

Facility Name: **Seminole Marine, Inc.**
 City: Cairo
 County: Grady
 AIRS #: 04-13-131-00021

Application #: TV-16127
 Date Application Received: March 29, 2005
 Permit No: 3732-131-0021-V-02-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Seminole Marine, Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

Seminole Marine, Inc.

2. Parent/Holding Company Name

Seminole Marine, Inc.

3. Previous and/or Other Name(s)

Sailfish Boats

4. Facility Location

2501 Milestone Industrial Park
Cairo, GA 31728
Grady County

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area (Grady County) for ground level ozone and all other criteria pollutants.

6. Class I Area Impacts

The facility is located within 100 km of the St. Marks Wilderness Area in Florida.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3732-131-0021-V-01-0	September 29, 2000	Initial Title V permit for the operation of a fiberglass boat manufacturing facility
3732-131-0021-V-01-1	September 15, 2004	Title V Amendment for the insertion of 40 CFR 63 Subpart VVVV requirements

D. Process Description

1. SIC Codes(s)

3732 – Boat Building and Repairing

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures fiberglass pleasure boats from 16 to 28 feet in length.

3. Overall Facility Process Description

The facility manufactures fiberglass pleasure boats from 16 to 28 feet in length. In the gel coat booth the molds (hulls) are cleaned and waxed, and a layer of gel coat is sprayed on the molds and is allowed to cure. A thin layer of resin (skin coat) is then applied over the first layer of gel coat. The skin coat aids in the adhesion of the gel coat to the resin. The boat hulls then enter the lamination process. Layers of unfilled resin, chopped fiberglass strands, and glass mat are applied to the bottom and the sides of the boat. Usually several layers of resin/fiberglass make up the laminate. The molded piece is then removed from the mold and trimmed in the grind booth. Filled resin is applied, and then foam is applied to the sides and corners of the boat hull. The boat deck and hulls are then assembled through the application of a polyester putty containing styrene, and the motor and all necessary wiring and furniture are installed. Small fiberglass parts are formed in the small parts gel coat booth and lamination area. No wood coating operations are performed at the facility - just installation. The facility produces about 900 boats per year.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a minor source under PSD. Potential VOC emissions do not exceed the annual PSD threshold of 250 tons per year (tpy) but are greater than the major source threshold of 100 tpy. The facility was previously subject to a VOC emission limit of 100 tpy in order to keep VOC emission fees low, but the facility has requested that the VOC emission limit be increased to 250 tpy to allow for an increase in production; however, to keep ground level concentrations below the acceptable ambient concentration for styrene, a VOC emission limit of 140 tpy has been given instead.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	yes			✓
PM ₁₀	yes			✓
SO ₂	n/a			
VOC	yes	✓		
NO _x	n/a			
CO	n/a			
TRS	n/a			
H ₂ S	n/a			
Individual HAP	yes	✓		
Total HAPs	yes	✓		

3. MACT Standards

40 CFR Part 63 Subpart VVVV,
 “National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing”

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

The facility has an emission cap of 140 tpy of VOC. Potential VOC emissions do not exceed the annual PSD threshold of 250 tons per year (tpy) but are greater than the major source threshold of 100 tpy. The facility was previously subject to a VOC emission limit of 100 tpy in order to keep VOC emission fees low, but the facility requested that the VOC emission limit be increased to 250 tpy to allow for increases in production; however, to keep ground level concentrations below the acceptable ambient concentration for styrene, a VOC emission limit of 140 tpy has been given instead.

A toxic impact assessment was performed to determine if the facility's requested VOC emission limit of 250 tpy could be emitted from the facility as styrene while keeping the maximum ground level concentration (MGLC) of styrene below the acceptable ambient concentration (AAC). The styrene emissions are emitted from the lamination building through five 4 ft x 4 ft outlets on the south side of the building (long side), centered at 5 ft above the ground, and through two 4 ft x 4 ft outlets on the east side of the building (short side), centered at 4 ft above the ground. The south side of the building (long side) is 300 ft (91.44 m) from the property line, and the east side of the building (short side) is 444 ft (135.33 m) from the property line. To be conservative, a distance of 90 m was used as the minimum distance to the property line for both the long and short sides of the building.

