S2 Yachts, Inc.
S2 Yachts, Pursuit Division

Facility ID No. 1110074
St. Lucie County

Title V Air Operation Permit Renewal

Permit No. 1110074-009-AV
Renewal of Title V Air Operation Permit No. 1110074-006-AV

Permitting Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southeast District Office

400 North Congress Avenue, Suite 200
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Florida Department of Environmental Protection

Southeast District Office
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West Palm Beach, FL 33401
561-681-6600

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

PERMITTEE:
S2 Yachts, Inc.
3901 St. Lucie Boulevard
Ft. Pierce, Florida 34946

Permit No. 1110074-009-AV
S2 Yachts, Pursuit Division
Facility ID No. 1110074
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 S2 Yachts, Pursuit Division is located in St Lucie County at 3901 St. Lucie Boulevard, Ft. Pierce, Florida. UTM Coordinates are: Zone 17: Zone 17, 562.27 km East, 3039.87 km North
Latitude: 27° 28' 57" North and Longitude: 80° 21' 48" 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: Pending
Renewal Application Due Date: 225 days before expiration date
Expiration Date: five years after effective date

_____ _____
Jill S. Creech, P.E. Date
Southeast District Director

JC/LB/md

SECTION I. FACILITY INFORMATION

Subsection A. Facility Description.

Pursuit Boats, a division of S2 Yachts, Inc., of Holland, Michigan., manufactures fiberglass fishing boats in a wide range of sizes and styles, the facility consists of one emissions unit for the manufacturing of the fiberglass boats. Styrene based resins and gelcoat are used to build fiberglass boats. In addition, various chemicals, solvent, coatings, and adhesives are used in the manufacturing process. Also, applications of varnish, paints and coatings to wooden parts of the boats are used in a spray boot using thinners and solvents. Emissions from the activities are vented through two main exhaust fans in the deck and hull gel coating area and two minor exhaust fans in the small parts areas, with an estimated total volumetric flow rate of 20,000 acfm.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fiberglass Boat Manufacturing Operation Building Activities. The regulated activities include the following: • Open molding resin and gelcoat operations. • Resin sprays application. • Gelcoat spray application. • Closed molding resin operations. • Varnish, paints, wood coatings and adhesives, and thinners, solvents and general cleanup activities and other miscellaneous material usage that contain volatile organic compounds. • The permit authorizes the use of the Emission Averaging and/or Compliant Materials options provisions of 40 CFR Pat 63, subpart VVVV.

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received July 18, 2012, 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.
40 CFR 63, subpart A, NESHAP General Provisions	001
40 CFR 63, subpart VVVV	
State Rule Citations	
62-296.320(1), F.A.C.	
62-296.320(2), F.A.C.	
62-296-320(4)(b), F.A.C.	
62-296-320(4)(c), F.A.C.	
62-297, F.A.C.	

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. [Rule 62-296.320(1), F.A.C. and 1110074-004-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, 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:
[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees

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. [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. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

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

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]

Subsection A. Emissions Unit 001

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

EU No.	Brief Description
001	Fiberglass Boat Manufacturing Operation Building Activities. (The facility uses open and closed molding processes) The regulated activities include the following: • Open molding resin and gelcoat operations. • Resin sprays application. • Gelcoat spray application. • Closed molding resin operations. • Varnish, paints, wood coatings and adhesives, and thinners, solvents and general cleanup activities and other miscellaneous material usage that contain volatile organic compounds. • The permit authorizes the use of the Emission Averaging and/or Compliant Materials options or provisions of 40 CFR Pat 63, subpart VVVV.

{Permitting note: (IMPORTANT REGULATORY CLASSIFICATIONS - the emissions unit is regulated under 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)75, F.A.C.}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit is allowed to operate continuously.
[Rules 62-4.160(2), F.A.C. and 1110074-004-AC]

40 CFR Part 63, subpart VVVV Requirements

A.2 40 CFR Part 63, subpart VVVV Activities: The affected activities (the portion of the boat manufacturing facility covered by subpart VVVV) is the combination of all of the boat manufacturing operations listed in paragraphs (a) through (e) of this condition.

