

Facility Name: **Caravelle Powerboats, Inc. (formerly Caravelle Marine, Inc.)**
City: Americus
County: Sumter
AIRS #: 04-13-261-00069

Application #: TV-16174
Date Application Received: April 21, 2005
Permit No: 3732-261-0069-V-02-0

Program	Review Engineers	Review Managers
SSPP	Laura Warner	Eric Cornwell
ISMP	Sid Stephens	Richard Taylor
SSCP	Michael Odom	Karen Hays
Toxics	Michael Odom	Karen Hays

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 **Caravelle Powerboats, Inc. (formerly Caravelle 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:

Caravelle Powerboats, Inc. (formerly Caravelle Marine, Inc.)

2. Parent/Holding Company Name

Caravelle Powerboats, Inc.

3. Previous and/or Other Name(s)

Caravelle Marine, Inc.
Caravelle Boats, Inc.

4. Facility Location

111 Matthews Drive
Americus, GA 31709
Sumter County

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

The facility is located in an attainment area (Sumter County).

6. Class I Area Impacts

The facility is not located within 200 km of any Class I area.

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
3732-261-0069-V-01-0	Oct. 18, 2000	Initial Title V permit for the operation of a fiberglass boat manufacturing facility
3732-261-0069-V-01-1	Sept. 2, 2004	Title V Amendment for the insertion of 40 CFR 63 Subpart VVVV requirements and a revision of Table 3.1 to reflect equipment rearrangements

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 powerboats.

3. Overall Facility Process Description

Caravelle Powerboats, Inc. (formerly Caravelle Marine, Inc.) manufactures fiberglass boats. The facility's ownership and name changed as of September 30, 2005. The facility consists of two buildings, with tooling, assembly, and upholstery performed in Building A, and gel coat, lamination, open and closed molding, and grinding and trimming performed in Building B.

First, the molds, which are manufactured in the tooling department, are cleaned and waxed, and a layer of styrene-based gel coat is sprayed on the molds. Then fiberglass and resin are layered onto the gel coat using spray guns and hand-applied techniques to form decks and hulls. The number of layers of this lamination varies depending on the type and size of the boat being made. After the lamination has cured, the deck or hull is removed from the mold, and then taken to the grinding and trimming area where the rough edges are trimmed away and ground smooth. The decks and hulls are then sent to the assembly area, where they are assembled, and the motor, all necessary wiring, and furniture are installed.

The main emission from this operation is styrene, with other trace VOCs resulting from gluing and bonding during assembly. These emissions are exhausted through powered horizontal vents in each building.

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. Non-attainment NSR is not applicable since this source is located in an attainment area. Potential emissions of particulate matter (PM), SO₂, NO_x, and CO are less than the 250 tons per year (tpy) that trigger PSD. Potential VOC emissions exceed the annual PSD threshold of 250 tpy but the facility is subject to a VOC emission limit of 249 tpy in order to avoid PSD review.

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 249 tons of VOC per year. Potential VOC emissions exceed the annual PSD threshold of 250 tons per year, so the facility is subject to a VOC emission limit of 249 tons per year in order to avoid PSD review.

A toxic impact assessment was performed to determine if the facility's VOC emission limit of 249 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). About 97% of the styrene emissions from the facility are emitted from ventilation fans 3901, 3902, 3903, 3904, and 3905 in Building B, which include emissions from the gel coat, lamination, and open molding processes. All five of these fans are located on the western side of Building B, and each fan is 4.5 feet in diameter with a flow rate of 32,000 cubic feet per minute (cfm). Three of the fans have a center height of 5 feet, and the other two fans have a center height of 14 feet, so the average center height of these fans is 8.6 feet. The shortest distance to the property line from these five fans is 158 feet (48.2 m). The remaining 3% of styrene emissions are emitted from ventilation fans 3920 and 3921 on the north side of Building A. These two fans are each 4.5 feet in diameter with a flow rate of 32,000 cfm, and have a center height of 15 feet. Both fans are 345 feet (105.2 m) from the property line.

