

Sea Ray Boats, Inc.
Palm Coast Division
Facility ID No.: 0350003
Flagler County

Title V Air Operation Permit Renewal

Draft Permit No.: 0350003-008-AV

Permitting and Compliance Authority:
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: (904) 807-3300
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Title V Air Operation Permit Renewal

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Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
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Charlie Crist
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Permittee:
Sea Ray Boats, Inc.
100 Sea Ray Drive
Flagler Beach, Florida 32136

Draft Permit No.: 0350003-008-AV
Facility ID No.: 0350003
SIC No(s): 3732
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit. This facility is located at 100 Sea Ray Drive, Flagler Beach, Flagler County. UTM Coordinates: Zone 17, 485.49; N-3262.93; and, Latitude: 29° 29' 45" North and Longitude: 81° 08' 59" 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:

<u>Attachment</u>	<u>Description</u>
Appendix I-1	List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6	TITLE V CONDITIONS version dated 06/23/06
Appendix A	General Provision of 40 CFR 63

Effective Date:
Renewal Application Due Date:
Expiration Date:

Draft

Christopher L. Kirts, P.E.
District Air Program Administrator

MCL: mcl

❖ Section I. Facility Information

Subsection A. Facility Description.

Sea Ray Boats, Inc. is a fiberglass boat manufacturing facility involving Lamination, Fabrication and Assembly processes that include, but not limited to, the following:

- | | | | |
|---|--|--|--|
| ▪ Gel coating & open molding resin operations | ▪ Closed molding resin operations | ▪ Carpet and fabric adhesive applications | ▪ Adhesive applications of bonding parts, structural adhesive applications |
| ▪ Holecutting, trimming, and grinding of reinforced fiberglass parts | ▪ Sawing, routing and fabricating of wood and plastic components | ▪ Resin storage tanks | ▪ Foam operations |
| ▪ Solvents for surface wipedown, cleaning & flushing of application equipment | ▪ surface coating and painting | ▪ boat cleaning mold making and repairing, mold prepping | ▪ parts repairing, and boat assembly stations |

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

Based on the Title V Permit Renewal application received April 21, 2008,

- The facility is a Title V source.
- The facility is a major source of hazardous air pollutants (HAPs).
- The facility is a Major Source of Air Pollutants, other than hazardous air pollutants (HAPs).
- The facility has one or more emissions units subject to NESHAP (40 CFR Part 61 or Part 63).

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

<u>E.U. ID.No.</u>	<u>Description</u>
-001	Boat manufacturing facilities with resin and gel coat operations and carpet and fabric adhesive 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:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1: Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1: Permit History

Statement of Basis

These documents are on file with the permitting authority:

Application for Title V Air Operation Permit Renewal received April 21, 2008.

Email Correspondence received June 17, 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. **[Not federally enforceable.]** 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.
[Rule 62-296.320(2), F.A.C.]
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. Open Burning Prohibition. Open burning is prohibited, except when determined by the Department to be the only feasible method of operation and authorized by this permit or an emergency exists which requires immediate action to protect human health and safety.
[Rule 62-296.320(3)(a)&(b), F.A.C.]
5. Lamination Building Exhaust Stack. The air emissions from the Lamination Building are vented out through a single, 8-foot diameter, 75-foot high stack (Emissions point E54) with 300,000 acfm flow rate. The stack is to reduce the odorous impact to the nearby area and was constructed under air construction permit No.0350003-005-AC.
[Rule 62-213.440(2), 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. The permittee shall continue to use the operational practices listed below:
 - a. All solvents and raw material are stored and handled in appropriate containers equipped with tight fitting lids.
 - b. Sea Ray Boats, Inc. practices good housekeeping and train personnel in their respective task at the facility.
[Rule 62-296.320(1)(a), F.A.C.; and Construction Permit No. 0350003-001-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):

The following requirement is "not federally enforceable":

a) *The application of dust suppressant.*

[Rule 62-296.320(4)(c)2, F.A.C.; and , Title V permit application received June 14, 1996]

8. 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]

9. 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.]

10. 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.]

11. 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 (sixty) 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)}

12. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's North East District Office.

