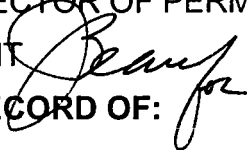


COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

March 27, 2002

TO: WILLIAM DEBOISBLANC, DIRECTOR OF PERMIT SERVICES
FROM: DIRECTOR OF ENFORCEMENT 
SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

HEXCEL CORPORATION (SITE #A0054)

In keeping with standard practice, the Compliance and Enforcement Division has conducted a review of the compliance record of:

HEXCEL Corporation

This memorandum is intended to provide you with the results of the review, and to advise of further action, if any, that will be initiated by the Director of Enforcement.

Background

It is standard practice of the Compliance and Enforcement Division to undertake a compliance record to review in advance of the initial renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on going compliance.

Finding

The Enforcement Division staff has commenced a review of the records for Hexcel for the period of March 1, 2001 to February 28, 2002. This review was initiated as part of the District evaluation of an application by Hexcel for a Title V Permit. During this review period, Hexcel activities known to the District include:

50 Notices of Violation were issued for failure to comply with permit condition requirements. One violation was for violation of Regulation 8, Rule 35, Section 301 (no lid on mixer).

No complaints were alleged against Hexcel.

29 parametric monitor excesses and 28 equipment breakdowns were reported and documented by District Staff.

Hexcel is not currently under a District variance or an Order of Abatement.

District staff and Hexcel personnel met for an office meeting on February 27, 2001. During this meeting staff and Hexcel personnel were able to discuss the number of episodes and breakdowns that have occurred. It has been documented that Hexcel has had no preventative maintenance program in place during the on-going episodes to ensure the proper operation of the four thermal oxidizers in place to abate VOC emissions from the mixing and coating operations. The personnel at Hexcel demonstrated to District staff the ongoing improvements at the plant and the installation of a preventative maintenance program with computer tracking. Hexcel has brought in existing staff from other Hexcel corporate facilities and outside environmental consultants to address the non-compliance issues.

No violations have been documented since November 1, 2001 and the amount of parametric monitor excesses and equipment breakdowns has significantly decreased.

Conclusions

The Director of Enforcement finds that reasonable intermittent compliance can be assured at this facility for the review period.

Recommendations

The Director of Enforcement believes that the proposed application for a Title V Permit is adequate and recommends that the Director of the Permit Services Division approve this application.

JG:rc

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