(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
(b) Close molding resin operations
(c) Resin and gel coat mixing operations.
(d) Resin and gel coat application equipment cleaning operations.
(e) Carpet and fabric adhesive operations.
[40 CFR 63.5689]

A.3 [40 CFR 63.5695 & Table 1 of 40 CFR Part 63, subpart VVVV]
{Permitting Note: The emissions unit was previously subjected to a case-by-case MACT determination (August 15, 2000) and a revised MACT Determination (October 30, 2002). Both determinations allowed for compliance demonstrations based compliant materials only. This permit replaces permit number 1110074-006-AV and the associated MACT determinations and allows compliance demonstrations through use of either compliant materials or emissions averaging as allowed by 40 CFR part 63, subpart VVVV.}

A.4 HAP Emission Limitation – Open Molding and Gelcoat Operations:

(a) The permittee shall limit organic HAP emissions from the five open molding operations listed in item (1) through (5) below to the emission limit specified in paragraph (b).

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

(b) Limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this condition based on a 12-month rolling average.

$$\textit{HAP Limit} = [46(M_R) + 159(M_{PG}) + 261(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \text{ - Equation 1}$$

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 gelcoat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{CG} = mass of clear gelcoat 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 gelcoat 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 (1) through (3) below are exempt from the open molding emission limit specified in paragraph (b) of this condition.

(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. The permittee shall maintain a record of the resins which are using this exemption.

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

(3) Pure, 100 percent vinyl ester 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. The permittee shall maintain 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.5 HAP Compliance Options – Open Molding Operations: The permittee shall use one or more of the options listed in paragraphs (a) through (c) of this condition to meet the emission limit in Condition A.4 (40 CFR 63.5698) for the resins and gel coats used in open molding operations.

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

(1) Demonstrate that emissions from the open molding resin and gelcoat operations that the permittee averages meet the emission limit in Condition A.4 (40 CFR 63.5698) using the procedures described in Condition A.8 (40 CFR 63.5710) of this permit. 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 condition.

(b) Compliant materials option. Demonstrate compliance by using resins and gelcoats that meet the organic HAP content requirements in Table A.5-1. Compliance with this option is based on a 12-month rolling average.

Table A.5-1

For this operation	And this organic HAP content application method	You must not exceed this weighted-average (weight percent) requirement
1. Production resin	Atomized (spray)	28 percent
2. Production resin	No atomized (non-spray)	35 percent
3. Pigmented gelcoat	Any method	33 percent
4. Clear gelcoat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent
6. Tooling resin operations	No atomized (non-spray)	39 percent
7. Tooling gelcoat	Any method	40 percent

[40 CFR 63.5701]

A.6 HAP General Requirement – Open Molding Operations: The permittee shall comply with the either paragraph (a) or (b) of this condition:

(a) ***Emissions averaging option***. For those open molding operations and materials complying using the emissions averaging option, the permittee shall demonstrate compliance by performing the steps (1) through (5) below.

(1) Use the methods specified in Condition A.16 (40 CFR 63.5758) of this permit to determine the organic HAP content of resins and gelcoats.
(2) Complete the calculations described in Condition A.8 (40 CFR 63.5710) of this permit to show that the organic HAP emissions do not exceed the limit specified in Condition A.4 (40 CFR 63.5698).

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

(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 Condition A.8 (40 CFR 63.5710) of this permit.

(4) Prepare and submit the implementation plan described in Condition A.7 (40 CFR 63.5707) of this permit to the Department's Southeast District Office and keep it up to date.

(5) Submit semiannual compliance reports to the Department's Southeast District Office as specified in Condition A.18 (40 CFR 63.5764) of this permit.

(b) ***Compliant materials option***. For each open molding operation complying using the compliant materials option, you must demonstrate compliance by performing the steps (1) through (4) below.

(1) Use the methods specified in Condition A.16 (40 CFR 63.5758) of this permit to determine the organic HAP content of resins and gelcoats.

(2) Complete the calculations described in Condition A.9 (40 CFR 63.5713) of this permit to show that the weighted-average organic HAP content does not exceed the limit specified in Condition A.4 of this permit.

(3) Keep records as specified in paragraphs (i) through (iv) below for each resin and gelcoat.

(i) Hazardous air pollutant content.

(ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iii) 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.

(iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in Condition A.9 (40 CFR 63.5713) of this permit.

(4) Submit semiannual compliance reports to the Administrator as specified in Condition A.18 (40 CFR 63.5764) of this permit.

[40 CFR 63.5704]

A.7 <u>Implementation Plan – Open Molding Operations:</u> The permittee shall:

(a) Prepare an implementation plan for all open molding operations for which the emissions averaging option described in Condition A.6 (40 CFR 63.5704(a)) of this permit.

(b) The implementation plan must describe the steps that will be taken to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in (1) through (3) below.

(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 Condition A.4 (40 CFR 63.5698) of this permit.