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256
Telephone: 904/807-3300, Fax: 904/448-4363

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

Sea Ray Boats, Inc.
Palm Coast Division

Draft Permit No.: 0350003-008-AV
Facility ID No.: 0350003

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

14. 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. Facility Wide Volatile Organic Compounds (VOC) Emissions Cap.

The emissions cap was requested by the applicant in the Title V Permit Renewal application received February 25, 2003 and established by Air Construction Permit No. 0350003-005-AC.

The emissions cap is requested by applicant to allow the facility to escape prevention of significant deterioration (PSD) review.

The following specific conditions apply facility wide for all the activities that emit VOC.

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

A.1. Hours of Operation. The hours of operation are not restricted, i.e. 8,760 hours per any consecutive 12 month period.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C; Air Construction Permit No. 0350003-005-AC]

EMISSION LIMITATIONS AND OPERATING 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.2. Facility Wide Volatile Organic Compounds (VOC) Emissions Cap. Total VOC emissions shall not exceed 249 tons per any consecutive 12-month period.

[Air Construction Permit No. 0350003-005-AC; Requested Emissions Cap in Title V Permit Renewal application received February 25, 2003]

COMPLIANCE DEMONSTRATION

{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.3. Compliance Determination. Compliance with the total VOC Emissions Cap stated in Condition No. A.2., shall be determined by recording the following data for each material used that contains VOC. Styrene and MMA are each considered a VOC as well as a HAP and shall be determined using the method as stated in Condition A.4.

Quantity
▪ Gallons of Material Used (Plant usage logs shall be maintained)
Emissions Factors
▪ Density of Material in Pounds per Gallon
▪ Pollutant Factor (Percentage by Weight)
VOC Emissions
▪ Total Cumulative VOC Emissions (Tons) for 12 consecutive month

A.4. Recordkeeping-Emission Calculation Equations.

a. Styrene emissions shall be determined using the following equations:

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

The applicable styrene emission factor** shall be obtained (interpolated/extrapolated, if applicable) from the following table, in conjunction with the percent of available non-vapor suppressed (NVS) styrene monomer in the resin/gelcoat:

Application Method	NVS Monomer 35%	NVS Monomer 38%	NVS Monomer 42%
Resin Non-Spray Lay-up	11 %	11 %	12 %
Tooling/Pigmented/ Based Gelcoats NOTE(1)	44 %	47 %	51 %
Resin Closed Molding	1.5 %	1.5 %	1.5 %

NOTE (1) Modified Emission Factor (MEF) - determined from the FL Interim Emission Factor minus the portion of the total monomer containing Methyl Methacrylate. Monomer contents of resins and gelcoats used for VOC equations consists of Styrene and Methyl Methacrylate in these calculations.

$$\text{MEF} = \frac{\text{FL Interim EF} \times [\% \text{ Total Monomer} - 3\% \text{ MMA}^*]}{[\% \text{ Total Monomer}]}$$

**Assumes percent of MMA in Gelcoat is an average of 3%.*

b. MMA emissions shall be determined by the following equations:

Emissions, in tons = Amount of material used (in pounds) x MMA content (percent/100) x 0.75** x ton/2000 pounds

c. Other VOC emissions shall be determined by the following equation for each material. These values shall be used in conjunction with the above Styrene and MMA emissions to determine total VOC:

Emissions, in tons = Amount of material used (in pounds) x other VOC content (percent/100) x 1.00 x ton/2000 pounds

d. Per applicant's comment received June 11, 2008, the following implementations are approved by the Department through Permit No. 0350003-008-AV for VOCs & HAPs emissions calculations.

- I. The permittee can utilize supplier-provided emissions data for reactive-based adhesives and foams.
- II. Apply the resin non-atomized Interim Emissions Factors for gunks and putties.
- III. Material safety data sheets (MSDS), supplier provided regulatory data sheets, EPA Method 24 and 24A, etc. are methods of documentation used to determine VOC, HAPS and other emissions.

