

# Part 70 Operating Permit Amendment

Permit Amendment No.: **3732-019-0003-V-02-3** Effective Date: **April 7, 2005**

**Facility Name:** **Chaparral Boats, Inc.**  
Industrial Park Boulevard  
Nashville, Georgia 31639 Berrien County

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Nashville, Georgia 31639

**Parent/Holding Company:** Chaparral Boats, Inc.

**Facility AIRS Number:** 04-13-019-00003

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Removal of the PSD avoidance limitation present in Condition No. 3.2.3 for Emission Unit ID No. P3LA. This permit includes conditions that specify the requirements of 40 CFR 52.21(j) (Best Available Control Technology) that are applicable to Emission Unit ID No. P3LA (resin and gel coat operations at Plant No. 3).

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 3732-019-0003-V-02-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 15715 dated October 18, 2004; any other applications upon which this Permit Amendment or Permit No. 3732-019-0003-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **22** pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 3732-019-0003-V-02-0.

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Director  
Environmental Protection Division

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**PART 1.0 FACILITY DESCRIPTION**

**1.3 Process Description of Modification**

The facility is requesting the removal of the PSD avoidance limits for the Plant No. 3 Lamination Assembly Area (Emission Unit ID No. P3LA). Condition Nos. 6.1.7b.vii will be deleted and Condition Nos. 6.2.2 and 6.2.3 will be modified to delete the references to the 71 tpy VOC limit on the Plant No. 3 resin and gel coat operations.

The removal of the VOC limitation in Condition No. 3.2.3 will trigger a major modification to the facility under the "Prevention of Significant Deterioration (PSD)" regulations (40 CFR 52.21). Per the PSD regulations the proposed Plant No. 3 resin and gel coat operations has gone through a technology review to determine the Best Available Control Technology (BACT) and the limits in this permit represent BACT. The facility has submitted a PSD application for the above emission units that include the required modeling and a BACT review.

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### PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1.1 Emission Units Associated with this Permit Amendment

Emission Units			Specific Limitations/Requirements		Air Pollution Control Devices	
Group Code No.	ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P003	P3LA	Plant No. 3 Production Resin/Lamination	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 52.21(j) 40 CFR 63 Subpart VVVV	3.2.1, 3.3.7 through 3.3.10, 3.3.15 through 3.3.17, 3.4.1, 3.4.2, 4.1.3, 5.2.1, 6.1.7, 6.2.1 through 6.2.3, 6.2.12 through 6.2.18, 6.2.21 through 6.2.33, and 6.2.35	P3F1 through P3F6	Dry Fabric Filters
P003	P3GC	Plant No. 3 Gel Coat Operations	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 52.21(j) 40 CFR 63 Subpart VVVV	3.2.1, 3.3.7 through 3.3.10, 3.3.15 through 3.3.17, 3.4.1, 3.4.2, 4.1.3, 5.2.1, 6.1.7, 6.2.1 through 6.2.3, 6.2.12 through 6.2.18, 6.2.21 through 6.2.33, and 6.2.35	P3F1 through P3F6	Dry Fabric Filters
P003	P3EC	Plant No. 3 Equipment Cleaning Operations	40 CFR 52.21(j) 40 CFR 63 Subpart VVVV	3.2.1, 3.3.7, 3.3.12, 3.3.13, 3.3.19, 3.3.20, 4.1.3, 5.2.6, 6.1.7, 6.2.1 through 6.2.3, 6.2.19, 6.2.20, 6.2.22, through 6.2.25, 6.2.27, and 6.2.37	None	None
P003	P3MX	Plant No. 3 Material Mixing Operations (Resins and Gel Coat)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 52.21(j) 40 CFR 63 Subpart VVVV	3.2.1, 3.3.7, 3.3.11, 3.3.18, 3.4.1, 3.4.2, 4.1.3, 5.2.5, 6.1.7, 6.2.1 through 6.2.3, 6.2.22 through 6.2.25, 6.2.26, and 6.2.36	None	None

