Century Boat Company
Panama City Facility
Facility ID No.: 0050061
Bay County

Title V Air Operation Permit Renewal

FINAL Permit Project No.: 0050061-007-AV

Permitting and Compliance Authority:
Florida Department of Environmental Protection
Northwest District
160 Governmental Center, Suite 308
Pensacola FL 32502
Telephone: 850/595-8300
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Title V Air Operation Permit Renewal

FINAL Permit No.: 0050061-007-AV

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6725 Bayline Drive
Panama City, Florida 32404

FINAL Permit No.: 0050061-007-AV
Facility ID No.: 0050061
SIC No(s).: 37, 3732
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit. This existing fiberglass boat manufacturing facility is located at 6725 Bayline Drive in Panama City, Bay County; UTM Coordinates: Zone 17, 642.1 km East and 3349.6 km North; and, Latitude: 30°16'16" North and Longitude: 85°31'23" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS version dated 6/23/06
Appendix CP-1, Compliance Plan received April 24, 2008

Effective Date: March 19, 2009
Renewal Application Due Date: August 6, 2013
Expiration Date: March 19, 2014

Rick Bradburn

Rick Bradburn
Air Program Administrator

RB/aj/c

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of fiberglass boat manufacturing and associated activities. This site consists of five major structures, identified as Building 1 through 6 (alternately Plant 1 through 6) running approximately north to south on the site plan.

Building 1	Contains offices and administrative functions
Building 2	Gelcoating and Lamination activities (main source of VOC) and Cabinet Shop and Upholstery/Canvas activities
Building 3	Maintenance Building
Building 4	Gelcoating and Lamination activities (main source of VOC)
Building 5	Parts and Materials storage
Building 6	R&D/prototype/warranty repair activities

In Buildings 2 and 4, a layer of (typically pigmented) gelcoat is spray applied to the prepared molds in the enclosed gelcoat areas. The mold and gelcoat surfaces must be kept extremely smooth and clean to avoid cosmetic flaws in the exterior surface of the boat.

After the application of the gelcoat layer, the molds are moved to the lamination area, where the various layers of resin and fiberglass are applied using non-atomized mechanical spray techniques. The resin is hard piped to the point of use from the resin storage tank. Gelcoating of "small parts" such as hatches, consoles and components is performed primarily in Building 4. Some small part manufacturing is done in Building 2 using the same techniques as for the larger hulls and decks. After the gelcoating, the small parts follow the same process as the hulls and decks.

Each of the gelcoat and resin application areas are exhausted by upward firing fans; the work areas utilize a "push-pull" process, where outside air is forced across the work area and directed towards an exhaust fan discharging at 12,600 acfm to 18,700 acfm terminating approximately 33 feet above ground level. This technique, and the higher than normal exit velocity, results in improved dispersion and minimizes the potential for odor complaints. The gelcoat application and lamination processes are the primary sources of VOC and HAP emissions. These emissions are dispersed uncontrolled by the VOC exhaust fans.

After curing, the hardened fiberglass hull and deck parts (and small parts) are removed from the mold and the excess material ("flashing") is trimmed, typically with a hand held air driven cut off tool. Flotation and structural foam may be added, depending on the requirements of the particular model being constructed. Imperfections in the surfaces are removed by grinding the surface and re-applying gelcoat and/or resin. These booths are equipped with dust collection systems with internally recirculated exhaust. The booths have had minor reconfigurations which have improved the airflow and collection efficiency compared to the original design. No exhaust air is emitted from these booths to the outside, and the booths are considered exempt from air permitting requirements.

The minor quantities of particulates generated from the trimming, cutting, shaping and sanding operations performed by hand tools and not performed within the grinding booths are in general controlled by normal, non-specific "good housekeeping" type procedures, including frequent

cleaning of surfaces using portable "shop-vac" type vacuum collectors where appropriate and sweeping of floors.

This facility is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP 40 CFR 63 Subpart VVVV) for existing boat manufacturing. The facility elected to demonstrate compliance by averaging emissions with the applicable MACT model point value equations and appropriate record keeping. The facility opted to use carpet and fabric adhesives that comply with carpet and fabric adhesive operations standards contained in Subpart VVVV.

