

# Maverick Boat Company, Inc.

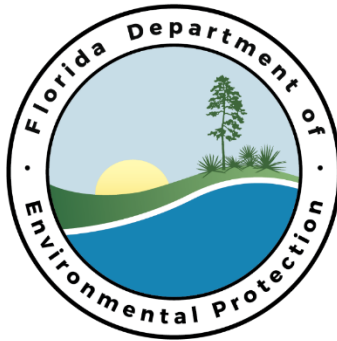
## Maverick Boat Company

Facility ID No. 1110086  
St. Lucie County

### Title V Air Operation Permit Revision

**Permit No. 1110086-011-AV**

(Revision of Title V Air Operation Permit No. 1110086-009-AV)



#### **Permitting Authority**

State of Florida  
Department of Environmental Protection  
Division of Air Resource Management  
Office of Permitting and Compliance  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, Florida 32399-2400  
Telephone: (850) 717-9000  
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#### **Compliance Authority:**

State of Florida  
Southeast District Office  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, Florida 33406  
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## Title V Air Operation Permit Revision

Permit No. 1110086-011-AV

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# Florida Department of Environmental Protection

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2600 Blair Stone Road  
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Lt. Governor

Noah Valenstein  
Secretary

## **PERMITTEE:**

Maverick Boat Company, Inc.  
3207 Industrial 29<sup>th</sup> Street  
Ft. Pierce, Florida 34946

Permit No. 1110086-011-AV  
Maverick Boat Company  
Facility ID No. 1110086  
Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility. The existing Maverick Boat Company is located in St. Lucie County at 3207 Industrial 29<sup>th</sup> Street, Ft. Pierce, Florida. UTM Coordinates are: Zone 17, 563.06 km East and 3,040.61 km North. Latitude is: 27°29'21" North; and, Longitude is: 80°21'19" West.

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

1110086-008-AV Effective Date: September 9, 2015  
1110086-011-AV Effective Date: October 10, 2017  
Renewal Application Due Date: January 27, 2020  
Expiration Date: September 8, 2020

Executed in Tallahassee, Florida

*For:*

Syed Arif, P.E., Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

SA/dlr/ead

## SECTION I. FACILITY INFORMATION.

### **Subsection A. Facility Description.**

The existing facility produces fiberglass boats, and styrene resins and gel coats are the primary materials used. Styrene is the primary contributor to volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions at the facility. Additionally, a range of adhesives, paints, solvents, and other VOC- or HAP-containing materials are used in the manufacturing process. The boat manufacturing process is a series of coordinated production activities, and each production line is considered a single emissions unit. The main facility is located at 3207 Industrial 29<sup>th</sup> Street. The production line consists of the following areas: lamination; assembly; tooling; warehouse; and two smaller areas for miscellaneous small parts and tooling that is not done in one of the primary areas.

### **Subsection B. Summary of Emissions Units.**

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Fiberglass boat building activities at 3207 Industrial 29 <sup>th</sup> Street.

Regulated fiberglass boat building activities include the following:

- Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
- Closed molding resin operations.
- Resin and gel coat mixing operations.
- Resin and gel coat application equipment cleaning operations.
- Miscellaneous materials usage that contains VOC.

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

### **Subsection C. Applicable Regulations.**

Based on the Title V air operation permit revision application received May 2, 2017, this facility is a major source of HAP. The existing facility is not a prevention of significant deterioration (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).
<i>Federal Rule Citations</i>	
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart VVVV, NESHAP for Boat Manufacturing	001
<i>State Rule Citations</i>	
62-4, F.A.C., Permits	001
62-204, F.A.C., Air Pollution Control – General Provisions	001
62-210, F.A.C., Stationary Sources – General Requirements	001
62-212, F.A.C., Stationary Sources – Preconstruction Review	001
62-213, F.A.C., Operation Permits for Major Sources of Air Pollution	001
62-296, F.A.C., Stationary Sources – Emission Standards	001
62-297, F.A.C., Stationary Sources – Emissions Monitoring	001

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## SECTION II. FACILITY-WIDE CONDITIONS.

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**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.

- a. Tightly cover or close all VOC containers when they are not in use.
- b. Tightly cover all VOC-containing tanks when they are not in use.
- c. Maintain in good operating condition all pipes, valves, and fittings that handle VOC.
- d. Confine rags used with VOC to tightly closed, fireproof containers when not in use.
- e. Immediately confine and clean up VOC spills and ensure waste is placed in closed containers for reuse, recycling, or proper disposal.

