Marlow-Hunter, LLC

Facility ID No. 0010077
Alachua County

Title V Air Operation Permit Renewal

Permit No. 0010077-009-AV
(Renewal of Title V Air Operation Permit No. 0010077-008-AV)

Permitting & Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Northeast District
7777 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256
Telephone: (904) 256-1700
Fax: (904) 256-1590

Title V Air Operation Permit Renewal

Permit No. 0010077-009-AV

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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
7777 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

PERMITTEE:
Marlow-Hunter, LLC
14700 Northwest US Highway 441
Alachua, Florida 32615

Permit No. 0010077-009-AV
Facility Id No. 0010077
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 facility is located in Alachua County at 14700 Northwest US Highway 441, Alachua, Alachua County; UTM Coordinates: Zone 17, 355.1 km East and 3296.37 km North; and, Latitude: 29°47'27" North and Longitude: 82°29'57" 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: **October 16, 2012**
Renewal Application Due Date: **March 5, 2017**
Expiration Date: O**ctober 16, 2017**

Khalid AlNahdy, P.E.
District Air Program Administrator

KAA/bcs

Subsection A. Facility Description.

Marlow-Hunter, LLC is a fiberglass boat manufacturing facility. Process operations include the fabrication of boat decks, hulls and fiberglass reinforced plastic parts, the grounding and sanding of rough surfaces, the coating of hulls with antifouling paint, and the assembly of the decks and hulls to form the completed boats.

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

Based on the Title V permit renewal application received August 20, 2012 this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Units.

E.U. ID No.	Brief Description
-001	Fiberglass boat manufacturing operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: ▪ EP1 Exhaust stacks E1-E4 & E9-E16 associated with the ventilation/exhaust system for the deck and hull building; ▪ EP2- Stack ML1, the mill lamination vent; ▪ EP3 & EP-4- Stacks W1 & W2 associated with each of the two, cyclone and baghouse in series combination; and ▪ EP5- Wall and ceiling vents, M1-M3, and five (5) exhaust fans from the spray room and drying room.

Emissions Point EP-1 identifies the 12 exhaust stacks of the ventilation/exhaust system for the deck and hull building. Each stack contains 2 polyester fiber non-woven filters and 12 box filters using a roll-mat media to control particulate. The polyester filters are changed on a weekly basis while the box filters are changed depending upon the pressure drop across the filter. Stacks E1-E4 and E9-E12 are located in the Hull Room and Stacks E13-E16 are located in the Deck Room.

Emission Point EP-2 identifies the exhaust stack for the mill lamination vent where various adhesives are applied to the wood components of the boats.

Emissions Point EP-3 & EP-4 identifies the (2) particulate matter control devices used to collect the generated dust in the woodworking mill. Each device consists of a cyclone and baghouse in series. Lumber that is milled in this building is used to pre-fabricate the boat interiors. This process utilizes various kinds of adhesives, varnishes, caulks, putty and filler, cleanup solvents and other minor VOC containing products.

Emissions Point EP-5 identifies the wall and ceiling vents through which fugitive VOC and HAP emissions resulting from the use of raw materials in the R & D Building, the Assembly Room, and the Finishing Room are emitted. In addition, the facility operates a spray room equipped with paint arrestor filters to control overspray as well as a drying room. The spray room has four (4) exhaust fans, while the drying room has one.

{Permitting note(s): These emissions unit(s) are regulated under: NESHAP - 40 CFR 63, Subpart A- General Provisions and Subpart VVVV [National Emission Standards For Hazardous Air Pollutants for Boat Manufacturing], adopted and incorporated by reference in Rule 62-204.800.}

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received August 20, 2012, this facility is a major source of hazardous air pollutants (HAP). The facility operates a fiberglass boat manufacturing facility which is subject to regulation under 40 CFR 63, Subpart VVVV – National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing. 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).
Rule 62-4, F.A.C.	001
Rule 62-210, F.A.C.	001
Rule 62-213, F.A.C.	001
Rule 62-296, F.A.C.	Facility

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.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

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:

a. Maintenance of paved areas/paved parking areas as needed;
b. Reduced speed for vehicular traffic; and
c. Implementation of good housekeeping practices.

[Rule 62-296.320(4)(c), F.A.C.]

