

Air Permit Review

Permit Issue Date:
CDS No. 376500170

Region: Raleigh Regional Office
County: Edgecombe
NC Facility ID: 3300170
Inspector's Name: Will Wike
Date of Last Inspection: 01/12/2005
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): HC Composites LLC</p> <p>Facility Address: HC Composites LLC 1090 West Saint James Street Tarboro, NC 27886</p> <p>SIC: 3732 / Boat Building And Repairing NAICS: 336612 / Boat Building</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP:</p> <p>NSPS:</p> <p>NESHAP:</p> <p>PSD:</p> <p>PSD Avoidance:</p> <p>NC Toxics:</p> <p>112(r):</p> <p>Other: First Time TV</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 3300170.05A Date Received: 06/21/2005 Application Type: Modification Application Schedule: TV-1st Time Existing Permit Data Existing Permit Number: 08819/R03 Existing Permit Issue Date: 06/21/2004 Existing Permit Expiration Date: 05/31/2009</p>
<p>Herman Watson Engineer (252) 641-8000 1090 West Saint James Street Tarboro NC, 27886</p>	<p>Mike O'Connell (252) 641-9996 1090 West Saint James Street Tarboro NC, 27886</p>	<p>Herman Watson Engineer (252) 641-8000 1090 West Saint James Street Tarboro NC, 27886</p>	
<p>Review Engineer: Mike Brandon</p> <p>Review Engineer's Signature: _____ Date: October 24, 2005</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 08819/R04 Permit Issue Date: Permit Expiration Date:</p>	

I. Introduction

This facility had requested removal of their synthetic minor condition and requires a first time Title V Operating Permit. This first time Title V Air Permit application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the Title V operating permit.

II. Background Information

The Title V operating permit replaces an existing Air Quality Construction and Operation Permit No. 8819R03 that was issued on June 21, 2004 and is currently scheduled to expire on May 31, 2009.

HC Composites submitted a complete Title V application to the Division of Air Quality on June 21, 2005 pursuant to the permit R03 requirement (15A NCAC 2Q .0504) for the submittal within one year of changing the facility status from synthetic minor (i.e., June 21, 2005). The permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

III. Facility Description

This facility manufactures and repairs boats.

IV. Statement of Compliance

The facility is presently in compliance with all applicable regulations and permit conditions. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

V. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which the First Time Title V Operating Permit is being issued.

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
LA-1 MACT VVVV	Main lamination area	NA	NA
LA-2 MACT VVVV	Small parts lamination area	NA	NA

VI. Emission Source-by-Source Evaluation

A. Lamination Areas (ID Nos. LA-1 and LA-2)

1. Description

These areas are where HAP based resins and gel coat are applied to plugs and molds. The areas also include mold care, clean up, adhesive operations, parts trimming, and parts assembly. There are particulate generating activities that remain contained within the building and were not included as emissions sources with the applicable requirements of 2D .01515 "Particulates from Miscellaneous Industrial Processes" and 2D.0521 "Visible Emissions".

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
HAPs	NESHAP for Boat Manufacturing	15A NCAC 2D .1111 40 CFR 63, Subpart VVVV
odor	Control of odorous emissions See Facility Wide Emission Sources -Section 2.2 A.1	15A NCAC 2D .1806
VOC	Work Practice Standards See Facility Wide Emission Sources -Section 2.2 A.2	15A NCAC 2D .0958
TAPs	Facility Wide Toxic Pollutant Exemptions Rates See Facility Wide Emission Sources -Section 2.2 A.3	15A NCAC 2D .0711 Last MACT Evaluation
TAPs	Emissions Rates for Toxics Air Pollutants Determined Pursuant to Acceptable Ambient Concentration Limits See Facility Wide Emission Sources -Section 2.2 A.4	15A NCAC 2D .1100 Last MACT Evaluation

a. 15A NCAC 2D .1111 (40 CFR 63, Subpart VVVV): NESHAP for BOAT MANUFACTURING

i. Regulatory Analysis

The facility uses resins and gel coats subject to these standards. The Permittee has selected the MACT Model Point Value Emissions averaging option for open molding and gel coat operations. This compliance option compares a calculated allowable (12-month rolling weighted average) that is compared to a calculated actual 12-month rolling weighted average. Calculations are based on month summaries of material used and HAP content. In addition to the emission limit requirement, work practice standards must be applied and an implementation plan for open molding operations.

ii. Monitoring Requirements

The Permittee is required to track monthly resin and gel coat use as well as HAP content. The implementation plan must be kept up to date and implemented work practice standards tracked.