[Rule 62-296.320(1), F.A.C., and Permit No. 1110086-006-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. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), 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. Where applicable, tools that can be retrofitted or purchased with point source dust collection devices, including high-efficiency particulate air (HEPA) filtration vacuum systems are used for cutting and grinding operations.
- b. Paving and maintenance of roads, parking areas, and yards.
- c. Application of water or other dust suppressants to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- d. Application of asphalt, water, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
- e. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- f. Landscaping or planting of vegetation.
- g. Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
- h. Confining abrasive blasting, where possible.
- i. Enclosure or covering of conveyor systems.
- j. Substitution of powder-based materials with granular or pelletized materials, where possible.

[Rule 62-296.320(4)(c), F.A.C., and Permit No. 1110086-006-AC]

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## SECTION II. FACILITY-WIDE CONDITIONS.

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### 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 (DEP) 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 1<sup>st</sup> 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, Post Office 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](mailto: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 and to the US. EPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

U.S. Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
Attn: Air Enforcement Branch

**FW8. Prevention of Accidental Releases (Section 112(r) of CAA).**

- a. As required by Section 112(r)(7)(B)(iii) of the CAA and 40 CFR 68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. (See paragraph e., below.)
- b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Division of Emergency Management, as established by department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6) of the CAA.

## SECTION II. FACILITY-WIDE CONDITIONS.

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- c. The owner or operator shall submit the required annual registration fee to the Division of Emergency Management on or before April 1, in accordance with Part IV, Chapter 252, F.S., and Rule 27P-21, F.A.C.
- d. Any required written reports, notifications, certifications, and data required to be sent to the Division of Emergency Management, should be sent to: Division of Emergency Management, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2100, Telephone: (850) 413-9970, Fax: (850) 488-1739.
- e. 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.
- f. Any required reports to be sent to the National Response Center, should be sent to: National Response Center, EPA Office of Solid Waste and Emergency Response, 1200 Pennsylvania Avenue Northwest, Mail Code: USEPA (5101T), Washington, DC 20460, Telephone: (800) 424-8802.
- g. Send the required annual registration fee using approved forms made payable to: Cashier, Division of Emergency Management, State Emergency Response Commission, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2149  
[Part IV, Chapter 252, F.S.; and, Rule 27P-21, F.A.C.]

### **Other Requirements**

**FW9. VOC Emissions Cap.** The permittee shall not allow facility-wide total emissions of VOC to exceed 220 tons in any consecutive 12-month period. [Rules 62-4.070(3) and 62-212.400, F.A.C.; Permit No. 1110086-010-AC Specific Condition 3; and, Application No. 1110086-011-AV]

**FW10. VOC Tracking Records.** The permittee shall maintain the following monthly records on materials usage and VOC emissions to demonstrate compliance with Specific Condition **FW9**. of this section:

- a. Material name.
- b. Monthly usage (pounds) of each material.
- c. Maximum possible VOC content (weight percent) of each material.
- d. Total monthly VOC emissions from all materials (tons).
- e. Twelve-month rolling total VOC emissions from all materials (tons).

[Rule 62-4.070(3), F.A.C.; and, Permit No. 1110086-010-AC Specific Condition 4]

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Unit 001

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

EU No.	Brief Description
001	Fiberglass boat building activities at 3207 Industrial 29 <sup>th</sup> Street.

Fiberglass boat building activities include the following:

- Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
- Closed molding resin operations.
- Resin and gel coat mixing operations.
- Resin and gel coat application equipment cleaning operations.
- Miscellaneous materials usage that contains VOC.

The production line consists of the following stages in the boat production process: lamination, tooling, and assembly. The lamination stage is the main source of VOC and HAP emissions from the source. The working areas use HEPA filters to recirculate air within the working spaces, and all the emissions are fugitive.

*{Permitting Note: This emissions unit is regulated under 40 CFR 63, Subpart VVVV – National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C. This emissions unit is also subject to the General Pollutant Emission Limiting Standards of Rule 62-296.320, F.A.C.}*

*The facility does not currently use add-on control devices as described in 40 CFR 63, Subpart VVVV.}*

#### **Essential Potential to Emit (PTE) Parameters**

**A.1. Hours of Operation.** This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.; and, Permit No. 1110086-010-AC, Specific Condition 3.]