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

### 3.2 Equipment Emission Caps and Operating Limits

3.2.3 Deleted

**3.3 Equipment Federal Rule Standards**

**Modified Permit Condition**

3.3.9 The Permittee shall use one or both of the following options to meet the emission limit in Condition No. 3.3.8 for the resins and gel coats used in open molding operations:  
[40 CFR 63.5701]

- a. Maximum Achievable Control Technology model point valued averaging (emissions averaging) option.
  - i. Demonstrate that emissions from some or all of the open molding resin and gel coat operations meet the emission limit in Condition No. 3.3.8 using the emission averaging procedures described in Condition No. 6.2.17. Compliance with this option is based on a 12-month rolling average.
  - ii. Those operations and materials not included in the emissions average described in Condition No. 6.2.17 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 3.3.9-1, below. Compliance with this option is based on a 12-month rolling average.

**Table 3.3.9-1**

For this operation-	And this application method-	This weighted-average organic HAP content must not be exceeded
1. Production resin operations	Atomized (spray)	28 percent.
2. Production resin operations	Nonatomized (nonspray)	35 percent.
3. Pigmented gelcoat operations	Any method	33 percent.
4. Clear gelcoat operations	Any method	48 percent.
5. Tooling resin operations	Atomized (spray)	30 percent.
6. Tooling resin operations	Nonatomized (nonspray)	39 percent.
7. Tooling gelcoat operations	Any method	40 percent.

**New Permit Conditions****Prevention of Significant Deterioration (PSD) – 40 CFR 52.21****Standards for Open Molding Resin and Gel Coat Operations**

3.3.15 The Permittee shall not, during any twelve consecutive month period, emit VOCs from open molding resin and gel coat operations present in Plant No. 3 (Group Code No. 3) in amounts equal to or exceeding the VOC limit for the corresponding twelve month period derived from the following equation:

[40 CFR 52.21(j)]

$$\text{VOC Limit} = 46M_R + 159M_{PG} + 291M_{CG} + 54M_{TR} + 214M_{TG} \quad [\text{Equation 2}]$$

Where;

**VOC Limit** = total allowable organic VOC (in kilograms) that can be emitted from the open molding operations

**M<sub>R</sub>** = mass of production resin used (in megagrams) in the past 12 months, excluding any exempt materials

**M<sub>PG</sub>** = mass of pigmented gel coat used (in megagrams) in the past 12 months, excluding any exempt materials

**M<sub>CG</sub>** = mass of clear gel coat used (in megagrams) in the past 12 months, excluding any exempt materials

**M<sub>TR</sub>** = mass of tooling resin used (in megagrams) in the past 12 months, excluding any exempt materials

**M<sub>TG</sub>** = mass of tooling gel coat used (in megagrams) in the past 12 months, excluding any exempt materials

3.3.16 The Permittee shall use one or both of the following options listed below to meet the emission limit in Condition No. 3.3.15 for the resins and gel coats used in open molding operations:

[40 CFR 52.21(j)]

a. Best Available Control Technology model point valued averaging (emissions averaging) option.

i. Demonstrate that emissions from some or all of the open molding resin and gel coat operations meet the emission limit in Condition No. 3.3.15 using the procedures described in Condition No. 6.2.32. Compliance with this option is based on a 12-month rolling average.

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ii. Those operations and materials not included in the emissions average described in Condition No. 6.2.32 must comply with paragraph (b) of this Condition.

b. Compliant materials option.

Demonstrate compliance by using resins and gel coats that meet the VOC content requirements in Table 3.3.16-1. Compliance with this option is based on a 12-month rolling average.

**Table 3.3.16-1**

For this operation-	And this application method-	This weighted-average VOC content must not be exceeded
1. Production resin operations	Atomized (spray)	28 percent.
2. Production resin operations	Nonatomized (nonspray)	35 percent.
3. Pigmented gelcoat operations	Any method	33 percent.
4. Clear gelcoat operations	Any method	48 percent.
5. Tooling resin operations	Atomized (spray)	30 percent.
6. Tooling resin operations	Nonatomized (nonspray)	39 percent.
7. Tooling gelcoat operations	Any method	40 percent.