It was estimated that 75% of the total styrene emissions are emitted from the long side of the building, which has 5 outlets venting from areas containing 3 gel coat guns, 5 chop guns, 2 foam guns, a spray core gun, and the grinding area, and 25% of the total styrene emissions are emitted from the short side of the building, which has 2 outlets venting from an area containing 2 gel coat guns and 1 chop gun. This distribution of styrene emissions was roughly estimated based on the number of gel coat and chop guns on each side of the building, 8 guns on the long side and 3 guns on the short side. For modeling purposes, a total of 4 lbs/hr of styrene emissions were used, with 3 lbs/hr (75%) styrene being emitted from the long side of the building, and 1 lb/hr (25%) styrene being emitted from the short side of the building.

To be conservative, the facility was modeled as a volume source in two separate toxic models, one for each side of the building. The maximum ground level concentrations from each model were added together to give a 1-hour concentration of 1.55931 mg/m³, at a total emission rate of 4 lbs/hr styrene. This concentration was converted to an annual average concentration by multiplying the 1-hour concentration by the multiplying factor 0.08, giving an annual average concentration of 0.125 mg/m³ at a total emission rate of 4 lbs/hr styrene. The 15-minute average concentration was also determined by multiplying the 1-hour concentration by the multiplying factor 1.32, giving a 15-minute concentration of 2.06 mg/m³ at an emission rate of 4 lbs/hr styrene.

The reference concentration (RfC) for styrene is 1.00 mg/m³, which is an annual average; therefore, the annual acceptable ambient concentration (AAC) for styrene is also 1.00 mg/m³.

Dividing the annual AAC by the annual average concentration ($1.00 \text{ mg/m}^3 \div 0.125 \text{ mg/m}^3$) gives a value of 8, so 8 times the emission rate used to determine the annual average concentration of 0.125 mg/m^3 (i.e., 4 lbs/hr styrene) can be emitted from the facility without exceeding the annual AAC. Therefore, 8 times 4 lbs/hr styrene equals 32 lbs/hr styrene. Multiplying 32 lbs/hr styrene by 8,760 hrs/yr gives 280,320 lbs/yr styrene, which equals 140.16 tons/yr styrene. Based on the results of this conservative toxic impact assessment model, the requested VOC emission limit of 250 tpy will exceed acceptable concentrations and will not be allowed; however, Seminole Marine can emit up to 140 tpy of styrene (VOC) and keep the MGLC below the annual AAC for styrene.

The ceiling limit for styrene is 852 mg/m^3 (200 ppm, according to OSHA standards), which is divided by a safety factor of 10 to give a 15-minute AAC of 85.2 mg/m^3 . Dividing the 15-minute AAC by the 15-minute average concentration ($85.2 \text{ mg/m}^3 \div 2.06 \text{ mg/m}^3$) gives a value of 41.4, so 41.4 times the emission rate used to determine the 15-minute average concentration of 2.06 mg/m^3 (i.e., 4 lbs/hr styrene) can be emitted from the facility without exceeding the 15-minute AAC. The annual AAC is therefore the limiting factor, limiting emissions to only 8 times the modeled emission rate (4 lbs/hr styrene), as opposed to the 15-minute AAC limiting emissions to 41.4 times the modeled emission rate. The facility's VOC emissions must be limited to 140 tpy to keep ground level concentrations below the annual AAC for styrene.