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.

[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).

a. As required by Section 112(r)(7)(B)(iii) of the CAA and 40 CFR 68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.

b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Department of Community Affairs (DCA), as established by department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6) of the CAA.

c. The owner or operator shall submit the required annual registration fee to the DCA on or before April 1, in accordance with Part IV, Chapter 252, F.S., and Rule 9G-21, F.A.C.

d. Any required written reports, notifications, certifications, and data required to be sent to the DCA, should be sent to: Department of Community Affairs, Division of Emergency Management, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2100, Telephone: (850) 413-9921, Fax: (850) 488-1739.

e. 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.

f. Any required reports to be sent to the National Response Center, should be sent to: National Response Center, EPA Office of Solid Waste and Emergency Response, USEPA (5305 W), 401 M Street SW, Washington, D.C. 20460, Telephone: (800) 424-8802.

g. Send the required annual registration fee using approved forms made payable to: Cashier, Department of Community Affairs, State Emergency Response Commission, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2149

[Part IV, Chapter 252, F.S.; and, Rule 9G-21, F.A.C.]

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

EU No.	Brief Description
-001	Fiberglass boat manufacturing operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: ▪ EP1 Exhaust stacks E1-E4 & E9-E16 associated with the ventilation/exhaust system for the deck and hull building; ▪ EP2- Stack ML1, the mill lamination vent; ▪ EP3 & EP4- Stacks W1 & W2 associated with each of the two, cyclone and baghouse in series combination; and ▪ EP5- Wall and ceiling vents, M1-M3, and five (5) exhaust fans from the spray room and drying room.

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

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. The hours of operation for these emissions units shall not exceed 8,232 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Permit AC01-200235]

Operational and Work Practices

A.2. Fabric Filter. The polyester fiber non-woven filters of the ventilation/exhaust system located throughout the Deck and Hull Buildings shall be changed weekly. The box filters shall be changed depending on the pressure drop across the filter.
[Title V Permit No. 0010077-004-AV, Rule 62-4.070(30, F.A.C.]

Resin and gel coat mixing operations:

A.3. 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.
[40 CFR 63.5731]

A.4. Resin and Gel Coat Mixing Container Work Practice Exemption. The work practice standard in **Specific Condition No. A.3.** 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.
[40 CFR 63.5731(b)]

Resin and Gel Coat Application Equipment Cleaning Operations:

A.5. Resin and Gel Coat Application Equipment Cleaning. For the routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. No organic HAP content limit applies when removing cured resin or gel coat from application equipment.

[40 CFR 63.5734(a)]

A.6. Organic HAP-containing Solvent Storage. The permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat[1] in containers with covers. The covers shall 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.

[1]*Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.*

[40 CFR 63.5734(b)]

Carpet and Fabric Adhesive Operations

A.7. Carpet and Fabric Adhesives Organic HAP Content. The permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.

[40 CFR 63.5740(a)]

Emission Limitations and Standards

{Permitting Note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.8. Visible Emissions (EP-3 & EP-4). Visible emissions from Emission Points 03 and 04 shall not exceed 5 percent opacity.

[Title V Permit No. 0010077-004-AV; Rule 62-297.310(7), F.A.C.]

A.9. Volatile Organic Compounds. Total VOC emissions (including styrene) shall not exceed 172 tons per year.

[Title V Permit No. 0010077-004-AV, Permit Revision Request received 05/09/01]

A.10. Styrene. Styrene emissions shall not exceed 131.57 tons per year.

[Title V Permit No. 0010077-004-AV]

A.11. Toluene. Toluene emissions shall not 17.50 tons per year.

[Emission Cap Title V Permit No. 0010077-004-AV]

A.12. Total Hazardous Air Pollutants. Total hazardous air pollutant emissions shall not exceed 157.05 tons per year.

[Emission Cap Title V Permit No. 0010077-004-AV]

A.13. Total Organic HAP Emissions. Total Organic HAP Emissions from the following open molding operations shall be limited as stated in **Specific Condition No. A.14**.:

Production resin
Pigmented gel coat
Clear gel coat
Tooling resin
Tooling gel coat

[40 CFR 63.5698(a)]

A.14. Total Organic HAP Emissions. Total Organic HAP Emissions shall be limited to the limit specified by the following equation, based on a 12-month rolling average:

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

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 Specific Condition **A.15**., megagrams.

