

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

Application #: TV-16120
 Date Application Received: April 21, 2005
 Permit No: 3732-299-0045-V-05-0

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 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 **Carolina Skiff, LLC** 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:

Carolina Skiff, LLC

2. Parent/Holding Company Name

Carolina Skiff, Inc.

3. Previous and/or Other Name(s)

Carolina Skiff, Inc.

4. Facility Location

3231 Fulford Road
Waycross, Georgia 31503

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

The facility is located in an attainment county.

6. Class I Area Impacts

The facility is located within 200 km of the Okefenokee W.R.A and the Wolf Island W.A.

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
3732-299-0045-V-04-0	September 26, 2000	Administrative amendment to change the name of the facility from Carolina Skiff, Inc. to Carolina Skiff, LLC.

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3732-299-0045-V-04-1	January 14, 2004	Amendment issued to change the name of the facility from Carolina Skiff, LLC to Carolina Skiff, Inc.
3732-299-0045-V-04-3	July 29, 2005	502(b)10 amendment issued for the construction and operation of 8 chop guns, 4 gel coat guns, and 2 (resin) putty stations.
3732-299-0045-V-04-2	September 15, 2004	Amendment issued to incorporate 40 CFR 63 Subpart VVVV and change the facility name to Carolina Skiff, LLC.

D. Process Description

1. SIC Codes(s)

3732: establishments primarily engaged in building and repairing boats.

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 boats.

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 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.

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 potentially a PSD/NSR major source; however, by maintaining a facility-wide 249 ton per year VOC emission cap, the facility will avoid PSD/NSR 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	No			
VOC	Yes	✓		
NO _x	No			
CO	No			
TRS	No			
H ₂ S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

The facility is subject to the provisions of 40 CFR 63 Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*. All applicable portions of this regulation appear in Georgia Air Quality Permit No. 3732-299-0045-V-05-0.

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:**

Emission and operating caps specified in Permit No. 3732-299-0045-V-05-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

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

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition No. 2.1.1 is being carried over from Permit No. 3732-299-0045-V-04-0 and limits the VOC emissions from the facility to less than 249 tons per year.

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.

The facility utilizes twelve gel coat spray booths (Emission Unit ID Nos. GL01 through GL05, and GS01 through GS07) for the application of the various gel coats at the Sea Chaser and Bass Boat operations, respectively. The facility utilizes 20 laminate spray resin systems (Emission Unit ID Nos. FC05 through FC12, FL01 through FL06, FS01, and FSC1 through FSC5) for the application of the resin skin coat and lamination layers for the Sea Chaser and Bass Boat operations, respectively. Fluid Impingement Technology (FIT) type applicators are used in the all of the gel coat and resin lamination operations. FIT guns use non-atomized sprays to minimize VOC/HAP emissions (similar to flow coater guns) which will result in a minimal amount of overspray, therefore, no booths are required for these operations. The emissions of concern from the resin and gel coat operations will be styrene (VOC/HAP). There are also three stations for dispensing a resin-based putty (not a spray application). The four foam forming operations (Emission Unit ID Nos. ISO1 through ISO4) will emit trace amounts of isocyanate (MDI). The facility is utilizing FIT application techniques for the gel coat and lamination operations,

The hull trimming and grinding is performed in the four trimming booths (Emission Unit ID Nos. GT01, GT02, GT03, and GT04), two for each operation. There will be very minor amounts of particulate emissions from the trimming booth after control. The four trimming booths have fiber filters (Air Pollution Control Device ID Nos. PF07, PF08, PF09, PF14, PF15, PF16, PF17, PF25 and PF26) to control any particulate emissions. The particulate filters associated with the grinding and trim operations will be changed once per day of operation and the particulate filters associated with the gel coat and lamination operations will be changed out once per week of operation. All of the aforementioned operations take place in three enclosed buildings.