***Should more accurate emission factors be developed in the future, the permittee will submit this information for consideration by the Department prior to implementation.*

[Air Construction Permit No. 0350003-005-AC]

A.5. Recordkeeping - VOC. The information required by Condition A.3. shall be recorded and maintained at the facility.

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

A.6. Recordkeeping - Material Safety and Data Sheets. MSDS' shall be maintained for all materials that are used by the facility.

[Air Construction Permit No. 0350003-001-AC; Rule 62-4.070(3), F.A.C.]

A.7. Reporting. A report of the data required by Condition A.3. 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:

<u>Reporting Period</u>	<u>Report Due Date</u>
January - June	September 1
July-December	March 1

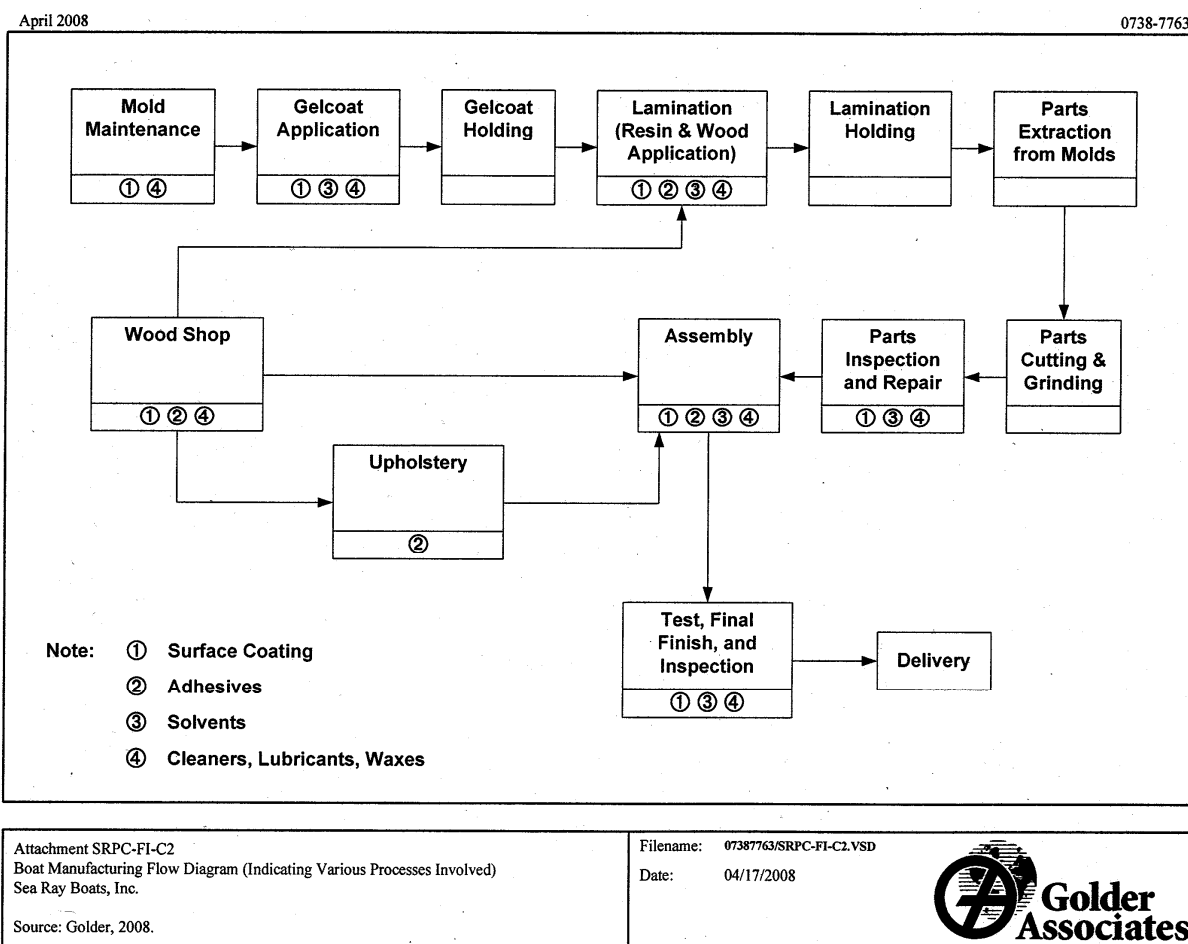
The annual operating report for that calendar year shall be submitted in lieu of the July-December semi-annual report.

