Facility Name: **Carolina Skiff, Inc.**
City: Waycross
County: Ware
AIRS #: 04-13-299-00045

Application #: TV- 11628
Date Application Received: August 17, 1999
Date Application Deemed Administratively Complete: October 16, 1999
Date of Draft Permit: May 16, 2000
Permit No: 3732-299-0045-V-03-0

Program	Review Engineers	Review Managers
SSPP/ASU	Matthew Page	Terry Johnson
SSCP/ASU	n/a	n/a
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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 Carolina Skiff, 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 revisions 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: Carolina Skiff, Inc.

2. Parent/Holding Company Name

   Carolina Skiff, Inc.

3. Previous and/or Other Name

   None

4. Facility Location

   3231 Fulford Road
   Waycross, Georgia 31503
   Ware County

5. Attainment or Non-attainment Area Location

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

6. Class I Area Impacts

   The facility is located within 100 km of a Class I area.

B. Site Determination

There are no applicable site determination issues with this facility.

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
3732-299-0045-E-02-0	June 30, 2000		x

D. Process Description

1. SIC Code: 3732

2. Description of Product(s)

Fiberglass constructed skiffs and sea chaser/bass boats approximately 25 to 35 feet in length.

3. Overall Facility Process Description

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 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. Once the layers of lamination have cured, a foam inserts are applied to the inside bottom of the boat hull. The molded piece is then removed from the mold and trimmed. The boat deck and hulls are then assembled, and any motors and/or necessary wiring and furniture are installed. No wood coating operations are performed at the facility just installation. The facility manufacturer skiffs and bass boats. The emissions from the resin and gel coat 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 trimming booth.

4. Overall Process Flow Diagram (optional)

The facility has included process flow diagrams as part of its Title V application (No. TV-11628).

5. Facility wide Emissions Summary

The facility wide emissions were estimated as part of the review for Permit Application No. 11409.

Table 2: Facility Wide Emissions Summary for Carolina Skiff, Inc.

Pollutant	Potential Emissions - Uncontrolled (tpy)	Potential Emissions - with Permit Limits (tpy)	Anticipated Actual Emissions (tpy)
VOC	768.3	249.0	146.5
Combined HAP	768	249.0	146.5
Styrene	768	249	146.5
MDI	0.03	0.03	0.007
Particulate	< 100	22.7	< 3.6

The emissions of NO_x, SO_2, and CO are extremely minor at the facility and are below major source thresholds.

E. Regulatory Status

1. PSD/NSR

The facility is non-major under PSD regulations due to the facility wide VOC limitation of 249 tpy. NSR regulations are not applicable because the facility is located in an attainment area (Grady County) for ground level ozone and all other criteria pollutants.

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_{10}	Yes			T
SO_2	Yes			T
VOC	Yes	T		
NO_x	Yes			T
CO	Yes			T
TRS	n/a			
H_2S	n/a			
Individual HAP	Yes	T		
Total HAPs	Yes	T		

3. MACT Standards

The facility is a major source with respect to hazardous air pollutants (HAP) because the facility has potential HAP emissions of greater than 10 tpy of styrene (an individual HAP) and will be subject to any applicable NESHAP. USEPA is scheduled to promulgate a MACT standard for the fiberglass boat manufacturing industry by November 15, 2000. The facility will likely be considered an existing source upon promulgation and will have to comply with the NESHAP by the compliance date specified in the standard. The facility will soon be compliant with preliminary standards of the NESHAP. The facility is converting to low styrene content resin (< 35 %, by weight). The MACT floor for the styrene content of the production resin will be 35 %, by weight. The gel coat styrene content (31 %, by weight) should be in compliance (34 %, by weight, will be considered MACT compliant). The facility is using non-atomized spray application techniques (fluid impingement technology) for all gel coat and resin operations, the facility should be in compliance with the NESHAP which will likely call for flow coaters/FIT to be used for resin operations and other non-atomized techniques (FIT) for gel coat operations.

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 following 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:

1. The facility will have a 249 tpy VOC limitation to avoid any PSD issues. The facility has potential VOC of well over 760 tpy. The facility only plans to emit 130 to 180 tpy of VOC emissions facility wide, therefore, the facility can easily accept this VOC emission limitation of 249 tpy.

B. Applicable Rules and Regulations

- Rules and Regulations Assessment:

  None Applicable.

- Emission and Operating Standards:

  None Applicable.