M_{PG} = **mass of pigmented gel coat** used in the past 12 months, excluding any materials exempt under Specific Condition **A.15**., megagrams.

M_{CG} = **mass of clear gel coat** used in the past 12 months, excluding any materials exempt under Specific Condition **A.15**., megagrams.

M_{TR} = **mass of tooling resin** used in the past 12 months, excluding any materials exempt under Specific Condition **A.15**., megagrams.

M_{TG} = **mass of tooling gel coat** used in the past 12 months, excluding any materials exempt under Specific Condition **A.15**., megagrams.

[40 CFR 63.5698(b)]

A.15. The following materials are exempt from the open molding emission limit specified in Specific Condition **A.14.**

(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 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(d)]

Compliance Methods:

A.16. The permittee shall use one or more of the following options, (a) and (b) to meet the emission limit in **Specific Condition No. A.14.:**

(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 are averaged meet the emission limit in **Specific Condition No. A.14**. using the procedures described in **Specific Condition Nos. B.7. through B.11.** 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 either (b) or (c) 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. Compliance with this option is based on a 12-month rolling average.

[40 CFR 63.5701]

A.17. The Permittee shall meet the requirements of **Specific Condition B.0**. through **B.15**., if using the Emissions Averaging Option to meet the emission limit in **Specific Condition No. A.14.**

A.18. The Permittee shall meet the requirements of **Specific Conditions Nos. C.0**. through **C.5**., if using the Compliant Materials Option to meet the emission limit in **Specific Condition No. A.14**.

A.19. Organic HAP Content of Cleaning Solvents Determination. The Permittee shall determine and record the organic HAP content of the cleaning solvents subject to the requirements of **Specific Condition Nos. A.5.** and **A.6.** using the methods stated in Specific Condition No**. A.21**.

[40 CFR 63.5737(a)]

A.20. Onsite Recycled Cleaning Solvents. For those cleaning solvents recycled onsite, 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 Specific Condition No. **A.21**. for demonstrating compliance with organic HAP content limits.

[40 CFR 63.5737(b)]

A.21. Organic HAP content Determination Method. The permittee shall use one of the following options, (1) through (5) to determine the organic HAP content for each material used in open molding resin and gel coat operations or carpet and fabric adhesive operations.

(1) *Method 311 (appendix A to 40 CFR part 63)*. The permittee may use Method 311 for determining the mass fraction of organic HAP. The procedures specified in (1)(i) and (ii) shall be used 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).

Condition A.21. Continued:

(2) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)*. The permittee 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*. The permittee may use an alternative test method for determining mass fraction of organic HAP if prior approval is obtained by the Administrator. The procedures in § 63.7(f) shall be followed in order to submit an alternative test method for approval.

(4) *Information from the supplier or manufacturer of the material*. The permittee may rely on information other than that generated by the test methods specified in paragraphs (1) through (4) above, such as manufacturer's formulation data, according to paragraphs (5)(i) through (iii) below.

(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 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 (1) through (4) above 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, 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 (1) through (4) above is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee 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 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, 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, the values for organic HAP content that are listed in Table 5 or 6 may be used. Table 6 may be used only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 and only whether the blend is either aliphatic or aromatic is known. However, if test results indicate higher values than those listed in Table 5 or 6, then the test results must be used for determining compliance.

[40 CFR 63.5758(a)]

A.22. Carpet and Fabric Adhesives Organic HAP Content Methods. The permittee shall determine and record the organic HAP content of the carpet and fabric adhesives using the methods in **Specific Condition No. A.21.** to demonstrate compliance with the emission limit in **Specific Condition No. A.7.**

[40 CFR 63.5740(b)]

Inspections:

A.23. Resin and Gel Coat Mixing Container Inspection. To demonstrate compliance with the work practice standard in **Specific Condition No.A.3.,** the permittee shall 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.

[40 CFR 63.5731(c)]

A. 24. Organic HAP-Containing Solvents Containers. The permittee shall 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 no less than once per month. The permittee shall keep records of the monthly inspections and any repairs made to the covers.

