

Facility Name: **Caravelle Marine Inc.**  
 City: Americus  
 County: Sumter  
 AIRS #: 04-13-261-00069

Application #: TV- 9620  
 Date Application Received: December 19, 1996  
 Date Application Deemed  
 Administratively Complete: January 14, 1997  
 Date of Draft Permit: May 16, 2000  
 Permit No: 3732-261-0069-V-01-0

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 in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revision made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

**I. Facility Description**

A. Facility Identification

1. Facility Name: Caravelle Marine Inc.
2. Parent/Holding Company Name: Caravelle Marine Inc.
3. Previous and/or Other Name(s): Caravelle Boats Inc.
4. Facility Location: 111 Matthews Drive  
Americus, Georgia 31709  
Sumter County
5. This facility is located in an attainment area.
6. This facility is not located within 100 km of any Class I Area.

B. Site Determination

This facility comprises one (1) Title V site; there are no site determination issues.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the “Permit” file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.

**Table 1: List of Current Permits, as Amended**

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
None	N/A	U	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
N/A	The Title V application is the first application received by the Air Branch for Caravelle Marine Inc. No other air permits have been previously issued.

#### D. Process Description

1. SIC Code: 3732
2. Description of Products: This facility manufactures fiberglass boats.
3. Overall Facility Process Description

Caravelle Marine manufactures sport boats ranging from 17 to 26 feet in length, and offshore pleasure craft ranging from 18 to 28 feet in length. The facility consists of two buildings, with sport boats being produced in the main building, and offshore boats being made in the adjacent, smaller building. The facility also has a resin tank behind the two buildings which has a capacity of approximately 6,500 gallons.

Both sport and offshore boats are made using a similar process, and each building at the site contains the complete process for the type of boat manufactured within.

First, the molds are cleaned and waxed, and a layer of styrene-based gelcoat is sprayed on the molds. After the gelcoat has been allowed to cure, a "skin coat" of resin and fiberglass strands is applied. This skin coat aids in the adhesion of the lamination layers to the gelcoat layer.

Once the skin coat has been applied and allowed to cure, the lamination process begins. This involves spraying layers of polyester resin (styrene based) and chopped fiberglass strands, along with the application of glass mat roving, onto the deck or hull being molded. The number of layers of lamination applied 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, 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 small amounts of Methylene Chloride and Methyl Methacrylate, and also other trace VOCs resulting from gluing and bonding during assembly. These emissions are exhausted through powered horizontal vents in each building.

## E. Regulatory Status

## 1. PSD/NSR

This source is non-major under PSD. Non-attainment NSR is not applicable since this source is located in an attainment area. Potential emissions of particulate matter, SO<sub>2</sub>, NO<sub>x</sub>, and CO are less than the 250 tons per year that trigger PSD. VOC emissions are being capped by the Title V permit at 249 tons per year. Although no permit has been previously issued to Caravelle Marine to cap VOCs, the facility submitted a timely and complete air permit application under Title V, and their past emissions have consistently been far below the PSD thresholds.

## 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	YES			T
PM <sub>10</sub>	YES			T
SO <sub>2</sub>	n/a			
VOC	YES	T		
NO <sub>x</sub>	n/a			
CO	n/a			
TRS	n/a			
H <sub>2</sub> S	n/a			
Individual HAP	YES	T		
Total HAPs	YES	T		

## 3. MACT Standards

There is a future NESHAP for fiberglass boat manufacturing.

40 CFR Part 63, Subpart II "Shipbuilding" does not apply. This Subpart states that pleasure craft are not defined as ships, and are therefore not subject to Subpart II. According to the information received, all boats manufactured at Caravelle Marine qualify for this exemption.

## 4. Program Applicability

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

**Regulatory Analysis**

The permit conditions discussed below will be federally enforceable by both the Georgia Environmental Protection Division and the US Environmental Protection Agency.

**II. Facility Wide Requirements**A. Emission and Operating Caps:

Section 3.30 of the Caravelle Marine facility's Title V application requested a limitation be placed in their permit which would ensure their status as a PSD minor source. Therefore, a plant wide VOC limitation of 24 tons per consecutive 12 month period is established under Condition 2.1.1, and Conditions 6.2.1, 6.2.2 and 6.2.3 ensure that this VOC permit limitation is being met.

B. Applicable Rules and Regulations:

The Caravelle Marine facility is not subject to any facility-wide air quality rules other than the Georgia General Provision, which has been incorporated in the Title V permit as Condition 2.3.1.

