



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

ELECTRONIC MAIL

John.Ward@whaler.com

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Renewal:

John Ward, President
Boston Whaler, Incorporated
100 Whaler Way
Edgewater, FL 32141

FINAL Permit Project No.: 1270063-005-AV
Boat Manufacturing Facility
Volusia County

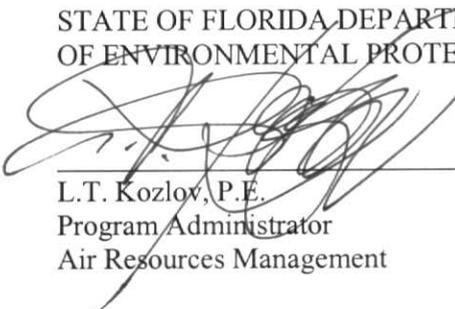
Dear Mr. Ward:

Enclosed is the FINAL Permit, No. 1270063-005-AV. The purpose is for the renewal of the Title V Air Operation Permit. The facility is located in Volusia County. This permit renewal is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


L.T. Kozlov, P.E.
Program Administrator
Air Resources Management



LTK/jar

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL permit) was sent by certified mail or electronically (with Received Receipt) before the close of business on Feb 21, 2007 to the person(s) listed or as otherwise noted:

John Ward, President, (**John.Ward@whaler.com**)
Boston Whaler, Incorporated
100 Whaler Way
Edgewater, FL 32141

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT was sent by U.S. Mail or electronically on the same date to the person(s) listed or as otherwise noted:

Scott A. McCann, P.E., Golder Associates Inc., (**smccann@golder.com**)
Chris Carver, EHS Specialist, Boston Whaler, Inc., (**Chris.Carver@whaler.com**)
Barbara Friday, BAR [**Barbara.Friday@dep.state.fl.us**] (for posting with Region 4, U.S. EPA)

Clerk Stamp

Filed on this date, pursuant to Section 120.52, F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Daria Jones
(Clerk)

Feb. 21, 2007
(Date)

FINAL Determination

Title V Air Operation Permit Renewal
FINAL Permit No.: 1270063-005-AV
Boston Whaler, Inc.
Boat Manufacturing Facility
Page 1 of 1

I. Comment(s).

No comments were received from the USEPA during their 45 day review period of the PROPOSED Permit.

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit.

Boston Whaler, Incorporated
Boat Manufacturing Facility
Facility ID No.: 1270063
Volusia County

Title V Air Operation Permit Renewal
FINAL Permit No.: 1270063-005-AV

Permitting & Compliance Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

Telephone: 407/893-3334
Fax: 407/897-5963

**Title V Air Operation Permit Renewal
FINAL Permit No.: 1270063-005-AV**

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Secretary

Permittee:

Boston Whaler, Incorporated
100 Whaler Way
Edgewater, Florida 32141

FINAL Permit No.: 1270063-005-AV

Facility ID No.: 1270063

SIC Nos.: 37, 3732

Project: Title V Air Operation Permit Renewal

This purpose of this permit is to renew the Title V Air Operation Permit. This existing facility is located at 100 Whaler Way, Edgewater, Volusia County; UTM Coordinates: Zone 17, 513.0 km East and 3199.2 km North; Latitude: 28° 55' 09" North and Longitude: 81° 51' 58" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix I-1, LIST of INSIGNIFICANT EMISSION UNITS and/or ACTIVITIES
Appendix TV-6, TITLE V CONDITIONS (version dated 6/26/06)
Appendix Subpart VVVV

Effective Date: February 18, 2007

Renewal Application Due Date: June 30, 2011

Expiration Date: December 30, 2011

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION


L. T. Kozlov, P.E.
Program Administrator
Air Resources Management


LTK/jar

Section I. Facility Information.

Subsection A. Facility Description.

The company operates a boat manufacturing facility. The facility consists of Building No. 1 (Administration), Building No. 2 (Boat Production), and R&D Prototype Building. The Administration Building has no stacks, the Boat Production Building has twenty-three stacks, and the R&D Prototype Building has two stacks.

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

Based on the Title V Air Operation Permit Renewal application received June 29, 2006, this facility is a major source of hazardous air pollutants (HAPS).