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
Skiff Line (Bass)					
GT01	Grind and Trim Station No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 5.2.1	PF07	Particulate Filter
				PF08	Particulate Filter
				PF09	Particulate Filter
GT02	Grind and Trim Station No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 5.2.1	PF14	Particulate Filter
				PF15	Particulate Filter
				PF16	Particulate Filter
				PF17	Particulate Filter
FL01	Flow 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF02	Particulate Filter
FL02	Flow 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF02	Particulate Filter
				PF03	Particulate Filter
FL03	Flow 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF03	Particulate Filter
				PF04	Particulate Filter
FL04	Flow 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF04	Particulate Filter
				PF05	Particulate Filter
FL05	Flow Coat 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF05	Particulate Filter
				PF06	Particulate Filter
FL06	Flow Coat Station No. 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF06	Particulate Filter
FS01	Small Parts Flow Coat Station	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF10	Particulate Filter
GL01	Exterior Hull Gel Coat Station	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF01	Particulate Filter
GL02	Interior 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF11	Particulate Filter
GL03	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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF10	Particulate Filter
				PF11	Particulate Filter
GL04	Small Parts 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF21	Particulate Filter

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
GL05	Small Parts Gel Coat 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF23	Particulate Filter
				PF24	Particulate Filter
GSS1	Small Parts Gelcoat Station	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 6.2.1 through 6.2.20	N/A	None Applicable.
GSS2	Small Parts Gelcoat Station	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 6.2.1 through 6.2.20	N/A	None Applicable.
Sea Chaser Line					
GT03	Grind Room No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 5.2.1	PF25	Particulate Filter
				PF26	Particulate Filter
GT04	Grind Room No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 5.2.1		
FSC1	Flow 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF22	Particulate Filter
FSC2	Flow 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	F03	Particulate Filter
FSC3	Flow 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	F02	Particulate Filter
FSC4	Flow 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	F01	Particulate Filter
FC05	Flow Coat 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 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
FC06	Flow Coat Station No. 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
FC07	Flow Coat Station No. 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
FC08	Flow Coat Station No. 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
FC09	Flow Coat Station No. 9	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
FC10	Flow Coat Station No. 10	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
FC11	Flow Coat Station No. 11	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
FC12	Flow Coat Station No. 12	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
GS01	Exterior 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 3.3.7, 3.4.1, 3.4.26.2.1 through 6.2.20	N/A	N/A
GS02	Interior 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 3.3.7, 3.4.1, 3.4.26.2.1 through 6.2.20	N/A	N/A
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 3.3.7, 3.5.2, 3.5.3, 5.2.2, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	PF27	Particulate Filter
				PF28	Particulate Filter
				PF29	Particulate Filter
GS04	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 3.3.7, 3.4.1, 3.4.2, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
GS05	Gel Coat 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 3.3.7, 3.4.1, 3.4.2, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
GS06	Gel Coat Station No. 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
GS07	Gel Coat Station No. 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1 through 3.3.7, 3.4.1, 3.4.2, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.20	N/A	N/A
PD01	Putty Station No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 6.2.17, 6.2.18, 6.2.19, 6.2.20	N/A	N/A
PD02	Putty Station No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 6.2.17, 6.2.18, 6.2.19, 6.2.20	N/A	N/A
PD03	Putty Station No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 6.2.17, 6.2.18, 6.2.19, 6.2.20	N/A	N/A

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

C. Equipment & Rule Applicability

Emission and Operating Caps:

None Applicable.

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. 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 currently in compliance with all applicable rules and regulations.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition Nos. 3.3.1 through 3.3.8 establish the emission limits and work practice standards of 40 CFR 63 Subpart VVVV.

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.

Condition No. 3.4.1 limits the opacity of visible emissions from the facility to forty (40) percent or less, as per Rule (b).

Condition No. 3.4.2 limits the amount of particulate matter that can be emitted from the facility using an equation based on process input weight rate, as per Rule (e).

Condition No. 3.5.1 requires that the particulate filters (Air Pollution Control Device ID Nos. PF07, PF08, PF09, PF14, PF15, PF16, PF17, PF25, and PF26) are in operation any time grinding and trimming operations are taking place and that the filter media be replaced once per day of operation.

