

**Baha Cruiser Boats, Inc.
Facility ID No.: 0670004
Lafayette County**

Title V Air Operation Permit Renewal

FINAL Permit Project No.: 0670004-006-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
Fax: 904/448-4363**

Title V Air Operation Permit Renewal

FINAL Permit No.: 0670004-006-AV

Table of Contents

| <u>Section</u> | <u>Page Number</u> |
|--|---------------------------|
| Placard Page | 1 |
| I. Facility Information | 2 - 3 |
| A. Facility Description. | |
| B. Summary of Emissions Unit ID No(s). and Brief Description(s). | |
| C. Relevant Documents. | |
| II. Facility-wide Conditions | 3 - 5 |
| III. Emissions Unit(s) and Conditions | |
| A. Emissions Unit(s) 001 Boat Manufacturing Process..... | 6 |
| B. Emissions Unit(s) 001 Boat Manufacturing Process..... | 7-16 |
| C. Emissions Unit(s) 001 Boat Manufacturing Process Emissions Averaging Option..... | 17-21 |
| D. Emissions Unit(s) 001 Boat Manufacturing Process Compliant Materials Option..... | 22-24 |



Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 ♦ Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:

Baha Cruiser Boats, Inc.
Highway 51 North
Mayo, Florida 32066

FINAL Renewal Permit No.: 0670004-006-AV

Facility ID No.: 0670004

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 and to merge Emission Units 001 & 002 into one EU001. This existing facility is located at State Road 51 North, Mayo, Lafayette County, Florida; UTM Coordinates: Zone 17, 291.77 km East and 3330.03 km North; Latitude: 30° 05' 08" North and Longitude: 83°10'00" 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 06/26/06

Effective Date: June 9, 2008
Renewal Application Due Date: October 27, 2012
Expiration Date: June 9, 2013

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

CLK: lm:jg

Section I. Facility Information.**Subsection A. Facility Description.**

Baha Cruiser Boats is a custom design fiberglass motorboat manufacturing facility. The facility has a maximum production capability of 600 boats per year.

The boat manufacturing process begins with the preparation of a mold. The mold is then cleaned and waxed prior to the application of white gel coat. As the gel coat begins to set, a layer of clear unsaturated polyester resin is sprayed on top of the gel coat. A mixture of chopped fiberglass strands, an organic peroxide catalyst, and unsaturated clear polyester resin is then applied over the clear coat. In between successive layers of this mixture, 6 - 8 layers of fiberglass cloth are hand applied and rolled onto the boat surface. The boat structure is allowed to harden, undisturbed, for 24 hours to allow the fiberglass to properly cure.

Following the boat hull cure, the hull is pulled from the mold and moved to the next station where fiberglass stringer, stiffeners, motor mounts, foam floatation, and interior components are installed. Once complete the boat deck is joined with the hull with metal fasteners and adhesive sealant. The final assembly and other electronic gear is installed. A similar process is used to construct the boat deck and interior components.

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

Based on the Title V Air Operation Permit Renewal application received December 4, 2007, this facility is a major source of hazardous air pollutants (HAPs).

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

E.U.

ID No. **Brief Description**

| | |
|-----|---|
| 001 | Gel Coat Application on Boat Hulls, Decks and Interior Component Molds Polyester Resin Mix Application and Hand Lay-up of Boat Hulls, Decks, and Interior Components |
|-----|---|

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

Appendix H-1, Permit History

Statement of Basis

These documents are on file with the permitting authority:

Initial Title V Air Operation Permit issued May 4, 1998

Application for a Title V Air Operation Permit Renewal received December 4, 2007

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. 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.

“Nothing was deemed necessary and ordered at this time.”

[Rule 62-296.320(1)(a), F.A.C.; and, renewal Title V permit application received December 4, 2007.]