[Air Construction Permit No. 0350003-001-AC]

Subsection B. Requirements of NESHAP, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

E.U. ID No. Brief Description

-001 Boat manufacturing facilities with resin and gel coat operations and carpet and fabric adhesive operations.



Open molding resin and gel coat operation means any process in which the reinforcing fibers and resin are placed in the mold and are open to the surrounding air while the reinforcing fibers are saturated with resin. Open molding includes operations in which a vacuum bag or similar cover is used to compress an uncured laminate to remove air bubbles or excess resin, or to achieve a bond between a core material and a laminate.

The facility primarily uses non-atomized applicators for resin application; however, rollers are also used occasionally. Gelcoating is conducted using atomized applicators. The facility currently does not have any resin and gel coat mixing operations since they are buying the pre-mix bulk material from the suppliers. The facility does not have any add-on control device to control the HAPs and VOCs emissions from the boat manufacturing activities.

Rule Applicability: This emissions unit is regulated under:

- NESHAP - 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800(11)(b) 59., F.A.C.

B.0. The operations as described by paragraph (a) through (d) below are subject to the requirements described in subsection B of Section III.

- (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 application equipment cleaning operations.
- (d) Carpet and fabric adhesive operations.
- (e) Resin and gel coat mixing operations.

The permittee shall also comply with the requirements of 40 CFR 63, Subpart A – General Provisions as described by attached Appendix A of this permit.
[40 CFR 63.5689]

STANDARDS FOR OPEN MOLDING RESIN AND GEL COAT OPERATIONS

B.1. The owner or operator shall limit organic HAP emissions from the five open molding operations listed in paragraphs (1) through (5) of this condition to the emission limit specified in specific condition B.2. of this subsection. Operations listed in specific condition B.3 are exempt from this limit.

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

[40 CFR 63.5698 (a)]

B.2. Organic HAP Emissions Limit. The owner or operator shall limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this condition, based on a 12-month rolling average.

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

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 B.3, megagrams.

M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under specific condition B.3, megagrams.

M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under specific condition B.3, megagrams.

M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under specific condition B.3, megagrams.

M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under specific condition B.3, megagrams.

[40 CFR 63.5698 (b)]

B.3. Exempt Materials. The materials specified in paragraphs (1) through (3) below are exempt from the open molding emission limit specified in specific condition B.2.

- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. The owner or operator shall keep a record of the resins for which he/she 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 the facility on a 12-month rolling-average basis. The owner or operator shall keep a record of the amount of gel coats used per month for which he/she 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. The owner or operator shall 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 OPTIONS FOR OPEN MOLDING EMISSIONS LIMIT

B.4. Compliance Options. The owner or operator shall use one or more of the options listed in paragraphs (a) and (b) of this condition to meet the emission limit in specific condition B.2 for the resins and gel coats used in open molding operations at the facility.

- (a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.*
 - (1) Demonstrate that emissions from the open molding resin and gel coat operations that the owner or operator averages meet the emission limit in specific condition B.2. using the procedures described in specific condition B.8 through B.12. 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 paragraph (b) of this condition.
- (b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to the Appendix B of this permit. Compliance with this option is based on a 12-month rolling average.

[40 CFR 63.5701]

GENERAL REQUIREMENTS OF EMISSIONS AVERAGING OPTION

B.5. For those open molding operations and materials complying using the emissions averaging option, the owner or operator shall demonstrate compliance by performing the steps in paragraphs (1) through (5) of this condition.

- (1) Use the methods specified in specific condition B.35 to determine the organic HAP content of resins and gel coats.
- (2) Complete the calculations described in specific condition B.8 through B.12 to show that the organic HAP emissions do not exceed the limit specified in specific condition B.2.
- (3) Keep records as specified in paragraphs (3)(i) through (iv) of this condition 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 B.8 through B.12.
- (4) Prepare and submit the implementation plan described in specific condition B.6 to the Department and keep it up to date.
- (5) Submit semiannual compliance reports to the Department as specified in specific condition B.39.

