Brunswick Commercial and Government Products
Edgewater Facility

Facility ID No. 1270173
Volusia County

Title V Air Operation Permit Renewal

Permit No. 1270173-004-AV
(Renewal of Title V Air Operation Permit No. 1270173-003-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Waste & Air Resource Programs, Central District

3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Telephone: (407) 897-4100
E-mail: DEP_CD@dep.state.fl.us

Compliance Authority:

State of Florida
Department of Environmental Protection
Compliance Assurance Program, Central District

3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Telephone: (407) 897-4100
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FINAL PERMIT

PERMITTEE:
Brunswick Commercial and Government Products
420 Megan Z Avenue
Edgewater, Florida 32132

Permit No. 1270173-004-AV
Edgewater Facility
Facility ID No. 1270173
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 Brunswick Commercial and Government Products facility is located in Volusia County at 420 Megan Z Avenue, Florida. UTM Coordinates are: Zone 17, 508.4 East and 3207 North. Latitude is: 28˚59'34" North; and, Longitude is: 80˚54'46" 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, 2014
Renewal Application Due Date: November 15, 2018
Expiration Date: June 30, 2019

F. Thomas Lubozynski, P.E.
Waste & Air Resource Programs Administrator

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The facility is a commercial boat manufacturing facility including resin and gel coat operations. Processes include fiberglass lamination, grinding and trimming operations, support structure installation, foam injection and final assembly.

Also included in this permit are miscellaneous unregulated/insignificant emission units and/or activities.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Boat Manufacturing Operation

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received November 12, 2013, this facility is a major source of hazardous air pollutants (HAP).

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, National Emission Standards for Hazardous Air Pollutants, General Provisions	001
40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing	001
State Rule Citations (62-4, 62-210.200, 62-213, 62-252, 62-296.320, and 62-297.310	001

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) and 62-210.200(Definitions), F.A.C.]

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. To comply, procedures to minimize pollutant emissions shall include the following:

a. tightly cover or close all VOC containers when they are not in use,
b. tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
c. maintain all piping, valves, fittings, etc. in good operating condition,
d. prevent excessive air turbulence across exposed VOC's,
e. immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1), F.A.C. and Construction Permit 1270173-001-AC, dated July 22, 1996]

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. and 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. Water application to unpaved roads and unpaved yard areas).
b. Paving and maintenance of roads, parking areas and yards.
c. Landscaping or planting of vegetation.
d. Frequent sweeping of outside areas; and
e. Other techniques as necessary

[Rule 62-296.320(4)(c)1. and 2., F.A.C.; and, proposed by applicant in Title V air operation permit application received November 8, 2013.]

Annual Facility-wide 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 (AORs) shall be submitted electronically to the Compliance Authority by April 1st of each year. Go to the following website for the latest information about electronic submittal of AORs:

http://www.dep.state.fl.us/air/emission/eaor/default.htm

[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. The submittal may be made electronically to **DEP_CD@dep.state.fl.us**. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of the Clean Air Act). If and when the facility becomes subject to Section 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.

   i. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650, or by e-mail RMPRC@epacdx.net.

   ii. According to the following hyperlink, the RMP can be submitted electronically: http://www.epa.gov/emergencies/content/rmp/index.htm#submitting

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

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

EU No.	Brief Description
001	Boat Manufacturing Operation - The facility includes resin and gel coat operations. Processes include fiberglass lamination, grinding and trimming operations, support structure installation, foam injection and final assembly. Emissions from the facility are fugitive emissions from the processes. This emissions unit is subject to 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation: The hours of operation are not limited (8,760 hours/year). [Rule 62-210.200(247) (Potential to Emit), F.A.C, Permit No. 1270173-001-AC, dated July 22, 1996]

Emission Limitations and Standards

A.2. Visible Emissions: Visible emissions shall not exceed 20% opacity. [Rule 62-296.320(4)(b)1, F.A.C]

A.3. HAP Emission Limits: The maximum facility total HAP emissions are limited to less than 49.0 tons per any consecutive 12-months, and each individual HAP (Styrene) emission is limited to less than 49 tons per any consecutive 12-months, updated monthly. [Rule 62-210.200, (PTE), F.A.C. and Permit No. 1270173-001-AC, dated July 22, 1996.]

A.4. Organic Hap Emission Limit: Organic HAP emissions from the following five open molding operations: production resin; pigmented gel coat; clear gel coat; tooling resin; and tooling gel coat open molding operations, are subject to the following limit specified by the following equation, based on a 12-month rolling average.

$$HAP\ Limit = \left[46\left(M_R\right) + 159\left(M_{PG}\right) + 291\left(M_{CG}\right) + 54\left(M_{TR}\right) + 214\left(M_{TG}\right)\right] \qquad (Eq.\ 1)$$

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.