The facility was initially modeled as a volume source using the Screen3 modeling program, and the 15-minute MGLC for styrene was well below the 15-minute AAC, but the annual MGLC for styrene exceeded the annual AAC using this conservative model, so a more detailed model was created using an ISCST3 program. In the ISCST3 model, the facility was modeled as a volume source, and it was assumed that 250 tons of styrene (57 lbs/hr) were emitted from Building B. The emissions from the two fans on Building A are negligible compared to the emissions from the five fans on Building B, so only Building B was considered in the model. The building dimensions used in the model were based on the lateral dimension of 301 feet, which is the length of the side of Building B where the five fans are located, and the vertical dimension of 28 feet. The initial lateral dimension was calculated by dividing the building length by 4.3 (301 ft ÷ 4.3), giving a value of 70 feet. The initial vertical dimension was calculated by dividing the building height by 2.15 (28 ft ÷ 2.15), giving a value of 13.0233 feet. The release height used in the model was 8.6 feet, which is the average center height of the five fans on Building B. Stack tip downwash was not included in the model, and elevated terrain was not considered. Meteorological data from Columbus, GA (file name "COLCNT-A") for 1985 – 1989, with an anemometer height of 30 m, was used in the model.

The reference concentration (RfC) for styrene is 1.00 mg/m³, which is an annual average; therefore, the annual AAC for styrene is also 1.00 mg/m³. Based on the ISCST3 model, the highest annual MGLC resulted from the 1986 meteorological data, with a value of 0.962 mg/m³. The annual MGLC is less than the annual AAC of 1.00 mg/m³, so the annual ambient impact is acceptable. Styrene's ceiling concentration is 852 mg/m³ (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/m³. The highest 1-hour MGLC determined by the ISCST3 model also resulted from the 1986

meteorological data, with a value of 18.3 mg/m³. The 15-minute MGLC is determined by multiplying the 1-hour MGLC by the factor 1.32 (18.3 × 1.32), which equals 24.2 mg/m³. The 15-minute MGLC is less than the ceiling AAC of 85.2 mg/m³, so the 15-minute ambient impact is also acceptable. Based on the results of this toxic impact assessment model, the facility will not exceed acceptable concentrations when 250 tpy of styrene is emitted, so the facility will remain in compliance with the 250 tpy VOC limit.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

During an unannounced inspection on July 13, 2005, the facility was not keeping records of the mixing container inspections as required by Condition No. 6.2.18. No enforcement action was made since this was their only violation. The facility's compliance engineer does not know if they have begun keeping these records but will check during the 2006 inspection of the facility.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition No. 2.1.1 limits VOC emissions from the facility to 249 tons during any twelve consecutive months.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility manufactures fiberglass powerboats, using open and closed mold fiberglass reinforced plastic (FRP) processes. Boat components are either produced on-site or purchased, and assembled into complete powerboats on-site.

Processes:

Gel Coat Application: Gel coat is sprayed onto the molds, including pigmented gel coat, base coat, and a barrier coat.

Resin Application – Open Mold: Resin and fiberglass are sprayed onto the molds after the gel coat is applied, producing the hull, deck, and various small components.

Resin Application – Closed Mold: Two-part molds are fitted together and then placed under vacuum to pull the resin into the mold to produce a select number of small parts.

Grind and Trim: Excess material is ground and trimmed from the boat components made in the molds to ensure that they fit together properly.

Upholstery: Saws and routers are used to construct substrate components for upholstered products, and upholstery fabrics are cut, sewn, and applied to the substrates with glue to produce the finished upholstered boat components.

Assembly: FRP boat components produced on-site, upholstery components produced on-site, and purchased components and accessories are assembled into a complete powerboat.

Final Clean and Finish: Completed powerboats are inspected and cleaned, and minor repairs are made as necessary. The boats are then wrapped for shipment.

Tooling: Plugs and the subsequent molds are produced, which are then used in the gel coat and resin processes to make boats.

R&D – Engineering: Product development and improvement activities are conducted.

B. Equipment List for the Process

Emission Unit Groups		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
2000	Gel Coat Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	None
3000	Lamination	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	None
4000	Closed Mold	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	None
5000	Grind and Trim	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	5840, 5841	Baghouse #1 Baghouse #2
6000	Upholstery	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	None
7000	Assembly	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	None
8000	Tooling	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 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 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 existing Condition No. 3.3.3 in Title V Permit Amendment No. 3732-261-0069-V-01-1 was moved to Condition 6.2.9 so that the table is located alongside its applicable requirements.

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.