#### **Emission Limitations and Standards**

**A.2. VOC Emissions.** VOC emissions from the production line at 3207 Industrial 29<sup>th</sup> Street shall contribute to the facility-wide VOC limitation of 220 tons in any consecutive 12-month period. Organic HAP emissions (i.e., styrene, methyl methacrylate, and other HAP identified by the applicant) shall contribute to the VOC limitation as well as the HAP limitation. [Rules 62-4.070(3) & 62-212.400, F.A.C.; and Application No. 1110086-011-AV]

#### **Excess Emissions**

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

**A.3. Excess Emissions Allowed.** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

**A.4. Excess Emissions Prohibited.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(1), F.A.C.]

#### **Test Methods and Procedures**

**A.5. Test Methods.** When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content



### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Unit 001

Method	Description of Method and Comments
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-204.800, F.A.C.]

- A.6. 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.]

#### Recordkeeping and Reporting Requirements

- A.7. Reporting Schedule.** The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Semiannual Compliance Report	No later than 60 days after the end of the semiannual reporting period	<a href="#">A.22.</a>

[Rule 62-213.440(1)(b), F.A.C.; and, 40 CFR 63.5761, 63.9(h), 63.5764, and Table 7 to Subpart VVVV]

- A.8. Other Reporting Requirements.** See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

#### 40 CFR 63, Subpart VVVV Requirements

- A.9. Regulated Activities.** Boat building activities for Emissions Unit 001 regulated by 40 CFR 63, Subpart VVVV, are as follows:

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

[40 CFR 63.5689; and, Permit No. 1110086-010-AC]

- A.10. HAP Emissions Limitation – Open Molding Resin and Gel Coat Operations.** The permittee shall comply with the following requirements for HAP emissions at the facility.

- Open Molding Operations.** The permittee shall limit organic HAP emissions from the five (5) open molding operations listed in subparagraphs (1) through (5) of this condition to the HAP emission limit specified in paragraph b. of this condition. Operations listed in paragraph d. are exempt from this limit.
  - Production resin.
  - Pigmented gel coat.
  - Clear gel coat.
  - Tooling resin.
  - Tooling gel coat.
- HAP Limit.** The permittee shall limit organic HAP emissions from open molding operations to the limit specified below by *Equation A-1*, based on a 12-month rolling average.

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

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

$M_R$  = mass of production resin, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Unit 001

$M_{PG}$  = mass of pigmented gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{CG}$  = mass of clear gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{TR}$  = mass of tooling resin, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{TG}$  = mass of tooling gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

- c. The open molding emission limit is the same for both new and existing sources.
- d. *Exempt Materials.* The materials specified in subparagraphs (1) through (3) of this condition are exempt from the open molding emissions limit specified in paragraph b. of this condition.
  - (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 permittee must keep a record of the resins for which this exemption is used.
  - (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. The permittee must keep a record of the amount of gel coats used per month when claiming this exemption, and the permittee must keep 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 this exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis. The permittee must keep a record of the amount of 100 percent vinylester skin coat resin used per month when claiming this exemption, and the permittee must keep copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

[40 CFR 63.5698; and, Permit No. 1110086-010-AC]

**A.11. HAP Compliance Options – Open Molding Resin and Gel Coat Operations:** The permittee shall use one or more of the options listed in paragraphs (a) through (c) of this condition to meet the emission limit specified in [Specific Condition A.10.](#) for resins and gel coats used in open molding operations. Compliance with each option is based on a 12-month rolling-average basis, unless otherwise noted.

- a. *Maximum Achievable Control Technology (MACT) Model Point Value Averaging (Emissions Averaging) Option.* Demonstrate that emissions from the open molding resin and gel coat operations that the permittee averages meet the emission limit specified in [Specific Condition A.10.](#), using the procedures described in [Specific Condition A.14.](#) of this permit. 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 A-1** of this condition.
- c. *Add-on control option.* Use an enclosure and add-on control device, and demonstrate that the resulting emissions meet the emission limit in §63.5698. Compliance with this option is based on control device performance testing and control device monitoring.