[40 CFR 63.5737(c)]

Recordkeeping Requirements:

A.25. Recordkeeping. Compliance with the limits stated in **Specific Condition Nos. A. 09**. through **A.12**. shall be determined by recording the following data for each material used that contains Styrene, total HAPs, or VOC.

Quantity	
• Gallons of Material Used (Plant usage logs shall be maintained)	
Emissions Factors	
• Density of Material in Pounds per Gallon (Manufacturer specification's data shall be maintained)	• Pollutant Factor (Percentage by Weight)
Emissions	
• Total Cumulative VOC Emissions (Tons) • Total Cumulative Styrene Emissions (Tons) • Total HAP Emissions (Tons)	

*Styrene emissions shall be determined using the same method as stated in Specific Condition **A.26**.*

A.26. Recordkeeping-Styrene. Styrene emissions shall be determined using the following equations:

Emissions, in tons = Amount of material x styrene monomer content (percent/100)
x emission factor (percent/100, from the table below)
x ton/2000 pounds

Application Method	NVS Monomer 35%	NVS Monomer 38%	NVS Monomer 42%	NVS Monomer 45%	NVS Monomer 50%
Resin Non-Spray Lay-up	11%	11%	12%	12%	13%
Tooling/Pigmented/ Based Gelcoats	48%	51%	54%	56%	---

The applicable emission factor shall be interpolated from the above table, in conjunction with the percent of available non-vapor suppressed (NVS) monomer in the resin/gelcoat.

[Title V Permit Revision No. 1090022-004-AV]

A.27. VOC, Styrene, Toluene and Total HAP Recordkeeping. The information required by **Specific Condition A.26**. shall be recorded and maintained at the facility.

[Rules 62-4.070(3); 62-213.440, F.A.C.]

A.28. Resin and Gel Coat Mixing Container Recordkeeping. The permittee shall keep records of which mixing containers are subject **Specific Condition Nos. A.3., A.4. and A.23**. The permittee shall maintain records of the results of the inspections, including a description of any repairs or corrective actions taken.

[40 CFR 63.5731(d)]

A.29. Records. The permittee shall maintain the records stated below:

(1) A copy of each notification and report that is submitted to comply with 40 CFR 63 Subpart VVVV.

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

(3) For facilities not controlled by an add-on control device: 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, the permittee shall also record the amounts of each applied by atomized and nonatomized methods.

(4) For facilities with an add-on control device: The records specified in § 63.10(b) relative to control device startup, shut down, and malfunction events; control device performance tests; and continuous monitoring system performance evaluations.

[40 CFR 63.5767]

A.30. Records – Form. The permittee shall maintain records that are readily available and in a form so that they can be easily inspected and reviewed. The records may be on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

[40 CRR. 63.5770(a) and (d)]

A.31. Records –Duration. The permittee shall maintain each record for a period of 5 years following the date that each record is generated. The record shall be maintained onsite for at least 2 years after the date that the record is generated and may be maintained offsite for the remaining 3 years.

[40 CFR 63.5770(b) and (c)]

Notification Requirements:

A.32. The permittee shall submit all applicable notifications in Table 7 to the Administrator and the Northeast District Office by the dates specified in the table. The notifications are described more fully in 40 CFR part 63, Subpart A, General Provisions Table 8.

[40 CFR 63.5761(a)]

A.33. If any information submitted in any notification is changed, the permittee shall submit the changes in writing to the Administrator within 15 calendar days after the change.

[40 CFR 63.5761(b)]

Reporting Requirements:

A.34. Reporting. A report of the data required by **Condition A.27**. shall be submitted to the Northeast District Office on a semi-annual basis. These reports shall be postmarked no later than the 60th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - June	August 1
July-December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the July-December semi-annual report.

[Title V Permit Revision No. 0010077-004-AV]

A.35. The permittee shall submit the applicable reports stated in **Specific Condition** Nos. **A.36**.- **A.40**. by the dates in **A.36**. through **A.39**.[1]

[1] Unless a different schedule for submission of reports has been approved by the Administrator pursuant to 40 CFR 63.10(a).

[40 CFR 63.5764(a)]

A.36. First Compliance Report Period -Organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions. The first compliance report must cover the period beginning 12 months after August 23, 2004 and ending on June 30th or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for this source.

