

## Air Permit Review

Permit Issue Date: **date, 2011**

**Region:** Wilmington Regional Office  
**County:** Brunswick  
**NC Facility ID:** 1000102  
**Inspector's Name:** Mark Hedrick  
**Date of Last Inspection:** 07/29/2011  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> US Marine Navassa</p> <p><b>Facility Address:</b> US Marine Navassa 100 Quality Drive Navassa, NC 28451</p> <p><b>SIC:</b> 3732 / Boat Building And Repairing <b>NAICS:</b> 336612 / Boat Building</p> <p><b>Facility Classification: Before:</b> Title V    <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V    <b>After:</b> Title V</p>			<p><b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b></p>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 1000102.11A <b>Date Received:</b> 08/25/2011 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 08882/T03 <b>Existing Permit Issue Date:</b> 09/17/2007 <b>Existing Permit Expiration Date:</b> 05/31/2012</p>
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<p><b>Review Engineer:</b> Mark Cuilla</p> <p><b>Review Engineer's Signature:</b> <b>Date:</b> <b>date, 2011</b></p>		<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 08882/T04 <b>Permit Issue Date:</b> <b>date, 2011</b> <b>Permit Expiration Date:</b> <b>date, 2016</b></p>	

### I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**08882T03**) was issued on **September 17, 2007**, and is currently scheduled to expire on **May 31, 2012**. The renewal application was received on **August 25, 2011**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

### II. Facility Description

The facility is a fiberglass boat manufacturer, producing primarily larger (30-60 foot) "Rampage" sport fishing yachts. Current permitted equipment includes spray booths for painting and varnish, laminating and gel coating operations, and miscellaneous woodworking operations.

### III. History/Background/Application Chronology

**June 4, 2007** – Permit **08882T02** issued as a Title V renewal.

**September 17, 2007** – Permit **08882T03** issued as an ownership change.

**July 29, 2011** – Mark Hedrick of the WIRO completed the annual compliance inspection of the facility. He noted that the facility idled its operations **October 2008** and permanently closed **May 21, 2009**, but wishes to keep its Title V permit active.

**October 3, 2011** – DRAFT permit sent to Permittee, Regional Office, and Title V Coordinator for comment prior to public notice and EPA review. The Permittee provided the following comments on the draft permit via email on October 21, 2011 (*DAQ response in italics*):

- (1) Page 7, Condition 2c references visible emissions readings every 6 months while on operation. Does "while on operation" mean that only have to take readings every 6 months if plant is operating OR Does it mean the reading must be taken while the process is operating so get accurate reading? As you know, the facility is not currently in operation. Therefore, there is no ability to conduct visible emissions readings. Would it be acceptable for Navassa to submit a report every 6 months stating "no VE readings required due to the facility is not operating during the six-month period OR simply maintain an internal document confirming no activities therefore no VE reading conducted?

*The term "while in operation" was added as a clarification to the monitoring requirements of multiple permit conditions as part of this renewal knowing that the facility is currently idled. Each monitoring requirement has a time limit associated with it (e.g., weekly, every six months, etc.). Those time periods indicate the span of time between each required monitoring observation. In the case you indicate, a visible emissions observation must be made at least once every six-months during normal operation. If the source is not operating during a monitoring period, a record of that status is all that is needed to satisfy recordkeeping requirement. Furthermore, General Condition LL (Reporting Requirements for Non-Operating Equipment) specifies that "the Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. During operation the monitoring recordkeeping and reporting requirements as prescribed by the permit shall be implemented within the monitoring period." The Permittee should keep the operation log of all equipment and report such activity as part of the required semi-annual reports. The suggested reporting language above should be verified with the Wilmington Regional Office at the time of the required reporting periods. It should be noted, that if the source operates at any time during the monitoring period (weekly, six-months, etc.) a reading should be made and recorded to satisfy this monitoring requirement.*

- (2) In regards to the Page, Condition 2C: Is NCDENR requiring those "visible emission readings" to be performed by an individual whom completed an EPA Approved Visible Emissions/Smoke School or is it meant to have someone to view for visible signs of particulate for stacks & dust collectors? If the readings are meant to be performed by a certified "Smoke School" individual for every 6- month period, this appears to be excessive for the fiberglass boat building facility. My experiences with other agencies for fiberglass boat building facilities is for only one set of visible emissions readings to be performed at sometime before the expiration of the renewed permit rather than a semi-annual reading as identified in this draft permit. Please consider US Marine Navassa's request to only require the visible emissions to be performed only once during the period of the renewed permit rather than requiring the readings every 6 months.