3.3.17 The following materials are exempt from the open molding emission limit set forth by the equation in Condition No. 3.3.15:  
[40 CFR 52.21(j)]

- a. 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 life boats, 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.
- b. 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.
- c. 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 the facility on a 12-month rolling-average basis.

**Standards for Resin and Gel Coat Mixing Operations**

- 3.3.18 The Permittee shall, for all resin and gel coat mixing operations for Plant No. 3 (Group Code P003), equip all 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, with covers that have no visible gaps between the cover and the body of the mixing container. These covers shall be in place during all mixing operations, except while material is being manually added or removed from the mixing vessel, or when mixing or pumping equipment is being placed in or removed from a mixing vessel.  
[40 CFR 52.21(j)]

**Standards for Resin and Gel Coat Application Equipment Cleaning Operations**

- 3.3.19 For routine flushing of resin and gel coat application equipment (e.g. spray guns, flowcoaters, brushes, rollers, and squeegees) for Plant No. 3 Equipment Cleaning Operations (Emission Unit ID No. P3EC), the Permittee shall use a cleaning solvent that contains no more than 5 percent VOC by weight. For removing cured resin or gel coat from application equipment, no VOC content limit applies. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.  
[40 CFR 52.21(j)]
- 3.3.20 The Permittee shall store organic VOC-containing solvents used for removing cured resin or gel coat for Plant No. 3 Equipment Cleaning Operations (Emission Unit ID No. P3EC) 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. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.  
[40 CFR 52.21(j)]

**PART 4.0 REQUIREMENTS FOR TESTING**

**4.1 General Testing Requirements**

**Modified Permit Condition**

4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

- a. Method 1 for sample point locations,
- b. Method 2 for the determination of flow rate,
- c. Method 3 for the determination of stack gas molecular weight,
- d. Method 4 for the determination of stack moisture,
- e. Method 5 or 5T, as applicable, for the determination of particulate matter emissions,
- f. Method 9 and the procedures of Section 1.3 for the determination of the opacity of emissions, and
- g. Method 24 for the determination of volatile matter content, water content, density, volume solids, and weight solids in surface coatings,
- h. Method 25 for the determination of total gaseous nonmethane organic emissions as carbon,
- i. Method 311 for the determination of hazardous air pollutant content.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**

**5.1 General Monitoring Requirements**

**Modified Permit Condition**

5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.  
[391-3-1-.02(6)(b)1]

**5.2 Specific Monitoring Requirements**

**Modified Permit Condition**

5.2.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement if the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) to the Division's monitoring requirements.  
[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]

- a. The pressure drop across Air Pollution Control Device ID Nos. P1DF, P1HF, P2PF, P3F1 through P3F6, P4GF, P5DF, and P5HF shall be recorded at least once per shift that the respective production area (Emission Unit ID Nos. P1DB, P1HB, P2PB, P3LA, P3GC, P4GB, P5DB, and P5HB) is in operation.

**New Permit Conditions**

5.2.5 The Permittee shall demonstrate compliance with the work practice standard of Condition No. 3.3.18 by conducting a visual inspection of all mixing containers subject to the provisions of Condition No. 3.3.18 at least once per month. This inspection shall ensure that all affected 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), 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1]

5.2.6 The Permittee shall demonstrate compliance with the work practice standard of Condition No. 3.3.20 by conducting a visual inspection of all containers storing VOC-containing solvents used for removing cured resin and gel coat subject to the provisions of Condition No. 3.3.20 at least once per month. This inspection shall ensure that all affected containers have covers with no visible gaps between the cover and the container.  
[40 CFR 63.5737, 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1]