**Table A-1. Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations**

For	And this application method	Weighted-average organic HAP content (weight percent) must not exceed
Production resin operations	Atomized (spray)	28 percent
Production resin operations	Nonatomized (nonspray)	35 percent

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**SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.**

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**Subsection A. Emissions Unit 001**

For	And this application method	Weighted-average organic HAP content (weight percent) must not exceed
Pigmented gel coat operations	Any method	33 percent
Clear gel coat operations	Any method	48 percent
Tooling resin operations	Atomized (spray)	30 percent
Tooling resin operations	Nonatomized (nonspray)	39 percent
Tooling gel coat operations	Any method	40 percent

[40 CFR 63.5701 & Table 2 to Subpart VVVV; and, Permit No. 1110086-010-AC]

**A.12. General Requirement for Compliance with the Open Molding HAP Emission Limitation.**

- a. *Emissions Averaging Option.* For those open molding operations and materials complying using the emissions averaging option (MACT model point values), the permittee must follow the requirements in subparagraphs (1) through (5) of this condition.
  - (1) Use the methods specified in [Specific Condition A.20.](#) to determine the organic HAP content of resins and gel coats.
  - (2) Complete the calculations described in [Specific Condition A.14.](#) to show that the organic HAP emissions do not exceed the limitation specified pursuant to [Specific Condition A.10.](#)
  - (3) Keep records as specified below for each resin and gel coat:
    - (a) HAP content.
    - (b) Amount of material used per month.
    - (c) 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 (non-spray) technology.
    - (d) Calculations performed to demonstrate compliance based on MACT model point values, as described in [Specific Condition A.14.](#)
  - (4) Prepare and submit the implementation plan described in [Specific Condition A.13.](#) to the Department and keep it up to date.
  - (5) Submit semiannual compliance reports to the Department as specified in [Specific Conditions A.7.](#) and [A.22.](#)
- b. *Compliant Materials Option.* For each open molding operation complying using the compliant materials option, the permittee must follow the requirements in subparagraphs (1) through (4) of this condition.
  - (1) Use the methods specified in [Specific Condition A.20.](#) to determine the organic HAP content of resins and gel coats.
  - (2) Complete the calculations described in [Specific Condition A.15.](#) to show that the weighted-average organic HAP content does not exceed the limit specified in **Table A-1.**
  - (3) Keep records as specified below for each resin and gel coat:
    - (a) HAP content.
    - (b) Amount of material used per month.
    - (c) 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 (non-spray) technology.
    - (d) Calculations performed to demonstrate compliance based on weighted-average organic HAP content, as described in [Specific Condition A.15.](#)
  - (4) Submit semiannual compliance reports to the Department as specified in [Specific Conditions A.7.](#) and [A.22.](#)

[40 CFR 63.5704; and, Permit No. 1110086-010-AC]

**A.13. Implementation Plan – Open Molding Operations.** The permittee must prepare an implementation plan for all open molding operations for which emissions averaging is used to comply as described in [Specific Condition A.12.](#)

- a. The implementation plan must describe the steps the permittee will take to bring the open molding operations covered by Subpart VVVV into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in subparagraphs (1) through (3).
  - (1) A description of each operation included in the average.

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Unit 001

- (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 limitation pursuant to [Specific Condition A.10](#).
  - b. The permittee must submit the implementation plan to the Department with the notification of compliance status pursuant to [Specific Condition A.21](#).
  - c. The permittee must keep the implementation plan on site and provide it to the Department when asked. If the implementation plan is revised, the permittee must submit the revised plan with the next semiannual compliance report pursuant to [Specific Conditions A.7](#) and [A.22](#).
- [40 CFR 63.5707; and, Permit No. 1110086-010-AC]

**A.14. Compliance Demonstration – Emissions Averaging.** If the permittee is complying with the appropriate HAP limit by MACT model point value averaging, then the permittee shall comply with the following requirements.

- a. If the organic HAP emissions, calculated in paragraph c. of this condition, are less than the organic HAP limitation calculated in [Specific Condition A.10](#) for the same 12-month period, then the facility is in compliance for those operations and materials included in the emissions average.
- b. Compliance using the emissions averaging option is based on a 12-month rolling-average period and is determined at the end of every month (i.e., 12 times per year).
- c. At the end of the 12<sup>th</sup> month after startup, and at the end of every subsequent month, use **Equation A-2** to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit pursuant to [Specific Condition A.10](#) calculated for the same 12-month period. Include only the terms in **Equation B** for those operations and materials included in the emissions average.

$$\text{HAP emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})] \quad (\text{Eq. A-2})$$

Where:

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

$PV_R$  = 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.