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

<u>E.U. ID</u>	<u>Brief Description</u>
015	Resin and Gelcoat Lamination of Fiberglass Boats

The gelcoat operation consists of hull manufacturing, small parts manufacturing, boat hull and small parts finishing, and boat assembly. The fiberglass boat production consists of resin and gelcoat lamination, small parts manufacturing, mold building, and research and development. Hull manufacturing takes place in one of seven bays at the facility. An interior hull mold and exterior hull mold is laminated with gelcoat and then with styrene resin. The hull interior mold is inverted and placed inside the exterior portion so that the interior portions are facing. A polyurethane foam is poured into the space between the facing portions of the mold. After the foam has cured, the unfinished boat hull is removed from the molds and sent to the finishing area.

Small parts manufacturing consists of spraying gelcoat and resin onto miscellaneous wood and metal small parts. After curing the small parts are sent to the finishing area. Boat hull manufacturing and small parts finishing consists of sanding excess laminates and foam from hulls and parts. Boat assembly consists of attaching small parts and trimmings to the hulls. Assembly takes place in the administration building.

Miscellaneous solvents, adhesives, and VOC-containing materials are used throughout the boat manufacturing process. The permittee may change the number or location of stacks; however, the permittee shall notify the Department within 60 days of completion of construction and identify the location and stack changes.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Statement of Basis

These documents are on file with permitting authority:
Initial Title V Air Operation Permit issued February 13, 1997.
Application for a Title V Air Operation Permit Renewal received November 30, 2000.
Title V Air Operation Permit Renewal issued May 21, 2001.
Title V Air Operation Permit Revision issued January 13, 2004.
Application for a Title V Air Operation Permit Renewal received June 29, 2006.

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test reports submittals, applications, etc.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).
[Rule 62-296.320(4)(b)1., and 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,

- b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

6. The permittee shall submit all compliance related notifications and reports required of this permit to the Department of Environmental Protection's Central District office:

Florida Department of Environmental Protection
Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/894-7555; Fax: 407/897-5963

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

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

{Permitting Note: This condition implements the requirements of Rule 62-210.370(3), F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}

8. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to the air compliance section of this office.

[Rule 62-210.370(3), F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-210.370(3) F.A.C. (see Condition 24. of APPENDIX TV-6, TITLE V CONDITIONS.)}

9. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS.)}

10. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62-213.420(4), F.A.C.]

11. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).

[Rule 62-4.090, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

<u>E.U. ID</u>	<u>Brief Description</u>
015	Resin and Gelcoat Lamination of Fiberglass Boats

The gelcoat operation consists of hull manufacturing, small parts manufacturing, boat hull and small parts finishing, and boat assembly. The fiberglass boat production consists of resin and gelcoat lamination, small parts manufacturing, mold building, and research and development. Hull manufacturing takes place in one of seven bays at the facility. An interior hull mold and exterior hull mold is laminated with gelcoat and then with styrene resin. The hull interior mold is inverted and placed inside the exterior portion so that the interior portions are facing. A polyurethane foam is poured into the space between the facing portions of the mold. After the foam has cured, the unfinished boat hull is removed from the molds and sent to the finishing area.

Small parts manufacturing consists of spraying gelcoat and resin onto miscellaneous wood and metal small parts. After curing the small parts are sent to the finishing area.

Boat hull manufacturing and small parts finishing consists of sanding excess laminates and foam from hulls and parts.

Boat assembly consists of attaching small parts and trimmings to the hulls. Assembly takes place in the administration building.

The facility is subject to the applicable requirements contained in 40 C.F.R. 63, Subpart VVVV, which is incorporated by reference and attached to this permit.

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

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. The hours of operation for this emissions unit shall not exceed 7,072 hours per twelve consecutive months.

[Rule 62-4.160(2) and Rule 62-210.200 - (PTE), F.A.C.]

Emission Limitations and Standards

A2. Visible emissions from each stack in the boat production building and the R & D prototype building shall not exceed 20% opacity.

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

A3. Volatile Organic Compound: The total VOC and HAP emission rate shall not to exceed 249 tons per twelve consecutive months, updated monthly.

[Permit 1270063-001-AC, date July 22, 1996 and Rule 62-210.200(PTE), F.A.C.]

Test Methods and Procedures

A4. Each stack in the boat production building and the R&D prototype building that emits particulates must be compliance tested for visible emissions in accordance with DEP Method 9 at least 180 days prior to the permit expiration date. The compliance test shall be conducted for one hour.

[Rule 62-297.401(9)(c), Rule 62-297.310(7)(a)4.a, and Rule 62-297.310(4)(a)2, F.A.C.]