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements****Modified Permit Condition**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
  - i. None required to be reported in accordance with Condition 6.1.4.
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
  - i. Any VOC emissions from Emission Unit Group Nos. P001, P002, P003, and P004, combined, equal to or exceeding 249 tons per any twelve consecutive month period.
  - ii. Any VOC emissions from Emission Unit Group No. P005 equal to or exceeding 150 tons per any twelve consecutive month period.
  - iii. Deleted.
  - iv. Deleted.
  - v. Deleted.
  - vi. Deleted.
  - vii. Deleted.
  - viii. Any 12 consecutive calendar month period during which the total HAP emissions exceed the value specified by the equation in Condition No. 3.3.8.
  - ix. If using Condition No. 3.3.9(b) to demonstrate compliance with Condition No. 3.3.8, any 12 month rolling total HAP usage that results in the exceedance of the limits in Table 3.3.9-1.

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- x. Any use of cleaning solvents in flush cleaning operations for resin and gel coat application equipment (e.g. spray guns, flowcoaters, brushes, rollers, and squeegees) with a HAP content greater than 5 percent, by weight.
  - xi. Any use of carpet or fabric adhesives with a HAP content greater than 5 percent, by weight.
  - xii. Any use of resin or gel coat mixing vessels of capacity equal to or greater than 208 liters (55 gallons) that are not equipped with covers.
  - xiii. Any instance when organic HAP-containing solvents used for removing cured resins or gel coats are not stored in a covered container.
  - xiv. Any instance when an organic HAP-containing solvent used for removing cured resins or gel coat is stored in a container with a capacity greater than 7.6 liters and the distance from the top of the container to the liquid surface is less than 0.75 times the diameter of the container.
  - xv. Any twelve-month rolling total VOC emissions for Plant No. 3 equal to or exceeding the value calculated from the equation in Condition No. 3.3.15.
  - xvi. If using Condition No. 3.3.16(b) to demonstrate compliance with Condition No. 3.3.15, any 12 month rolling total VOC usage for Plant No. 3, which results in the exceedance of the limits in Table 3.3.16-1.
  - xvii. Any use of cleaning solvents in flush cleaning operations for resin and gel coat application equipment in Plant No. 3 (e.g. spray guns, flowcoaters, brushes, rollers, and squeegees) with a VOC content greater than 5 percent.
  - xviii. Any instance when organic VOC-containing solvents used for removing cured resins or gel coat in Plant No. 3 Equipment Cleaning Operations (Emission Unit ID No. P3EC) is not stored in a covered container.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
- i. Any two consecutive pressure drop readings across any of the filter systems (Air Pollution Control Device ID Nos. P1DF, P1HF, P2PF, P3F1 through P3F6, P3SF, P4GF, P5DF, and P5HF) that are equal to or above 1.75 inches of water column.
  - ii. Any failure to perform inspections of Air Pollution Control Device ID Nos. CDC1, CFB3, CFB4, and CFB5 as specified in Condition No. 5.2.2.

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- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
  - i. Any failure to perform the visual inspection of mixing vessels meeting the criteria of Condition No. 3.3.11, in accordance with Condition No. 5.2.3.
  - ii. Any failure to perform the visual inspection of HAP-containing solvent storage containers meeting the criteria of Condition No. 3.3.13, in accordance with Condition No. 5.2.4.
  - iii. Any failure to perform the visual inspection of mixing vessels meeting the criteria of Condition No. 3.3.18, in accordance with Condition No. 5.2.5.
  - iv. Any failure to perform the visual inspection of VOC-containing solvent storage containers meeting the criteria of Condition No. 3.3.20, in accordance with Condition No. 5.2.6.