C. Compliance Status:

Caravelle Marine has been operating without an air permit, but did submit a timely and complete Title V permit application. The Division opted to accept the facility's Title V Permit Application in place of a SIP application and to allow the facility to operate under the application shield provided by that submittal until the Title V permit is issued. The Stationary Source Compliance Program was notified of the facility's situation and has taken appropriate action.

D. Operational Flexibility:

The facility has not requested any operational flexibility in their Title V application.

E. Permit Conditions:

2.1.1 - Establishes 249 ton per year VOC cap on the facility. This was put in place in order to avoid the regulations under PSD.

2.3.1 - Incorporates the Georgia General Provisions into the Title V Permit.

Note that Section 3.30 of Caravelle Marine's Title V application proposed permit conditions requiring annual reporting of chemical usages, and also limiting the facility's hours of operation in order to reduce their PTE and avoid being subject to regulation under PSD. The Title V permit does indeed include the record keeping and reporting of chemical usages to assure compliance with standards, but the limitation on hours of operation has been replaced with a straight forward limit on emissions (Condition 2.1.1). This emissions cap provides more flexibility in the day to day operation of the facility than a limit on hours of operation, and still affords the same protections from PSD regulations.

**III. Regulated Equipment Requirements**

A. Brief Process Description

Two main types of fiberglass boats are manufactured at Caravelle Marine and are classified as either 'sport boats' or 'offshore boats'. Each type of boat is produced, from start to finish, in a separate building at the site. The production process for each type of boat has been split up into three different steps, and each step is similar for each type of boat:

Sport Boat Production (operations group ID # SB99):

- SG01 – Gelcoat application process (takes place in a large spray booth with a powered vent and associated filter, which is assigned control device ID number SGC1)
- SR01 – Resin application process
- SA01 – Assembly process (includes glueing and some further resin application)

Offshore Boat Production (operations group ID # OB99):

- OG01 – Gelcoat application process
- OR01 – Resin application process
- OA01 – Assembly process (includes glueing and some further resin application)

Other activities not listed by emission unit ID numbers are considered insignificant and include: grinding and cutting, welding, miscellaneous cleaning, and the storage tanks and drums on site (see Attachment B to the Title V permit).

The sport boat production process (in the 'main' building) is the source of approximately 75% of the facility's emissions. Thus, the gelcoat application process (SG01) in that area is done in a spray booth area fitted with an exhaust fan and associated filter (SGC1).

The main emission from the facility is styrene, with additional trace VOCs being emitted from the adhesives used to assemble the boats (included as part of emission units SA01 and OA01). Emissions are exhausted through non-powered horizontal vents in each building with the exception of SG01 which is exhausted horizontally via a powered vent after passing through a filter (assigned control device ID number SGC1).

See above (Section I of this permit review) for a more detailed description of the gelcoat and lamination processes.

#### B. Equipment List for the Process

**Table 4: Equipment Listing for Caravelle Marine Inc.**

Equipment Unit ID No.	Equipment Unit Description	Pollutants emitted	Applicable Regulations	Corresponding Permit Conditions	Air Pollution Control Device
SG01	Sport Boat gelcoat application process	VOC, HAP, PM	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, 6.2.2, 6.2.3	SGC1 (Gelcoat Booth Filter)
SR01	Sport Boat resin application process	VOC, HAP, PM	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.2.1, 6.2.2, 6.2.3	none
SA01	Sport Boat assembly process	VOC, HAP, PM	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.2.1, 6.2.2, 6.2.3	none
OG01	Offshore Boat gelcoat application process	VOC, HAP, PM	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.2.1, 6.2.2, 6.2.3	none
OR01	Offshore Boat resin application process	VOC, HAP, PM	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.2.1, 6.2.2, 6.2.3	none
OA01	Offshore Boat assembly process	VOC, HAP, PM	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.2.1, 6.2.2, 6.2.3	none

Note that two emission units listed in Section 5.00 of Caravelle Marine's application are actually insignificant activities and have been removed from the equipment list. Emission Unit ST01 (Storage Tank #1 for Styrene Resin) has been placed in the 'Insignificant Activities Checklist' since it has a true vapor pressure less than 0 psia, while Emission Unit PS01 (Piping System Associated with ST01) has been placed in the 'Insignificant Activities Based On Emission Levels' table, both of which can be found in Attachment B of the Title V permit.

### C. Equipment & Rule Applicability

- Emission and Operating Caps:

None applicable.