The facility already has a 100 tpy VOC emission limit, but based on the annual AAC the facility will be able to increase its VOC emission limit to 140 tpy with the impact from the styrene emissions remaining insignificant.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

The facility received a letter of noncompliance, dated April 14, 2005, for using a carpet adhesive with greater than 5% HAP, which violates Condition No. 3.3.8 of the permit, and also for calculating VOC rolling total emissions incorrectly. These issues were discovered during an unannounced inspection on March 16, 2005. The facility has since begun using a compliant adhesive and their compliance engineer will check their VOC emission calculations during the next inspection in fiscal year 2006.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition No. 2.1.1 limits VOC emissions from the facility to 140 tons during any twelve consecutive months. The emission cap was increased from 100 tpy to 140 tpy so that production can be increased.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility manufactures fiberglass pleasure boats from 16 to 28 feet in length. In the gel coat booth the molds (hulls) are cleaned and waxed, and a layer of gel coat is sprayed on the molds and is allowed to cure. A thin layer of resin (skin coat) is then applied over the first layer of gel coat. The skin coat aids in the adhesion of the gel coat to the resin. The boat hulls then enter the lamination process. Layers of unfilled resin, chopped fiberglass strands, and glass mat are applied to the bottom and the sides of the boat. Usually several layers of resin/fiberglass make up the laminate. The molded piece is then removed from the mold and trimmed in the grind booth. Filled resin is applied, and then foam is applied to the sides and corners of the boat hull. The boat deck and hulls are then assembled through the application of a polyester putty containing styrene, and the motor and all necessary wiring and furniture are installed. Small fiberglass parts are formed in the small parts gel coat booth and lamination area. No wood coating operations are performed at the facility - just installation. The facility produces about 900 boats per year.

The facility utilizes a gel coat spray booth (Emission Unit ID No. GC01) and a small parts gel coat spray booth (Emission Unit ID No. SG01) for the application of the various gel coats. The facility utilizes a laminate spray resin system (Emission Unit ID No. LR01) and a small parts laminate spray resin system (Emission Unit ID No. SL01) for the application of the resin skin coat and lamination layers. Non-atomized spray guns are used in the gel coat operations and non-atomized flow coat spray guns are used in the resin operations. The hull trimming and grinding is performed in the grind booth (Emission Unit ID No. GR01). The deck and hull bonding operation (Emission Unit ID No. PP01) occurs in the assembly building through the application of a polyester putty. The emissions from the resin, gel coat, and polyester putty operations will be styrene (VOC/HAP). The foam operation will emit trace amounts of isocyanate. There will be very minor amounts of particulate emissions from the grind booth. All of the operations above take place in an enclosed building. The gel coat booth has a fiberglass filter (Air Pollution Control Device ID No. FE01) and the small parts gel coat booth has two fiberglass filters (Air Pollution Control Device ID Nos. FE08 and FE09) to control any over spray from the gel coat. The emissions from the lamination resin operations vent out of four exhaust fans that are equipped with fiberglass filters (Air Pollution Control Device ID Nos. FE02, FE03, FE04, and FE05). The small parts lamination area vents to two fiberglass filters (Air Pollution Control Device ID Nos. FE10 and FE11) to control particulate emissions. The grind booth has two fiberglass filters (Air Pollution Control Device ID No. FE06 and FE07) to control any particulate emissions. All filters are required to be changed out at least once per week.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
GC01	Gel Coat Spray Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	FE01	Fugitive Emission Filter #1
LR01	Lamination Spray Resin Operation	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	FE02, FE03, FE04, FE05	Fugitive Emission Filters #2, #3, #4, #5
SG01	Small Parts Gel Coat Spray Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	FE08, FE09	Fugitive Emission Filters #8, #9
SL01	Small Parts Lamination Spray Resin Operation	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	FE10, FE11	Fugitive Emission Filters #10, #11
GR01	Grind Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	FE06, FE07	Fugitive Emission Filters #6, #7
PP01	Polyester Putty Operation	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	None

C. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

40 CFR Part 63 Subpart VVVV applies to the operations at the facility. Regulatory applicability for Subpart VVVV is triggered when a facility is primarily engaged in the manufacture of fiberglass boats and is a major source for HAP emissions.