C. Compliance Status

The facility is currently in compliance. Section 11.0 of the facility's Title V application does not note any compliance issues nor does the Division files.

D. Operational Flexibility

The facility has not requested any operational flexibility in their Title V application. There are no new rules,

regulations, or work practices that will be applicable to this source for the purpose of operational flexibility.

E. Permit Conditions

1. Condition No. 2.1.1 limits the facility wide VOC emissions to less than 249 tons per any twelve consecutive month period. This limit is included in the permit to ensure the facility is a PSD minor source. Condition No. 5 of the SIP Permit (No. 3732-299-0045-E-02-0) already limits the VOC emissions to 249 tpy.

III. Regulated Equipment Requirements

A. Brief Process Description

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 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. Once the layers of lamination have cured, a layer of foam is applied to the sides and corners of the boat hull. The molded piece is then removed from the mold and trimmed. The boat deck and hulls are then assembled, and the motor and all necessary wiring and furniture are installed. No wood coating operations are performed at the facility just installation of cabinets.

The facility utilizes nine gel coat spray booths (Emission Unit ID Nos. GS01, GS02, GS03, GL01, GL02, GL03, GL04, GSC1, and GSC2) for the application of the various gel coats at the Sea Chaser and Bass Boat operations. The facility utilizes eleven laminate spray resin systems (Emission Unit ID Nos. FS01, FL01, FL02, FL03, FL04, FL05, FSC1, FSC2, FSC3, FSC4, and FSC5) for the application of the resin skin coat and lamination layers for the Sea Chaser and Bass Boat operations. FIT type applicators are used in the all of the gel coat and resin operations. The hull trimming and grinding is performed in the three trimming booths (Emission Unit ID Nos. GT01, GT02, and GT03). The emissions from the resin and gel coat operations will be styrene (VOC/HAP). The foam operations (Emission Unit ID Nos. ISO1 and ISO2) will emit trace amounts of isocyanate (MDI). There will be very minor amounts of particulate emissions from the trimming booth after control. All of the operations above take place in two enclosed buildings. The facility is utilizing FIT application techniques which will result in a minimal amount of over spray, therefore, no booths or filters are required for these operations. The three trimming booths have fiber filters (Air Pollution Control Device ID Nos. FT01 through FT09) to control any particulate emissions. All filters will be required to be changed out at least once per week.

B. Equipment List for the Process

Table 4: Equipment List for Carolina Skiff, Inc.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements / Standards***	**Corresponding Permit Conditions**	**ID No.**	**Description**
GS01	Small Parts Gelcoat Station No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
GS02	Small Parts Gelcoat Station No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None

Table 4: Equipment List for Carolina Skiff, Inc.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards*	Corresponding Permit Conditions	ID No.	Description
GS03	Small Parts Gelcoat Station No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FS01	Small Parts Flow Coater Station No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FL01	Flow Coater Lamination Station No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FL02	Flow Coater Lamination Station No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FL03	Flow Coater Lamination Station No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FL04	Flow Coater Lamination Station No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FL05	Flow Coater Lamination Station No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
GL01	Boat Lamination Gelcoat Station No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
GL02	Boat Lamination Gelcoat Station No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
GL03	Boat Lamination Gelcoat Station No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
GL04	Boat Lamination Gelcoat Station No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FSC1	Flow Coater (Sea Chaser) Station No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FSC2	Flow Coater (Sea Chaser) Station No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FSC3	Flow Coater (Sea Chaser) Station No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FSC4	Flow Coater (Sea Chaser) Station No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
FSC5	Flow Coater (Sea Chaser) Station No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
GSC1	Gelcoat (Sea Chaser) Station No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None

Table 4: Equipment List for Carolina Skiff, Inc.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards*	Corresponding Permit Conditions	ID No.	Description
GSC2	Gelcoat (Sea Chaser) Station No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, and 6.2.5	None	None
ISO1	Bass Boat Isofoam System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.2, 6.2.1, 6.2.2, 6.2.3, and 6.2.5	None	None
ISO2	Sea Chaser Isofoam System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, and 6.2.5	None	None
GT01	Skiff Grinding and Trim Booth area No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.3, and 6.2.6	FT01, FT02, and FT03	Fabric Filters
GT02	Small Parts Grinding and Trim Booth area No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.3, and 6.2.6	FT04 and FT05	Fabric Filters
GT03	Sea Chaser Grinding and Trim Booth area No.3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.3, and 6.2.6	FT06 through FT09	Fabric Filters

