Fabbro Marine Group
Santa Rosa Facility

Facility ID No. 1130163
Santa Rosa County

Title V Air Operation Permit Renewal

Permit No. 1130163-005-AV
(Renewal of Title V Air Operation Permit No. 1130163-004-AV)

Permitting and Compliance Authority:
State of Florida
Department of Environmental Protection
Air Resource Management, Northwest District

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Permit No. 1130163-005-AV

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PERMITTEE:
Fabbro Marine Group
5552 Industrial Boulevard
Milton, Florida 32583-8717

Permit No. 1130163-005-AV
Santa Rosa Facility
Facility ID No. 1130163
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Santa Rosa Facility is located in Santa Rosa County at 5552 Industrial Boulevard, at the Santa Rosa Industrial Park in Milton, Florida. UTM Coordinates: Zone 16, 501.8 km East and 3389.1 km North; and, Latitude: 30° 38' 09" North and Longitude: 86° 58' 53" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Draft)

_____

J. Charles Harp
Program Administrator
Waste Management/Air Resources
Northwest District

JCH/aj/m

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Facility Information.

This Title V renewal operating permit follows permit 1130163-004-AV, effective October 7, 2008. During this renewal the VE testing frequency is removed. The previous 5% visible emissions limit was changed in this permit to 20% per the general facility-wide VE standard because there was no rule-based requirement. Previous VE test results from 1999 – 2012 revealed opacity readings of 0.0 %

Subsection A. Facility Description.

This facility consists of fiberglass boat manufacturing and associated activities. Boat-building activities are performed inside two joined building and consist of a fiberglass lay-up area and rigging area.

The manufacturing process starts in the lay-up area with the application of a gel coat layer to the mold, and is followed by building up styrene based resins and chopped glass fiber and fiberglass mats to the required thickness for the particular structure (hull, liner, etc). After curing, the parts are removed from the molds, trimmed and finished.

The fiberglass lay-up area includes the lamination area where the hulls and decks are fabricated and the gel coat spray room where gel coat is applied to the hulls and decks. The equipment used to apply resin and gel coat is cleaned using acetone in both the lamination and gel coat areas. The acetone is filtered on site and reused. Ventilation is provided by one exhaust fan/stack in the gel coat area and there are seven exhaust fan/stacks in the lamination and machining areas. Styrene (which is the major HAP pollutant emitted) from the resin and gel coat application along with other VOCs, are emitted uncontrolled. PM from overspray is controlled by filters on the stack intakes. The majority of the VOC emissions are expected from the lay-up area stacks and gel coat spray booth ventilating system stack.

Boats are moved from the lay-up area to the rigging area for final assembly and are outfitted with hardware, controls and motors as required by clients. Some minor touch-up fiberglass repair may be done in the rigging area as needed. Carpet and adhesive operations and aluminum recreational boat surface coating operations are not performed at this facility.

Cutting, shaping and sanding of the fiberglass hulls, decks and parts are done in a sanding booth in the rigging area, which is separated with a canvas entrance screen. Fugitive particulate emissions from these operations, primarily polystyrene and glass fiber dust are controlled by an exhaust fan and box filter. Molds and foam structural members are made in the woodworking shop.

This emission unit is subject to 40 CFR 63 Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. The permittee elected to demonstrate compliance with the emission limits by averaging emissions with the applicable MACT model point value equations and appropriate record keeping.

This permit also includes miscellaneous insignificant activities. These include general facility cleanup and maintenance, mold fabrication and maintenance, product final assembly and miscellaneous activities pursuant to operating and maintaining a manufacturing facility and offices.

Based on the Title V Air Operation Permit Renewal application received February 20, 2013, this facility is a major source of hazardous air pollutants (HAPs).

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Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fiberglass Boat Manufacturing Facility

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received February 20, 2013, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A – General Provisions	Facility
40 CFR 63, Subpart VVVV – NESHAP For Boat Manufacturing	Facility
62-4 - Permits	Facility
62-204 – Air Pollution Control – General Provisions	Facility
62-296 – Stationary Sources: Emission Standards	Facility
62-297 – Stationary Sources: Emissions Monitoring	Facility
62-213 – Operation Permits for Major Sources of Air Pollution	Facility

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The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2), F.A.C., and permit 1130163-001-AC]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.
The following controls are required:

a. Maintain tightly fitting cover, lids, etc., on all VOC containers when they are not being handled, tapped, etc. All containers that are used for temporary and permanent storage of VOC/organic solvents shall be covered where feasible to prevent vaporization of VOC when not in use.
b. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc., of VOC so that it can be covered when not in use.
c. Immediately attend to all spills/waste as appropriate.
d. All equipment, pipes, hoses, lids, fittings, etc., shall be operated and maintained in such a manner as to minimize leaks, fugitive emissions and spills of VOC materials.