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.

The following Operations listed in paragraphs (a) through (c) are exempt from this limit:

a) 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.

b) 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.

c) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester 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 vinylester 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) through (d)]

Monitoring of Operations

A.5. Resin and Gel Coat Mixing Containers: 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. This requirement 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. Refer to Condition **A.13**. for inspection and recordkeeping requirements. [40 CFR 63.5731 (a) and (b)]

Recordkeeping Compliance Demonstration Requirements

A.6. Open Molding Operations: The permittee shall use one or more of the following options to meet the emission limit in Condition **A.4**. for the resins and gel coats used in open molding operations at the facility:

a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.*

1. Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in Condition **A.4**. using the procedures described in Condition **A.9**. Compliance with this option is based on a 12-month rolling average.

2. Those operations and materials not included in the emissions average must comply with paragraph (b) of this section.

b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 of 40 CFR 63, Subpart VVVV. Compliance with this option is based on a 12-month rolling average.

[40 CFR 63.5701]

{Permitting Note: The permittee has indicated that they are using the Compliant Materials option at the facility; however, requirements for both options are listed in the permit. Requirements for demonstrating compliance utilizing add-on controls have not been listed in this permit since they are currently not in use at the facility}

A.7. MACT Emission Averaging Option: For those open molding operations and materials complying using the emissions averaging option, compliance shall be demonstrated by performing the following steps:

a) Use the methods specified in Condition **A.17**. to determine the organic HAP content of resins and gel coats.

b) Complete the calculations described in Condition **A.9.** to show that the organic HAP emissions do not exceed the limit specified in Condition **A.4**.

c) Keep records as specified in the following paragraphs (1) through (4) for each resin and gel coat.

1. Hazardous air pollutant content.

2. Amount of material used per month.

3. Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized technology.

4. Calculations performed to demonstrate compliance based on MACT model point values, as described in Condition **A.9.**

d) Prepare and submit the implementation plan described in Condition **A.8.** to the Administrator and keep it up to date.

e) Submit semiannual compliance reports to the Administrator as specified in Condition **A.19**.

[40 CFR 63.5704(a)]

A.8. Implementation Plan for Emission Averaging Options: The permittee shall prepare an implementation plan for all open molding operations for which they demonstrate compliance by using the emissions averaging option described in Condition **A.7**. The implementation plan must describe the steps taken to bring the open molding operations covered by Condition **A.4** into compliance. For each operation included in the emissions average, your implementation plan must include the following elements:

a) A description of each operation included in the average.

b) 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.

c) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in Condition **A.4**.

The implementation plan must be submitted to the Administrator with the notification of compliance status specified in Condition **A.18**. The implementation plan must be kept on site and provided to the Administrator when asked. If implementation plan is revised, the revised plan must be submitted with the next semiannual compliance report specified in Condition **A.19**.
[40 CFR 635707]

A.9. Emission Averaging Organic HAP Calculation Method: Compliance using the emissions averaging option shall be demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). Each month, use the following equation (Eq 1) to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Condition **A.4** calculated for the same 12-month period. (Include terms in the calculation in Condition **A.4** and the following equation (Eq 1) for only those operations and materials included in the average.)

$$HAP\ \text{emissions} = \left[(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})\right] \qquad (Eq.\ 1)$$

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 the 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.

At the end of every month, use the following equation (Eq 2) to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

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

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.
M_i = mass of resin or gel coat i used within an operation in the past 12 months, megagrams.
n = number of different open molding resins and gel coats used within an operation in the past 12 months.
PV_i = the MACT model point value for resin or gel coat i used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

The permittee shall use the equations in Table 3 of 40 CFR Part 63 Subpart VVVV (Appendix E) to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.

If the organic HAP emissions, as calculated using equation 1 of this section, are less than the organic HAP limit calculated in Condition **A.4**. for the same 12-month period, then you are in compliance with the emission limit in Condition **A.4.** for those operations and materials included in the average.
[40 CFR 63.5710]

A.10. Compliant Materials Option: For each open molding operation complying using the compliant materials option, compliance shall be demonstrated by performing the following steps:

a) Use the methods specified in Condition **A.17.** to determine the organic HAP content of resins and gel coats.

b) Complete the calculations described in Condition **A.11.** to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 of 40 CFR Part 63 Subpart VVVV.

c) Keep records as specified in the following paragraphs (1) through (4) for each resin and gel coat.

(1) Hazardous air pollutant content.

(2) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized technology.

(3) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.