C. Equipment & Rule Applicability

- Emission and Operating Caps:

  None Applicable

- Applicable Rules and Regulations -

  Rules and Regulations Assessment:

  Equipment at the facility is subject to the following Georgia Rules:

  391-3-1-.02(2)(b) Visible Emissions
  391-3-1-.02(2)(e) Particulate Emissions from Manufacturing Processes

  The Emission Units listed in Table 4 are subject to Georgia Rule 391-3-1-.02(2)(b) because it applies to all sources that are subject to at least one other emission limitation and not subject to any other, more stringent, opacity standard.

  The Emission Units listed in Table 4 are subject to Georgia Rule 391-3-1-.02(2)(e) because these emission units are considered new equipment, constructed after July 2, 1968. Therefore, particulate matter emissions allowable is based on the following equation:

  $E = 4.1*(P)^{0.67}$ where E equals the allowable particulate emissions rate in lb/hr and P equals the process input weight rate in tons/hr. This equation applies only to process input rates up to and including 30 tons/hr. The emission units above will have very minor particulate emissions. The uncontrolled potential particulate emissions from the trimming booths could exceed 25 tpy, therefore, these emission units are listed in Table 3.1.

Emission and Operating Standards:

391-3-1-.02(2)(b) Visible Emissions: Limits opacity of an air contaminant source to less than 40 %. The mixer will not exceed this standard.

391-3-1-.02(2)(e) Particulate Emissions from Manufacturing Processes: Limits emissions of particulate matter from the Emission Units listed in Table 4 based upon $E= 4.1(P)^{0.67}$, E = emission rate in pounds per hour, P= process input weight rate in tons per hour. The controlled potential PM emissions are incredibly minimal if the fabric filters are properly maintained.

D. Compliance Status

The facility is currently in compliance. Section 11.10 of the facility's Title V application and the Division files do not note any active compliance issues. Per SSCP compliance files the facility has complied with Consent order No. EPD-AQC-513, issued December 15, 1999.

E. Operational Flexibility

The facility has not requested any operational flexibility in their Title V application. There are no new rules, regulations, or work practices that will be applicable to this source for the purposes of operational flexibilit

F. Permit Conditions

1. Condition No. 3.4.1 subjects the Emission Units listed in Table 4 to Rule (b). This limits opacity from the above emission units to no greater than forty percent.

2. Condition No. 3.4.2 subjects the Emission Units listed in Table 4 to Rule (e). This limits particulate matter emissions derived from the equation, $E = 4.1(P)^{0.67}$.

3. Condition No. 3.5.1 requires that the facility utilize only non-atomized application techniques for the resin and gel coat operations (Emission Unit ID Nos. GS01, GS02, GS03, FS01, FL01, FL02, FL03, FL04, FL05, GL01, GL02, GL03, GL04, FSC1, FSC2, FSC3, FSC4, FSC5, GSC1, and GSC2). This condition is in the current SIP permit (Condition No. 6) as part of Consent Order No. EPD-AQC-513. The Division has determined that particulate emissions will best be controlled if the facility utilizes flow coaters and/or FIT application techniques for resin operations and FIT application techniques for gel coat operations.

4. Condition No. 3.5.2 requires the facility to cover all containers of volatile organic compounds and/or hazardous air pollutants when not in use and to ensure that all open doors and windows are closed when the isofoam systems (Emission Unit ID Nos. ISO1 and ISO2) are in operation. This condition is Condition No. 8 (and part of Condition No. 10) of the current SIP permit. This condition was inserted into the permit in order to ensure that the facility utilizes good work practices and minimizes emissions.
5. Condition No. 3.5.3 requires the facility to use the dry fabric filter systems (Air Pollution Control Device ID Nos. FT01 through FT09) to control particulate emissions from the three grinding and trimming operations (Emission Unit ID Nos. GT01, GT02, and GT03) and maintain and operate them per manufacturer's

specifications. The facility will replace the filters for Air Pollution Control Device ID Nos. FT01 through FT09 at least once per operating week. This condition is in the current SIP permit as Condition No. 9 and ensures that the particulate emissions from the grinding and trimming booths are minimized.

