factor was equation 1(c.)(i) from Table 1 of 40 CFR 63 Subpart WWWW, which applies to the nonatomized, non vapor surpressed spray of a resin in an open molding operation.

³ All of the resins in this process stream are applied by a nonatomized, nonvapor surpressed spray gun.

⁴ Weighted Average HAP Factor = Σ (Actual Process Stream EF_i*Material_i)/ Σ Material_i.

Normal Operations Vacuum Bagging Resin, Without Rollout

Process	Material	Total Organic	HAP EF ²
Stream		HAP	(lb/ton of material
Name		%	applied)
Vacuum Bagging	777108305 UPR AS11 (Hexion)	41.13	64.73

¹ The Usage data was approximated using purchase order information.

² The Equation used to calculate the organic HAP Emission Factor was equation 1(a)(iv) from Table 1 of 40 CFR 63 Subpart WWWW, which applies to a manual resin application for vacuum bagging/closed-mold curing without rollout.

³ All of the gelcoats in this process stream are applied by a nonatomized, nonvapor surpressed spray gun.

⁴ Due to the fact that there is only one resin in this process stream, the usage is irrelavant, and the weighted average HAP EF is equal to the HAP EF of the one resin.

Simon Operations CR/HS Gelcoats Plus						
Process Stream Name	Material	Total Organic HAP %	Usage (lbs) ¹ January 1,2012 - December 31,2012	Adjusted Total Organic HAP ² %	Adjusted Usage (lbs) ² January 1,2012 - December, 31,2012	Adj HAP EF ³ (lb/ton of material applied)
	White FDA Airless	35	8700	38.51	9244.63	246.09
	Roval Blue	40.14	1150	43.35	1221.99	289.69
	Sandstone OPT 10	37.79	0	37.79	0.00	239.56
	Medium Bronze	40.29	0	40.29	0.00	262.09
	Forest Green Opt 17	39.74	155	42.98	164.70	286.30
	Walt Disney Mont Red	39.33	47	42.59	49.94	282.82
ts₄	Seafoam Green	36.09	0	36.09	0.00	224.24
coa	Independence Blue	40.62	47	43.80	49.94	293.76
Gel	CCA Tan	37.35	48	40.73	51.00	266.03
ţţ	Gray Anonymous	38.67	48	41.97	51.00	277.22
ŝua.	Custom Color	45	353	47.93	375.10	330.91
Str	Deep Red Opt 20	38.05	0	38.05	0.00	241.91
ligh	Rollup Tan Ultra	38.66	0	38.66	0.00	247.40
t /H	Smokey Blue Opt 14	39.24	419	42.50	445.23	282.05
tan	Cancun Blue Opt 14	38.07	0	38.07	0.00	242.09
esis	Winchester Blue Ultra	39.3	0	39.30	0.00	253.17
n R	Dark Bronze 109	40.47	0	40.47	0.00	263.72
sio	Mid Summer Night	37.84	0	37.84	0.00	240.01
orro	FS26270 Gray Ultra	38.77	0	38.77	0.00	248.40
Ŭ	Dragon Red	35.6	210	39.08	223.15	251.18
	Dark Gray Opt 21	38.42	0	38.42	0.00	245.24
	Contra Costa Black	40.52	0	40.52	0.00	264.17
	Outer Space Gray Ultra	38.31	0	38.31	0.00	244.25
	Safety Yellow	37.66	56	41.02	59.51	268.65
	White Polar	39.17	258	42.44	274.15	281.46
	Green Sweet Basil	41.64	250	44.76	265.65	302.41
Additive	Parafin Wax 58 10078 0	94.66	735			
Maximum HAP Factor (lb/ton of Material applied) ⁵					330.91	

1 The Usage data was approximated using purchase order information.

 $\sum_{i=1}^{n}$

² An additive is mixed with the Simon Operations gelcoats, and so in order to compensate for the added HAP, an adjusted usage and adjusted HAP % was calculated. The HAP Emission Factor is then calculated off these adjusted values.

³ The organic HAP Emission Factor was calculated using equation 1(g) from Table 1 of 40 CFR 63 Subpart WWWW, which applies to nonatomized, nonvapor surpressed spray of gelcoat in an open molding operation.

⁴ All of the gelcoats in this process stream are applied by a nonatomized, nonvapor surpressed spray gun.

⁵ Weighted Average HAP Factor = Σ (Actual Process Stream EF_i*Material_i)/ Σ materiali.