(4) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in Condition **A.11**.

d) Submit semiannual compliance reports to the Compliance Authority as specified in 40 CFR 63.5764. [40 CFR 63.5704(b)]

A.11. Compliant Material Organic HAP Calculation Method: Compliance using the organic HAP content requirements listed in Table 2 of 40 CFR Part 63 Subpart VVVV is based on a 12-month rolling average that is calculated at the end of every month. If you are using filled material (production resin or tooling resin), you must comply according to the procedure described in Condition **A.12**.

a) At the end of every month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2 of 40 CFR Part 63 Subpart VVVV, then you are in compliance with the emission limit specified in Condition **A.4.** for that 12-month period for that operation. In addition, you do not need to complete the weighted-average organic HAP content calculation contained in paragraph **A.11 b)** of this section for that operation.

b) At the end of every month, you must use equation 1 of this section to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\textit{Weighted-Average}\ \text{HAP Content}\ (\%) = \frac{\sum_{i=1}^{n}(M_i\ \text{HAP}_i)}{\sum_{i=1}^{n}(M_i)} \qquad (Eq.\ 1)$$

Where:
M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.
HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in §63.5758 to determine organic HAP content.
n = number of different open molding resins or gel coats used in the past 12 months in an operation.

If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 of 40 CFR Part 63 Subpart VVVV, then you are in compliance with the emission limit specified in Condition **A.4**.

A.12. Filled Resin Material Usage: If the permittee uses a filled production resin or filled tooling resin, the permittee must demonstrate compliance for the filled material on an as-applied basis using equation 1 of this section:

$$PV_F = PV_u \times \frac{(100 - \%\ \text{Filler})}{100} \qquad (Eq.\ 1)$$

Where:
PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to this subpart.
% Filler = The weight-percent of filler in the as-applied filled resin system.

a) If the filled resin is used as a production resin and the value of PV_F calculated by equation 1 of this section does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

b) If the filled resin is used as a tooling resin and the value of PV_F calculated by equation 1 of this section does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

c) If you are including a filled resin in the emissions averaging procedure described in Condition **A. 9**. then use the value of PV_F calculated using equation 1 of this section for the value of PVi in equation 2 of Condition **A. 9.**

[40 CFR 63.5714]

A.13. Resin and Gel Coat Mixing Container Inspections: To demonstrate compliance with the work practice standard in Condition **A.5**., the permittee shall inspect all mixing containers subject to this Condition 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. The permittee shall keep records of which mixing containers are subject to this Condition and the results of the inspections, including a description of any repairs or corrective actions taken. [40 CFR 63.5731 (c) and (d)

A.14. Resin and Gel Coat Application Equipment Cleaning: For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee must use 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.

The permittee 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, 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 part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid. [40CFR 63.5734]

A.15. Resin and Gel Coat Application Equipment Cleaning Records: The permittee shall determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Condition **A.14.** using the methods specified in Condition **A.17**. If the permittee recycles cleaning solvents on site, the permittee 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 Condition **A.17** for demonstrating compliance with organic HAP content limits. At least once per month, the permittee 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. The permittee keep records of the monthly inspections and any repairs made to the covers. [40CFR 63.5737]

A.16. Carpet and Fabric Adhesive Operations: The permittee must use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight. To demonstrate compliance with this limit, the permittee must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in Condition **A.17**. [40CFR 63.5740]

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A.17. Methods for Determining Organic HAP Content: To determine the organic HAP content for each material used in open molding resin and gel coat operations, carpet and fabric adhesive operations, the permittee must use one of the options in paragraphs "a)" through "f)" of this section. Additional requirements for aluminum recreational boat surface coating operations are contained in 40 CFR Part 63 Subpart VVVV, § 63.5758 (b) and (c).

a) *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) and a)(2) of this section when determining organic HAP content by Method 311.

1. 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).

2. 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).

b) *Method 24 (appendix A to 40 CFR part 60).* You may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.

c) *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.

d) *Alternative method.* You may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval from U.S. EPA Region IV, Air, Pesticides, & Toxics Management Division, 61 Forsyth Street Southwest, Atlanta, GA 30303-8960 with a copy to the Compliance Authority. You must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

e) *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) through d) of this section, such as manufacturer's formulation data, according to paragraphs e)(1) through e)(3) of this section.

1. 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.

2. 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) through d) 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.