**6.2 Specific Record Keeping and Reporting Requirements**

**Modified Permit Conditions**

6.2.2 The Permittee shall use the monthly usage records required in Condition No. 6.2.1 to calculate total monthly volatile organic compound emissions from Emission Unit Group Nos. P001, P002, P003, and P004. The procedures specified in Appendix H of the Georgia Department of Natural Resources **Procedures for Testing and Monitoring Sources of Air Pollutants** shall be used to calculate VOC emissions from the facility's manufacturing processes (Emission Unit ID Nos. P1DB, P1HB, P1LA, P3LA, P3GC, RDML, P4GB, and P4LA). The following equations shall be used to calculate VOC emissions from all other operations (Emission Unit ID Nos. P1WB, P2PB, and P3WB):

- a. VOC (lbs) = Material used (lbs) \* (% weight VOC/100); or
- b. VOC (lbs)= Material used (gallons) \* (VOC Content lbs/gallon)

The Permittee shall notify the Division in writing if volatile organic compound emissions from Emission Unit Group Nos. P001, P002, P003, and P004 exceed 20.75 tons or during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limits in Condition No. 3.2.1. All calculations should be kept as part of the monthly record. These records shall be kept available for inspection or submittal for five years from the date of record. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.3 The Permittee shall use the calculations required by Condition No. 6.2.2 to determine the twelve month rolling total VOC emissions from Emission Unit Group Nos. P001, P002, P003, and P004 for each month. The Permittee shall notify the Division in writing if the volatile organic compound emissions for any twelve consecutive month period exceed 249 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit specified in Condition No. 3.2.1. All calculations should be kept as part of the monthly record. These records shall be kept available for inspection or submittal for five years from the date of record. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.18 When filled resins are used, the Permittee shall demonstrate compliance by one of the following methods:  
[40 CFR 63.5714]

- a. Compliance is demonstrated for the filled material on an as-applied basis using the following equation:

$$PV_F = PV_U * \frac{100 - \% \text{ Filler}}{100}$$

Where,

**PV<sub>F</sub>** = The as-applied MACT model point value for a filled production resin or tooling resin (in kilograms organic HAP per megagram of filled material).

**PV<sub>U</sub>** = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 6.2.17-1.

**%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<sub>F</sub>** calculated in paragraph (a) of this Condition 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<sub>F</sub>** calculated in paragraph (a) of this Condition 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 emission averaging procedure described by Condition No. 6.2.17, then use the value of **PV<sub>F</sub>** calculated in paragraph (a) of this Condition for the value of **PV<sub>i</sub>** in the equation in Condition No. 6.2.17(a)(ii).

6.2.27 The Permittee shall maintain records of the inspections required by and conducted according to Condition No. 5.2.4. The information gathered during the inspection, the date and time of the inspection, and any repairs to the covers subsequent to the inspection shall be kept in a logbook, suitable for inspection by or submittal to the Division, for no less than five (5) years from the date of record.  
[40 CFR 63.5737(c)]

**New Permit Conditions**

**Plant No. 3 Recordkeeping for BACT Limitations [40 CFR 52.21(j)]**

- 6.2.28 The Permittee shall maintain the following records for all of the materials that are exempted from the open molding emission limit in Condition No. 3.3.15.  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. A record of all production resins (including skin coat resins), applied with non atomizing (non-spray) resin application equipment, 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 life boats, 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.
  - b. A record of all pigmented, clear, and tooling gel coat used for part or mold repair and touch up, including calculations demonstrating that the total amount of gel coat materials exempted does not exceed 1 percent by weight of all the gel coat used at the facility on a 12-month rolling-average basis.
  - c. A record of all pure, 100 percent vinylester resin used for skin coats, including calculations demonstrating that the amount of 100 percent vinylester resin exempted does not exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis.
- 6.2.29 For those open molding operations and materials complying using the emissions averaging option, the Permittee shall demonstrate compliance by performing the following steps:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. Use the methods specified in Condition No. 4.1.3 and/or MSDS's, supplier information, etc. to determine the VOC content of resins and gel coats.
  - b. Complete the calculations described in Condition No. 6.2.32 to show that the VOC emissions do not exceed the limit specified in Condition No. 3.3.15.
  - c. Keep the following records for each resin and gel coat:
    - i. Volatile organic compound content.
    - ii. Amount of material used per month.
    - iii. Application method used for production resin and tooling resin. This record is not required of all production resins and tooling resins that are applied with nonatomized technology.
    - iv. Calculations performed to demonstrate compliance based on BACT model point values, as described in Condition No. 6.2.32.