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) *Gel coat overspray, chopper gun overspray, and polyester resin dripping from mold lay-up shall be collected on tar paper. The tar paper shall be changed after the boat has been pulled from the mold.*
- b) *Fiberglass dust generated from the cutting of excess off mold edges is considered to be non- PM₁₀ particulate which is allowed to accumulate on the floor. This dust shall be swept up after each cutting operation.*

[Rule 62-296.320(4)(c)2, F.A.C.; and , FINAL Title V Permit No. 0670004-001-AV]

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 (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)}

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

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(s).

E.U.

| <u>ID No.</u> | <u>Brief Description</u> |
|---------------|--|
| 001 | Gel Coat Application on Boat Hulls, Decks and Interior Component Molds Polyester Resin Mix Application and Hand Lay-up of Boat Hulls, Decks, and Interior Components |

Emission Unit 001 identifies the gel coat application of boat hulls, deck molds, interior component molds and the application of unsaturated polyester resin, catalyst, and chopped fiberglass and the hand lay-up of fiberglass boat hull, decks, and interior components.

{Permitting note(s): (**IMPORTANT REGULATORY CLASSIFICATIONS** - These emissions unit(s) are regulated under: NSPS - 40 CFR 63 Subpart VVVV, adopted and incorporated by reference in Rule 62-204.800, F.A.C.

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

Essential Potential to Emit (PTE) Parameters

A.0. This Subsection A has become null and void upon the August 23, 2004 compliance deadline established in 40 CFR 63 Subpart VVVV, and is replaced by Subsection B. [Rule 62-4.070(3), F.A.C.]

Subsection B. This section addresses the following emissions units.

E.U.

ID No. Brief Description

| | |
|-----|--|
| 001 | Gel Coat Application on Boat Hulls, Decks and Interior Component Molds Polyester Resin Mix Application and Hand Lay-up of Boat Hulls, Decks, and Interior Components |
|-----|--|

Emission Unit 001 identifies the gel coat application of boat hulls, deck molds, interior component molds and the application of unsaturated polyester resin, catalyst, and chopped fiberglass and the hand lay-up of fiberglass boat hull, decks, and interior components.

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

Essential Potential to Emit (PTE) Parameters

B.1. 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.]

Resin and gel coat mixing operations:

B.2. Resin and Gel Coat Mixing Containers. All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.

[40 CFR 63.5731(a)]

B.3. Resin and Gel Coat Mixing Container Work Practice Exemption. The work practice standard in Specific Condition No. **B.2.** does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

[40 CFR 63.5731(b)]

Resin and Gel Coat Application Equipment Cleaning Operations:

B.4. Resin and Gel Coat Application Equipment Cleaning. For the routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. No organic HAP content limit applies when removing cured resin or gel coat from application equipment.

[40 CFR 63.5734(a)]

B.5. Organic HAP-containing Solvent Storage. The permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat¹ in containers with covers. The covers shall have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR Part 63, Subpart T.

¹*Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.*
[40 CFR 63.5734(b)]

Carpet and Fabric Adhesive Operations

B.6. Carpet and Fabric Adhesives Organic HAP Content. The permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.
[40 CFR 63.5740(a)]

Emission Limitations and Standards

B.7. Total Organic HAP Emissions. Total Organic HAP Emissions from the following open molding operations shall be limited as stated in Specific Condition No. **B.8.**:

| |
|--------------------|
| Production resin |
| Pigmented gel coat |
| Clear gel coat |
| Tooling resin |
| Tooling gel coat |

[40 CFR 63.5698(a)]

B.8. Total Organic HAP Emissions. Total Organic HAP Emissions shall be limited to the limit specified by the following equation, based on a 12-month rolling average:

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

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 Specific Condition **B.9.**, megagrams.

M_{PG} = **mass of pigmented gel coat** used in the past 12 months, excluding any materials exempt under Specific Condition **B.9.**, megagrams.

M_{CG} = **mass of clear gel coat** used in the past 12 months, excluding any materials exempt under Specific Condition **B.9.**, megagrams.

B.8. continued:

M_{TR} = **mass of tooling resin** used in the past 12 months, excluding any materials exempt under Specific Condition **B.9.**, megagrams.

