Seabring Marine Industries, Inc.

Williston Airport Plant

Facility ID No. 0750082

Levy County

Title V Air Operation Permit Renewal

Permit No. 0750082-015-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Permitting Program, Northeast District

8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256
Telephone: 904/256-1700
Fax: 904/256-1587

Compliance Authority:

State of Florida
Department of Environmental Protection
Compliance Assurance, Northeast District

8800 Baymeadows Way West, Suite 100
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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

Permittee:
Seabring Marine Industries, Inc.
1579 SW 18th Street
Williston, Florida 32696

Permit No.: 0750082-015-AV
Facility ID No.: 0750082
Williston Airport Plant
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit. The existing facility is located at 1579 SW 18th Street, Williston, Florida 32696. UTM Coordinates are: Zone 17, 356.9 km East and 3249.2 km North; Latitude: 29º 21' 55.6" North and Longitude: 82º 28' 27.5" West.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: **June 3, 2015**
Renewal Application Due Date: **October 22, 2019**
Expiration Date: **June 3, 2020**

Richard S. Rachal III, P.G.
Permitting Program Administrator

RSR: rfs

Subsection A. Facility Description:

This facility is a fiberglass boat manufacturing facility. Process operations include construction of fiberglass, woodworking and material storage and handling.

Based on the Title V permit renewal application received March 19, 2015, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Units:

EU No.	Brief Description
Regulated Emissions Units	
-001	Fiberglass boat manufacturing operation

Subsection C. Applicable Regulations:

Based on the Title V air operation permit application received March 19, 2015, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No (s).
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart VVVV- Boat Manufacturing	001
State Rule Citations: 62-4, 62-204, 62-210.300, 62-213, 62-296.320, 62-297.310	001

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

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated.

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

Emissions and Controls

FW2. [Not federally enforceable.] Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

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

1. All solvents and raw material are stored and handled in appropriate containers equipped with tight fitting lids.
2. Good housekeeping and training personnel in their respective task(s) at the facility.

[Rule 62-296.320(1), F.A.C.; Construction Permit No. 0750033-001-AC]

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

[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

(a) the application of dust suppressants

(b) the paving and maintenance of roads, parking areas and yards,

(c) the use of hoods, fans, filters, and similar equipment to contain, capture and or/ vent particulate matter

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

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.

[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www2.epa.gov/rmp. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

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

[40 CFR 68]

The Conditions in this subsection apply to the following emissions unit:

EU No.	Brief Description
-001	Fiberglass boat operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – gelcoat booth stack, EP2 and EP3 - two (2) small parts grinding booth stacks, EP4 – woodworking area dust collector stack, and EP5 – parts cutting and grinding area cyclone stack. There are numerous horizontal building exhaust fans in the plant.

{Permitting notes: This emissions unit is regulated under: 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, F.A.C.

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. 0750033-001-AC; Air Construction Permit No. 0750033-002-AC; Air Construction Permit No. 0750082-011-AC]

OPERATIONAL AND WORK PRACTICES

A.2. Method of Operation (Exhaust Fans). A lamination area exhaust fan shall be run at all times, including nights and weekends (with the exception of when plant operations are to be ceased for one week or greater), in order to prevent the build-up of odor causing pollutants. The Department may require the running of additional fan(s), if deemed necessary.

[Air Construction Permit No. 0750033-001-AC; Air Construction Permit No. 0750033-002-AC]

A.3. Method of Operation (Exhaust Fans). The gelcoat area exhaust fan(s) shall be run during all gelcoat activities.

[Air Construction Permit No. 0750033-001-AC; Air Construction Permit No. 0750033-002-AC]

EMISSION LIMITATIONS AND STANDARDS

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

A.4. Facility-Wide Volatile Organic Compounds (VOC) Emissions**.** The maximum facility-wide total VOC emissions, including hazardous air pollutants (HAPs), shall not exceed 228 tons per any consecutive 12-month period.