Condition No. 3.5.2 requires that the particulate filters (Air Pollution Control Device ID Nos. F01 through F03, PF01 through PF06, PF10 through PF13, PF21 through PF24 and PF27 through PF29) are in operation anytime gel coat and lamination operations are taking place and that the filter media be replaced once per week of operation.

Deleted Conditions

Condition No. 3.5.2 of Permit No. 3732-299-0045-V-04-0 is being deleted due to the fact that Subpart VVVV requires that containers/mixers holding HAP containing materials be kept closed when not in use; therefore, that part of the Condition has become obsolete. Secondly, the isofoam application system has been moved to an interior section of the facility and is no longer near any windows or doorways leading outside the facility.

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:**

None applicable.

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

Condition No. 5.2.1 requires that the date and time of the filter changes for the grind and trim stations be recorded in a logbook.

Condition No. 5.2.2 requires that the date and time of the filter changes for the gel coat/lamination areas be recorded in a logbook.

Condition No. 5.2.3 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. (40 CFR 63 Subpart VVVV requirement)

Condition No. 5.2.4 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. (40 CFR 63 Subpart VVVV requirement)

C. Compliance Assurance Monitoring (CAM)

Not Applicable.

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 Nos. 6.2.1 through 6.2.16 are required by 40 CFR 63 Subpart VVVV.

Condition No. 6.2.1 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. 6.2.2 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. 6.2.3 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. 6.2.3.

Condition No. 6.2.4 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. 6.2.5 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. 6.2.6 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. 6.2.7 presents the methods for demonstrating compliance with Condition No. 3.3.2 if filled resins are used at the facility.

Condition No. 6.2.8 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. 6.2.9 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. 6.2.10 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. 6.2.11 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. 6.2.12 requires that the Permittee send to the Division all notifications required by Table 7 of Subpart VVVV (Table 6.2.12-1 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. 6.2.13 presents the content and reporting schedule for the compliance reports that the facility must submit to the Division.

Condition No. 6.2.14 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. 6.2.15 requires the Permittee to maintain records of all visual inspections and corrective actions taken conducted in accordance with Condition No. 5.2.3. The written inspection records are to be kept in a logbook. The records are to be kept for at least five years from the date of record.

Condition No. 6.2.16 requires the Permittee to maintain records of all visual inspections and corrective actions taken conducted in accordance with Condition No. 5.2.4. 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. 6.2.17 requires usage records be kept for all VOC-containing materials utilized at the facility.

Condition No. 6.2.18 requires the calculation of the monthly VOC emissions from the entire facility. A notification is required to be sent to the Division if the monthly VOC emissions equal or exceed 20.75 tons.

Condition No. 6.2.19 requires the calculation of the monthly rolling 12-month total VOC emissions from the entire facility. A notification is required to be sent to the Division in the monthly rolling 12-month total VOC emissions equal or exceed 249 tons.

Condition No. 6.2.20 contains the equations and methods used to calculate the monthly VOC emissions from the facility, as required by Condition No. 6.2.18.

Deleted Conditions

Condition No. 6.2.4 from Permit No. 3732-299-0045-V-04-0 is being deleted because there is no regulatory basis for the requirement and Subpart VVVV allows the use of atomized gel coat and resin application techniques.

Condition No. 6.2.5 from Permit No. 3732-299-0045-V-04-0 is being deleted due to the fact that Subpart VVVV requires that containers/mixers holding HAP containing materials be kept closed when not in use; therefore, that part of the Condition has become obsolete. Secondly, the isofoam application system has been moved to an interior section of the facility and is no longer near any windows or doorways leading outside the facility.

Condition No. 6.2.6 from Permit No. 3732-299-0045-V-04-0 has been moved to Condition No. 5.2.1 of this Permit.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

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

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

The facility is not subject to the provisions of Title IV.

I. Stratospheric Ozone Protection Requirements

The facility is not subject to the requirements of Title VI.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

None 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 public notice was published November 23, 2005 and expired December 23, 2005. No comments were received.