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:

To ensure compliance with Condition No. 8.17.1, Condition Nos. 5.2.3 and 5.2.5 have been included in the permit. These conditions require the facility to monitor the pressure drop across the baghouses, inspect the baghouse cleaning systems, and inspect baghouse hoppers and conveying systems. Also to ensure compliance with Condition No. 8.17.1, Condition No. 5.2.4 has been included in the permit, requiring a daily visible emissions check on each baghouse. The results of the visible emissions inspections and baghouse inspections must be recorded in a log. Failure to perform any of these inspections, or any time that visible emissions are detected for 2 consecutive days must be reported as an excursion in the semiannual report.

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

Existing Condition Nos. 5.2.2 and 5.2.3 have been renumbered as Condition Nos. 5.2.1 and 5.2.2 respectively, due to the deletion of Condition No. 5.2.1 in Title V Permit Amendment No. 3732-261-0069-V-01-1.

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.

C. Compliance Assurance Monitoring (CAM)

CAM is not applicable because control devices are not used to achieve compliance with the VOC or HAP emission limits.

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, annual and monthly VOC emission limits, and baghouse and visible emissions inspections that are to be included in the semiannual report required in Condition No. 6.1.4.

Condition Nos. 6.1.7(b)(iv) through (viii) 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 Nos. 6.1.7(c)(i) through (v) have been added to include excursions for the mixing container, solvent storage container, baghouse and visible emission inspections. Condition No. 6.1.7(d)(i) has been added to include the monthly VOC emission limit of 20.75 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 20.75 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 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 249 tons during any consecutive twelve month period. Notification must be submitted within 15 days.

Condition Nos. 6.2.4 through 6.2.19 are requirements of 40 CFR Part 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 are exempted 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 the Condition.

Condition No. 6.2.7 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).

Existing Condition No. 6.2.8 in Title V Permit Amendment No. 3732-261-0069-V-01-1 was renumbered as 6.2.9, while Existing Condition No. 6.2.9 in Title V Permit Amendment No. 3732-261-0069-V-01-1 was renumbered as 6.2.8 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)).

Condition No. 6.2.8 presents the methods 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. 6.2.9 presents the methods for certifying compliance with the compliant materials option specified in Condition No. 3.3.3(b), if used. 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 6.2.9-1 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. 6.2.10 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 operations (Condition No. 3.3.6). These requirements include two separate methods for determining the organic HAP content of each of the solvents.

Condition No. 6.2.12 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 6.2.17.

Condition No. 6.2.13 requires that the Permittee maintain records of all notifications and compliance reports and any supporting documentation, and the total amount of resins and gel coats used at the facility each month and the weighted-average HAP content for each operation.

Condition No. 6.2.14 requires that the Permittee maintain all records onsite 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 they are 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 and that if any material submitted in those notifications changes, the Permittee must notify the Division within 15 days after the change is made. Table 6.2.15-1 in the existing condition has been removed because it is not necessary.

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. 5.2.1. 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. 6.2.19 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.

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. 6.2.15 and 6.2.16.

During an unannounced inspection on July 13, 2005, the facility was not keeping records of the mixing container inspections as required by Condition No. 6.2.18. No enforcement action was made since this was their only violation. The facility's compliance engineer does not know if they have begun keeping these records but will check during the 2006 inspection of the facility.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they have air conditioners or refrigeration equipment that use CFC's, HFC's or other stratospheric ozone-depleting substances, but the equipment does not contain a refrigerant charge of greater than 50 pounds.

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 March 11, 2006 and ended on April 10, 2006. Comments were received by the Division from Mr. James Smith of SafEnvirons, Inc., the facility's consultant, on March 3, 2006.

Comments:

The comments from SafEnvirons requested that Condition Nos. 5.2.4, 6.1.7(c)iii, and 6.1.7(c)iv be deleted from the permit. These conditions refer to visible emission (VE) requirements for baghouses 5840 and 5841, including daily VE inspections, a VE logbook, and semiannual reporting of VE occurrences and missed VE inspections. VE requirements do not apply to these baghouses because both baghouses exhaust back into the building, but that information was not provided in the air permit application.

Changes to Permit:

Draft Permit Condition No. 5.2.4 was deleted, and Draft Permit Condition No. 5.2.5 has been changed to Final Permit Condition No. 5.2.4.

Draft Permit Condition Nos. 6.1.7(c)iii and 6.1.7(c)iv were deleted, and Draft Permit Condition No. 6.1.7(c)v has been changed to Final Permit Condition No. 6.1.7(c)iii.

Final Permit Condition No. 6.1.7(c)iii has been updated to reflect the change that Draft Permit Condition No. 5.2.5 has been changed to Final Permit Condition No. 5.2.4.