

Facility Name: **Caravelle Marine, Inc.**

City: Americus

County: Sumter

AIRS #: 04-13-261-00069

Application Nos: TV-13755  
TV-15235

Date SIP Application Received: N/A

Date Title V Application Received: March 26, 2004

Permit No: 3732-261-0069-V-01-1

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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<b>SSCP</b>	N/A	N/A
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## Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

**I. Facility Description**

A. Existing Permits

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3732-261-0069-V-01-0	October 18, 2000	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3732-261-0069-V-01-0	Initial Title V Permit

B. Regulatory Status

1. PSD/NSR/RACT

The facility is potentially a major source in regards to the PSD regulations, but has taken enforceable limits on VOC emissions to remain a minor source in regards to the PSD regulations.

2. Title V Major Source Status by Pollutant

Table 3: 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	Y			✓
PM <sub>10</sub>	Y			✓
SO <sub>2</sub>	N			
VOC	Y	✓		
NO <sub>x</sub>	N			
CO	N			
TRS	N			
H <sub>2</sub> S	N			
Individual HAP	Y	✓		
Total HAPs	Y	✓		

## II. Proposed Modification

### A. Description of Modification

There is no new process equipment being added to the facility at this time. The purpose of this modification is to include all applicable requirements of 40 CFR 63 Subpart VVVV in the Caravelle Marine, Inc. permit as well as the revision of Table 3.1 to reflect rearrangement of process equipment at the facility, mainly, the consolidation of all gel coat and resin lamination operations into the Offshore Boat building and the consolidation of all grinding operations into one area.

### B. Emissions Change

**Table 4: Emissions Change Due to Modification**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Net Potential Emissions Increase (Decrease) (tpy)</b>
PM	Y	0	0
PM <sub>10</sub>	Y	0	0
SO <sub>2</sub>	N		
VOC	Y	0	0
NO <sub>x</sub>	N		
CO	N		
TRS	N		
H <sub>2</sub> S	N		
Individual HAP	Y	0	0
Total HAPs	Y	0	0

### C. PSD/NSR Applicability

Due to the fact that no new process equipment is being added to the facility and the company is not making any process changes that would increase emissions, this modification is not subject to the PSD regulations.

**III. Facility Wide Requirements**

A. Emission and Operating Caps:

No facility wide emission or operating caps are required or are being imposed at this time.

B. Applicable Rules and Regulations

Rules and Regulations Assessment –

None applicable.

Emission and Operating Standards –

None applicable.

C. Compliance Status

The Caravelle Marine, Inc. facility is operating in compliance with all applicable rules and regulations at this time.

D. Operational Flexibility

No operational flexibility on a facility wide basis is being requested.

E. Permit Conditions

None applicable.

**IV. Regulated Equipment Requirements**

A. Brief Process Description

The manufacturing process has not changed since the issuance of Georgia Air Quality Permit No. 3732-261-0069-V-01-0. No new process equipment is being added to the Caravelle Marine, Inc. facility. The table shown below is being revised to list the new Conditions pertaining to 40 CFR 63 Subpart VVVV and reflect the rearrangement of some of the process equipment at the facility. Gel coats and resins will no longer be used in the Sport Boat building, so all references to those processes are being removed from the Permit.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
SA01	Sport Boat Assembly Process	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 5.2.1, 6.2.1 through 6.2.3	None	None
OG01	Offshore Boat Gel Coat Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 5.2.2, 5.2.3, 6.2.1 through 6.2.19	None	None
OR01	Offshore Boat Resin Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 5.2.2, 5.2.3, 6.2.1 through 6.2.19	None	None
OA01	Offshore Boat Assembly Process	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.2.1 through 6.2.3	None	None

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

C. Equipment & Rule Applicability

**Emission and Operating Caps –**

No new emission or operating caps have been imposed or are being required for the equipment listed in the table above.

**Applicable Rules and Regulations -**

Rules and Regulations Assessment:

40 CFR Part 63 Subpart VVVV applies to the gel coat, resin lamination, and adhesive 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 of HAP.

Emission and Operating Standards:

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.

D. Compliance Status

The facility is operating in compliance with all applicable rules and regulations.

E. Operational Flexibility

Due to the fact that no new process equipment has been added, no operational flexibility is being requested.

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 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. 6.2.9, 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 content requirements of Table 2 of Subpart VVVV (Table 3.3.3-1 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.

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.

**V. Testing Requirements (with Associated Record Keeping and Reporting)**

A. Individual Equipment:

None applicable.

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

None applicable.

**VI. Monitoring Requirements (with Associated Record Keeping and Reporting)**

A. Individual Equipment:

None applicable.

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

Condition No. 5.2.2 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.

Condition No. 5.2.3 requires the Permittee to inspect, at least once per month, all contaminated solvent storage containers subject to Condition No. 3.3.7 to ensure that the containers have covers with no visible gaps between the cover and the container.

## **VII. Other Record Keeping and Reporting Requirements**

Condition No. 6.1.7 has been modified to include provisions defining exceedances for the requirements of 40 CFR 63 Subpart VVVV.

Condition No. 6.2.4 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. 6.2.5 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. 6.2.6 requires that, for all open molding operations and materials complying with the compliant materials option, the Permittee maintain the list of records required in Condition No. 6.2.6.

Condition No. 6.2.7 presents the information to be contained in submission requirements, availability requirements, and revision procedures for the Implementation Plan that the Permittee is required to develop for all open molding operations for which compliance with the limit of Condition No. 3.3.2 is determined using the emission averaging option.

Condition No. 6.2.8 presents the methods for certifying compliance with the compliant materials option, if used. These methods include verifying, at the end of each month, that each resin and gel coat used in each operation complies with the content limits of Table 2 of Subpart VVVV (Table 3.3.3-1 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. 6.2.9 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 demonstrating compliance with Condition No. 3.3.2 if filled resins are used at the facility.

Condition No. 6.2.11 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. 6.2.12 requires that the Permittee demonstrate compliance with Condition No. 3.3.8 using the methods presented in Condition Nos. 4.1.3 and 6.2.17.

Condition No. 6.2.13 requires that the Permittee maintain records of all notifications and compliance reports submitted to the Division, and 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. 6.2.14 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. 6.2.15 requires that the Permittee send to the Division all notifications required by Table 7 of Subpart VVVV (Table 6.2.15-1 of the permit) 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. 6.2.16 presents the content and reporting schedule for the compliance reports that the facility must submit to the Division.

Condition No. 6.2.17 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. 6.2.18 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.

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. 5.2.3. 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.

**VIII. Specific Requirements**

A. Operational Flexibility

No operational flexibility has been requested.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

No Insignificant Activities are being added as a result of this Permit Modification.

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable. The facility is operating in compliance with all applicable rules and regulations.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Prevention of Accidental Releases

Not applicable.

J. Stratospheric Ozone Protection Requirements

The facility is not subject to Title VI.

K. Pollution Prevention

None applicable.

L. Specific Conditions

None applicable.

**Addendum to Narrative**

The 30-day public review started on July 30, 2004 and ended on August 29, 2004. No comments were received by the Division.