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

Based on the Title V Air Operation Permit Renewal application received April 24, 2008, this facility is a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
010	Fiberglass Boat Manufacturing Operations

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Statement of Basis

These documents are on file with the permitting authority:
Initial Title V Air Operation Permit issued June 8, 1998
Appendix H-1, Permit History
Application for a Title V Air Operation Permit Renewal received April 24, 2008
Additional Information Request dated June 20, 2008
Additional Information Response received August 14, 2008

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. Objectionable odor is 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 unreasonable interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

If the Department determines the facility is emitting objectionable odors, the permittee shall submit an odor remediation plan within 45 days of receipt of written notification from the Department. The plan shall include, but not limited to, dispersion modeling analysis, cycles, manufacturing methods and/or plant exhaust systems.
[Rule 62-296.320(2), F.A.C.; and 0050061-001-AC]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,
b. The permittee shall 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]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

a. All vats, containers, etc that are used for temporary and permanent storage of VOC/organic solvents shall be covered to prevent vaporization of VOC when not in use.
b. All equipment, pipes, hoses, lids, fittings, etc shall be operated and maintained in such a manner as to minimize leaks, fugitive emissions and spills of VOC materials.

[Rule 62-296.320(1)(a), F.A.C.; and 0050061-001-AC]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57 of APPENDIX TV-6, TITLE V CONDITIONS):

a. The permittee shall provide proper maintenance and disposal of exhaust fan filters and shall adequately protect dust containers from wind action that might make dust airborne; and,
b. The permittee shall periodically remove particulate matter from buildings or work areas by sweeping and/or vacuuming and closing doors on windy days as needed; and,
c. The permittee shall use portable dust collectors as necessary in work areas; and,
d. The permittee shall remove particulate matter from roads and other paved areas under the control of the owner or operator as necessary; and,
e. The permittee shall take other actions as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.; and 0050061-001-AC]

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

9. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office.

Department of Environmental Protection
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794-8218
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to NWDAIR@dep.state.fl.us. A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Panama City at 2353 Jenks Avenue, Panama City Florida 32405.

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
010	Fiberglass Boat Manufacturing Operations

This emissions unit consists of fiberglass boat manufacturing and associated activities described in the Facility Description. The gelcoat application and lamination processes are the primary sources of VOC and HAP emissions, mostly Styrene. These emissions are dispersed uncontrolled by 16 VOC exhaust fans.

This facility is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP 40 CFR 63 Subpart VVVV) for existing boat manufacturing. The facility elected to demonstrate compliance by averaging emissions with the applicable MACT model point value equations and appropriate record keeping. The facility opted to use carpet and fabric adhesives that comply with carpet and fabric adhesive operations standards contained in Subpart VVVV.

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

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable operating rate for this emission unit includes the simultaneous operation of all gelcoat and resin application systems operating in each of the manufacturing buildings.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit 0050061-004-AV]

A.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A. C., and permit 0050061-004-AV]

Emission Limitations and Standards

A.3. Organic HAP emissions limit (HAP_{limit}) shall be as calculated in the equation from Specific condition A.6.
[40 CFR 63.5698 Rule 62-204.800(11)(b)77, F.A.C., construction permit application 0050061-008-AC, Title V Operation permit renewal application 0050061-007-AV]

{Permitting Note: VOC Emissions are mostly HAP (Styrene). Based on the existing facility configuration, past production, anticipated growth, and industry emission factors, VOC/HAP/Styrene emissions are estimated to be 175 TPY.}

Monitoring of Operations

A.4. The Permittee shall implement and maintain a record keeping and reporting system to demonstrate compliance with the HAP emissions limit in Specific Condition **A.6** and to gather data to submit annual operating reports. Records, including purchase orders and invoices for gelcoats, resins and paints, shall be maintained and made available for inspection and verification

for at least the most recent five years. The system shall include, as a minimum, the following information:

Monthly and rolling 12-month consumption records in tons of all materials used containing VOC and/or HAP. These records shall identify the material usage, VOC and/or individual HAP content consistent with MSDS or applicable test data and species emissions based on emission calculations.

VOC and individual HAP emissions shall be summarized on a monthly and rolling 12-month basis. These records shall be maintained at the facility and made available for Department inspection.

Organic HAP emissions ($HAP_{emissions}$) shall be as calculated in the equation from Specific condition **A.8**.