(c) Submit the implementation plan to the Department's Southeast District Office with the notification of compliance status specified in Condition A.17 (40 CFR 63.5761) of this permit.

(d) Keep the implementation plan on site and provide it to the Department when asked.

(e) Revisions to the implementation plan, must be submitted to the Department's Southeast District Office with the next semiannual compliance report specified in Condition A.18 (40 CFR 63.5764) of this permit.
[40 CFR 63.5707]

A.8 Compliance Demonstration – Emissions Averaging: If compliance using the emissions averaging option is selected, the permittee shall:

(a) Demonstrate compliance on a 12-month rolling-average basis and determined compliance at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in Condition A.3 (40 CFR 63.5695) of this permit.

(b) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use equation 1 of this condition to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Condition A.4 (40 CFR 63.5698) of this permit calculated for the same 12-month period. (Include terms in equation 1 of Condition A.4 (40 CFR 63.5698) of this permit calculated for the same 12 month period. Include terms in equation 1 of Condition A.4 (40 CFR 63.5698) and equation 1 of this condition 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 gelcoat used in the past 12 months, kilograms per megagram.

MP_G = Mass of pigmented gelcoat used in the past 12 months, megagrams.

PV_{CG} = Weighted-average MACT model point value for clear gelcoat used in the past 12 months, kilograms per megagram.

M_{CG} = Mass of clear gelcoat 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 gelcoat used in the past 12 months, kilograms per megagram.

M_{TG} = Mass of tooling gelcoat used in the past 12 months, megagrams.

(c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gelcoat 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 (PVR, PVPG, PVCG, PVTR, and PVTG) included in the average, kilograms of HAP per megagram of material applied.

M_i = mass of resin or gelcoat i used within an operation in the past 12 months, megagrams.

n = number of different open molding resins and gelcoats used within an operation in the past 12 months.

PV_i = the MACT model point value for resin or gelcoat i used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

(d) Use the equations in Table A.9-1 to calculate the MACT model point value (PVi) for each resin and gelcoat used in each operation in the past 12 months.

(e) If the organic HAP emissions, as calculated in paragraph (b) of this condition, are less than the organic HAP

limit calculated in by Equation 1 of Condition A.4 for the same 12-month period, then the facility is in compliance with the emission limit in Condition A.5 (40 CFR 63.5698) of this permit for those operations and materials included in the average.
[40 CFR 63.5710]

A.9 Compliance Demonstration – Compliant Materials: If compliance using the compliance materials option is selected, the permittee shall:

(a) Demonstrate compliance using the organic HAP content requirements listed in Condition A.5 (Table A.5-1) of this permit based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in Condition A.3 (40 CFR 63.5695) of this permit. For filled materials (production resin or tooling resin), demonstrate compliance according to the procedure described in Condition A.11 (40 CFR 63.5717) of this permit.

(b) At the end of the twelfth month after the compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gelcoats used in the past 12 months in each operation. If all resins and gelcoats used in an operation have organic HAP contents no greater than the applicable

organic HAP content limits in Condition A.5, Table A.5-1 of this permit, then the facility is in compliance with the emission limit specified in Condition A.4 (40 CFR 63.5698) of this permit for that 12-month period for that operation. In addition, the facility does not need to complete the weighted-average organic HAP content calculation contained in paragraph (c) of this section for that operation.

Table A.9-1

For this operation	And this application method	Use this formula to calculate the MACT model plant value for each resin and gelcoat
1. Production resin, tooling resin	a. Atomized. b. Atomized, plus vacuum bagging with roll-out. c. Atomized, plus vacuum bagging without roll-out. d. Nonatomized. e. Nonatomized, plus vacuum bagging with roll-out. f. Nonatomized, plus vacuum bagging without roll-out.	$0.014 \times (\text{Resin HAP\%})^{2.425}$ $0.01185 \times (\text{Resin HAP\%})^{2.425}$ $0.00945 \times (\text{Resin HAP\%})^{2.425}$ $0.014 \times (\text{Resin HAP\%})^{2.275}$ $0.0110 \times (\text{Resin HAP\%})^{2.275}$ $0.0076 \times (\text{Resin HAP\%})^{2.275}$
2. Pigmented gelcoat, clear gelcoat, tooling gelcoat.	All methods	$0.445 \times (\text{Gelcoat HAP\%})^{1.675}$
\1\Equations calculate MACT model point value in kilograms of organic HAP per megagrams of resin or gelcoat 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.		