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6.2.30 For each open molding operation complying with the compliant materials option, the Permittee shall demonstrate compliance by maintaining the following records for each resin and gel coat:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Volatile organic compound content.
- b. 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.
- c. Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the VOC content requirements.

6.2.31 If the Permittee is using Condition No. 3.3.16b to demonstrate compliance with Condition No. 3.3.15, then the following should be performed:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. The Permittee shall demonstrate compliance using the VOC content requirements listed in Table 3.3.16-1 based on a 12-month rolling-average that is calculated at the end of every month. The first 12-month rolling-average period begins upon the issuance of this permit amendment. If filled material (production resin or tooling resin) is used, compliance will be assessed according to the procedure described in Condition No. 6.2.33.
- b. At the end of the twelfth month after the applicable compliance date and at the end of every subsequent month, the Permittee shall review the VOC 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 VOC contents no greater than the applicable VOC content limits in Table 3.3.16-1, then the operation is in compliance with the emission limit specified in Condition No. 3.3.15 for that 12-month period. In addition, the Permittee does not need to complete the weighted-average VOC content calculation contained in paragraph (c) of this Condition for that operation.
- c. At the end of every month, the Permittee shall use the following equation to calculate the weighted-average VOC content for all resins and gel coats used in each operation in the past 12 months.

$$WA_{VOC} = \frac{\sum_{i=1}^n M_i VOC_i}{\sum_{i=1}^n M_i}$$

Where,

**WA<sub>VOC</sub>** = Weighted-average VOC content percent.

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

$VOC_i$  = VOC 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 No. 4.1.3 and/or MSDS's, supplier information, etc. to determine the VOC content.

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

- d. The Permittee is in compliance with the VOC emissions limit in Condition No. 3.3.15 if all the resins and gel coats used in an operation have VOC contents no greater than those specified in Table 6.2.31-1 or if the weighted-average VOC content, calculated in Condition No. 6.2.31c, does not exceed the applicable VOC content limit in Table 6.2.31-1.

**Table 6.2.31-1**

For this operation...	And this application method...	The Permittee must not exceed this weighted-average VOC content requirement...
1. Production resin operations	a. Atomized (spray) b. Nonatomized (nonspray)	i. 28 percent ii. 35 percent
2. Pigmented gel coat operations	a. Any method	i. 33 percent
3. Clear gel coat operations	a. Any method	i. 48 percent
4. Tooling resin operations	a. Atomized (spray) b. Nonatomized (nonspray)	i. 30 percent ii. 39 percent
5. Tooling gel coat operations	a. Any method	i. 40 percent

- 6.2.32 The Permittee shall, when demonstrating compliance with the VOC emission limits in Condition No. 3.3.15 by using the BACT Model Point Value Averaging Option based on a 12-month rolling average (as specified in Condition No. 3.3.16(a)), perform the following steps:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. At the end of each month, calculate the BACT model point value,  $BV_i$ , for each resin and gel coat used in each operation in the past twelve months using Table 6.2.32-1.

**Table 6.2.32-1**

Operation Type	Application Method	Formula to calculate BV <sub>i</sub> for each resin and gel coat
Production resin, tooling resin	a. Atomized b. Atomized, plus vacuum bagging with roll-out c. Atomized, plus vacuum bagging without roll-out d. Nonatomized e. Nonatomized, plus vacuum bagging with roll-out f. Nonatomized, plus vacuum bagging without roll-out	0.014 x (Resin VOC %) <sup>2.425</sup> 0.01185 x (Resin VOC %) <sup>2.425</sup> 0.00945 x (Resin VOC %) <sup>2.425</sup> 0.014 x (Resin VOC %) <sup>2.275</sup> 0.0110 x (Resin VOC %) <sup>2.275</sup> 0.0076 x (Resin VOC %) <sup>2.275</sup>
Pigmented gel coat, clear gel coat, tooling gel coat	All methods	0.445 x (Gel coat VOC %) <sup>1.675</sup>

- b. At the end of every month, the Permittee shall use the following equation to compute the weighted-average BACT model point value for each open molding resin and gel coat operation included in the average.

$$BV_{OP} = \frac{\sum_{i=1}^n M_i BV_i}{\sum_{i=1}^n M_i}$$

Where,

**BV<sub>OP</sub>** = Weighted-average BACT model point value for each open molding operation (**BV<sub>R</sub>**, **BV<sub>PG</sub>**, **BV<sub>CG</sub>**, **BV<sub>TR</sub>**, and **BV<sub>TG</sub>**) included in the average (in kilograms of VOC per megagram of material applied).