- d. At the end of every month, use **Equation A-3** to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

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$$PV_{OP} = \frac{\sum_{i=1}^n (M_i)(PV_i)}{\sum_{i=1}^n M_i} \quad (Eq. A-3)$$

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.

- e. The permittee must use the equations in **Table A-2** to calculate the MACT model point ( $PV_i$ ) for each resin and gel coat used in the operation in the past 12 months.

**Table A-2. MACT Model Point Value ( $PV_i$ ) Formulas for Open Molding Operations**

For	And this application method <sup>1</sup>	Use this formula to calculate the MACT model point value for each resin and gel coat <sup>2</sup>
Production resin, tooling resin	Atomized	$0.014 \times (\text{Resin HAP}\%)^{2.425}$
	Atomized, plus vacuum bagging with roll-out	$0.01185 \times (\text{Resin HAP}\%)^{2.425}$
	Atomized, plus vacuum bagging without roll-out	$0.00945 \times (\text{Resin HAP}\%)^{2.425}$
	Nonatomized	$0.014 \times (\text{Resin HAP}\%)^{2.275}$
	Nonatomized, plus vacuum bagging with roll-out	$0.0110 \times (\text{Resin HAP}\%)^{2.275}$
	Nonatomized, plus vacuum bagging without roll-out	$0.0076 \times (\text{Resin HAP}\%)^{2.275}$
Pigmented gel coat, clear gel coat, tooling get coat	All methods	$0.445 \times (\text{Gel coat HAP}\%)^{1.675}$
<sup>1</sup> Equations calculate MACT model point value in kilograms of organic HAP per megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric.		
<sup>2</sup> HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100 percent.		

[40 CFR 63.5710 & Table 3 to Subpart VVVV; and, Permit No. 1110086-010-AC]

**A.15. Compliance Demonstration – Compliant Materials.** If the permittee is complying with the appropriate HAP limit by using compliant materials, then the permittee shall comply with the following requirements.

- Compliance using the organic HAP content requirements listed in **Table A-1** is based on a 12-month rolling average that is calculated at the end of every month. For filled material (production resin or tooling resin), the permittee must comply according to the procedure in [Specific Condition A.16](#).
- At the end of every month, the permittee shall use **Equation A-4** to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\text{Weighted-Average HAP Content (\%)} = \frac{\sum_{i=1}^n (M_i)(HAP_i)}{\sum_{i=1}^n M_i} \quad (Eq. A-4)$$

Where:

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



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$HAP_i$  = 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 A.20.](#) to determine HAP content.

$n$  = number of different open molding resins or gel coat used in the past 12 months in an operation.

- c. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limitation specified in **Table A-1**, then the facility is in compliance.

[40 CFR 63.5713; and, Permit No. 1110086-010-AC]

**A.16. Compliance Demonstration – Filled Resins.** When using filled resins, the permittee must comply with the following requirements.

- a. For filled production resins or filled tooling resins, the permittee must demonstrate compliance for the filled material on an as-applied basis using **Equation A-5**.

$$PV_F = (PV_U) \left( \frac{100 - \% \text{ Filler}}{100} \right) \quad (Eq. A-5)$$

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 A-2** of this permit.

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

- b. If the filled resin is used as a production resin and the value of  $PV_F$  calculated by **Equation A-5** does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
- c. If the filled resin is used as a tooling resin and the value of  $PV_F$  calculated by **Equation A-5** does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
- d. If the filled resin is included in the emissions averaging procedure pursuant to [Specific Condition A.14.](#), then use the value of  $PV_F$  calculated using **Equation A-5** for the value of  $PV_i$  in **Equation A-3**.

[40 CFR 63.5714; and, Permit No. 1110086-010-AC]

**A.17. Standards for Closed Molding Resin Operations.** Closed molding resin operations at the facility are subject to the following requirements.