[40 CFR 63.5704 (a)]

B.6. Implementation Plan for Open Molding Operation. The owner or operator shall prepare an implementation plan for all open molding operations for which he/she complies by using the emissions averaging option described in specific condition B.5.

- (a) The implementation plan must describe the steps the owner or operator will take to bring the open molding operations covered by this subsection into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in paragraphs (1) through (3) as shown below.
 - (1) A description of each operation included in the average.
 - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
 - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in specific condition B.2.
- (b) The owner or operator shall submit the implementation plan to the Department with the notification of compliance status specified in specific condition B.36.
- (c) The owner or operator shall keep the implementation plan on site and provide it to the Department when asked.

- (d) If the owner or operator revises the implementation plan, he/she shall submit the revised plan with the next semiannual compliance report specified in specific condition B.39.
[40 CFR 63.5707]

GENERAL REQUIREMENTS OF COMPLIANT MATERIALS OPTION

B.7. General Requirements of Compliant Materials Option. For each open molding operation complying using the compliant materials option, the owner or operator shall demonstrate compliance by performing the steps in paragraphs (1) through (4) of this condition.

- (1) Use the methods specified in specific condition B.35 to determine the organic HAP content of resins and gel coats.
- (2) Complete the calculations described in specific condition B.13 through B.16 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 in the Appendix B of this permit.
- (3) Keep records as specified in paragraphs (i) through (iv) as shown below 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 B.13 through B.16.
- (4) Submit semiannual compliance reports to the Department as specified in specific condition B.39.

[40 CFR 63.5704 (b)]

COMPLIANCE DEMONSTRATION USING EMISSIONS AVERAGING OPTION

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

[40 CFR 63.5710 (a)]

B.9. At the end of the twelfth month after the compliance date and at the end of every subsequent month, use equation 1 of this condition to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in specific condition B.2 calculated for the same 12-month period. (Include terms in equation 1 of specific condition B.2 and equation 1 of this condition for only those operations and materials included in the average.)

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

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.10.** At the end of every month, use equation 2 of this condition to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

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

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.11.** The owner or operator shall use the equations in Table 3 to the Appendix B of this permit 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.12.** If the organic HAP emissions, as calculated in specific condition B.9, are less than the organic HAP limit calculated in specific condition B.2 for the same 12-month period, then the regulated operations are in compliance with the emission limit in specific condition B.2 for those operations and materials included in the average.
[40 CFR 63.5710 (e)]

COMPLIANCE DEMONSTRATION USING COMPLIANT MATERIALS OPTION

B.13. Compliance using the organic HAP content requirements listed in Table 2 to the Appendix B of this permit 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 the compliance date, August 23, 2004. If the owner or operator is using filled material (production resin or tooling resin), he/she shall comply according to the procedure described in specific condition B.17 through B.20.

[40 CFR 63.5713 (a)]

B.14. At the end of the twelfth month after the compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and 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 to the Appendix B of this permit, then the regulated operations are in compliance with the emission limit specified in specific condition B.2 for that 12-month period for that operation. In addition, the owner or operator does not need to complete the weighted-average organic HAP content calculation contained in specific condition B.15 for that operation.

[40 CFR 63.5713 (b)]

B.15. At the end of every month, the owner or operator shall use equation 1 of this condition to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

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

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 B.35 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)]

B.16. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 to the Appendix B of this permit, then the regulated operations are in compliance with the emission limit specified in specific condition B.2.

[40 CFR 63.5713 (d)]

B.17. If the owner or operator is using a filled production resin or filled tooling resin, he/she shall demonstrate compliance for the filled material on an as-applied basis using equation 1 of this condition.

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

Where:

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

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to the Appendix B of this permit.

