SWD INTERNAL PERMITTING MEMORANDUM
AND TECHNICAL EVALUATION

TO:	Kelley M. Boatwright District Air Program Administrator
THRU:	Nancy Knight Air Permitting Engineering Specialist III
FROM:	Quaid Noor Air Permitting Engineering Specialist IV
DATE:	11/5/2013
SUBJECT:	Draft/Proposed Title V Operation Permit Renewal No: 1030226-008-AV & Draft Construction Permit 1030226-009-AC (Concurrent processing) Stamas Yacht, Inc.

Title V Permit Application Receipt Date: 10/17/13 *(Time In-House Day 90 is 01/15/2014)*
Construction Permit Application Receipt Date: 10/31/2013 (*Time In-House Day 90 is 01/29/2014*)

Document Date: 1030226-008-AV – 10/15/2013; 1030226-009-AC – 10/30/2013

EU ID Nos. To Be Linked To This Project When Issued: *All Active EU's*

Permit Application Summary Screen Completed Date for 1030226-008-AV: 10/29/2013

The applicant applied on 10/17/2013 to the Department for a Title V air operation permit renewal. This is a renewal of the Title V air operation permit No. 1030226-008-AV.

The applicant wanted to remove material usage specific condition A.1. in Subsection III of the current Title V Permit. The applicable standards are the VOC/HAP emissions limits and the MACT emissions compliance standards. The material usages are unnecessarily restrictive and are not consistent with the Title V air permits issued by the Department. The facility needs the flexibility to substitute materials with lower VOC/HAP contents and correspondingly increase material usage, without increasing the VOC/HAP emissions, to compete in a difficult market. However, the specific condition A.1 was introduced to the Title V air permit through a construction permit No. 1030226-001-AC. Therefore, another construction permit is required with the public notice for public comments to remove the specific condition.

This matter was discussed with the consultant Mr. Tom John and accordingly the appropriate pages of the permit application with due signatures of the authorized representative and the professional engineer was submitted to the Department on 10/31/2013. Accordingly, a construction permit project No. 1030226-009-AC was created. It was decided that a concurrent permitting process would be appropriate for these two projects 1030226-008-AV and 1030226-009-AC (draft-proposed Title V air permit concurrently processed with the draft construction permit).

The permits have been reformatted according to the current permit templates. The material usage condition has been removed as a specific condition from both the construction permit and Title V permit. This memo also serves as the technical evaluation for the construction permit project No. 1030226-009-AC since there is no change in the emissions limits for the facility.

A pre-draft permit was e-mailed to Stamas Yachts on 11/5/2013 with a copy to PCAQD. No comments were received.

I recommend your approval of the attached draft/proposed permit for the Title V air operation permit renewal project and the draft permit for the construction permit project.