[Rule 62-296.320(1), F.A.C., and Permit No.1130163-001-AC]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1. & 4., F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Proper maintenance and disposal of exhaust fan filters and protecting dust containers from wind action that might make dust airborne.
b. Periodic removal of particulate matter from buildings or work areas by sweeping and/or vacuuming and closing doors on windy days as needed.
c. Usage of portable dust collectors and dust suppressant chemicals in work areas.
d. Removal of particulate matter from roads and other paved areas under control of the owner or operator.
e. Maintenance of roads, parking area and yards.
f. Application of water or other dust suppressants to roads, parking areas and yards when necessary to control emissions.
g. Exhaust stack filters are to be inspected daily and properly maintained or replaced as needed to prevent excessive dust buildup from compromising exhaust fan operation. Additionally, all provisions of the attached "Particle Emission (PM) Control" (ATT-3) are incorporated and made a part of this permit.

[Rule 62-296.320(4)(c), F.A.C.; Permit No. 1130163-001-AC]

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Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. A copy of the form and instructions may be obtained electronically at http://www.dep.state.fl.us/air/rules/forms/aor.htm. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]

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Subsection A. The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	Fiberglass Boat Manufacturing Facility

This emission unit consists of fiberglass boat manufacturing and associated activities. Carpet and adhesive operations and aluminum recreational boat surface coating operations are not performed at this facility. The gel coating and lamination processes are the primary sources of VOC and HAP emissions. These emissions are dispersed uncontrolled by VOC exhaust fans.

The emission unit is subject to 40 CFR 63 Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. The permittee has elected to demonstrate compliance with the emission limits by averaging emissions with the applicable MACT model point value equations and appropriate record keeping.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting Note: This emissions unit is subject to the General Visible Emission Standard (20% opacity). No scheduled visible emission testing is required.}

Monitoring of Operations

A.2. The Permittee shall implement and maintain a recordkeeping/reporting system to document the facility level of production. Records, including purchase orders and invoices for gel coats, resins, and paints, shall be maintained and made available for inspection/verification for at least the most recent five years. The system shall include, as a minimum, the following information:

(a) Monthly and rolling 12-month average consumption records in tons of all materials used containing VOC and/or HAP. These records shall identify the material density, and VOC and/or individual HAP content consistent with MSDS or applicable test data.
(b) A summation of VOC and individual HAP emissions on a monthly and rolling 12-month average basis. These reports shall be submitted along with the required annual operating report (AOR) for the months covered by that AOR.
(c) Calculations for monthly Styrene emissions "**E**" from resin and/or gel coat usage "**W**" shall be consistent with the following equation:

$$E = (W \times EF)/2000$$

Where:
E = Styrene emissions (tons per month);
W = Resin or gel coat usage (tons per month);
EF = Emission Factor (lb Styrene/ton of resin or gel coat)
Note: Do NOT multiply by styrene content %. The % is already figured into the emission factor.

Emissions from gel coat and resin usage shall be calculated using the following emission factors (**EF**) or emission factors identified in the Unified Emission Factors for Open Molding of Composites, dated July 23, 2001, expressed in pounds of styrene emissions per ton of resin or gel coat processed, or other emission factors as approved by the Department.

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EMISSION FACTORS (lb Styrene/Ton of Resin or Gel coat)			
Process	**Styrene content in resin/gel coat, %**		
	33%	**34%**	**35%**
Mechanical Non-Atomized	71	74	77
Mechanical Atomized	111	126	140
Manual	83	89	94
Gel coat Application	294	315	336

[Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.; Permit No. 1130163-003-AV]

Other Requirements

A.3. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subpart VVVV – NESHAP for Boat Manufacturing. [Rule 62-204.800(11)(b)77, F.A.C.]

A.4. Affected activities. The affected source activities covered by this subpart are the combination of all of the boat manufacturing operations listed below.
(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
(b) Closed molding resin operations.
(c) Resin and gel coat mixing operations.
(d) Resin and gel coat application equipment cleaning operations.
(e) N/A
(f) N/A
[40 CFR 63.5689]

A.5. Emission limit.
(a) The permittee shall limit organic HAP emissions from the five open molding operations listed in paragraphs (1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.

(1) Production resin.
(2) Pigmented gel coat.
(3) Clear gel coat.
(4) Tooling resin.
(5) Tooling gel coat.