- a. If a resin application operation meets the definition of closed molding specified in 40 CFR 63, Subpart VVVV, then there is no requirement to reduce emissions from that operation.
- b. If a resin application operation does not meet the definition of closed molding, then the facility must comply with the limitation for open molding resin operations pursuant to [Specific Condition A.10](#).
- c. Open molding resin operations that precede a closed molding operation (e.g., gel coat or skin coat layers that are applied before lamination by closed molding) must comply with the limitation for open molding resin and gel coat operations pursuant to [Specific Condition A.10](#).

[40 CFR 63.5728; and, Permit No. 1110086-010-AC]

**A.18. Work Practice Standards for Resin and Gel Coat Mixing Operations.** Resin and gel coat mixing operations at the facility are subject to the following requirements.

- a. All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters (~55 gallons), including those used for on site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
- b. The work practice standard in paragraph a. 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.
- c. To demonstrate compliance with the work practice standard in paragraph a., all mixing containers subject to this condition must be visually inspected at least once per month. The inspection should ensure that all

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containers have covers with no visible gaps between the cover and container, or between the cover and equipment passing through the cover.

- d. The permittee must 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; and Permit No. 1110086-010-AC]

**A.19. Resin and Gel Coat Application Equipment Cleaning Operations.** The permittee shall comply with the following requirements for resin and gel coat application equipment cleaning operations at the facility.

a. *Compliance Standards.*

- (1) For routine flushing of resin and gel coat application equipment (e.g. spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee must 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 limitation applies.
- (2) The permittee must 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 cleaning is placed in or removed from the container. On containers with a capacity greater than 7.6 liters (~2 gallons), the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resins or gel coats are exempt from the requirements of 40 CFR 63, Subpart T (NESHAP for Halogenated Solvent Cleaning). Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

[40 CFR 63.5734; and, Permit No. 1110086-010-AC]

b. *Compliance Demonstrations.*

- (1) The permittee must determine and record the organic HAP content of the cleaning solvents subject to the standards specified in paragraph a. of this condition using the methods specified in [Specific Condition A.20](#).
- (2) If cleaning solvents are recycled on site, 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 requirements in [Specific Condition A.20](#) for demonstrating compliance with organic HAP content limitations.
- (3) At least once per month, the permittee must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. The permittee must keep records of the monthly inspections and any repairs made to the covers.

[40 CFR 63.5737; and, Permit No. 1110086-010-AC]

**A.20. Organic HAP Content Determination Procedures.** The permittee must 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, the permittee shall use one of the methods described in paragraphs a. through f. of this condition.

a. *Method 311 (appendix A to 40 CFR 63).* The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in subparagraphs (1) and (2) when determining organic HAP content by Method 311.

- (1) 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. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point.
- (2) 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.

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- b. *Method 24 (appendix A to 40 CFR 60)*. The permittee 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.
- c. *ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins)*. The permittee may use ASTM D1259-85 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.
- d. *Alternative Methods*. The permittee may use an alternative test method for determining mass fraction of organic HAP if prior approval is obtained from the U.S. EPA. The permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
- e. *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 a. through d., such as manufacturer's formulation data, according to subparagraphs (1) through (3).
- (1) 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.
  - (2) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs a. through d. exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance.
  - (3) If the organic HAP content is provided as a single value, then the permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs a. through d. 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 the permittee must use the measured organic HAP content to determine compliance.
- f. *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 permittee may use the values for organic HAP content that are listed in **Table A-3** or **A-4**. The permittee may use **Table A-4** only if the solvent blends in the materials used do not match any of the solvent blends in **Table A-3** and the permittee knows only whether the blend is aliphatic or aromatic. However, if test results indicate higher values than those listed in **Table A-3** or **A-4**, then the test results must be used for determining compliance.

**Table A-3. Default Organic HAP Contents of Solvents and Solvent Blends**

Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP make-up, percent by mass
Toluene	108-88-3	100	Toluene
Xylene(s)	1330-20-7	100	Xylenes, ethylbenzene
Hexane	110-54-3	50	n-Hexane
n-Hexane	110-54-3	100	n-Hexane
Ethylbenzene	100-41-4	100	Ethylbenzene
Aliphatic 140	-----	0	None
Aromatic 100	-----	2	1% xylene, 1% cumene
Aromatic 150	-----	9	Naphthalene
Aromatic naphtha	64742-95-6	2	1% xylene, 1% cumene
Aromatic solvent	64742-94-5	10	Naphthalene
Exempt mineral spirits	8032-32-4	0	None
Ligroines (VM & P)	8032-32-4	0	None