M_{TG} = **mass of tooling gel coat** used in the past 12 months, excluding any materials exempt under Specific Condition **B.9.**, megagrams.

[40 CFR 63.5698(b)]

B.9. The following materials are exempt from the open molding emission limit specified in Specific Condition **B.8.**

- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption.
- (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.
- (3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

[40 CFR 63.5698(d)]

Compliance Methods:

B.10. The permittee shall use one or more of the following options, (a) and (b) to meet the emission limit in Specific Condition No. **B.8.**:

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

(1) Demonstrate that emissions from the open molding resin and gel coat operations that are averaged meet the emission limit in Specific Condition No. **B.8.** using the procedures described in Specific Condition Nos. **C.7.** through **C.11.** Compliance with this option is based on a 12-month rolling average.

(2) Those operations and materials not included in the emissions average must comply with option (b) of this section.

(b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in 40 CFR part 63, Subpart VVVV, Table 2. Compliance with this option is based on a 12-month rolling average.

[40 CFR 63.5701]

B.11. The Permittee shall meet the requirements of Specific Condition **C.0.** through **C.15.**, if using the Emissions Averaging Option to meet the emission limit in Specific Condition No. **B.8.**

B.12. The Permittee shall meet the requirements of Specific Conditions Nos. **D.0.** through **D.5.** if using the Compliant Materials Option to meet the emission limit in

Specific Condition No. B.8.

B.13. Organic HAP Content of Cleaning Solvents Determination. The Permittee shall determine and record the organic HAP content of the cleaning solvents subject to the requirements of Specific Condition Nos. **B.4.** and **B.5.** using the methods stated in Specific Condition No. **B.15.**

[40 CFR 63.5737(a)]

B.14. Onsite Recycled Cleaning Solvents. For those cleaning solvents recycled onsite, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in Specific Condition No. **B.15.** for demonstrating compliance with organic HAP content limits.

[40 CFR 63.5737(b)]

B.15. Organic HAP content Determination Method. The permittee shall use one of the following options, (1) through (6) to determine the organic HAP content for each material used in open molding resin and gel coat operations or carpet and fabric adhesive operations.

- (1) *Method 311 (appendix A to 40 CFR part 63).* The permittee may use Method 311 for determining the mass fraction of organic HAP. The procedures specified in (1)(i) and (ii) shall be used when determining organic HAP content by Method 311.
 - (i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).
 - (ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
- (2) [Reserved.]
- (3) *ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins).* The permittee may use ASTM D1259-85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
- (4) *Alternative method.* The permittee may use an alternative test method for determining mass fraction of organic HAP if prior approval is obtained by the Administrator. The procedures in § 63.7(f) shall be followed in order to submit an alternative test method for approval.
- (5) *Information from the supplier or manufacturer of the material.* The permittee may rely on information other than that generated by the test methods specified in paragraphs (1) through (4) above, such as manufacturer's formulation data, according to paragraphs (5)(i) through (iii) below.
 - (i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.

B.15. continued:

- (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (1) through (4) above exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then use the measured organic HAP content to determine compliance.
- (iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (1) through (4) above is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then use the measured organic HAP content to determine compliance.
- (6) *Solvent blends.* Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP, which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the values for organic HAP content that are listed in 40 CFR part 63, Subpart VVVV, Table 5 or 6 may be used. Table 6 may be used only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 and only whether the blend is either aliphatic or aromatic is known. However, if test results indicate higher values than those listed in Table 5 or 6, then the test results must be used for determining compliance.

[40 CFR 63.5758(a)]

B.16. Carpet and Fabric Adhesives Organic HAP Content Methods. The permittee shall determine and record the organic HAP content of the carpet and fabric adhesives using the methods in Specific Condition No. **B.15.** to demonstrate compliance with the emission limit in Specific Condition No. **B.6.**

[40 CFR 63.5740(b)]

Inspections:

B.17. Resin and Gel Coat Mixing Container Inspection. To demonstrate compliance with the work practice standard in Specific Condition No. **B.2.**, the permittee shall visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

[40 CFR 63.5731(c)]

B. 18. Organic HAP-Containing Solvents Containers. The permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps no less than once per month. The permittee shall keep records of the monthly inspections and any repairs made to the covers.