6. Condition No. 10 of the current SIP permit specifies that the facility should operate the grinding, trimming, resin, gel coat, and isofoam operations such that particulate emissions are minimized. The resin and gel coat operations should not generate much particulate emissions with the use of FIT application devices. The trimming and grinding booths are controlled by booths with fabric filters. The isofoam particulate emissions are very minor in nature and are covered by Condition No. 3.5.2.

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

A. General Testing Requirements

None of the applicable regulations requires performance testing; therefore, this permit does not contain any conditions to require specific testing for any sources. The permit specifies that a performance test may be required to determine compliance with the emission limits in Part 3.0, and the test methods to be used to determine compliance are listed. A general condition to require notification of any test and for the submission of a test plan is included.

B. Specific Testing Requirements

None Applicable.

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 the calibration was performed and completed properly.

B. Specific Monitoring Requirements

The resin, gel coat, and isofoam stations are all subject to Georgia Rules (b) and (e). Particulate matter and visible emissions from these operations are minimal; therefore, no monitoring is being specified. The three grinding and trim booths are also subject to Georgia Rules (b) and (e). These booths are controlled for particulate matter by fabric filters. Condition 3.5.3 specifies a filter change schedule, and Condition 6.2.6 requires that a log be kept of all filter changes to ensure that the filter systems are functioning properly.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The standard general requirements for the maintenance of all records for a period of five years and for the prompt reporting of excess emissions from process malfunctions or improper maintenance are included (Condition Nos. 6.1.1, 6.1.2, and 6.1.3).

The Permittee is required in Condition 6.1.4 to submit a semiannual report. This report should contain information on deviations (described in exceedences) which occurred during the reporting period. The required information is enumerated in the Condition. Condition 6.1.5 requires any analysis or sampling records to be kept. All records should be maintained for at least five years according to Condition 6.1.6.

Condition No. 6.1.7 details deviations which are to be included in the semiannual report required in Condition No. 6.1.4. Exceedances would occur if the facility exceeded the VOC limit specified in Condition No. 2.1.1 for any twelve consecutive month period. Excursions would occur if the facility failed to perform a filter change as required by Condition No. 3.5.3.

B. Specific Record Keeping and Reporting Requirements

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. 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. Styrene is the only VOC emitted by the facility and is also the only HAP emitted by the facility (isocyanate emissions are deminimus). Therefore, HAP records are not required. The above conditions are derived from Condition Nos. 11, 12, and 13 of the SIP permit.

Condition No. 6.2.4 requires the facility to keep permanent documentation that the resin and gel coat operations are utilizing non-atomized application techniques. Condition No. 6.2.5 requires the facility to perform an inspection at least once per week to verify that the facility is complying with Condition No. 3.5.2. The facility should keep a suitable log with the time a date of each inspection and note if any containers of VOC/HAP containing materials are covered or not covered, and the log should note if any windows and doors in the isofoam operations are opened. The log should be kept in a form suitable for submittal to the Division and for five years from the date of record. Condition No. 6.2.6 requires the facility to keep a log of the filter replacement for Emission Unit ID Nos. GT01, GT02, and GT03 in order to verify compliance with Condition No. 3.5.3. Air pollution Device Nos. FT01 through FT09 consist of dry fabric filters for the three trimming and grinding booths.

VII. Specific Requirements

A. Operational Flexibility

None Applicable

B. Alternative Requirements

None Applicable

C. Insignificant Activities

The insignificant activities are listed in Appendix B of the Title V operating permit. This list was created from Section 4.10 of the facility's application. The facility indicated that they have some brazing, soldering, and welding operations. The facility also indicated that they have some drilling and machining operations. The facility also indicated that they have a petroleum liquid storage tank with a capacity of less than 10,000 gallons storing a petroleum liquid (listed in Table 4.10 of the Title V application).

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None indicated.

F. Compliance Schedule/Progress Reports

The facility will be subject to the "Fiberglass Boat Manufacturing" MACT Standard due to be promulgated by USEPA by November 15, 2000.

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 does use air conditioning and/or refrigeration equipment that uses CFC's or HCFC's that are listed in 40 CFR Part 82, Subpart A, Appendices A and B. However, the facility does not have any piece of equipment that has a charge greater than 50 pounds of refrigerant.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

None

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

//Place addendum text starting here//

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

SSPP Unit Manager: _____ _____

Robert T. Johnson **Date**

SSPP Program Manager: _____ _____

SSPP Program Manager **Date**