40 CFR Part 63 Subpart VVVV allows the affected facility to use several different compliance techniques. Affected facilities may use compliant materials and/or a series of equations to determine emissions and average them over a rolling 12-month period. Subpart VVVV also imposes different work practice standards on each of the operations that are involved in the manufacture of fiberglass boats.

Georgia Air Quality Rule 391-3-1-.02(2)(b) applies to all facilities operating in the state of Georgia that are subject to at least one other Georgia Air Quality Rule.

Georgia Air Quality Rule 391-3-1-.02(2)(e) applies to all facilities operating in the state of Georgia that engage in some sort of manufacturing operation.

D. Compliance Status

See Section II(C).

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition No. 3.3.1 requires that the Permittee comply with all applicable requirements of 40 CFR Part 63 Subpart VVVV as they apply to open molding resin and gel coat operations, closed molding resin operations, resin and gel coat mixing operations, carpet and fabric adhesive operations, and aluminum deck and hull coating operations.

Condition Nos. 3.3.2 through 3.3.8 establish the emission limits, compliance options, and work practice standards of 40 CFR Part 63, Subpart VVVV.

Condition No. 3.3.2 presents the equation that the Permittee must use to determine the HAP emissions limit from all open molding operations at the facility. This equation is based on the amount of resins and other materials used during the corresponding 12-month period.

Condition No. 3.3.3 presents two methods of complying with the emission limit of Condition No. 3.3.2. One method is to use the equation presented in Condition No. 6.2.8, to demonstrate that the emissions from all operations and materials that are not using the compliant materials option meet the emission limit calculated in Condition No. 3.3.2. The second method is to demonstrate that some or all of the materials meet the weighted-average HAP content requirements of Table 2 of Subpart VVVV (Table 6.2.9-1 of the permit).

Condition No. 3.3.4 gives a list of materials that are exempt from the HAP emission limit in Condition No. 3.3.2. These materials include those that are used in the fabrication of military or Coast Guard vessels or that are regulated under 46 CFR Subchapter Q or T, gel coats used for touch-up operations provided that the amount of touch-up gel coat does not exceed 1 percent of all gel coat used at the facility, and resins that are composed of 100 percent vinylester resins.

Table 3.3.3-1 in Condition No. 3.3.3 in Title V Permit Amendment No. 3732-131-0021-V-01-1 was eliminated because the same table is already present in Condition No. 6.2.10 (which is renumbered as Condition 6.2.9 in this permit).

Condition No. 3.3.5 requires that all mixing vessels that exceed 208 liters in size be equipped with covers that are to be in place at all times except when adding or removing material.

Condition No. 3.3.6 limits the organic HAP content of all solvents used for flush cleaning resin and gel coat application equipment to five percent or less, by weight.

Condition No. 3.3.7 requires that the Permittee store all solvents used to remove cured resin and gel coat in closed containers and, for containers with a capacity greater than 7.6 liters, limits the distance from the top of the container to the surface of the liquid to no less than 0.75 times the diameter of the container.

Condition No. 3.3.8 limits the organic HAP content of fabric and carpet adhesives to five percent or less, by weight.

Condition No. 3.4.1 subjects all of the emission units listed in the table in Section 3.1 to Rule (b), which limits the opacity.

Condition No. 3.4.2 subjects all of the emission units listed in the table in Section 3.1 to Rule (e), which limits the rate of PM emissions.

Condition No. 3.5.1 requires filter changes on the gel coat and lamination booths and the grind booth.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements**1. Individual Equipment**

None applicable.

2. Equipment Groups (all subject to the same test requirements):

None applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

1. Individual Equipment:

None applicable.