[40 CFR 63.5764(b)(1)]

A.37. First Compliance Report Submittal Date. The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period stated in **Specific Condition A. 36**. as applicable.

[40 CFR 63.5764(b)(2)]

A.38. Subsequent Compliance Report Periods. Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

[40 CFR 63.5764(b)(3)]

A.39. Subsequent Compliance Report Submittal Dates. Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

[40 CFR 63.5764(b)(4)]

A.40. The compliance report shall include the information specified below in (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.

A.40. Continued:

(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 during the reporting period compliance was reached with the emission limits and work practice standards, a statement shall be included to that effect.

(7) If during the reporting period a deviation from an emission limit or work practice standard occurred, the information listed in (7)(i) through (iv) of this section shall be included 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 the actions 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(c)]

A.41. Compliance Method: To demonstrate compliance with 40 CFR 63 Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used, it must be used for a minimum of 12 consecutive months before switching to the other option.

<u>Test Methods and Procedures</u>

{Permitting Note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.42. <u>Visible Emissions (EP-3 & EP-4).</u> The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C.

[Rule 62-297.310(7)(a)4.]

A.43. <u>Applicable Test Procedures.</u>

(a) <u>Required Sampling Time.</u>

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling port shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

A.43.(a)2. **Continued:**

a. For batch, cyclical processes, or other operations, which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

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

EU No.	Brief Description
-001	Fiberglass boat manufacturing operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: ▪ EP1 Exhaust stacks E1-E4 & E9-E16 associated with the ventilation/exhaust system for the deck and hull building; ▪ EP2- Stack ML1, the mill lamination vent; ▪ EP3 & EP4- Stacks W1 & W2 associated with each of the two, cyclone and baghouse in series combination; and ▪ EP5- Wall and ceiling vents, M1-M3, and five (5) exhaust fans from the spray room and drying room.

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

B.0. Conditions B.1. through **B.15**. shall become effective should the permittee use the Emissions Averaging Option to meet the emission limit in **Specific Condition No. A.15.**

[Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

{Permitting Note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.1. Emissions Averaging Option. If using the Emissions Averaging Option to meet the emission limit in **Specific Condition No. A.14**., the permittee shall demonstrate compliance by performing the following steps (1) through (5) of this section.

(1) Use the methods specified in **Specific Condition No. A.21**. to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in **Specific Condition Nos. B.7. – B.11**. to show that the organic HAP emissions do not exceed the limit in Specific Condition No. **A.14.**

(3) Keep records as specified below in (3)(i) through (iv) 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 **Specific Condition Nos. B.8**. through **B.12.**

(4) Prepare and submit the implementation plan described in **Specific Condition Nos. B. 2**. through **B. 6.** to the Administrator and keep it up to date.

(5) Submit semiannual compliance reports to the Administrator as stated in specific condition No. **A.34.**

[40 CFR 63.5704(a)]

Recordkeeping and Reporting Requirements

B.2. Implementation Plan. If using the emissions averaging option to meet the emission limit in **Specific Condition No. A.14**., the permittee must prepare an implementation plan .

[40 CFR 63.5707(a)]

B.3. Implementation Plan Requirements. The implementation plan stated in Specific Condition No. **B.2**. shall describe the steps that will be taken in order to bring the open molding operations stated in **Specific Condition No. A.13**. into compliance with 40 CFR 63 Subpart VVVV. For each operation included in the emissions average, the implementation plan must include the elements listed below in (1) through (3) of this section.

(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 stated in **Specific Condition No. A.14.**

[40 CFR 63.5704(b)]

B.4. Implementation Plan Submittal. The permittee shall submit the implementation plan to the Administrator with the notification of compliance status stated in Specific **Condition Nos. A.32.** and **A.33.**

[40 CFR 63.5704(c)]

B.5. The permittee shall keep the implementation plan on site and provide it to the Administrator when asked.

[40 CFR 63.5704(d)]

B.6. Should the implementation plan be revised, the permittee shall submit the revised plan with the next semiannual compliance report stated in **Specific Condition No. A.38.**

[40 CFR 63.5704(e)]

B.7. Recordkeeping. 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). The first 12-month rolling-average period begins on the compliance date, August 23, 2004.