[40 CFR 63.5737(c)]

Recordkeeping Requirements:

B.19. A monthly inventory usage log shall be maintained of all materials that are used by the facility.

[Title V Permit No. 0670004-001-AV]

B.20. Material Safety and Data Sheets shall be maintained for all materials that are used by the facility.

[Title V Permit No. 0670004-001-AV]

B.21. Resin and Gel Coat Mixing Container Recordkeeping. The permittee shall keep records of which mixing containers are subject Specific Condition Nos. **B.2.**, **B.3.** and **B.17.** The permittee shall maintain records of the results of the inspections, including a description of any repairs or corrective actions taken.

[40 CFR 63.5731(d)]

B.22. Records. You must keep the records specified in paragraphs (a) through (d) of this section in addition to records specified in individual sections of this subpart.

(a) You must keep a copy of each notification and report that you submitted to comply with this subpart.

(b) You must keep all documentation supporting any notification or report that you submitted.

B.22. continued:

(c) If your 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), you must keep the records specified in paragraphs (c)(1) through (3) of this section.

(1) 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 non-atomized methods.

(2) The total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in § 63.5752.

(3) The total amount of each aluminum wipe-down solvent used per month and the weighted-average organic HAP content as determined in § 63.5749.

(d) If your facility has an add-on control device, you must keep the records specified in § 63.10(b) relative to control device startup, shut down, and malfunction events; control device performance tests; and continuous monitoring system performance evaluations.

[40 CFR 63.5767]

B.23. Records – Form. The permittee shall maintain records that are readily available and in a form so that they can be easily inspected and reviewed. The records may be on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

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

B.24. Records –Duration. The permittee shall maintain each record for a period of 5 years following the date that each record is generated. The record shall be maintained onsite for at least 2 years after the date that the record is generated and may be maintained offsite for the remaining 3 years.

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

Notification Requirements:

B.25. The permittee shall submit all applicable notifications in 40 CFR part 63, Subpart VVVV, Table 7 to the Administrator and the Northeast District Office by the dates specified in the table. The notifications are described more fully in 40 CFR part 63, Subpart A, General Provisions Table 8.

[40 CFR 63.5761(a)]

B.26. If any information submitted in any notification is changed, the permittee shall submit the changes in writing to the Administrator within 15 calendar days after the change.

[40 CFR 63.5761(b)]

Reporting Requirements:

B.27. The permittee shall submit the applicable reports stated in Specific Condition Nos. **B.28.- B.32.** by the dates in **B.28.** through **B.31.**¹

¹ Unless a different schedule for submission of reports has been approved by the Administrator pursuant to 40 CFR 63.10(a).
[40 CFR 63.5764(a)]

B.28. First Compliance Report Period -Organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions. The first compliance report must cover the period beginning 12 months after August 23, 2004 and ending on June 30th or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for this source.
[40 CFR 63.5764(b)(1)]

B.29. First Compliance Report Submittal Date. The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period stated in Specific Condition **B. 27.** as applicable.
[40 CFR 63.5764(b)(2)]

B.30. Subsequent Compliance Report Periods. Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
[40 CFR 63.5764(b)(3)]

B.31. Subsequent Compliance Report Submittal Dates. Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
[40 CFR 63.5764(b)(4)]

B.32. The compliance report shall include the information specified below in (1) through (7) of this section.

- (1) Company name and address.
- (2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
- (3) The date of the report and the beginning and ending dates of the reporting period.
- (4) A description of any changes in the manufacturing process since the last compliance report.