- Applicable Rules and Regulations:

All emission units listed in the equipment list above are subject to the following Georgia State Rules:

391-3-1-.02(2)(b)	Visible Emissions: Limits opacity of an air contaminant source to less than 40 %. Minimal visible emissions are expected from this facility.
391-3-1-.02(2)(e)	Particulate Emissions from Manufacturing Processes: Limits emissions of particulate matter from any source not subject to a more stringent rule or standard. The PM limit is based upon the formula $E = 4.1(P)^{0.67}$ , where E = emission rate in pounds per hour, and P = process input weight rate in tons per hour. Minimal particulate emissions are expected from this facility.

### D. Compliance Status

Due to the current lack of an air operating permit, a Section 11.10 form indicating noncompliance was submitted for each emission unit at the facility. This information was forwarded to the compliance program and has been dealt with accordingly. The facility's compliance plan was the submittal of the Title V permit application, with the resolution being the receipt of a valid permit for operation.

### E. Operational Flexibility

The facility has not requested any operational flexibility in their Title V application.

### F. Permit Conditions

The following conditions were included in Section 3 of the Title V permit, and are present in order to ensure compliance with State Rules (b) and (e) for all emission units at the facility.

- 3.4.1 — subjects all of the emission units listed in the equipment list to Rule (b). This limits the opacity from those units to forty percent or less.
- 3.4.2 — subjects all of the emission units listed in the equipment list to Rule (e). This limits the rate of particulate matter emissions from those units to E, where  $E = 4.1(P)^{0.67}$ , and P equals the process input rate in tons/hr.
- 3.5.1 — requires the changing of the sport boat gelcoat spray booth filter (SGC1) at least once per week. This will ensure compliance with Rule (e) for particulate matter, and, in general, reduce the amount of entrained gelcoat product emitted from the facility.

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

None of the applicable regulations require performance testing, therefore this permit does not contain any conditions requiring specific testing. The permit does specify that a performance test may be required to determine compliance with the emission limits in Part 3.0. A condition requiring written prior notification any test is included. The test methods to be used to determine compliance, if required in the future, are list in Condition 4.1.3.

**B. Specific Testing Requirements**

None.

**V. Monitoring Requirements (with Associated Record Keeping and Reporting)****A. General Monitoring Requirements**

Condition 5.1.1 requires that all monitors be operated continuously except during breakdowns, repairs, and quality assurance activities. Any repairs or maintenance should be completed in an expeditious manner so downtime is minimized. All data should also be recorded during any calibration activity to help verify that calibration was performed and completed properly.

**B. Specific Monitoring Requirements**

Particulate matter emissions and visible emissions from the uncontrolled processes at the facility are neglig and the likelihood of violation of Rules (e) or (b) is minimal, therefore no monitoring systems are required be installed.

Condition 5.2.1 requires the Permittee to maintain a log of the dates and times that the filter on the Sport B Gelcoat Spray Booth (control device ID #SGC1) is changed. This is done to confirm compliance with Condition 3.5.1 and to monitor compliance with Rules (e) and (b).

**C. Record keeping and Reporting Requirements**

Since no monitoring systems are required to be installed, there are no record keeping or reporting requirements applicable for this section.

## VI. Other Record Keeping and Reporting Requirements

### A. General Record Keeping and Reporting Requirements

General requirements for the retention of all records for a period of five years following the date of entry, and for the prompt reporting of deviations or failures to meet any limitations, standards or applicable requirements are included in section 6.1 of the permit.

These general requirements also include the semi-annual reporting of any excess emissions, exceedances or excursions, which are defined within Condition 6.1.7. An exceedance of the applicable stipulations of the permit would occur if VOC records indicate that the facility emitted 249 tons of VOC or more in a twelve consecutive month period (due to the limit in Condition 2.1.1). And an excursion would occur, and would need to be included with the semi-annual report required by Condition 6.1.4, if the filter on the Sport Boat Gelcoat Spray Booth (air pollution control device ID number SGC1) is not changed a minimum of once per week.

### B. Specific Record Keeping and Reporting Requirements

The Permittee is subject to the annual VOC emission limit of 249 tons as specified in Condition 2.1.1. The compliance strategy of this Permit is to maintain VOC records (Condition 6.2.1) such that a compliance determination can be made for the annual limit. Within these records it is required that the usage of gelcoat and resins be categorized separately from the rest of the materials containing VOC. This is done so that a compliance determination for styrene emissions (which represents the vast majority of emissions from the facility) can be done quickly, without the need to sort through a number of materials with minor VOC content in order to find the gelcoats and resins.