A.10 Compliance Demonstration – Compliant Materials (continued):

(c) At the end of every month, use equation 1 of this condition to calculate the weighted-average organic HAP content for all resins and gelcoats 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 gelcoat i used in the past 12 months in an operation, megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gelcoat i used in the past 12 months in an operation. Use the methods in Condition A.16 (40 CFR 63.5758) of this permit to determine organic HAP content.

n = number of different open molding resins or gelcoats used in the past 12 months in an operation.

(d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Condition A.5, Table A.5-1 of this permit, the facility is in compliance with the emission limit specified in Condition A.4 (40 CFR 63.5698) of this permit.
[40 CFR 63.5713]

A.11 Compliance Demonstration – Filled Resins: The permittee shall demonstrate compliance when using filled resins in accordance with the following procedures:

(a) For filled production resin or filled tooling resin, the facility must demonstrate compliance for the filled material on an as-applied basis using equation 1 of this condition.

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

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 Condition A.9, Table A.9-1 of this permit.

% Filler =The weight-percent of filler in the as-applied filled resin system.

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

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

(d) If a filled resin is included in the emissions averaging procedure described in Condition A.9 (40 CFR 63.5710) of this permit, then use the value of PV_F calculated using equation 1 of this section for the value of PV_i in equation 2 of Condition A.9 (40 CFR 63.5710).
[40 CFR 63.5714]

A.12 Compliance Demonstration – Closed Molding Resin Operations: The permittee shall comply with the following:

(a) If a resin application operation meets the definition of closed molding specified in Appendix 63-VVVV of this permit, there is no requirement to reduce emissions from that operation.

(b) If the resin application operation does not meet the definition of closed molding, then you must comply with the limit for open molding resin operations specified in Condition A.4 (40 CFR 63.5698) of this permit.

(c) Open molding resin operations that precede a closed molding operation must comply with the limit for open molding resin and gelcoat operations specified in Condition A.4 (40 CFR 63.5698) of this permit.

Examples of these operations include gelcoat or skin coat layers that are applied before lamination is performed by closed molding.
[40 CFR 63.5728]

A.13 Compliance Requirements – Resin and GelCoat Mixing Operations: The permittee shall comply with the following:

(a) All resin and gelcoat 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 condition 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 condition, 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) 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.14 Compliance Standards – Resin and Gelcoat Application Equipment Cleaning Operations: The permittee shall comply with the following:

(a) For routine flushing of resin and gelcoat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gelcoat from application equipment, no organic HAP content limit applies.

(b) Store organic HAP-containing solvents used for removing cured resin or gelcoat 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 gelcoat are exempt from the requirements of 40 CFR, part 63, subpart T. Cured resin or gelcoat means resin or gelcoat that has changed from a liquid to a solid.
[40 CFR 63.5734]

A.15 Compliance Demonstrations - Resin and Gelcoat Application Equipment Application Equipment Cleaning Standards: The permittee shall comply with the following:

(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Condition A.14 (40 CFR 63.5734) using the methods specified in Condition A.16 (40 CFR 63.5758) of this permit.

(b) When recycling cleaning solvents on site, 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.16 (40 CFR 63.5758) of this permit for demonstrating compliance with organic HAP content limits.

(c) At least once per month, visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gelcoat 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.16 Organic HAP Content Determination Procedures: The permittee shall determine organic HAP content in accordance with the following:

(a) Determine the organic HAP content for each material used. To determine the organic HAP content for each material used in the open molding resin and gelcoat operations, use one of the options in (1) through (6) below.

(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 condition 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, do not include it in the organic HAP total. Express the mass fraction of each organic HAP measures 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) Method 24 (appendix A to 40 CFR, part 60). 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.

(3) ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins). Use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gelcoats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

(4) Alternative method. Use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Department. Follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

(5) Information from the supplier or manufacturer of the material. Use information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this condition, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this condition.

(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, do not 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 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 condition exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then use the measured organic HAP content to determine compliance.

(iii) If the organic HAP content is provided as a single value, 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 condition is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then 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 use the measured organic HAP content to determine compliance.

(6) 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, use the values for organic HAP content that are listed in the following Tables to this condition. Use Table A.16-2 to this condition only if the solvent blends in the materials used do not match any of the solvent blends in Table A.16-1 to this subpart and it is known that the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in the Tables to this condition, then the test results must be used for determining compliance.