(b) The permittee shall limit organic HAP emissions from open molding operations to the limit specified by the following equation, based on a 12-month rolling average.

$$HAP_{limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \qquad \text{(Eq. 1)}$$

Where:
HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.
M_R = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

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M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
(c) The open molding emission limit is the same for both new and existing sources.
(d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinyl ester resin used for skin coats. This exemption does not apply to blends of vinyl ester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinyl ester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.
[40 CFR 63.5698]

A.6. Compliance Options and Procedures.
(a) Compliance with the open molding emission limit in 40 CFR 63.5698 shall be demonstrated using the Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option. The permittee shall demonstrate that emissions from the open molding resin and gel coat operations meet the emission limit in 40 CFR 63.5698, using the procedures described in 40 CFR 63.5710. Compliance with this option is based on a 12-month rolling average.

(b) Compliance shall be demonstrated by performing the following procedures:

(1) Use the methods specified in 40 CFR 63.5758 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in 40 CFR 63.5710 to show that the organic HAP emissions do not exceed the limit specified in 40 CFR 63.5698.

(3) Keep records as specified in paragraphs (i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Amount of material used per month.

(iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in 40 CFR 63.5710.

(4) Prepare and submit the implementation plan described in 40 CFR 63.5707 to the Administrator and keep it up to date.
(5) Submit semiannual compliance reports to the Administrator as specified in 40 CFR 63.5764.
[40 CFR 63.5701, 40 CFR 63.5704]

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A.7. Emissions Averaging Option.
(a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year).
(b) At the end of every subsequent month, use the following equation to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in 40 CFR 63.5698 calculated for the same 12-month period. (Include terms in equation 1 of 40 CFR 63.5698 and equation 1 of this section for only those operations and materials included in the average.)

$$HAP_{emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})] \quad \text{(Eq. 1)}$$

Where:
HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.
PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.
M_R = Mass of production resin used in the past 12 months, megagrams.
PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.
M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.
PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.
M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.
PV_{TR} = Weighted-average MACT model point value for tooling resin used in he past 12 months, kilograms per megagram.
M_{TR} = Mass of tooling resin used in the past 12 months, megagrams.
PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.
M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams.

(c) At the end of every month, the following equation shall be used to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^{n}(M_i PV_i)}{\sum_{i=1}^{n}(M_i)} \quad \text{(Eq. 2)}$$

Where:
PV_{OP} = weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, PV_{TR}, and PV_{TG}) included in the average, kilograms of HAP per megagram of material applied.

(d) The equations in Table 3 (below) to 40CFR63 Subpart VVVV shall be used to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.

Table 3 to Subpart VVVV of 40 CFR 63-MACT Model Point Value Formulas for Open Molding Operations[1]
As specified in 40 CFR 63.5710(d) and 63.5714(a), you must calculate point values using the formulas in the following table:

For this operation-	And this application method-	Use this formula to calculate the

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		MACT model plant value for each resin and gel coat-
1. Production resin, tooling resin	a. Atomized	$0.014 \times (\text{Resin HAP\%})^{2.425}$
	d. Nonatomized	$0.014 \times (\text{Resin HAP\%})^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	$0.445 \times (\text{Gel coat HAP\%})^{1.675}$

[1]*Equations calculate MACT model point value in kilograms of organic HAP per megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric. HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100 percent.*

(e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in 40 CFR 63.5698(b), for the same 12-month period, then compliance is demonstrated with the emission limit in 40 CFR 63.5698 for those operations and materials included in the average.
[40 CFR 63.5710]

A.8. Standards for Resin and Gel Coat Mixing Operations.
(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
(b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
(c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, you must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
(d) You must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.
[40 CFR 63.5731]

A.9. Standards for Resin and Gel Coat Application Equipment Cleaning Operations.
(a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flow coaters, brushes, rollers, and squeegees), shall be performed using a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
(b) You must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters (2.0 gallons), the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.
[40 CFR 63.5734]

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A.10. Compliance with the resin and gel coat application equipment cleaning standards shall be demonstrated as follows:
(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in 40 CFR 63.5734 using the methods specified in 40 CFR 63.5758.
(b) If you recycle cleaning solvents on site, you may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in 40 CFR 63.5758 for demonstrating compliance with organic HAP content limits.
(c) At least once per month, you must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.
[40 CFR 63.5737]

A.11. Methods for Determining Hazardous Air Pollutant Content. The determination of the organic HAP content for each material used in the open molding resin and gel coat operations shall be accomplished using one of the following methods.

(1) *Method 311 (appendix A to 40 CFR part 63)*. You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when determining organic HAP content by Method 311.

(i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).

(ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).

(2) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)*. You may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
(3) *Alternative method*. You may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Administrator. You must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
(4) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section.

(i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.

(iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content

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provided by the material supplier or manufacturer, then you 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 you must use the measured organic HAP content to determine compliance.

(5) *Solvent blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP that must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 (below) to this subpart. You may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to this subpart, then the test results must be used for determining compliance.