2. Equipment Groups (all subject to the same monitoring requirements):

Condition No. 5.2.1 requires the Permittee to inspect, at least once per month, all resin and gel coat mixing vessels subject to the requirements of Condition No. 3.3.5 to ensure that there are no cracks between the cover and the container or between the cover and any equipment passing through the cover, as required by 40 CFR Part 63, Subpart VVVV. Records of the inspections are also required.

Condition No. 5.2.2 requires the Permittee to inspect, at least once per month, all containers storing HAP-containing solvents used for removing cured resin and gel coat that are subject to Condition No. 3.3.7 to ensure that the containers have covers with no visible gaps between the cover and the container, as required by 40 CFR Part 63, Subpart VVVV. Records of the inspections are also required.

Due to the nature of the fiberglass boat manufacturing process, the likelihood of a violation of Georgia Rules (b) and (e) are minimal. Therefore, no monitoring is required.

C. Compliance Assurance Monitoring (CAM)

CAM is not applicable because control devices are not used to achieve compliance with the emission limit.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition No. 6.1.7 includes provisions defining exceedances for the requirements of 40 CFR 63 Subpart VVVV. Condition No. 6.1.7(b)(i) has been modified to include a VOC emission limit of 140 tpy. Condition Nos. 6.1.7(b)(iv) through (vii) have been rearranged so that the order of these permit conditions corresponds with the order of the conditions to which they refer (Condition Nos. 3.3.5 through 3.3.8). Condition No. 6.1.7(d)(i) has been updated to include the new monthly VOC emission limit of 11.6 tons.

Condition No. 6.2.1 requires the facility to maintain monthly usage records of all VOC containing compounds utilized at the facility.

Condition No. 6.2.2 requires the facility to calculate the monthly VOC emissions per Division Guidelines and notify the Division if the VOC emissions for any month exceed 11.6 tons. The facility must utilize the procedures for calculating styrene emissions specified in Appendix H of the Division's Procedure for Testing and Monitoring Sources of Air Pollutants or in the "Unified Emission Factors for Open Molding of Composites" (UEF). This condition has been modified to change the monthly VOC limit from 8.33 tons to 11.6 tons, and to add the UEF procedures as a method for calculating styrene emissions.

Condition No. 6.2.3 requires the facility to calculate the twelve month rolling total VOC emissions for each month and notify the Division when the VOC emissions exceed 140 tons during any consecutive twelve month period. Notification must be submitted within 15 days. This condition has been modified to change the yearly VOC limit from 100 tons to 140 tons

Condition No. 6.2.4 requires the facility to keep a log of the filter replacement for Emission Unit ID Nos. GC01, LR01, SG01, SL01, and GR01 in order to verify compliance with Condition No. 3.5.1.

Condition Nos. 6.2.5 through 6.2.20 are requirements of 40 CFR Part 63, Subpart VVVV.

Condition No. 6.2.5 requires that the Permittee maintain usage records and, in some instances, certification records for all materials that the Permittee wishes to claim as exempt from the open molding emission limit of Condition No. 3.3.2.

Condition No. 6.2.6 requires that, for all open molding operations and materials complying with the emissions averaging option, the Permittee follow the steps required in this Condition to certify compliance with the emission limit of Condition No. 3.3.2.

Condition No. 6.2.7 requires that, for all open molding operations and materials complying with the compliant materials option, the Permittee maintain the list of records required in the condition.

Condition No. 6.2.8 presents the information to be contained in the Implementation Plan that the Permittee is required to develop for all open molding operations for which compliance is determined using the emission averaging option described in Condition No. 3.3.3(a).

Condition No. 6.2.9 in Title V Permit Amendment No. 3732-131-0021-V-01-1 was renumbered as 6.2.10, while Condition No. 6.2.10 in Title V Permit Amendment No. 3732-131-0021-V-01-1 was renumbered as 6.2.9 so that the order of these two permit conditions corresponds with the order of the conditions to which they refer (Condition Nos. 3.3.3(a) and 3.3.3(b) respectively).

