

SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW

Facility Name: **Carolina Skiff, LLC**

City: Waycross

County: Ware

AIRS #: 04-13-299-00045

Application #: 17019

Date SIP Application Received: October 26, 2006

Date Title V Application Received: October 36, 2006

Permit No: 3732-299-0045-V-05-1

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and proposed 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 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 and minor and significant modifications and 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-05-0	January 11, 2006	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
3732-299-0045-V-05-0	Title V Permit Renewal

B. Regulatory Status

1. PSD/NSR/RACT

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 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	✓			✓
PM ₁₀	✓			✓
SO ₂				
VOC	✓	✓		
NO _x				
CO				
TRS				
H ₂ S				
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

The application was submitted for the addition of emissions unit FS02, Small Parts Flow Coat Station No. 2, including a non-atomized resin spray gun for the application of resin to open molds. The facility also requested a reassignment of emission control units to emission units that match the physical plant layout. Some of these emission control units were not included in the previous Title V renewal application. The units include: PF18, PF19, PF20, PF30, PF31, PF32, PF33, PF35, and PF36.

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	✓	0	0
PM ₁₀	✓	0	0
SO ₂			
VOC	✓	3.5	15
NO _x			
CO			
TRS			
H ₂ S			
Individual HAP	✓	3.5	15
Total HAPs	✓	3.5	15

C. PSD/NSR Applicability

The proposed modification will not trigger PSD or nonattainment NSR.

III. Facility Wide Requirements

A. Emission and Operating Caps

No new emissions caps will be established.

B. Applicable Rules and Regulations

No new rules or regulations are triggered.

C. Compliance Status

No noncompliance issues were identified in the application.

D. Operational Flexibility

No operational flexibility was requested in the application.

E. Permit Conditions

No changes.

IV. Regulated Equipment Requirements

A. Brief Process Description

The facility currently 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. This application is for the installation of an additional Small Parts Flow Coat Station, Emission ID No. FS02, including a non-atomized resin spray gun for the application of resin to open molds. Fluid Impingement Technology (FIT) type applicators are used in all 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 are styrene (VOC/HAP).

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)					
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
				PF18	Particulate Filter
				PF19	Particulate Filter
FS02	Small Parts 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	PF20	Particulate Filter
				PF22	Particulate Filter
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
				PF32	Particulate Filter
				PF33	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	PF36	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
				PF31	Particulate Filter
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	PF30	Particulate Filter
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
				PF35	Particulate Filter

* 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 and operating caps.
- Applicable Rules and Regulations -

Rules and Regulations Assessment: No new rules or regulations are triggered

Emission and Operating Standards: N/A

D. Compliance Status

This application was submitted because of a Letter of Noncompliance issued to the facility on June 19, 2006.

E. Operational Flexibility

No operational flexibility was requested in the application.

F. Permit Conditions

Conditions 3.5.1 and 3.5.2 have been modified to add Small Parts Flow Coat Station No. 2 (FS02) and the applicable emission control units included in the application.

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: No new monitoring requirements applicable.
- B. Equipment Groups (all subject to the same monitoring requirements): No new monitoring requirements applicable.

VII. Other Record Keeping and Reporting Requirements

None applicable.

VIII. Specific Requirements

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

A. Operational Flexibility

No changes.

B. Alternative Requirements

No changes.

C. Insignificant Activities

No changes.

D. Temporary Sources

No changes.

E. Short-Term Activities

No changes.

F. Compliance Schedule/Progress Reports

No changes.

G. Emissions Trading

No changes.

H. Acid Rain Requirements

No changes.

I. Prevention of Accidental Releases

No changes.

J. Stratospheric Ozone Protection Requirements

No changes.

K. Pollution Prevention

No changes.

L. Specific Conditions

No changes.

Addendum to Narrative

The 45-day EPA review started on June 14, 2007 and ended on July 30, 2007. Comments were not received by the Division.