3. 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) through d) of this section is less than 2 percentage points higher than the value for total organic HAP content 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.

f). *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 which 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 of 40 CFR Part 63 Subpart VVVV. You may use Table 6 of 40 CFR Part 63 Subpart VVVV only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 of 40 CFR Part 63 Subpart VVVV 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 of 40 CFR Part 63 Subpart VVVV, then the test results must be used for determining compliance. [40 CFR 63.5758 (a) (1) through (6)]

Notification, Reporting and Recordkeeping Requirements

A.18. Notifications: The Permittee must submit all of the notifications in Table 7 to 40 CFR Part 63 Subpart VVVV that apply to its facility by dates in the table. The notifications are described more fully in 40 CFR Part 63, Subpart A, General Provisions, referenced in Table 8 of Subpart VVVV. If any information submitted in any notification is changed, the Permittee must submit the changes in writing to the Compliance Authority within 15 calendar days after the change. [40 CFR 63.5761]

A.19. Compliance Report: The Permittee shall submit the applicable reports specified in paragraphs "a)" through "d)" of this section. To the extent possible, you must organize each report according to the operations covered and the compliance procedure followed for that operation.

a) You must submit each report by the dates in paragraphs a)1 through 5 of this section.

1. Because your source is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), each compliance report must cover the six month period ending on June 30 or December 31.

2. Each compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (a)(1) of this section. Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance

report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

b) The compliance report must include the information specified in paragraphs 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 below (that is, 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.

[40 CFR 63.5764]

A.20. Recordkeeping Requirements: The Permittee shall keep the records specified in paragraphs “a)” through ”d)” of this section in addition to records specified in other Conditions of this Permit.

a) A copy of each notification and report which was submitted to comply with this subpart.

b) You must keep all documentation supporting any notification or report that you submitted.

c) If your facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the Permittee shall keep the records specified in the following paragraphs 1 through 3 of this section.

1. 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.
2. The total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in 40 CFR 63.5752.

3. The total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in 40 CFR 63.5749.

d) Records must be readily available and in a form so they can be easily inspected and reviewed. Each record must kept for 5 years following the date that each record is generated. Each record must be kept on site for at least 2 years after the date that each record is generated. Records can be kept offsite for the remaining 3 years. Records can be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

[40 CFR 63 5767 (a) through (c) and 63.5770]

A.21. Monthly Log: In order to demonstrate compliance with Specific Condition No. **A.3.,** the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall be made available to the Department upon request. The log shall contain the following:

a. Facility Name, Facility ID No. (i.e., 1270173);

b. Month and year of record;

c. Most recent monthly total of HAP emissions, in tons;

d. Most recent monthly usage totals of gel-coats, resins, and other HAP containing material;

e. Most recent consecutive 12-month total of HAP emissions, in tons;

f. Most recent consecutive 12-month usage totals of gel-coats, resins, and other HAP containing material;

g. The HAP content of each gel-coat and resin applied; and

h. Dated maintenance records of each filter replacement on a pollution control device.

Monthly logs shall be completed by the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12 month period. A consecutive 12-month total is not a year-to-date total. Facilities or emission units that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]

A.22. HAP Emissions Calculations. Documentation of each chemical reclaimed will use a mass balance method to determine emissions during usage (the amount used minus the amount collected for disposal or recycle). The emissions calculation methods are:

- Styrene, Methyl Methacrylate, and methyl styrene (aka vinyl toluene/methyl toluene) emissions from open mold applications of resin, gelcoat, putty, gunk, and gelpatch shall be determined by use of "United Emissions Factors" (UEF) for Open Molding of Composites (Revised January 26, 2011 UEF Table)"

- Closed Molding: Use 1.5% emissions factor for all HAP content components, that is, styrene + methyl methacrylate + other organic HAPs

- Cold Press Closed Molding: Use 3% emissions factor for all HAP content components, that is, styrene + methyl methacrylate + other organic HAPs

- Methyl Methacrylate two-part adhesives: Use 75% emissions factor for methyl methacrylate emissions. (Use supplier-provided emissions data when available.)

- Supplier-provided emissions data for reactive-base adhesives, foams, and all other materials

- MDI, and other isocyanate ingredients, and polyols (polyglycol) from foams produce negligible emissions and are not required to be included in the HAP calculations.

- Organic peroxides and dimethyl phthalate produce negligible emissions and are not required to be included in the HAP calculations.

- Emissions of isocyanate ingredients from polyurethane paint products produce negligible emissions and are not required to be included in the HAP calculations.

Supporting documentation which includes sufficient information to determine usage rates and emissions (for example, chemical usage tracking logs, MSD sheets, Safety Data Sheet, supplier-provided Regulatory Data Sheets or equivalent, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) shall be kept for each chemical and associated product.

These records shall be made available to the Department upon request. The log and documents shall be kept at the facility for at least five years.
[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing
Appendix I, List of Insignificant Emissions Units and/or Activities
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.

The following Attachment is for Information only

Table H, Permit History.