[40 CFR 63.5710 Rules 62-296.320, 62-4.070(3), and 62-204.800(11)(b)77, F.A.C., construction permit application 0050061-008-AC, Title V Operation permit renewal application 0050061-007-AV]

Additional Specific Conditions Applicable for 40 CFR 63 Subpart VVVV (NESHAPS for Boat Manufacturing)

A.5. Affected Activities. The affected source activities covered by this subpart are the combination of all of the following boat manufacturing operations listed below.
(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
(b) Closed molding resin operations.
(c) Resin and gel coat mixing operations.
(d) Resin and gel coat application equipment cleaning operations.
(e) Carpet and fabric adhesive operations.
[40 CFR 63.5689 and Rule 62-204.800(11)(b)77, F.A.C.]

A.6. Emission limit.
(a) The permittee shall limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.

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

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

$$HAP_{limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})]$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.
M_R = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
(c) The open molding emission limit is the same for both new and existing sources.

(d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.

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

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

(3) Pure, 100 percent 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 and Rule 62-204.800(11)(b)77, F.A.C.]

A.7. Compliance option and procedures.
(a) Compliance with the open molding emission limit in 40 CFR 63.5698 (Specific Condition **A.6**) shall be demonstrated using the Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option. The permittee shall demonstrate that emissions from the open molding resin and gel coat operations meet the emission limit in 40 CFR 63.5698 (Specific Condition **A.6**), using the procedures described in 40 CFR 63.5710, (Specific Condition **A.8**). Compliance with this option is based on a 12-month rolling average.
(b) Compliance shall be demonstrated by performing the following procedures:

(1) Use the methods specified in § 63.5758 (Specific Condition **A.15**) to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in § 63.5710 (Specific Condition **A.8**) to show that the organic HAP emissions do not exceed the limit specified in § 63.5698 (Specific Condition **A.6**).

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

(i) Hazardous air pollutant content.

(ii) Amount of material used per month.

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

(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in § 63.5710 (Specific condition **A.8**).

(4) Prepare and submit the implementation plan described in § 63.5707 (Specific condition **A.19**) to the Administrator and keep it up to date.

(5) Submit semiannual compliance reports to the Administrator as specified in § 3.5764.
[40 CFR 63.5701, 40 CFR 63.5704 and Rule 62-204.800(11)(b)77, F.A.C.]

A.8. 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). 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 § 63.5698 (Specific condition **A.6**) calculated for the same 12-month period. (Include terms in equation 1 of § 63.5698 and equation 1 of this section for only those operations and materials included in the average.)

$$HAP_{emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$$

Where:
HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.
PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.
M_R = Mass of production resin used in the past 12 months, megagrams.
PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.
M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.
PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.
M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.
PV_{TR} = Weighted-average MACT model point value for tooling resin used in he past 12 months, kilograms per megagram.
M_{TR} = Mass of tooling resin used in the past 12 months, megagrams.
PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.
M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams.
At the end of every month, the following equation shall be used to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^{n}(M_i PV_i)}{\sum_{i=1}^{n}(M_i)}$$

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.

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

If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in § 63.5698(b), (Specific Condition **A.6**), for the same 12-month period, then compliance is demonstrated with the emission limit in § 63.5698 for those operations and materials included in the average.
[40 CFR 63.5710 and Rule 62-204.800(11)(b)77, F.A.C.]

A.9. Standards for Resin and Gel Coat Mixing Operations. 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. The covers shall be in place at all times except 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 and Rule 62-204.800(11)(b)77, F.A.C.]

A.10. All mixing containers with a capacity equal to or greater than 208 liters (55 gallons) shall be inspected 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. 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, shall be maintained in accordance with Specific Condition **A.21**.
[40 CFR 63.5731 and Rule 62-204.800(11)(b)77, F.A.C.]

A.11. Standards for Resin and Gel Coat Application Equipment Cleaning Operations. All routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers and squeegees), shall be performed using a cleaning solvent that contains no more than 5.0 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies. (Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.)
[40 CFR 63.5734 and Rule 62-204.800(11)(b)77, F.A.C.]

A.12. All organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers shall have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in, or removed from, the container. On containers with a capacity greater than 7.6 liters (2.0 gallons), the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat

are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.
[40 CFR 63.5734 and Rule 62-204.800(11)(b)77, F.A.C.]

A.13. Compliance with the resin and gel coat application equipment cleaning standards shall be demonstrated as follows:
(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in § 63.5734 (Specific Condition **A.11**) using the methods specified in § 63.5758 (Specific Condition **A.15**).
(b) If you recycle cleaning solvents on site, you may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in § 63.5758 (Specific Condition **A.15**) for demonstrating compliance with organic HAP content limits.
(c) At least once per month, you must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.
[40 CFR 63.5737 and Rule 62-204.800(11)(b)77, F.A.C.]

