Blazer Boats, Inc.
Ellyson Field Facility
Facility ID No. 0330264
Escambia County

Title V Air Operation Permit Renewal

Permit No. 0330264-005-AV
(Renewal of Title V Air Operation Permit No. 0330264-004-AV)

Permitting and Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Northwest District

160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Telephone: 850/595-8300
Fax: 850/595-8096

Title V Air Operation Permit Renewal

Permit No. 0330264-005-AV

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Florida Department of
Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

PERMITTEE:
Blazer Boats, Inc.
3300 Bill Metzger Lane
Pensacola, Florida 32514

Permit No. 0330264-005-AV
Ellyson Field Facility
Facility ID No. 0330264
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 Escambia County at 3300 Bill Metzger Lane, Pensacola, Florida. UTM Coordinates are: Zone 16, 482.6 km East and 3375.9 km North. Latitude is: 30° 31' 27" North; and, Longitude is: 87° 11' 41" 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: November 2, 2011
Renewal Application Due Date: March 22, 2016
Expiration Date: November 2, 2016

/s/

Rick Bradburn
Air Program Administrator

RB/dm/c

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

Blazer Boats, Inc. is an existing facility located in a 57,000 square foot manufacturing facility in the Ellyson Industrial Park. The facility includes two gelcoat booths, a fiberglass shop, a wood working shop, a grinding area, and a rigging area. Boats built at this facility range from 16 to 21 feet in length.

Activities at this facility consist of the application of gelcoat to molds with airless spray guns. Chop guns are then used to apply styrene resin and glass fiber to molds to build up appropriate material thickness. The formed shells are removed from molds and cleaned in the grinding shop. Interior boat components are manufactured in the woodworking shop. Boat assembly is completed in the rigging area.

The gelcoat booths are used to apply the exterior layer of the boat hulls and decks. One of the booths is equipped with a multicolor airless sprayer and the other is equipped with a single color airless sprayer. Each gelcoat booth is equipped with an exhaust system that discharges through a stack 10 feet above the building roof. The exhaust system inlets are equipped with particulate filters to aid in the removal of fugitive gelcoat particles. The fiberglass shop, which contains four chop guns and a flowcoater gun (Glass-Craft INDy), is equipped with four exhaust stacks and the inlets are equipped with particulate filters. Approximately 70% of the resin is applied using the flowcoater gun. Portable vacuum systems are used to contain dust generated in the grinding and wood working shops. These shops also contain exhaust stacks that are equipped with fabric filters designed to catch paint, fiberglass or wood dust. The filters are inspected on a daily basis and changed as required.

The equipment used to apply resin is cleaned using acetone as a solvent. The acetone cleaning solution, from the airless sprayers and chop guns, is collected in containers and distilled onsite for reuse. Styrene and other VOCs are emitted uncontrolled. The majority of the styrene and other VOC emissions exit the building through the gelcoat booths and fiberglass shop exhausts. The wood working shop makes molds and wood and/or foam structural boat members.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities. These include general facility cleanup and maintenance, mold fabrication and maintenance, product final assembly and miscellaneous activities pursuant to operating and maintaining a manufacturing facility and offices.

This facility is subject to national emission standards for hazardous air pollutants (NESHAP, 40CFR Part 63, subpart VVVV) for existing boat manufacturing facilities. The facility has elected to demonstrate compliance by averaging emissions with the applicable MACT model point value equations and appropriate record keeping.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
001	Fiberglass Boat Manufacturing Facility

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received June 28, 2011, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart VVVV – Standards for Boat Manufacturers	001
62-296.320(2) & (4), 62-213.205, 62-213.430, 62-213.900(1), 62-213.440, F.A.C.	001

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

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

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C. and Permit No. 0330264-001-AC]

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

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/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of VOC materials.

[Rule 62-296.320(1), F.A.C. and Permit No. 0330246-001-AC]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C. and Permit No.0330246-001-AC]

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. 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. 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. Permittee shall use portable dust collectors as necessary in work areas; and,
d. Permittee shall remove particulate matter from roads and other paved areas under the control of the owner or operator as necessary; and,
e. Permittee shall take other actions as necessary.