B.32. continued:

- (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
- (6) If during the reporting period compliance was reached with the emission limits and work practice standards, a statement shall be included to that effect.
- (7) If during the reporting period a deviation from an emission limit or work practice standard occurred, the information listed in (7)(i) through (iv) of this section shall be included in the semiannual compliance report.
 - (i) A description of the operation involved in the deviation.
 - (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
 - (iii) A description of any corrective action taken to minimize the deviation and the actions taken to prevent it from happening again.
 - (iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

[40 CFR 63.5764(c)]

B.33. Compliance Method: To demonstrate compliance with 40 CFR 63 Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used, it must be used for a minimum of 12 consecutive months before switching to the other option.

Section III. Emissions Unit(s) and Conditions.**Subsection C. This section addresses the following emissions units.****E.U.****ID No. Brief Description**

| | |
|-----|---|
| 001 | Gel Coat Application on Boat Hulls, Decks and Interior Component Molds Polyester Resin Mix Application and Hand Lay-up of Boat Hulls, Decks, and Interior Components |
|-----|---|

Emission Unit 001 identifies the gel coat application of boat hulls, deck molds, interior component molds and the application of unsaturated polyester resin, catalyst, and chopped fiberglass and the hand lay-up of fiberglass boat hull, decks, and interior components.

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

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

C.0. Conditions **C.1.** through **C.15.** shall become effective should the permittee use the Emissions Averaging Option to meet the emission limit in Specific Condition No. **B.8.** [Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

C.1. Emissions Averaging Option. If using the Emissions Averaging Option to meet the emission limit in Specific Condition No. **B.8.**, the permittee shall demonstrate compliance by performing the following steps (1) through (5) of this section.

- (1) Use the methods specified in Specific Condition No. **B.15.** to determine theorganic HAP content of resins and gel coats.
- (2) Complete the calculations described in Specific Condition Nos. **C.7. - C.11.** to show the organic HAP emissions do not exceed the limit in Specific Condition No. **B.8.**
- (3) Keep records as specified below in (3)(i) through (iv) for each resin and gel coat.
 - (i) Hazardous air pollutant content.
 - (ii) Amount of material used per month.
 - (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

C.1. continued:

- (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in Specific Condition Nos. **C.7.** through **C.11.**
- (4) Prepare and submit the implementation plan described in Specific Condition Nos. **C. 2.** through **C. 6.** to the Administrator and keep it up to date.
- (5) Submit semiannual compliance reports to the Administrator as stated in **specific condition No. B.27.**

[40 CFR 63.5704(a)]

Recordkeeping and Reporting Requirements

C.2. Implementation Plan. If using the emissions averaging option to meet the emission limit in Specific Condition No. **B.8.**, the permittee must prepare an implementation plan

[40 CFR 63.5707(a)]

C.3. Implementation Plan Requirements. The implementation plan stated in Specific Condition No. **C.2.** shall describe the steps that will be taken in order to bring the open molding operations stated in Specific Condition No. **B.7.** into compliance with 40 CFR 63 Subpart VVVV. For each operation included in the emissions average, the implementation plan must include the elements listed below in (1) through (3) of this section.

- (1) A description of each operation included in the average.
- (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
- (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in § 63.5698.

[40 CFR 63.5707(b)]

C.4. Implementation Plan Submittal. The permittee shall submit the implementation plan to the Administrator with the notification of compliance status stated in **Specific Condition Nos. B.28. and B.29.**

[40 CFR 63.5707(c)]

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

[40 CFR 63.5707(d)]

C.6. Should the implementation plan be revised, the permittee shall submit the revised plan with the next semiannual compliance report stated in **Specific Condition No. B.31.**

[40 CFR 63.5707(e)]

C.7. Recordkeeping. Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date, August 23, 2004.

[40 CFR 63.5710(a)]

C.8. Recordkeeping. At the end of the twelfth month after your compliance date and at the end of every subsequent month, use the following equation to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Specific Condition No. **B.8.** calculated for the same 12-month period. (Include terms in the equation in Specific Condition No. **B.8.** and the following equation for only those operations and materials included in the average.)