If the VOC emissions in a given month exceed 20.75 tons (derived by dividing the annual limit by twelve), then Condition 6.2.2 requires that the Division be notified within 15 days of the conclusion of that month. Furthermore, Condition 6.2.3 requires that the Permittee include the 12 month rolling total of VOC emissions in the semiannual report described in Condition 6.1.4, and that any exceedance of the 249 ton VOC limit be reported within 15 days.

## VII. Specific Requirements

### A. Operational Flexibility

The facility has not indicated a need for operational flexibility.

### B. Alternative Requirements

There were no alternative requirements indicated in the facility's application.

C. Insignificant Activities

Note that two emission units listed in Section 5.00 of Caravelle Marine’s application are actually insignificant activities. Emission Unit ST01 (Storage Tank #1 for Styrene Resin) has been placed in the ‘Insignificant Activities Checklist’ below since it has a true vapor pressure less than 0.19 psia, while Emission Unit PS01 (Piping System Associated with ST01) has been placed in the ‘Insignificant Activities Based On Emission Levels’ table below. Both of these can also be found in Attachment B of the Title V permit.

**INSIGNIFICANT ACTIVITIES CHECKLIST**

Category	Description of Insignificant Activity/Unit	Quantity
<b>Mobile Sources</b>	1. Cleaning and sweeping of streets and paved surfaces	1
<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.	2
<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.	

**INSIGNIFICANT ACTIVITIES CHECKLIST**

Category	Description of Insignificant Activity/Unit	Quantity
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	1
	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.	4
<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.	1
<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 data-bbox="553 1247 1224 1310">i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.</li> <li data-bbox="553 1310 1224 1352">ii) Porcelain enameling furnaces or porcelain enameling drying ovens.</li> <li data-bbox="553 1352 883 1394">iii) Kilns for firing ceramic ware.</li> <li data-bbox="553 1394 1256 1562">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 data-bbox="553 1562 964 1604">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 data-bbox="521 1772 883 1793">i) Activity is performed indoors; &amp;</li> <li data-bbox="521 1793 1240 1824">ii) No significant fugitive particulate emissions enter the environment; &amp;</li> <li data-bbox="521 1824 1062 1858">iii) No visible emissions enter the outdoor atmosphere.</li> </ul>	54

## INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
	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.	
<b>Industrial Operations (continued)</b>	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.	
<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.	2
	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.	150*
	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).	1

\*Maximum at any one time.

## INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Foam Injection (part of the assembly process)	2
Mold Cleaning	6
Mold Waxing	6
Finished Product Cleaning	6

**INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS**

<b>Description of Emission Units / Activities</b>	<b>Quantity</b>
Cutting and Sewing Fabric	2
Upholstery Area	1
Product Wrap Area	2
Piping System (pump, strainer, pipe, valves, etc.) Associated with Styrene Resin Storage Tank	1

D. Temporary Sources

There are no temporary sources indicated.

E. Short-Term Activities

The facility listed two short term activities (Mold Building and Warranty Repair) in Section 4.40 of the Title permit application. These activities are adequately covered by the other terms and conditions of the Title V permit, and no separate conditions are therefore required in this section.

F. Compliance Schedule/Progress Reports

Caravelle Marine has been operating without an air permit, but did submit a timely and complete Title V permit application. The facility's compliance plan was the submittal of the Title V permit application, with the resolution being the receipt of a valid permit for operation. Once this permit is issued, they will then be in compliance, and therefore no further permit stipulations regarding compliance were placed in this section.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

The facility has not indicated applicability to the acid rain requirement.

I. Prevention of Accidental Releases

The facility has not indicated applicability according to Section 12.10 of the Title V permit application.

J. Stratospheric Ozone Protection Requirements

The facility has listed applicability according to Section 3.11 of the Title V permit application, but has stated that there are no units at the facility with a refrigerant charge of greater than 50 lbs. The standard requirements concerning Title VI have been included under Condition 7.11.

K. Pollution Prevention

The facility has not indicated any pollution prevention controls.

L. Specific Conditions

All conditions have been covered elsewhere in the review.

**VIII. General Provisions**

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

**Addendum to Narrative**

Not applicable.

<b>Draft Permit Review</b>		
<b>Reviewing Program</b>	<b>Comments Received? (y/n)</b>	<b>Comments Taken Into Consideration In Draft Permit? (y/n)</b>
<b>ISMP</b>		
<b>SSCP</b>		

**SSPP Unit Manager:**

\_\_\_\_\_ Date

Terry Johnson

**SSPP Program Manager:**

\_\_\_\_\_ Date

Jimmy Johnston