[Air Construction Permit No. 0750033-002-AC; Air Construction Permit No. 0750082-011-AC; Applicant Requested Emissions Cap; Rules 62-4.070(3), and 62-210.200(PTE), F.A.C.]

A.5. Visible Emissions - Woodworking area dust collector stack (EP 04)**.** Visible emissions from Emission Point 04 shall not exceed 5% Opacity.

[Rule 62-297.620(4); Air Construction Permit No. 0750033-001-AC; Air Construction Permit No. 0750033-002-AC]

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.6. Compliance Demonstration-VOC**.** Compliance with the VOC Emissions Cap stated in **Condition No. A.4.** shall be determined by recording the following data for each material used that contains VOC. Styrene is considered a VOC as well as a HAP and shall be determined using the method stated in **Condition A.7.**

Quantity	
• Gallons of Material Used (Plant usage logs shall be maintained)	
Emissions Factors	
• Density of Material in Pounds per Gallon (Manufacturer specification's data shall be maintained)	• Pollutant Factor (Percentage by Weight)
VOC Emissions	
• Total Cumulative VOC Emissions (Tons) for each 12 consecutive months	

[Rule 62-4.070, F.A.C.; Air Construction Permit No. 0750033-001-AC]

A.7. Styrene Emissions. Styrene emissions shall be calculated as 11% of the available monomer for the resins; 48% of the available monomer for the pigmented and base gelcoats; and, 51% of the available monomer for the tooling gelcoats. The total styrene content of each material shall be calculated based on the maximum weight percent stated in the MSDS for that particular material.

[Air Construction Permit No. 0750082-002-AC; Air Construction Permit No. 0750082-011-AC]

TEST METHODS AND PROCEDURES

A.8. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

A.9. Emissions Point 04-Visible Emissions**.**

a. Test Method. The test method for the visual determination of opacity shall be EPA Method 9, as incorporated in Chapter 62-297, F.A.C.

b. Test Frequency. A formal compliance test shall be conducted during each calendar year (January 1st – December 31st).

c. Test Duration. The required minimum period of observation for a visible emissions test shall be 30 minutes, except that for batch, cyclical processes, or other operations that are typically completed within less than the minimum observation period, the period of observation shall include each occurrence of the operation during the minimum observation period. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

[Rule 62-297.310(5)(b), F.A.C.; 62-297.310(8)(a)3., F.A.C., Rule 62-297.310(8)(b)1., F.A.C.]

RECORDKEEPING REQUIREMENTS:

A.10. VOC Recordkeeping. The information required by **Specific Condition A.6**. shall be recorded and maintained at the facility.

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

REPORTING REQUIREMENTS

A.11. Reporting. A report of the data required by **Specific Condition A.6.** shall be submitted to the Northeast District Office on a semi-annual basis. These reports shall be submitted in accordance with Condition RR.4. of Appendix RR- Facility Wide Reporting Requirements.

[Air Construction Permit No. 0750033-001-AC]

A.12. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Applicable Requirements

A.13. Federal Rule Requirements. In addition to the Conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63, Subpart VVVV – Boat Manufacturing. The conditions of both Subpart A and Subpart VVVV are incorporated into this permit (attached and part of this permit, see Subsection B and Section IV. Appendices).

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

EU No.	Brief Description
-001	Fiberglass boat operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – gelcoat booth stack, EP2 and EP3 - two (2) small parts grinding booth stacks, EP4 – woodworking area dust collector stack, and EP5 – parts cutting and grinding area cyclone stack. There are numerous horizontal building exhaust fans in the plant.

B.0. The operations as described by paragraph (a) through (e) below are subject to the requirements described in Subsection B of Section III of this permit.

(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(b) Closed molding resin operations.

(c) Resin and gel coat mixing operations.

(d) Resin and gel coat application equipment cleaning operations.

(e) Carpet and fabric adhesive operations.