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

[40 CFR 63.5714 (a)]

B.18. If the filled resin is used as a production resin and the value of PV_F calculated by equation 1 of specific condition B.17. 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.19. If the filled resin is used as a tooling resin and the value of PV_F calculated by equation 1 of specific condition B.17. 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)]

B.20. If the owner or operator is including a filled resin in the emissions averaging procedure described in specific condition B.8 through B.12, then use the value of PV_F calculated using equation 1 of specific condition B.17. for the value of PV_i in equation 2 of specific condition B.10.

[40 CFR 63.5714 (d)]

STANDARDS FOR CLOSED MOLDING RESIN OPERATIONS

B.21. If a resin application operation meets the definition of closed molding as described below, there is no requirement to reduce emissions from that operation.

Closed molding means any molding process in which pressure is used to distribute the resin through the reinforcing fabric placed between two mold surfaces to either saturate the fabric or fill the mold cavity. The pressure may be clamping pressure, fluid pressure, atmospheric pressure, or vacuum pressure used either alone or in combination. The mold surfaces may be rigid or flexible. Closed molding includes, but is not limited to, compression molding with sheet molding compound, infusion molding, resin injection molding (RIM), vacuum-assisted resin transfer molding (VARTM), resin transfer molding (RTM), and vacuum-assisted compression molding. Processes in which a closed mold is used only to compact saturated fabric or remove air or excess resin from the fabric (such as in vacuum bagging), are not considered closed molding. Open molding steps, such as application of a gel coat or skin coat layer by conventional open molding prior to a closed molding process, are not closed molding.

[40 CFR 63.5728(a) and 40 CFR 63.5779]

B.22. If the resin application operation does not meet the definition of closed molding, then the owner or operator shall comply with the limit for open molding resin operations specified in specific condition B.2.

[40 CFR 63.5728 (b)]

B.23. Open molding resin operations that precede a closed molding operation must comply with the limit for open molding resin and gel coat operations specified in specific condition B.2. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding.

[40 CFR 63.5728 (c)]

STANDARDS FOR RESIN AND GEL COAT MIXING OPERATIONS

B.24. 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)]

B.25. The work practice standard in specific condition B.24. 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)]

B.26. To demonstrate compliance with the work practice standard in specific condition B.24, the owner or operator 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)]

B.27. The owner or operator shall keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

[40 CFR 63.5731 (d)]

STANDARDS FOR RESIN AND GEL COAT APPLICATION EQUIPMENT CLEANING OPERATIONS

B.28. For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the owner or operator shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.

[40 CFR 63.5734 (a)]

B.29. The owner or operator shall store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

[40 CFR 63.5734 (b)]

B.30. Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in specific condition B.28 & 29 using the methods specified in specific condition B.35 [40 CFR 63.5737 (a)]

B.31. If the owner or operator recycles cleaning solvents on site, he/she 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 B.35 for demonstrating compliance with organic HAP content limits.

[40 CFR 63.5737 (b)]

- B.32.** At least once per month, the owner or operator 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. Keep records of the monthly inspections and any repairs made to the covers.

[40 CFR 63.5737 (c)]

STANDARDS FOR CARPET AND FABRIC ADHESIVE OPERATIONS

- B.33.** The owner or operator shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight. Excluded from this limit are hand held aerosol adhesives.

[40 CFR 63.5740 (a), 40 CFR 63.5683 (d)]

- B.34.** To demonstrate compliance with the emission limit in specific condition B.33, the owner or operator shall determine and record the organic HAP content of the carpet and fabric adhesives using the methods in specific condition B.35.

[40 CFR 63.5740 (b)]

METHODS FOR DETERMINING HAZARDOUS AIR POLLUTANT CONTENT

- B.35.** Determine the Organic HAP Content for Each Material Used. To determine the organic HAP content for each material used in the open molding resin and gel coat operations and carpet and fabric adhesive operations, the owner or operator shall use one of the options in paragraphs (1) through (6) of this condition. [40 CFR 63.5758 (a)]

Options	Requirements
1. Method 311 (appendix A to 40 CFR part 63).	<p>The owner or operator may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (i) and (ii) as shown below when determining organic HAP content by Method 311.</p> <p>(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, the owner or operator does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP the owner or operator measures as a value truncated to four places after the decimal point (for example, 0.1234).</p> <p>(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).</p>
2. Method 24 (appendix A to 40 CFR part 60)	<p>The owner or operator may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.</p>