*This visible emissions requirement has two parts associated with it. The first allows the Permittee to make an observation during the reporting period (using a Method 22-like procedure) and if it is found to be different than the "normal" observation level, make adjustments to the operation of the equipment, etc., to bring the observation back to a state of normal operation all within the same monitoring period. The second allows the Permittee to, rather than make modifications to the operation of the equipment, make a Method 9 observation (with a certified smoke reader) and record that the emissions do not exceed the standard for the equipment. The reduction of monitoring frequency will remain unchanged from current levels as part of this permit renewal. Again, if the source is not operating during the monitoring period, a record of that fact will be sufficient to satisfy the requirements of this permit condition.*

- (3) Page 20: The permit requires "The report shall contain the monthly VOC emissions for the previous 17 months while in operation. The emissions must be calculated for each of the 12-month periods over the previous 17 months while in operation." Please consider US Marine Navassa's request for the report to only contain this information for only the previous 12 months while in operation rather than 17 months.

*The specific VOC emission limit is 250 tons per consecutive 12-month period. Therefore, the semi-annual reports should include monthly and 12-month rolling totals ending on each month of the reporting period. In order to receive all six 12-month rolling periods, the Permittee must look back a full 17 months. Again, if the source is not operating during the monitoring period, a record of that fact will be sufficient to satisfy the requirements of this permit condition.*

- (4) Page 22 State Enforcement Only Condition 4C Limits are set by lbs/day & lbs/hr of emissions for the following chemicals: MEK, Methyl Isobutyl Ketone, Toluene & Xylene. US Marine Navassa is requesting the formulas for calculation (determination) of this information in regards to MEK, Methyl Isobutyl Ketone, Toluene & Xylene to be calculated using an averaging formula similar to what the permit identified for Page 22 State Enforcement Only Condition 5 for styrene to allow a more manageable tracking of this information.

*The permit condition requires that the Permittee maintain records of the operational information demonstrating that the TAP emissions do not exceed the TPERs as listed in the table. These TPERs were added to the permit as part of a permit modification that included a modeling demonstration indicating that emissions were each less than the amounts in the table. The permit condition does not include any additional recordkeeping or reporting. The records that have to be maintained should include enough information that the regional office inspector can determine if the permit condition is being met. Many of the variables included in the formula mentioned above are going to be the types of records that the Permittee will need to keep indicating compliance. The permit does not need to specify the exact calculation method for these pollutants thus maintaining flexibility in the method the Permittee can use to comply with this requirement.*

(5) The permit referenced "appropriate emissions factors" for styrene, but did not provide a specific reference of emissions factors to use for styrene. There are commonly applied emissions factors for other materials utilized within the fiberglass industry. Here is a list of emissions factors commonly identified in the Title V permits for our other fiberglass boat plants. Please review and consider adding to the permit. This would help avoid any future disagreements on emissions factors. If NCDENR is agreeable with those emissions factors, please insert effective date of emissions factors is issuance date of this renewal permit. I have attached a section of a FL permit which shows the common emissions factors for our industry of which most of my facilities utilize. I have also attached the UEF Table of emissions factors for styrene and MMA. Please consider inserting these emissions factors into the Renewal Permit.