**M<sub>i</sub>** = Mass of resin or gel coat **i** used within an operation in the past 12 months (in megagrams).

**n** = The number of different open molding resins and gel coats used within an operation in the past 12 months.

**BV<sub>i</sub>** = The BACT model point value for resin or gel coat **i** used within an operation in the past 12 months (in kilograms of VOC per megagram of material applied).

The Permittee shall use the equations in Table 6.2.32-1 to calculate the BACT model point value (**BV<sub>i</sub>**) for each resin and gel coat used in each operation in the past 12 months.

- c. The Permittee shall calculate VOC emissions from resin and gel coat operations each month using the equation below for all resins and gel coat that:

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- i. Are not exempt from the emission standard of Condition No. 3.3.15 pursuant to the provisions of Condition No. 3.3.17; and
- ii. Are not demonstrating compliance with the emission standard of Condition No. 3.3.15 through the compliant materials option pursuant to Condition No. 3.3.16b.

$$\text{VOC Emissions} = \text{BV}_R\text{M}_R + \text{BV}_{PG}\text{M}_{PG} + \text{BV}_{CG}\text{M}_{CG} + \text{BV}_{TR}\text{M}_{TR} + \text{BV}_{TG}\text{M}_{TG}$$

Where,

**VOC Emissions** = VOC emission calculated using BACT model point values for each operation included in the average (in kilograms).

**BV<sub>R</sub>** = Weighted-average BACT model point value for production resin used in the past 12 months (in kilograms per megagram).

**M<sub>R</sub>** = Mass of production resin used in the past 12 months (in megagrams).

**BV<sub>PG</sub>** = Weighted-average BACT model point value for pigmented gel coat used in the past 12 months (in kilograms per megagram).

**M<sub>PG</sub>** = Mass of pigmented gel coat used in the past 12 months (in megagrams).

**BV<sub>CG</sub>** = Weighted-average BACT model point value for clear gel coat used in the past 12 months (in kilograms per megagram).

**M<sub>CG</sub>** = Mass of clear gel coat used in the past 12 months (in megagrams).

**BV<sub>TR</sub>** = Weighted-average BACT model point valued for tooling resin used in the past 12 months (in kilograms per megagram).

**M<sub>TR</sub>** = Mass of tooling resin used in the past 12 months (in megagrams).

**BV<sub>TG</sub>** = Weighted-average BACT model point value for tooling gel coat used in the past 12 months (in kilograms per megagram).

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$M_{TG}$  = Mass of tooling gel coat used in the past 12 months (in megagrams).

- d. The Permittee is in compliance with the VOC emission limit if the actual emissions calculated in Condition No. 6.2.32a.iii are less than the HAP emission limit calculated in Condition No. 3.3.15.

6.2.33 If filled resins are used, the Permittee shall demonstrate compliance by the following: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Compliance is demonstrated for the filled material on an as-applied basis using the following equation:

$$BV_F = BV_U * \frac{100 - \% \text{Filler}}{100}$$

Where,

$BV_F$  = The as-applied BACT model point value for a filled production resin or tooling resin (in kilograms VOC per megagram of filled material).

$BV_U$  = The BACT model point value for the neat (unfilled) resin, before filler is added.

