

Facility Name: **Carolina Skiff, LLC**

City: Waycross

County: Ware

AIRS #: 04-13-299-00045

Application #: 15247

Date SIP Application Received: N/A

Date Title V Application Received: March 22, 2004

Permit No: 3732-299-0045-V-04-2

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
<b>SSPP</b>	Matt Henderson	Dean Story
<b>SSCP</b>	N/A	N/A
<b>ISMP</b>	Sid Stephens	Richard Taylor
<b>TOXICS</b>	Michael Odom	Karen Hays

## **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 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3732-299-0045-V-04-0	June 26, 2003		X
3732-299-0045-V-04-1	January 14, 2004	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3732-299-0045-V-04-1	Administrative Amendment issued to change name to Carolina Skiff, Inc.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is potentially a major source in regards to PSD/NSR, but has limited VOC emissions from the facility below the PSD major source threshold for VOC emissions in an Attainment area, so PSD/NSR does not apply.

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			✓
PM <sub>10</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes	✓		
NO <sub>x</sub>	Yes			✓
CO	Yes			✓
TRS	N/A			
H <sub>2</sub> S	N/A			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

## II. Proposed Modification

### A. Description of Modification

This amendment will add the applicable requirements of 40 CFR 63 Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*, to Carolina Skiff's Title V Operating Permit and change the facility's name from Carolina Skiff, Inc. to Carolina Skiff, LLC.

### B. Emissions Change

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

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

### C. PSD/NSR Applicability

Since no new equipment is being added to the facility and there is no emissions increase associated with this modification, PSD/NSR is not applicable.

**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 Carolina Skiff, LLC facility is operating in compliance with all applicable rules and regulations at this time.

D. Operational Flexibility

Since no new process equipment is being added and no changes to the existing process equipment are being made, 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. 3732-299-0045-V-04-0. No new process equipment is being added to the Carolina Skiff, LLC facility. The table shown below is being revised to list the new Conditions pertaining to 40 CFR 63 Subpart VVVV.

**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
GS01	Small Parts Gel coat Station No. 1	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
GS02	Small Parts Gel coat Station No. 2	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
GS03	Small Parts Gel coat Station No. 3	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FS01	Small Parts Flow Coater Station No. 1	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FL01	Flow Coater Lamination Station No. 1	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FL02	Flow Coater Lamination Station No. 2	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FL03	Flow Coater Lamination Station No. 3	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FL04	Flow Coater Lamination Station No. 4	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None

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FL05	Flow Coater Lamination Station No. 5	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
GL01	Boat Lamination Gel coat Station No. 1	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
GL02	Boat Lamination Gel coat Station No. 2	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
GL03	Boat Lamination Gel coat Station No. 3	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
GL04	Boat Lamination Gel coat Station No. 4	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FSC1	Flow Coater (Sea Chaser) Station No. 1	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FSC2	Flow Coater (Sea Chaser) Station No. 2	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FSC3	Flow Coater (Sea Chaser) Station No. 3	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FSC4	Flow Coater (Sea Chaser) Station No. 4	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
FSC5	Flow Coater (Sea Chaser) Station No. 5	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None
GSC1	Gel coat (Sea Chaser) Station No. 1	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	None	None

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GSC2	Gel coat (Sea Chaser) Station No. 2	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, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22	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

\* 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 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.

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 and Carolina Skiff, LLC is not changing any of the existing process equipment, 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. 6.2.12, 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 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. 5.2.1 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.

Condition No. 5.2.2 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. 6.2.7 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. 6.2.8 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. 6.2.9 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. 6.2.9.

Condition No. 6.2.10 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. 6.2.11 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. 6.2.12 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. 6.2.13 presents the methods for demonstrating compliance with Condition No. 3.3.2 if filled resins are used at the facility.

Condition No. 6.2.14 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. 6.2.15 requires that the Permittee demonstrate compliance with Condition No. 3.3.8 using the methods presented in Condition Nos. 4.1.3 and 6.2.20.

Condition No. 6.2.16 requires that the Permittee maintain records of all notifications and compliance reports submitted to the Division, any supporting documentation, and the total amount of resins and gel coats used at the facility and the weighted-average HAP content for each operation.

Condition No. 6.2.17 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. 6.2.18 requires that the Permittee send to the Division all notifications required by Table 7 of Subpart VVVV (Table 6.2.18-1 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. 6.2.19 presents the content and reporting schedule for the compliance reports that the facility must submit to the Division.

Condition No. 6.2.20 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. 6.2.21 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. 6.2.22 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.

**VIII. Specific Requirements**

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

Due to the fact that no new equipment is being added at the facility and Carolina Skiff, LLC is not changing any of the existing process equipment, no operation 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 23, 2004 and ended on August 23, 2004. Comments were not received by the Division.