*DAQ recognizes that emission factors change over time. In order to provide the greatest flexibility for the Permittee, specific emission factors are not represented in most permits. If the renewed permit were to include a specific version of the emission factors, the Permittee would be required to have its permit modified each time he wanted to use subsequent or different factors. The Permittee should calculate emissions per the permit condition and reference the emission factors used in all correspondence/records for the subject equipment. The regional office will verify the appropriateness of the emission factors as each submittal is received. The burden of proof of appropriateness of an emission factor lies with the Permittee.*

**Date, 2011** – DRAFT permit sent to 30-day public notice and 45-day EPA review.

#### IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Pages	Section	Description of Changes
Attachment	Insignificant activities	-added shell asterisk language
Cover	-	-amended all dates and permit revision numbers -corrected facility mailing address
TOC	-	-removed all references to Part II (here and throughout permit)
All	Header	-amended permit revision number
4	2.1 A.1.b 2.1 A.1.c	-corrected testing rule cross reference -clarified when monitoring/recordkeeping is required (based on facility operation)
5	2.1 A.2.b 2.1 A.2.c  2.1 A.2.e	-corrected testing rule cross reference -clarified when monitoring/recordkeeping is required (based on facility operation) -updated shell language
6	2.1 B.1.b	-corrected testing rule cross reference
7	2.1 B.2.b 2.1 B.2.c	-corrected testing rule cross reference -clarified when monitoring/recordkeeping is required (based on facility operation)
18	2.1 C.2.b	-corrected testing rule cross reference
19	2.1 C.2.c	-clarified when monitoring/recordkeeping is required (based on facility operation)
20	2.2 A.2.d	-updated VOC PSD avoidance condition reporting language
21	2.2 A.4	-added "State-enforceable only" clarification
22	2.2 A.5	-added "State-enforceable only" clarification
23	2.2 A.6	-added "State-enforceable only" clarification

Pages	Section	Description of Changes
23-34	General Conditions	-updated shell conditions (v3.5)
35	List of Acronyms	-added acronyms for CAIR, NAA, and RACT

There were no required equipment modifications in TVEE as a result of this permit renewal.

## V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0958, Work Practice Standards for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1100, Control of Toxic Air Pollutants
- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart VVVV)
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2Q .0317, Avoidance Conditions (for 2D .0530, Prevention of Significant Deterioration)
- 15A NCAC 2Q .0705, Existing Sources and SIC Calls
- 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these existing requirements will not be included in this document.

## VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

**NSPS** – The facility is not currently subject to any New Source Performance Standards (40 CFR Part 60). This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility is currently subject to the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV). The current permit includes specific monitoring, recordkeeping, and reporting requirements. This permit renewal does not affect this status.

**PSD** – The facility is currently subject to a permit condition that limits volatile organic compound emissions facility-wide to less than 250 tons per year. The current permit includes specific monitoring, recordkeeping and reporting requirements. This permit renewal does not affect this status.

**112(r)** – The facility is not currently subject to the 112(r) “Prevention of Accidental Releases” requirements because it does not store any chemicals in amounts greater than the applicability threshold. This permit renewal does not affect this status.

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The Permittee currently operates one bagfilter controlling particulate emissions from its miscellaneous woodworking operations. CAM was determined not to apply during the processing of the latest Title V permit renewal (see Permit Review for **08882T02 – June 4, 2007**). This permit renewal does not affect this status.

## VII. Facility Wide Air Toxics

The facility is currently subject to the following state-enforceable only requirements:

1. 15A NCAC 2D .1100 for modeled air toxics (TAPs) emission rates,
  2. 15A NCAC 2Q .0711 for all other TAPs not emitted in quantities greater than their respective toxic permit emission rates (TPERs), and
  3. 15A NCAC 2Q .0705 indicating compliance with the last MACT/air toxics permit requirements.
- This permit renewal does not affect this status.

## VIII. Facility Emissions Review

There is no change in emissions for this renewal (*see note in Section I of this Document concerning facility operating status*).

The following table represents the latest years' emission inventories from the facility:

Pollutant(s)	2009 Actual Emissions (tpy)	2010 Actual Emissions (tpy)
CO	-	0.03
NO <sub>x</sub>	-	0.04
PM <sub>10</sub>	-	0.03
VOC	-	0.02
Total HAP/TAP	-	-

## IX. Stipulation Review

The facility was last inspected by Mark Hedrick of the WIRO on **July 29, 2011**. He found the facility non-operational; therefore, is "in compliance" by virtue of shutdown. He noted no required permit modifications.

## X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be made (via DAQ website). The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The state of South Carolina is an affected state within 50 miles of this facility.

## XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WIRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WIRO's recommendation to issue the renewed air permit.