[40 CFR 63.5710(a)]

B.8. Recordkeeping. At the end of the twelfth month after your compliance date and 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 Specific Condition No. **A.14**. calculated for the same 12-month period. (Include terms in the equation in Specific Condition No. **A.14**. and the following equation for only those operations and materials included in the average.)

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

(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.

[40 CFR 63.5710(b)]

B.9. Recordkeeping. At the end of every month, use the following equation to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

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

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.

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.

[40 CFR 63.5710(c)]

B.10. Recordkeeping. The permittee shall use the equations in Table 3 to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.

[40 CFR 63.5710(d)]

B.11. Recordkeeping. If the organic HAP emissions, as calculated in **Specific Condition No. B.8.**, are less than the organic HAP limit calculated in **Specific Condition No. A.14.** for the same 12-month period, then you are in compliance with the emission limit in **Specific Condition No. A.14.** for those operations and materials included in the average.

[40 CFR 63.5710(e)]

Filled Resins:

B.12. Filled Resin Usage. If including a filled resin in the emissions averaging procedure described in **Specific Condition No. B.1.,** then use the value of PVF calculated using the equation in **Specific Condition B.13**. for the value of PV i in the equation in **Specific Condition No. B.9.**

[40 CFR 63.5714(d)]

B.13. Filled Resin Usage. When using either a filled production resin or filled tooling resin, the permittee must demonstrate compliance for the filled material on an as-applied basis using the following equation:

$$PV_F = PV_u \times \frac{(100 - \%Filler)}{100}$$

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.

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

[40 CFR 63.5714(a)]

B.14. Filled Resin as a Production Resin Compliance Determination. If the filled resin is used as a production resin and the value of PV_F calculated by the equation in Specific Condition No. **B.13.** does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

[40 CFR 63.5714(b)]

B.15. Filled Resin as a Tooling Resin Compliance Determination. If the filled resin is used as a tooling resin and the value of PV_F calculated by the equation in Specific Condition No. **B.13.** does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

[40 CFR 63.5714(c)]

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

EU No.	Brief Description
-001	Fiberglass boat manufacturing operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: ▪ EP1 Exhaust stacks E1-E4 & E9-E16 associated with the ventilation/exhaust system for the deck and hull building; ▪ EP2- Stack ML1, the mill lamination vent; ▪ EP3 & EP4- Stacks W1 & W2 associated with each of the two, cyclone and baghouse in series combination; and ▪ EP5- Wall and ceiling vents, M1-M3, and five (5) exhaust fans from the spray room and drying room.

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

C.0. Conditions C.1. through **C.5.** shall become effective should the permittee use the Compliant Materials Option to meet the emission limit in **Specific Condition No. A.14.**

[Rule 62-4.070(3), F.A.C.]

C.1. Compliant Materials Option. If using the Compliant Materials Option to meet the emission limit in **Specific Condition No. A.14**., the permittee shall demonstrate compliance by performing the following steps (1) through (4) of this section.

(1) Use the methods specified in **Specific Condition No. A.21**. to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in Specific Condition No. **C.4**. to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2.

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

(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 Specific Condition No. **C.4.**

(4) Submit semiannual compliance reports to the Administrator as specified in Specific Condition **A.35.**

[40 CFR 63.5704(b)]

C.2. Recordkeeping. Compliance using the organic HAP content requirements listed in Table 2 is 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 August 23, 2004. If using filled material (production resin or tooling resin), the permittee shall comply according to the procedure described in Specific Condition No. **B.12. – B.15.**

[40 CFR 63.5713(a)]

C.3. Recordkeeping. At the end of the twelfth month after August 23, 2004 and at the end of every subsequent month, the permittee shall 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, then in the facility has reached compliance with the emission limit stated in **Specific Condition A.14.** for that 12-month period for that operation. In addition, the permittee is not required to complete the weighted-average organic HAP content calculation contained in **Specific Condition No. C.4**. for that operation.

[40 CFR 63.5713(b)]

C.4. Recordkeeping. At the end of every month, the permittee shall use the following equation to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

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

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 **Specific Condition No. A.21**. to determine organic HAP content.

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

[40 CFR 63.5713(c)]

C.5. Recordkeeping. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2, then the facility has reached compliance with the emission limit stated in **Specific Condition No. A.14.**

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.