Table 5 to Subpart VVVV of 40 CFR 63-Default Organic HAP Contents of Solvents and Solvent Blends
As specified in 40 CFR 63.5758(a)(5), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
1. Toluene	108-88-3	100	Toluene.
2. Xylene(s)	1330-20-7	100	Xylenes, ethylbenzene.
3. Hexane	110-54-3	50	n-hexane.
4. n-hexane	110-54-3	100	n-hexane.
5. Ethylbenzene	100-41-4	100	Ethylbenzene.
6. Aliphatic 140		0	None.
7. Aromatic 100		2	1% xylene, 1% cumene.
8. Aromatic 150		9	Naphthalene.
9. Aromatic naptha	64742-95-6	2	1% xylene, 1% cumene.
10. Aromatic solvent	64742-94-5	10	Naphthalene.
11. Exempt mineral spirits	8032-32-4	0	None.
12. Ligroines (VM & P)	8032-32-4	0	None.
13. Lactol spirits	64742-89-6	15	Toluene.
14. Low aromatic white spirit	64742-82-1	0	None.
15. Mineral spirits	64742-88-7	1	Xylenes.
16. Hydrotreated naphtha	64742-48-9	0	None.
17. Hydrotreated light distillate	64742-47-8	0.1	Toluene.
18. Stoddard solvent	8052-41-3	1	Xylenes.
19. Super high-flash naphtha	64742-95-6	5	Xylenes.
20. Varol®solvent	8052-49-3	1	0.5% xylenes, 0.5% ethyl

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Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
			benzene.
21. VM & P naphtha	64742-89-8	6	3% toluene, 3% xylene.
22. Petroleum distillate mixture	68477-31-6	8	4% naphthalene, 4% biphenyl.

Table 6 to Subpart VVVV of 40 CFR 63-Default Organic HAP Contents of Petroleum Solvent Groups
As specified in 40 CFR 63.5758(a)(5), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent type	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naptha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.)	3	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.)	6	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

[40 CFR 63.5758]

A.12. Notifications.
(a) The permittee shall submit all of the notifications in Table 7 to this Subpart that apply to you by the dates in the table. The notifications are described more fully in 40 CFR 63 Subpart A, General Provisions, referenced in Table 8 to this Subpart.
(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.
[40 CFR 63.5761]

Recordkeeping and Reporting Requirements

A.13. Reports. The permittee shall:
(a) Submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.
(b) Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), you must submit each report by the dates in paragraphs (b)(1) through (5) of this section.
(1) N/A
(2) N/A
(3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

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(4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section.

(1) Company name and address.

(2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.

(3) The date of the report and the beginning and ending dates of the reporting period.

(4) A description of any changes in the manufacturing process since the last compliance report.

(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.

(6) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.

(7) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section in the semiannual compliance report.

(i) A description of the operation involved in the deviation.

(ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.

(iii) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.

(iv) A statement of whether or not your facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

(d) - (e) [Reserved.]

[40 CFR 63.5764]

A.14. Records. The Permittee shall implement and maintain a recordkeeping/reporting system to demonstrate compliance with the requirements of this permit. The system shall include, as a minimum, the following information.

(a) Copies of each notification and report that you submitted to comply with this subpart.

(b) All documentation supporting any notification or report that you submitted.

(c) Records showing the total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.

(d) Retention of purchase orders and invoices for gel coats, resins, and paints for at least the previous five consecutive years.

(e) Records of all calculations used to determine compliance. The records must be readily available and in a form so they can be easily inspected and reviewed. Each record shall be kept for five years following the date that each record is generated. Each record shall be kept on site for at least two years after the date that each record is generated. The records may be kept offsite for the remaining three years. The records may be

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kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
[Rules 62-4.070(3), F.A.C.; 40 CFR 63.5767 and 40 CFR 63.5770]

A.15. Implementation Plan. The permittee shall prepare an implementation plan for all open molding operations for which compliance will be demonstrated by using the emissions averaging option described in 40 CFR 63.5704(a). The implementation plan must be submitted to the Administrator with the notification of compliance status specified in 40 CFR 63.5761 and shall describe the steps to be taken take to bring the open molding operations into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in (1) through (3) below. The implementation plan shall be kept on site and made readily available upon request. If the implementation plan is revised, the revised plan must be submitted with the next semiannual compliance report specified in 40 CFR 63.5764.

(1) A description of each operation included in the average.

(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.

(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in 40 CFR 63.5698.

[40 CFR 63.5707]

A.16. Other Applicable Requirements. The permittee shall comply with all applicable requirements of the General Provisions in Table 8 of 40 CFR 63 Subpart A, and, all applicable requirements of 40 CFR 63 Subpart VVVV. [Rule 62-204.800(11), F.A.C.; and 40 CFR 63.5773]

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SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Combined Appendices
Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart VVVV – For Boat Manufacturing.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
ATT-3, Particle Emission (PM) Control

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