- iii. Recordkeeping Requirements
The Permittee is required to maintain records of all resin and gel coat use and HAP content, monthly calculations of the MACT Point Values, and inspections performed for work practice standards.
- iv. Reporting Requirements
Semi annual reports require a summary of compliance or non-compliance with emission limits and work practice standards is required.

VII. Multiple Emission Source Limits

A. Facility Wide

All facility emission sources are subject to these limits and/or standards.

STATE ONLY REQUIREMENT

1. **15A NCAC 2D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**

This "state enforceable only" permit requirement applies facility wide and prohibits the Permittee from operating the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary. This provision has no recordkeeping or reporting requirement and is complaint based.

2. **15A NCAC 2D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS**

This permit requirement applies facility wide and provides housekeeping and work practice standards to prevent fugitive emissions of VOC to the atmosphere. Monthly inspections are required to ensure the work practice and housekeeping standards are being implemented. Records of inspections are required and semi annual reporting of deviations.

STATE ONLY REQUIREMENT

3. **TOXIC AIR POLLUTANT EXEMPTION RATE EMISSIONS LIMITATIONS**

The facility presently emits six TAPs, five of which is below its respective TPER. These are n-hexane, hexane isomers except n-hexane, methyl ethyl ketone, toluene, and xylene. This is a facility wide assessment based on potential product that satisfies the last MACT assessment requirements of 15A NCAC 2Q .0705.

STATE ONLY REQUIREMENT

4. **TOXIC AIR POLLUTANT EMISSIONS LIMITATION MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS**

The facility modeled for styrene impacts using a single source emission point for facility wide emissions. The hourly impact from the worst-case facility wide emission estimate of 19 pounds per hour was less than 0.5 milligrams per cubic meter (1-hour period). The Acceptable Ambient Level is 10.6 milligrams per cubic meter (1-hour standard). The AQAB review and concurred with the modeling analysis in a memorandum dated ??????, 2005. It should be noted that the emissions from the insignificant source styrene tanks were not modeled, but that the maximum one-hour emission rate of one pound per hour was determined to most likely have an impact less than 10 milligrams per cubic meter. Since the styrene impact was so very low, monitoring, recordkeeping and reporting requirements are a only requirement for the Permittee to notify the DAQ, and submit modeling showing compliance with the AAL, if production changes in such a manner as to cause the worst case emission estimate to increase.

This is a facility wide assessment based on potential product that satisfies the last MACT assessment requirements of 15A NCAC 2Q .0705.

VIII. General Conditions

The General Conditions section of the Title V Operating Permits lists additional applicable rule requirements that the Permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, property rights, submission of documents, inspections and entry procedures, reopen for cause, and severability.

IX. Insignificant Activities

The insignificant activities listed in the application include two 6,000-gallon styrene storage tanks (ID Nos. IST-1 and IST-2) and grinding, trimming, and sanding operations. The two styrene tanks were included in the permit and IBEAM as insignificant activities; however, the grinding, trimming, and sanding operations do not have emission points external to the building structure are not considered emission sources. Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement (e.g., toxic air pollutant regulations) or that the Permittee is exempted from demonstrating compliance with any applicable requirement. Categorically exempt significant activities are not included on this list.

X. Public Notice

Pursuant to 15A NCAC 2Q .0521, a notice of the Title V Operating Permit will be placed in a newspaper of general circulation in the area where the facility is located. The notice provides for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice will be sent to persons on the Title V mailing list. EPA will be provided the draft documents for a concurrent 45 day review period.

XI. Recommendations

The initial Title V application for HC Composites LLC has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. The DAQ has made a final determination that the facility will achieve compliance as specified in the permit with all applicable requirements.