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

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

C.8. continued:

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)]

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

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

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)]

C.10. Recordkeeping. The permittee shall use the equations in 40 CFR part 63, Subpart VVVV, Table 3 to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.

[40 CFR 63.5710(d)]

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

[40 CFR 63.5710(e)]

Filled Resins:

C.12. Filled Resin Usage. If including a filled resin in the emissions averaging procedure described in Specific Condition No. **C.1.**, then use the value of PV_F calculated using the equation in Specific Condition **C.13.** for the value of PV_i in the equation in Specific Condition No. **C.9.**
[40 CFR 63.5714(d)]

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

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

Where:

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

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in 40 CFR part 63, Subpart VVVV, Table 3.

% Filler = The weight-percent of filler in the as applied filled resin system.
[40 CFR 63.5714(a)]

C.14. Filled Resin as a Production Resin Compliance Determination. If the filled resin is used as a production resin and the value of PV_F calculated by the equation in Specific Condition No. **C.13.** does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
[40 CFR 63.5714(b)]

C.15. Filled Resin as a Tooling Resin Compliance Determination. If the filled resin is used as a tooling resin and the value of PV_F calculated by the equation in Specific Condition No. **C.13.** does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
[40 CFR 63.5714(c)]

Section III. Emissions Unit(s) and Conditions.**Subsection D. This section addresses the following emissions units.****E.U.****ID No. Brief Description**

| | |
|-----|---|
| 001 | Gel Coat Application on Boat Hulls, Decks and Interior Component Molds Polyester Resin Mix Application and Hand Lay-up of Boat Hulls, Decks, and Interior Components |
|-----|---|

Emission Unit 001 identifies the gel coat application of boat hulls, deck molds, interior component molds and the application of unsaturated polyester resin, catalyst, and chopped fiberglass and the hand lay-up of fiberglass boat hull, decks, and interior components.

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

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

D.0. Conditions **D.1.** through **D.5.** shall become effective should the permittee use the Compliant Materials Option to meet the emission limit in Specific Condition No. **B.8.** [Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

D.1. Compliant Materials Option. If using the Compliant Materials Option to meet the emission limit in Specific Condition No. **B.8.**, the permittee shall demonstrate compliance by performing the following steps (1) through (4) of this section.

- (1) Use the methods specified in Specific Condition No. **B.15.** to determine the organic HAP content of resins and gel coats.
- (2) Complete the calculations described in Specific Condition No. **D.4.** to show that the weighted-average organic HAP content does not exceed the limit specified in 40 CFR part 63, Subpart VVVV, Table 2.
- (3) Keep records as specified below in (3)(i) through (iv) of this section for each resin and gel coat.
 - (i) Hazardous air pollutant content.
 - (ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

D.1. continued:

- (iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.
 - (iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in Specific Condition No. **D.4.**
- (4) Submit semiannual compliance reports to the Administrator as specified in Specific Condition **B.27.**

[40 CFR 63.5704(b)]

Recordkeeping and Reporting Requirements

D.2. Recordkeeping. Compliance using the organic HAP content requirements listed in 40 CFR part 63, Subpart VVVV, Table 2 is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on August 23, 2004. If using filled material (production resin or tooling resin), the permittee shall comply according to the procedure described in Specific Condition No. **C.12. - C.15.**

[40 CFR 63.5713(a)]

D.3. Recordkeeping. At the end of the twelfth month after August 23, 2004 and at the end of every subsequent month, the permittee shall review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in 40 CFR part 63, Subpart VVVV, Table 2, then in the facility has reached compliance with the emission limit stated in Specific Condition **B.8.** for that 12-month period for that operation. In addition, the permittee is not required to complete the weighted-average organic HAP content calculation contained in Specific Condition No. **D.4.** for that operation.

[40 CFR 63.5713(b)]

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

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

D.4. continued:

Where:

M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in **Specific Condition No. B.15.** 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)]

D.5. Recordkeeping. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in 40 CFR part 63, Subpart VVVV, Table 2, then the facility has reached compliance with the emission limit stated in **Specific Condition No. B.8.**