A5. The permittee shall notify the air compliance section of this office, in writing, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

[Rule 62-297.310(7)(a)9., F.A.C.]

A6. The maximum operation rate is 777 pounds/hour of resin and 271 pounds per hour of gelcoat.

[Rule 62-4.160(2), F.A.C.]

A7. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rule 62-297.310(2), F.A.C.]

Recordkeeping and Reporting Requirements

A8. In order to demonstrate compliance with condition numbers **A1.**, **A3.**, and **A6.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

- a) designation of month and year of operation for which records are being tabulated
- b) consecutive 12-month total of operating hours
- c) consecutive 12-month total of resin and gelcoat material used (pounds)
- d) consecutive 12-month total of VOC and HAP emissions

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

Note: A consecutive 12- month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month.

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

A9. Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept to provide sufficient information to determine compliance. The log and documents shall be kept at the facility for at least 5 years and made available to the Department. The monthly log shall be completed by the 15th of the following month.

[Rule 62-4.070(3) and Rule 62-213.440(1)(b)2.b, F.A.C.]

A10. Reports of the required compliance tests shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.

[Rule 62-297.310(8)(b), F.A.C.]

40 CFR 63, Subpart VVVV

A11. The facility is subject to the applicable requirements contained in 40 C.F.R. 63, Subpart VVVV, which is incorporated by reference and attached to this permit. The company will maintain records to show compliance with Subpart VVVV. Rule 63.5701 allows three methods to comply with open molding emission limit; a) maximum achievable control technology model point averaging (emission averaging) option, b) compliant material option, or c) add-on control device.

[40 C.F.R. 63, Subpart VVVV]

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

Abbreviations and Acronyms:

°F:	Degrees Fahrenheit
BACT:	Best Available Control Technology
CFR:	Code of Federal Regulations
DEP:	State of Florida, Department of Environmental Protection
DARM:	Division of Air Resource Management
EPA:	United States Environmental Protection Agency
F.A.C.:	Florida Administrative Code
F.S.:	Florida Statute
ISO:	International Standards Organization
LAT:	Latitude
LONG:	Longitude
MMBtu:	million British thermal units
MW:	Megawatt
ORIS:	Office of Regulatory Information Systems
SOA:	Specific Operating Agreement
UTM:	Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Appendix H-1: Permit History

Boston Whaler, Inc.
Boat Manufacturing Facility (Edgewater)

FINAL Permit No.: 1270063-005-AV
Facility ID No.: 1270063

<u>E.U. ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Effective Date</u>	<u>Expiration Date</u>	<u>Project Type</u>
All	Facility	1270063-004-AV	01/13/04	12/30/06	Revision
All	Facility	1270063-003-AV	05/21/01	05/30/06	Renewal
All	Facility	1270063-002-AV	10/13/97	05/30/01	Initial
-011 to -014	Resin and Gelcoat Lamination of Fiberglass Boats	1270063-001-AC	07/22/96	05/31/01	Construction (modification)

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Boston Whaler, Incorporated
Boat Manufacturing Facility (Edgewater)

FINAL Permit No.: 1270063-005-AV
Facility I.D. No.: 1270063

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emission Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1)	Boat hull and small parts grinding
2)	Closed-cell polyurethane flotation foam usage
3)	Plant maintenance activities (painting, welding, soldering, landscaping, etc.)
4)	Two 7,500-gallon styrene resin storage tanks
5)	Woodworking

STATEMENT OF BASIS

Boston Whaler, Incorporated
Boat Manufacturing Facility (Edgewater)
Facility ID No.: 1270063
Volusia County

Title V Air Operation Permit Renewal
FINAL Permit No.: 1270063-005-AV

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit is for the renewal of the Title V Air Operation Permit. The company operates a boat manufacturing facility. The facility consists of Building No. 1 (Administration), Building No. 2 (Boat Production), and R&D Prototype Building. The Administration Building has no stacks, the Boat Production Building has twenty-three stacks, and the R&D Prototype Building has two stacks.

The facility is subject to the General Pollutant Emission Limitations, Rule 62-296.320(2), F.A.C., and 40 CFR 60 Subpart VVVV, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. MACT is not applicable, as there is not any construction or increase in emissions within the application. CAM does not apply, as there are no control devices at the facility.

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

Based on the Title V Air Operation Permit Renewal application received June 29, 2006, this facility is a major source of hazardous air pollutants (HAPs).