3. <i>ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)</i>	The owner or operator 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.
4. <i>Alternative method</i>	The owner or operator may use an alternative test method for determining mass fraction of organic HAP if he/she obtains prior approval by the Administrator. The owner or operator must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
5. <i>Information from the supplier or manufacturer of the material</i>	<p>The owner or operator may rely on information other than that generated by the test methods specified in option (1) through (4) of this condition, such as manufacturer's formulation data, according to option (5)(i) through (iii) of this condition.</p> <ul style="list-style-type: none"> (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, the owner or operator does 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 the owner or operator shall 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) of this condition exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the owner or operator shall use the measured organic HAP content to determine compliance. (iii) If the organic HAP content is provided as a single value, the owner or operator 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 option (1) through (4) of this condition is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the owner or operator 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 the owner or operator shall use the measured organic HAP content to determine compliance.
6. <i>Solvent blends</i>	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 owner or operator may use the values for organic HAP content that are listed in Table 5 or 6 to the Appendix B of this permit. The owner or operator may use Table 6 to the Appendix B of this permit only if the solvent blends in the materials he/she uses do not match

	any of the solvent blends in Table 5 to the Appendix B of this permit and the owner or operator knows 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 the Appendix B of this permit, then the test results must be used for determining compliance.
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NOTIFICATIONS REQUIREMENTS

B.36. The owner or operator shall submit all of the notifications in Table 7 to the Appendix B of this permit that apply to him/her 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 the Appendix B of this permit.
[40 CFR 63.5761 (a)]

B.37. If the owner or operator changes any information submitted in any notification, he/she shall submit the changes in writing to the Department within 15 calendar days after the change.
[40 CFR 63.5761 (b)]

REPORTING REQUIREMENTS

B.38. The owner or operator shall submit the applicable reports specified in specific condition B.39 and B.40. To the extent possible, the owner or operator shall organize each report according to the operations covered by this subsection and the compliance procedure followed for that operation.
[40 CFR 63.5764 (a)]

B.39. Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the owner or operator shall submit each report by the dates as described by the table below.

Reporting Schedule
<ul style="list-style-type: none">▪ If the source is not controlled by an add-on control device (i.e., the owner or operator is complying with 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 the compliance date (August 23, 2004) and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date (August 23, 2004).
<ul style="list-style-type: none">▪ The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (1) of this table.
<ul style="list-style-type: none">▪ Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
<ul style="list-style-type: none">▪ Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

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| <ul style="list-style-type: none">▪ 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), the owner or operator may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (1) through (4) of this table. |
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[40 CFR 63.5764 (b)]

B.40. The compliance report must include the information specified in the table 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, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
(6) If the owner or operator was in compliance with the emission limits and work practice standards during the reporting period, the owner or operator shall include a statement to that effect.
(7) If the owner or operator deviated from an emission limit or work practice standard during the reporting period, he/she shall also include the information listed in paragraphs (7)(i) through (iv) of this condition in the semiannual compliance report. <ul style="list-style-type: none">(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 the owner or operator has 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)]

RECORDKEEPING REQUIREMENTS

B.41. The owner or operator shall keep the records specified in the table below in addition to records specified in other specific conditions of this subsection.

(a) The owner or operator shall keep a copy of each notification and report that he/she submitted to comply with this subsection.
(b) The owner or operator shall keep all documentation supporting any notification or report that

he/she submitted.

- (c) If the facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the owner or operator shall keep the records of the followings:
- 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 owner or operator shall also record the amounts of each applied by atomized and nonatomized methods.

[40 CFR 63.5767]

B.42. The owner or operator shall also meet the recordkeeping requirements as described below.

- (a) The records must be readily available and in a form so they can be easily inspected and reviewed.
- (b) The owner or operator shall keep each record for 5 years following the date that each record is generated.
- (c) The owner or operator shall keep each record on site for at least 2 years after the date that each record is generated. The owner or operator can keep the records offsite for the remaining 3 years.
- (d) The owner or operator can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

[40 CFR 63.5770]