[40 CFR 63.5689]

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 **Condition B.2** of this subsection. Operations listed in **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.

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

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 **Condition B.3**, megagrams.

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

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

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

M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under **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 **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 **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 **Condition B.2** using the procedures described in **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 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 of 40 CFR 63 Subpart VVVV. 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 **Condition B.35** to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in **Condition B.8 through B.12** to show that the organic HAP emissions do not exceed the limit specified in **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 **Condition B.8 through B.12.**

(4) Prepare and submit the implementation plan described in **Condition B.6** to the Department and keep it up to date.

(5) Submit semiannual compliance reports to the Department as specified in **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 **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 **Condition B.2.**

(b) The owner or operator shall submit the implementation plan to the Department with the notification of compliance status specified in **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 **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 **Condition B.35** to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in **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 40 CFR 63 Subpart VVVV.

(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 **Condition B.13 through B.16.**

(4) Submit semiannual compliance reports to the Department as specified in **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 began on the issuance date of Construction Permit No. 0750082-008-AC (April 24, 2002).

[40 CFR 63.5710(a); Construction Permit No. 0750082-008-AC]

B.9. At the end of the twelfth month after the compliance date (April 24, 2002) 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 Condition B.2 calculated for the same 12-month period. (Include terms in equation 1 of **Condition B.2** and equation 1 of this condition for only those operations and materials included in the average.)

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

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); Construction Permit No. 0750082-008-AC]

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.

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

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 of 40 CFR 63 Subpart VVVV 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 **Condition B.9**, are less than the organic HAP limit calculated in **Condition B.2** for the same 12-month period, then the regulated operations are in compliance with the emission limit in **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 of 40 CFR 63 Subpart VVVV 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 **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 of 40 CFR 63 Subpart VVVV, then the regulated operations are in compliance with the emission limit specified in **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 **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.

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

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 **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 of 40 CFR 63 Subpart VVVV, then the regulated operations are in compliance with the emission limit specified in **Condition B.2.**

[40 CFR 63.5713(d)]

Filled Resins:

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.

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

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 of 40 CFR 63 Subpart VVVV.

% 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 **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 **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 **Condition B.8 through B.12**, then use the value of PV_F calculated using equation 1 of Condition **B.17** for the value of PV i in equation 2 of **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 **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 **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 **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 **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)]

Resin and Gel Coat application equipment cleaning standards

B.30. Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in **Condition B.28 & 29** using the methods specified in 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 **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 **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 **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.

Options	Requirements
1. Method 311 (appendix A to 40 CFR part 63).	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. (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). (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. Method 24 (appendix A to 40 CFR part 60)	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.
3. ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)	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. Alternative method	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. Information from the supplier or manufacturer of the material	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. (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. 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 owner or operator may use the values for organic HAP content that are listed in Table 5 or 6 of 40 CFR 63 Subpart VVVV. The owner or operator may use Table 6 of 40 CFR 63 Subpart VVVV only if the solvent blends in the materials he/she uses do not match any of the solvent blends in Table 5 of 40 CFR 63 Subpart VVVV 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 of 40 CFR 63 Subpart VVVV, then the test results must be used for determining compliance.

[40 CFR 63.5758(a)]

Notifications Requirements

B.36. The owner or operator shall submit all of the notifications in Table 7 of 40 CFR 63 Subpart VVVV 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 of 40 CFR 63 Subpart VVVV.

[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 **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
▪ 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).
▪ 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.
▪ Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
▪ Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
▪ 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.

[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. (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 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]

Other Applicable Requirements

B.43. Federal Rule Requirements. In addition to the Conditions listed above, this emissions unit is also subject to the applicable requirements contained in:

40 CFR 63, Subpart A – General Provisions as specified in Table 8 of 40 CFR 63 Subpart VVVV.

[40 CFR 63.5773]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart VVVV- Boat Manufacturing.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History.
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.