

Facility Name: **Carolina Skiff, LLC**

City: Waycross

County: Ware

AIRS #: 04-13-299-00045

Application #: 16121

Date SIP Application Received: March 24, 2005

Date Title V Application Received: N/A

Permit No: 3732-299-0045-V-04-3

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
<b>SSPP</b>	Matt Henderson	Eric Cornwell
<b>SSCP</b>	N/A	N/A
<b>ISMP</b>	N/A	N/A
<b>TOXICS</b>	N/A	N/A

## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and operate and Section 502(b)(10) change to the Part 70 source. 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), 391-3-1-.03(2), 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 permit and is presented in the same general order as the permit amendment. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

**I. Facility Description**

A. Existing Permits

Table 1 below lists the current Title V permit, all administrative amendments and minor and significant modifications to that permit, and any 502(b)(10) changes. 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	September 26, 2000	X	
3732-299-0045-V-04-1	January 14, 2004	X	
3732-299-0045-V-04-2	September 14, 2004	X	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
3732-299-0045-V-04-0	Administrative amendment issued to change facility name to Carolina Skiff, LLC from Carolina Skiff, Inc.
3732-299-0045-V-04-1	Administrative amendment issued to change facility name to Carolina Skiff, Inc. from Carolina Skiff, LLC.
3732-299-0045-V-04-2	Significant modification amendment issued to incorporate the applicable portions of 40 CFR 63 Subpart VVVV into the permit and change the facility name to Carolina Skiff, LLC from Carolina Skiff, Inc.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is potentially a PSD major source for VOC emissions but chose to limit VOC emissions from the entire facility to less than 250 tons per year to avoid PSD review.

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	No			
H <sub>2</sub> S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

**II. Proposed Modification**

A. Description of Modification

The Permittee will be adding eight flow coat spray guns (Emission Unit ID Nos. FC05, FC06, FC07, FC08, FC09, FC10, FC11, and FC12), four gel coat spray guns (Emission Unit ID Nos. GS04, GS05, GS06, and GS07), and two putty stations (Emission Unit ID Nos. PD02 and PD03) to the list of current equipment in operation at the Carolina Skiff, LLC facility in Waycross (Ware County). This equipment is being added to expand boat-making capacity at the facility.

B. Emissions Change

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

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Net Potential Emissions Increase (Decrease) (tpy)</b>
PM	Yes	0	0
PM <sub>10</sub>	Yes	0	0
SO <sub>2</sub>	Yes	0	0
VOC	Yes	68	0
NO <sub>x</sub>	Yes	0	0
CO	Yes	0	0
TRS	No		
H <sub>2</sub> S	No		
Individual HAP	Yes	65	0
Total HAPs	Yes	68	0

C. Title I Modification

- PSD/NSR Applicability

Since the facility is not a PSD major source, and is not removing the 249 ton per year VOC emission limit, this modification is not a Title I modification.

- NSPS Modification

The facility is not subject to any promulgated NSPS; therefore, this is not a modification under 40 CFR Part 60.

- NESHAP Modification

The facility is not subject to any promulgated Part 61 NESHAP, therefore, this is not a modification under 40 CFR Part 61.

**III. Facility Wide Requirements**

A. Emission and Operating Caps

None Applicable.

B. Applicable Rules and Regulations

- Rules and Regulations Assessment –

None Applicable.

- Emission and Operating Standards –

None Applicable.

C. Compliance Status

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

D. Operational Flexibility

None Requested.

E. Permit Conditions

None Applicable.

**IV. Regulated Equipment Requirements**

**A. Brief Process Description**

Eight flow coat spray guns (Emission Unit ID Nos. FC05, FC06, FC07, FC08, FC09, FC10, FC11, and FC12), four gel coat spray guns (Emission Unit ID Nos. GS04, GS05, GS06, and GS07), and two putty stations (Emission Unit ID Nos. PD02 and PD03) are being added to the facility. The purpose of the gel coat spray guns is to apply a layer of clear or colored gel coat to the boat hull molds. The purpose of the flow coat spray guns is to apply layers of styrene resin over layers of chopped and strand fiberglass on top of the gel coat layer to form the boat hull. The purpose of the putty stations is to apply the putty adhesive that bonds the boat deck to the hull.

**B. Equipment List for the New or Modified Process(es)**

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
FC05	Flow Coat Spray Gun	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, 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	N/A	N/A
FC06	Flow Coat Spray Gun	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, 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	N/A	N/A
FC07	Flow Coat Spray Gun	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, 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	N/A	N/A
FC08	Flow Coat Spray Gun	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, 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	N/A	N/A
FC09	Flow Coat Spray Gun	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, 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	N/A	N/A
FC10	Flow Coat Spray Gun	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, 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	N/A	N/A
FC11	Flow Coat Spray Gun	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, 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	N/A	N/A
FC12	Flow Coat Spray Gun	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, 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	N/A	N/A
GS04	Gel Coat Spray Gun	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, 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	N/A	N/A
GS05	Gel Coat Spray Gun	391-3-1-.02(2)(b)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 5.2.1, 5.2.2,	N/A	N/A

**SIP CONSTRUCTION & OPERATING PERMIT AND TITLE V 502(b)10 CHANGE APPLICATION REVIEW**

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
		391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, and 6.2.7 through 6.2.22		
GS06	Gel Coat Spray Gun	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, 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	N/A	N/A
GS07	Gel Coat Spray Gun	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, 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	N/A	N/A
PD02	Putty Station No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.2.1, and 6.2.2	N/A	N/A
PD03	Putty Station No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.2.1, and 6.2.2	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.
- Applicable Rules and Regulations -

**Rules and Regulations Assessment:**

40 CFR Part 63 Subpart VVVV applies to the gel coat and flow coat spray guns listed in the Table above. Regulatory applicability for Subpart VVVV is triggered when a facility is primarily engaged in the manufacture of fiberglass boat hulls and is a major source of HAP. The provisions of 40 CFR Part 63 Subpart VVVV has already been incorporated into the Carolina Skiff, LLC Title V Operating Permit with Amendment No. 3732-299-0045-V-04-2. The gel coat and flow coat spray guns must be in compliance with the provisions of 40 CFR Part 63 Subpart VVVV at startup.

**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 boat hulls.

**D. Compliance Status**

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

**E. Operational Flexibility**

None Requested.

F. Permit Conditions

All Conditions governing the operation of the equipment listed in Table 3.1.1 already appear in the Title V Operating Permit for Carolina Skiff, LLC.

**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):

None Applicable.

**VII. Other Record Keeping and Reporting Requirements**

None Applicable.

**VIII. Specific Requirements**

A. Operational Flexibility

None Requested.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

None Applicable.

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

The facility is operating 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. Prevention of Accidental Releases

Not Applicable.

J. Stratospheric Ozone Protection Requirements

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

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

None Applicable.