[Rule 62-296.320(4)(c), F.A.C.; and Permit No. 0330264-001-AC]

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). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

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

[40 CFR 68]

FW10. Permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District Office.

Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us.

FW11. 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

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

EU No.	Brief Description
001	Fiberglass Boat Manufacturing Facility

The above emission unit is composed of the following activities. Gelcoat is applied to molds. Resin and fiberglass is applied by flowcoater to molds. Parts are removed from molds and finished (grinding and sanding) then sent onto wood shop. Parts are then assembled followed by a final inspection and gelcoat touch-up. All building exhaust fans are equipped with a fabric filter designed to catch paint, fiberglass dust or wood dust. The filters are inspected on a daily basis and changed as required. Each of the two gelcoat booth are equipped with an exhaust system that discharges through a stack 10 feet above the building roof. The fiberglass shop, which contains four chop guns and a flowcoater gun (Glass-Craft INDy), is equipped with four exhaust stacks and the inlets are equipped with particulate filters. Approximately 70% of the resin is applied using the flowcoater gun. The grinding and wood working shops also contain exhaust stacks for a total of eight stacks at the facility. Portable vacuums are used in areas that may generate dust if the area is not contingent to one of the eight exhaust systems.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0330264-001-AC]

Emission Limitations and Standards

A.2. Emissions Limit for Carpet and Fabric Adhesive Operations.

(a) Carpet and fabric adhesives must contain no more than 5 percent organic HAP by weight.
(b) Compliance with the emission limit for carpet and fabric adhesive operations must be demonstrated by determining and recording the organic HAP content of the carpet and fabric adhesives using the methods in 40 CFR 63.5758.

[40 CFR 63.5740]

A.3. Open Molding resin and gel coat operations. Organic HAP emissions from the five open molding operations listed below in paragraphs (1) through (5) must be limited to the emission limit specified in Eq. 1 of 40 CFR 63.5698 (below), based on a 12-month rolling average. Operations listed in paragraph d. of 40 CFR 63.5698 (see open molding exemptions below) are exempt from this limit.

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

A.4. Open Molding operations emissions limit. Organic HAP emissions from open molding operations must be limited to the limit specified by Eq. 1, based on a 12-month rolling average.

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

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.
M_R = mass of production resin used in the past 12 months, excluding any materials exempt(listed below) under paragraph d. of 40 CFR 63.5698, megagrams.
M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt (listed below) under paragraph d. of 40 CFR 63.5698, megagrams.

M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt (listed below) under paragraph d. of 40 CFR 63.5698, megagrams.

M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt (listed below) under paragraph d. of 40 CFR 63.5698, megagrams.

M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt (listed below) under paragraph d. of 40 CFR 63.5698, megagrams.

A.5. Open Molding Exemptions. The materials specified in paragraphs (d) (1) through (3) of 40 CFR 63.5698 (below) are exempt from the open molding emission limit specified in Eq. 1 (above):

(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 non-atomizing (non-spray) resin application equipment. A record must be kept of the resins for which this exemption is being used.

(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 the facility on a 12-month rolling-average basis. A record must be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

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

[40 CFR 63.5698 and Rule 62-204.800(11)(b)78, F.A.C.]

A.6. Affected source. The affected source (the portion of the boat manufacturing facility covered by 40 CFR 63 subpart VVVV) is the combination of all of the boat manufacturing operations listed below:

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

[40 CFR 63.5689 (a) – (e) and Rule 62-204-800(11)(b)78, F.A.C.]

A.7. Compliance Option and Procedures. Compliance with the open molding emission limit in 40CFR 63.5698 shall be demonstrated using the Maximum Achievable Control Technology (MACT) model point value averaging (emissions averaging) option. Permittee shall demonstrate that emissions from the open molding resin and gel coat operations meet the emission limit in 40CFR 63.5698, using the procedures described in 40CFR 63.5710. Compliance with this option is based on a 12-month rolling average. Those operations and materials not included in the emissions average must comply with either paragraph (b) or (c) of 40 CFR 63.5701. [40CFR 63.5701, Rule 62-204.800(11)(b)78., F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

A.8. General Requirements for complying with open molding emissions limit. Compliance shall be demonstrated by performing the following steps in paragraphs (1) through (5) of 40 CFR 63.5704(a).