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Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP make-up, percent by mass
Lactol spirits	64742-89-6	15	Toluene
Low aromatic white spirit	64742-82-1	0	None
Mineral spirits	64742-88-7	1	Xylenes
Hydrotreated naphtha	64742-48-9	0	None
Hydrotreated light distillate	64742-47-8	0.1	Toluene
Stoddard solvent	8052-41-3	1	Xylenes
Super high-flash naphtha	64742-95-6	5	Xylenes
Varol solvent	8052-49-3	1	0.5% xylenes, 0.5% ethyl benzene
VM & P naphtha	64742-89-8	6	3% toluene, 3% xylene
Petroleum distillate mixture	68477-31-6	8	4% naphthalene, 4% biphenyl

**Table A-4. Default Organic HAP Contents of Petroleum Solvent Groups**

Solvent Type	Average organic HAP content, percent by mass	Typical organic HAP make-up, percent by mass
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend).	3	1% xylene, 1% toluene, and 1% ethylbenzene
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent).	6	4% xylene, 1% toluene, and 1% ethylbenzene

[40 CFR 63.5758 & Tables 5 and 6 to Subpart VVVV; and, Permit No. 1110086-010-AC]

**A.21. Compliance Notifications.** The permittee shall submit the following notifications to the Department by the specified dates. Refer to [Specific Condition A.7](#) for a summary of the notification and report schedule.

*{Permitting Note: The requirement to submit the initial notification of compliance status was satisfied on June 26, 2006, with the submittal of the initial notification and the facility's implementation plan.}*

**Notifications of Information Updates.** If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the Department within 15 calendar days after the change.

[40 CFR 63.5761(b)]

**A.22. Compliance Reports.** The permittee shall submit the semiannual compliance report according to the following requirements, and to the extent practicable, shall organize each report according to the operations covered by this permit and the compliance procedure followed for that operation. Each compliance report must contain 6 12-month rolling-average periods (i.e., one 12-month period for each month in the semiannual reporting period). For the requirements of this condition, *semiannual* is taken to mean "every 6 months."

a. **Reporting Dates.** Submit each compliance report by the dates specified in subparagraphs (1) through (4).

- (1) The first compliance report shall cover the period immediately following the end of the 12<sup>th</sup> month after the startup, and ending on June 30 or December 31, whichever date is sooner.
- (2) 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 subparagraph (1) of this condition.
- (3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 to June 30 or from July 1 to December 31.

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- (4) Each subsequent report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
- b. *Report Content.* Each compliance report must include the following information as specified in subparagraphs (1) through (7).
  - (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 the facility is 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 facility was in compliance with the emissions limitations and work practice standards during the reporting period, then the permittee must include a statement to that effect.
  - (7) If the facility deviated from an emissions limitation or work practice standard during the reporting period, then the permittee must also include the information listed in sub-subparagraphs (a) through (d) in the semiannual compliance report.
    - (a) A description of the operation involved in the deviation.
    - (b) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
    - (c) A description of any corrective actions taken to minimize the deviation and actions taken to prevent it from happening again.
    - (d) 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; and, Permit No. 1110086-010-AC]

**A.23. Recordkeeping Requirements.** The permittee shall keep the records according to paragraphs a. through c. of this condition.

- a. The permittee must keep a copy of each notification and report that is submitted to comply with this permit.
- b. The permittee must keep all documentation supporting any notification or report that has been submitted.
- c. If the facility is complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions, then the permittee must keep the following records:
  - (1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month.
  - (2) The weighted-average organic HAP contents for each operation, expressed as a weight percent.
  - (3) For open molding production resin and tooling resin, the amounts of each applied by atomized and nonatomized methods.

[40 CFR 63.5770]

**A.24. Applicability of 40 CFR 63, Subpart A – General Provisions.** The permittee must comply with the requirements of the General Provisions of 40 CFR 63, Subpart A, as specified in Table 8 to 40 CFR 63, Subpart VVVV. Table 8 has been omitted from the body of this permit due to its size; Table 8 can be found in Appendix 40 CFR 63, Subpart VVVV – NESHAP for Boat Manufacturing. [40 CFR 63.5773 & Table 8 to Subpart VVVV]