$\% \text{Filler}$  = 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  $BV_F$  calculated in paragraph (a) of this Condition does not exceed 46 kilograms of VOC 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  $BV_F$  calculated in paragraph (a) of this Condition does not exceed 54 kilograms of VOC per megagram of filled resin applied, then the filled resin is in compliance.
- d. If filled resins are included in the emission averaging procedure outlined in Condition No. 6.2.32a then use the equation in paragraph (a) of this Condition for the value of  $BV_i$  in the equation in Condition No. 6.2.32a.ii.

6.2.34 The Permittee shall demonstrate compliance with Condition No. 3.3.19 by the following: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Determine and record the VOC content of the cleaning solvents subject to the standards specified in Condition No. 3.3.19 using the methods specified in Condition No. 4.1.3 and/or MSDS's, supplier information, etc.

- b. If cleaning solvents are recycled on-site, the Permittee may use documentation from the solvent manufacturer or supplier or a measurement of the VOC content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the condition in Condition No. 4.1.3 and/or MSDS's, supplier information, etc for demonstrating compliance with the VOC content limits.

6.2.35 The Permittee shall keep the following records for the facility for a period of no less than five (5) years from the date of record: The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gelcoat used per month and the weighted-average VOC contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the amounts of each applied by atomized- and non-atomized methods must be recorded.  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

**Work Practice Standard Compliance Record Keeping**

6.2.36 The Permittee shall maintain records of which mixing containers are subject to the provisions of Condition No. 3.3.18 and the inspections required by and conducted according to Condition No. 5.2.5. The information gathered during the inspection, the date and time of the inspection, and any repairs to the covers or mixing containers subsequent to the inspection shall be kept in a logbook, suitable for inspection by or submittal to the Division, for no less than five (5) years from the date of record.  
[40 CFR 63.5731(d)]

6.2.37 The Permittee shall maintain records of the inspections required by and conducted according to Condition No. 5.2.6. The information gathered during the inspection, the date and time of the inspection, and any repairs to the covers subsequent to the inspection shall be kept in a logbook, suitable for inspection by or submittal to the Division, for no less than five (5) years from the date of record.  
[40 CFR 63.5737(c)]

**PART 7.0 OTHER SPECIFIC REQUIREMENTS**

**7.4 Insignificant Activities Associated with this Amendment**

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

**7.5 Temporary Sources Associated with this Amendment**

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

None associated with Plant No. 3.

**7.6 Short-term Activities Associated with this Amendment**

(see Section 4.40 of Permit application and White Paper #1)

None associated with Plant No. 3.

**7.14 Specific Conditions Associated with this Amendment**

None applicable.

**Attachments**

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups



## Title V Permit Amendment

### ATTACHMENT B

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

#### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Mobile Sources</b>	1. Cleaning and sweeping of streets and paved surfaces	
<b>Combustion Equipment</b>	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:  i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.  ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.  iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning:  i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators; ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year. iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year. iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
<b>Trade Operations</b>	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	
<b>Maintenance, Cleaning, and Housekeeping</b>	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

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### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Laboratories and Testing</b>	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
<b>Pollution Control</b>	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act..	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
<b>Industrial Operations</b>	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour: <ul style="list-style-type: none"> <li>i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.</li> <li>ii) Porcelain enameling furnaces or porcelain enameling drying ovens.</li> <li>iii) Kilns for firing ceramic ware.</li> <li>iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.</li> <li>v) Bakery ovens and confection cookers.</li> </ul>	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: <ul style="list-style-type: none"> <li>i) Activity is performed indoors; &amp;</li> <li>ii) No significant fugitive particulate emissions enter the environment; &amp;</li> <li>iii) No visible emissions enter the outdoor atmosphere.</li> </ul>	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

## Title V Permit Amendment

Chaparral Boats, Inc.

Permit No.: 3732-019-0003-V-02-3

### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Storage Tanks and Equipment</b>	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

### INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
None Associated with the resin and gel coat operations for Plant No. 3	

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### ATTACHMENT B (continued)

### GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
None Applicable Associated with this permit amendment				

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	0
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	5 <sup>1</sup>
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	4 <sup>2</sup>

- 1 Spaces heaters
- 2 Hanging furnaces