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

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

(3) –(5) See recordkeeping and reporting section below.

[40 CFR 63.5704(a)]

A.9. 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 month, use Eq. 1 (below) of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in §63.5698 calculated for the same 12-month period. (Include terms in equation 1 of §63.5698 and Eq. 1 (below) of 40 CFR 63.5710(b) for only those operations and materials included in the average.)

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

Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

M_R = Mass of production resin used in the past 12 months, megagrams.

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.

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

M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.

PV_{TR} = Weighted-average MACT model point value for tooling resin used in 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)]

A.10. At the end of every month, use Eq. 2 (below) of 40 CFR 63.5710(c) 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)]

A.11. The equations in Table 3 to 40CFR Part 63 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. [40 CFR 63.5710(d)]

A.12. If the organic HAP emissions, as calculated in paragraph (b) of 40 CFR 63.5710, are less than the organic HAP limit calculated in §63.5698(b) 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(e), Rule 62-204.800(11)(b)78., F.A.C. and Title V Air Operation Permit No. 0330264-003-AV]

A.13. Work Practice Standard for resin and gel coating 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 poly-putties, must have a cover with no visible gaps 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(a) &(b) and Rule 62-204.800(11)(b)78, F.A.C.]

A.14. Standards for resin and gel coat application equipment cleaning operations.

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

(b) Organic HAP containing solvents used for removing cured resin or gel coat must be stored in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR 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)78, F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

A.15. Compliance Demonstration with resin and gel coat application equipment cleaning standards.

(a) The organic HAP content of the cleaning solvents subject to the standards specified in 40 CFR 63.5734 must be determined and recorded using the methods specified in 40 CFR 63.5758.

(b) If cleaning solvents are recycled on site, 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 may be used for demonstrating compliance, subject to the conditions in §63.5758 for demonstrating compliance with organic HAP content limits.

[40 CFR 63.5737 (a) & (b) and Rule 62-204.800(11)(b)78, F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

A.16. Methods for Determining the organic HAP content of materials. To determine the organic HAP content for each material used in the open molding resin and gel coat operations, or carpet and fabric adhesive operations, use one of the following options:

(1) *Method 311 (appendix A to 40 CFR part 63).* Method 311 may be used for determining the mass fraction of organic HAP. Use the procedures specified below in paragraphs (1)(i) and (ii) 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 29CFR 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, it does not need to be included in the organic HAP total. Express the mass fraction of each measured organic HAP 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).* ASTM D1259–85 (available for purchase from ASTM) may be used to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and that value used as a substitute for mass fraction of organic HAP.

(3) *Alternative method.* An alternative test method may be used for determining mass fraction of organic HAP if prior approval is obtainer by the Administrator. The procedure in §63.7(f) must be followed to submit an alternative test method for approval.

(4) *Information from the supplier or manufacturer of the material*. Information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of 40 CFR 63.5758 may be relied on, such as manufacturer's formulation data, according to paragraphs (a)(4)(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, it does not have to be included in the organic HAP total.

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the upper limit of the range must be used for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of 40 CFR 63.5758 exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the measured organic HAP content must be used to determine compliance.

(iii) If the organic HAP content is provided as a single value, it may be assumed that 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 40 CFR63.5758 is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the provided value may be used to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the measured organic HAP content must be used 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 may be used that are listed in Table 5 or 6 to 40 CFR 63 subpart VVVV. Table 6 to this Subpart may be used only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 to this Subpart and

it is known 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.

[40CFR 63.5758, Rule 62-204.800(11)(b)78., F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

Monitoring of Operations

A.17. Monthly visual inspections of resin and gel coat mixing containers. All resin and gel coat mixing containers subject to the work practice standard of 40 CFR 63.5731(a) must be visually 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. [40 CFR 63.5731(c) and Rule 62-204.800(11)(b)78, F.A.C.]

A.18. Monthly visual inspections of containers holding organic HAP-containing solvents. At least once per month any containers holding organic HAP-containing solvents used for removing cured resin and gel coat must be visually inspected to ensure that the containers have covers with no visible gaps. [40 CFR 63.5737(c) and Rule 62-204.800(11)(b)78, F.A.C.]