Table A.16-1

Solvent/solvent blend	CAS No.	Average organic HAP content	Typical organic HAP, percent by mass percent by mass
1. Toluene	108-88-3 100	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	----------	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	8032-32-40	0	None
12. Ligroines (VM & P)	8032-32-4	0	None
13. Lactol spirits	64742-89-6	15	Toluene
14. Low aromatic white	64742-82-1	0	None
spirit	64742-88-7	1	Xylenes
15. Mineral spirits	64742-48-9	0	None
16. Hydrotreated naphtha	64742-47-8	0.1	Toluene
17. Hydrotreated light	8052-41-3	1	Xylenes
distillate	64742-95-6	5	Xylenes
18. Stoddard solvent	8052-49-3 1	1	0.5% xylenes, 0.5% ethyl benzene
19. Super high-flash naphtha	64742-89-8	6	3% toluene, 3% xylene
20. Varol ® solvent	68477-31-6	8	4% naphthalene, 4% biphenyl.
21. VM & P naphtha			
22. Petroleum distillate mixture			

Table A.16-2

Solvent type	Average organic HAP content, percent by mass	Typical organic HAP content percent by mass
Aliphatic (Mineral Spirits	3	1% Xylene, 1% Toluene, and 1%

135, 3 1% Xylene, 1% Mineral Spirits 150 EC, Toluene, and 1% Naphtha, Mixed Hydrocarbon, Ethylbenzene. Aliphatic Hydrocarbon, Aliphatic Naptha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.). Aromatic (Medium-flash Naphtha, 6 4% Xylene, 1% High-flash Naphtha, Aromatic Toluene, and 1% Naphtha, Light Aromatic Ethylbenzene. Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.)	6	Ethylbenzene 4% Xylene, 1% Toluene, and 1% Ethylbenzene

[40 CFR 63.5758]

A.17 Compliance Notifications: The permittee shall submit all of the notifications in Table A.17-1 of this condition by the dates in the table. The notifications are described more fully in 40 CFR Part 63, subpart A, General Provisions, referenced in Appendix 63-A of this permit. If any information submitted in any notification is change, the permittee shall submit the changes in writing to the Department within 15 calendar days after the change.

Table A.17-1

If your facility	You must submit	By this date
1. Is an existing source subject to this subpart	An initial notification containing the information specified in § 63.9(b)(2).	No later than the dates specified in § 63.9(b)(2).
2. Is a new source subject to this subpart.	The notifications specified in § 63.9(b) (3) to (5).	No later than the dates specified § 63.9(b)(4) and (5)
3. Qualifies for a compliance extension as specified in § 63.9(c)	A request for a compliance extension as specified in § 63.9(c).	No later than the dates specified in § 63.6(i).
4. Is complying with organic HAP content limits, application equipment requirements; or MACT model point value averaging period provisions.	A notification of compliance status as specified in § 63.9(h).	No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date.

[40 CFR 63.5761]

A.18 Compliance Reports: The permittee shall submit the following reports and to the extent possible, shall organize each report according to the operations covered by this permit and the compliance procedure followed for that operation.

(a) Submit each report by the dates in paragraphs (1) through (4) of this condition.

(1) The first compliance report shall cover the period beginning 12 months after the compliance date specified for your source in Condition 1.2 of this permit and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date.

(2) The first compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in item (1).

(3) Each subsequent compliance report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

(4) Each subsequent compliance report shall 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 condition.

(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 the facility was in compliance with the emission limits and work practice standards during the reporting period, the report shall include a statement to that effect.

(7) If the facility deviated from an emission limit or work practice standard during the reporting period, the report shall also include the information listed in paragraphs (b)(7)(i) through (iv) of this condition 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 taken to minimize the deviation and actions that have been taken to prevent it from happening again.

(iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.
[40 CFR 63.5764]

A.19 Recordkeeping Requirements: The permittee shall keep the records specified in (a) through (c) below in addition to records specified in other conditions of the permit.

(a) A copy of each notification and report that is submitted to comply with this subpart.

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

(c) The total amounts of open molding production resin, pigmented gelcoat, clear gelcoat, tooling resin, and tooling gelcoat 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.
[40 CFR 63.5767]

A.20 Record Maintenance: The permittee shall ensure that:

(a) All records are readily available and in a form so they can be easily inspected and reviewed.

(b) Each record is kept for 5 years following the date that each record is generated.

(c) Each record is kept on site for at least 2 years after the date that each record is generated and keep the records offsite for the remaining 3 years.

(d) Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
[40 CFR 63.5770]

A.21 Definitions: Appendix 63-VVVV contains additional definitions not addressed in Appendix 63-A applicable to this emissions unit.
[40 CFR 63.5779]

A.22 Applicability: The permittee shall comply with each applicable provision in Appendix 63-A (40 CFR subpart A).
[40 CFR 63.2]