Condition No. 6.2.9 presents the method for determining compliance with Condition No. 3.3.2 using the MACT model point value (emissions averaging) option specified in Condition No. 3.3.3(a).

Condition No. 6.2.10 presents the methods for certifying compliance with the compliant materials option specified in Condition No. 3.3.3(b). These methods include verifying, at the end of each month, that each resin and gel coat used in each operation in the past 12 months complies with the content limits of Table 2 of Subpart VVVV (Table 6.2.10-1 of the permit), and for those operations that do not, calculating the weighted-average HAP content for all resins and gel coats used during the previous 12 months and comparing the result with the appropriate content limit.

Condition No. 6.2.11 presents the methods for demonstrating compliance with Condition No. 3.3.2 if filled resins are used at the facility.

Condition No. 6.2.12 presents the requirements for demonstrating compliance with the resin and gel coat application equipment cleaning operation requirements (Condition No. 3.3.6). These requirements include two possible methods for determining the organic HAP content of each of the solvents.

Condition No. 6.2.13 requires that the Permittee demonstrate compliance with the carpet and fabric adhesive HAP content limit in Condition No. 3.3.8 using the methods presented in Condition Nos. 4.1.3 and 6.2.18.

Condition No. 6.2.14 requires that the Permittee maintain records of all notifications and compliance reports submitted to the Division, any supporting documentation, and the total amount of resins and gel coats used at the facility and the weighted-average HAP content for each operation.

Condition No. 6.2.15 requires that the Permittee maintain all records on site for two years and gives the accepted media that these records may be stored on if they are moved off-site after the initial two year period. Records, whether or not moved off-site after the initial two year period, must be maintained for an additional three years.

Condition No. 6.2.16 requires that the Permittee send to the Division all notifications required by Table 7 of Subpart VVVV and that if any material submitted in those notifications changes, the Permittee must notify the Division within 15 days after the change is made.

Condition No. 6.2.17 presents the content and reporting schedule for the compliance reports that the facility must submit to the Division.

Condition No. 6.2.18 allows the Permittee to use information provided by material manufacturers in order to determine the organic HAP content of the resins and gel coats used in the facility and sets forth the criteria for handling organic HAP contents expressed as a range, what organic HAP in a given compound would have to be reported based on content level in the material, and which organic HAP content level to use if the manufacturer's information for a certain product does not agree with an independent analysis of the same product.

Condition No. 6.2.19 requires the Permittee to maintain records of all visual inspections and corrective actions taken conducted in accordance with Condition No. 5.2.1. The written inspection records are to be kept in a logbook. The records are to be kept for at least five years from the date of record.

Condition No. 6.2.20 requires the Permittee to maintain records of all visual inspections and corrective actions taken conducted in accordance with Condition No. 5.2.2. The written inspection records are to be kept in a logbook. The records are to be kept for at least five years from the date of record.

VII. Specific Requirements

A. Operational Flexibility

Not applicable.

B. Alternative Requirements

Not applicable.

C. Insignificant Activities

See Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance.

The facility operates a foam gun operation that has insignificant emissions.

D. Temporary Sources

Not applicable.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

Requirements and schedules for compliance status notifications and semiannual compliance reports are described in Condition Nos. 6.2.16 and 6.2.17.

The facility received a letter of noncompliance, dated April 14, 2005, for using a carpet adhesive with greater than 5% HAP, which violates Condition No. 3.3.8 of the permit, and also for calculating VOC rolling total emissions incorrectly. The facility is now using a compliant adhesive and their compliance engineer will check their VOC emission calculations during the next inspection in fiscal year 2006.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they do not have air conditioners or refrigeration equipment that use CFC's, HFC's or other stratospheric ozone-depleting substances.

J. Pollution Prevention

Not applicable.

K. Specific Conditions

Not applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The 30-day public review started on December 7, 2005 and ended on January 6, 2006. Comments were not received by the Division.