A.14. Standards for Carpet and Fabric Adhesive Operations. The permittee shall use carpet and fabric adhesives that:
(a) Contain no more than 5 percent organic HAP by weight.
(b) To demonstrate compliance with the emission limit in paragraph (a) of this section, you must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in § 63.5758 (Specific Condition **A.15**).
[40 CFR 63.5740 and Rule 62-204.800(11)(b)77, F.A.C.]

A.15. Methods for Determining Hazardous Air Pollutant Content. The determination of the organic HAP content for each material used in the open molding resin and gel coat operations and the carpet and fabric adhesive operations shall be accomplished using one of the following methods.
(1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when determining organic HAP content by Method 311.
(i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).
(ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
(2) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins).* You may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

(3) *Alternative method*. You may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Administrator. You must follow the procedure in § 63.7(f) to submit an alternative test method for approval.
(4) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section.
(i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.
(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.
(iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.
(5) *Solvent blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP that must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart. You may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to this subpart, then the test results must be used for determining compliance.
[40 CFR 63.5758 and Rule 62-204.800(11)(b)77, F.A.C.]

A.16. Notifications. The permittee shall submit all of the notifications in Table 7 to 40 CFR 63 subpart VVV**V** that apply by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to 40 CFR 63 subpart VVVV. The permit shall provide notification of any changes in writing to the Administrator within 15 calendar days after the change.
[40 CFR 63.5761 and Rule 62-204.800(11)(b)77, F.A.C.]

A.17. Reports. The permittee shall:
(a) Submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.

(b) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you must submit each report by the dates in paragraphs (b)(1) through (5) of this section.

(1) N/A – first compliance report already submitted

(2) N/A – first compliance report already submitted

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

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

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

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

(1) Company name and address.

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

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

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

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

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

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

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

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

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

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

(d) - (e) [Reserved.]

[40 CFR 63.5764 and Rule 62-204.800(11)(b)77, F.A.C.]

A.18. Records. The Permittee shall implement and maintain a recordkeeping/reporting system to demonstrate compliance with the requirements of this permit. The system shall include, as a minimum, the following information.

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

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

(c) Records showing the total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.
(d) Retention of purchase orders and invoices for gelcoats, resins, and paints for at least the previous five consecutive years.
(e) Records of all calculations used to determine compliance. The records must be readily available and in a form so they can be easily inspected and reviewed. Each record shall be kept for five years following the date that each record is generated. Each record shall be kept on site for at least two years after the date that each record is generated. The records may be kept offsite for the remaining three years. The records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
[Rules 62-4.070(3) and 62-204.800(11)(b)77, F.A.C.; 40 CFR 63.5767 and 40 CFR 63.5770]

A.19. Implementation Plan. The permittee shall prepare an implementation plan for all open molding operations for which compliance will be demonstrated by using the emissions averaging option described in 40 CFR 63.5704(a), (Specific Condition **A.8**). The implementation plan must be submitted to the Administrator with the notification of compliance status specified in Sec. 63.5761 and shall describe the steps to be taken take to bring the open molding operations into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in (1) through (3) below. The implementation plan shall be kept on site and made readily available upon request. If the implementation plan is revised, the revised plan must be submitted with the next semiannual compliance report specified in 40 CFR 63.5764.
(1) A description of each operation included in the average.
(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in 40 CFR 63.5698 (Specific Condition **A.6**).
[40CFR63.5707 and Rule 62-204.800(11)(b)77, F.A.C.]

A.20. Other Applicable Requirements. The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart A - General Provisions including Table 8 to Subpart VVVV, Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart VVVV and all applicable provisions of 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing including Table 1, Compliance Dates for New and Existing Boat manufacturing Facilities, Table 3, MACT Model Point Value Formulas for Open Molding Operations, Table 5 – Default Organic HAP Contents of Solvents and Solvent Blends, Table 6 – Default Organic HAP Contents of Petroleum Solvent Groups, Table 7 – Applicability and Timing of Notifications, and Table 8 – Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart VVVV. These tables are attached to and made a copy of this permit. [40 CFR 63.5773 and Rule 62-204.800(11), F.A.C.]