Recordkeeping and Reporting Requirements

A.19. Recordkeeping and Reporting Requirements for complying with open molding emission limit. To demonstrate compliance for each open molding operation complying using the compliant materials option, the following must be performed:

(a) (3) Keep records as specified below in paragraphs (a)(3)(i) through (iv) of 40 CFR 63.5704 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.

(3) Prepare and submit the implementation plan described in 40CFR 63.5707, to the Administrator, keep it up-to-date, on-site and made readily available upon request.

(4) Submit semiannual compliance reports to the Administrator as specified in 40CFR 63.5764. If the implementation plan is revised, the revised plan must be submitted with the next semiannual compliance report specified in 40CFR 63.5764

[40CFR 63.5704(a)(3-5) & 63.5707(d) & (e), Rule 62-204.800(11)(b)78., F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

A.20. Records of resin and gel coat mixing containers. Records must be kept of which mixing containers are subject to the work practice standard in 40 CFR 63.5731(a) and the results of the monthly inspections, including a description of any repairs or corrective actions taken. [40 CFR 63.5731(d) and Rule 62-204.800(11)(b)78, F.A.C.]

A.21. Records of containers holding organic HAP containing solvents used for removing cured resin and gel coat. Records of the monthly inspections and any repairs made to the covers must be kept. [40 CFR 63.5737(c) and Rule 62-204.800(11)(b)78, F.A.C.]

A.22. Records. The records specified below must be kept:

(a) a copy of each notification and report that was submitted to comply with 40 CFR subpart VVVV

(b) all documentation supporting any notification or report that was submitted

(c) 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 amounts of each applied by atomized and nonatomized methods must be recorded.

(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.

[40 CFR 63.5767 (a), (b), and (c)(1), and Rules 62-204.800(11)(b)78., F.A.C. and 62-4.070(3), F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

A.23. Records Retention. Records must be kept according to the following:

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

(b) records must be kept for 5 years following the date that each record is generated

(c) Each record must be kept on site for at least 2 years after the date that each record is generated. Records can be kept offsite for the remaining 3 years.

(d) records can be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

[40 CFR 63.5770 and Rules 62-204.800(11)(b)78, F.A.C. and 62-4.070(3), F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

A.24. Notifications. All of the applicable notifications in Table 7 to 40 CFR 63 subpart VVVV must be submitted by the dates in the table. The notifications are described more fully in 40 CFR 63 Subpart A, General Provisions, referenced in Table 8 to 40 CFR 63 subpart VVVV. If any information submitted in any notification is changed, the changes must be submitted in writing to the Administrator within 15 calendar days after the change. [40 CFR 63.5761 and Rule 62-204.800(11)(b)78., F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

A.25. Reports. The applicable reports specified in paragraphs (b) through (e) of 40 CFR 63.5764 (below) must be submitted. To the extent possible, each report must be organized according to the operations covered by 40 CFR 63 subpart VVVV and the compliance procedure followed for that operation. Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), each report must be submitted by the dates specified below:

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

(b) For each affected source that is subject to permitting regulations pursuant to 40 CFR 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), the first and subsequent compliance reports may be submitted according to the dates the permitting authority has established instead of according to the dates in paragraphs (b) (1) through (4) of 40 CFR 63.5764 (above).

(c) The compliance report must include the information specified below:

(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. The statement or table must also show the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period.

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

(7) If there was a deviation from an emission limit or work practice standard during the reporting period, include the following information in the semiannual compliance report:

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

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

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

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

[40 CFR 63.5764 (a), (b)(3)-(5), and (c) and Rule 62-204.800(11)(b)78., F.A.C., and Title V Air Operation Permit No. 0330264-003-AV]

A.26. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Compliance Report	Semi-annual	A.25

[Rule 62-213.440, F.A.C.]

A.27. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

A.28. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 6, Subpart A – General Provisions as specified in Table 8 of 40 CFR 63 subpart VVVV applicable to Boat Manufacturing and 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 (40CFR Part 63, Subpart A) to Subpart VVVV. These tables are attached to and made a part of this permit (see Appendix NESHAP, subpart VVVV). [Rule 62-213.440, F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.
Appendix NESHAP, Subpart A – General Provisions. (Include for all units that are subject to a NESHAP)
Appendix NESHAP, Subpart VVVV Standards for Boat Manufacturers.