

Air Permit Review

Permit Issue Date: **date, 2010**

Region: Washington Regional Office
County: Chowan
NC Facility ID: 2100073
Inspector's Name: Robert Bright
Date of Last Inspection: 07/13/2009
Compliance Code: 3 / Compliance - inspection

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|--|--|---|---|
| Facility Data | | | Permit Applicability (this application only) |
| <p>Applicant (Facility's Name): Regulator Marine Inc</p> <p>Facility Address: Regulator Marine Inc 187 Peanut Drive Edenton, NC 27932</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: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p> |
| Contact Data | | | Application Data |
| Facility Contact | Authorized Contact | Technical Contact | <p>Application Number: 2100073.09A Date Received: 11/03/2009 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 07132/T08 Existing Permit Issue Date: 12/05/2008 Existing Permit Expiration Date: 07/31/2010</p> |
| Erik Wiborg Facilities Manager (252) 482-3837 187 Peanut Drive Edenton, NC 27932 | Erik Wiborg Facilities Manager (252) 482-3837 187 Peanut Drive Edenton, NC 27932 | Owen Maxwell Vice President (919) 482-3837 187 Peanut Drive Edenton, NC 27932 | |
| Review Engineer: Mark Cuilla | | Comments / Recommendations: | |
| Review Engineer's Signature: | | Issue 07132/T09 | |
| Date: date, 2010 | | Permit Issue Date: date, 2010 | |
| | | Permit Expiration Date: date, 2015 | |

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 (**07132T08**) was issued on **December 5, 2008**, and is scheduled to expire on **July 31, 2010**. The renewal application was received on **November 3, 2009**, at least nine months prior to the expiration date. Therefore, the existing permit will not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit remain in effect until this renewal permit has been issued or denied.

II. Facility Description

The facility is a fiberglass boat manufacturer where manufacturing is completed in open molds.

III. History/Background/Application Chronology

November 3, 2009 – Permit application **2100073.09A** was received for the renewal of the current Title V air permit.

January 6, 2010 – DRAFT permit sent to WARO and Permittee for comment prior to public notice and EPA review.

date, 2010 – 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.

| Page | Section | Description of Change |
|-------|---|---|
| Cover | - | -amended all dates and permit revision numbers |
| All | Header | -amended permit revision number |
| 3 | Equipment table 2.1 2.1 A | -provided the fiberglass filters an equipment ID number -updated shell permit language -amended equipment description to add control device ID number |
| 3-4 | 2.1 A (table) | -clarified 2D .0515 emission limit -added avoidance condition description -added reference to 2Q .0705 -listed MACT Subpart |
| 4 | 2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.1.d 2.1 A.1.f | -added ID numbers -corrected testing rule cross reference -added ID numbers and updated shell language -updated shell language -updated shell language |
| 5 | 2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.2.d 2.1 A.2.e | -added ID numbers -corrected testing rule cross reference -added ID numbers and updated shell language -updated shell language -updated shell language |
| 6 | 2.1 B (table) 2.1 B.1.a 2.1 B.1.b 2.1 B.1.c 2.1 B.1.d | -clarified 2D .0515 emission limit -added ID numbers -corrected testing rule cross reference -added ID numbers and updated shell language -updated shell language |
| 7 | 2.1 B.1.f 2.1 B.2.a 2.1 B.2.b 2.1 B.2.c 2.1 B.2.d | -updated shell language -added ID numbers -corrected testing rule cross reference -added ID numbers and updated shell language -updated shell language |
| 8 | 2.1 B.2.e 2.2 A (table) 2.2 A.1 2.2 A.1.b | -updated shell language -listed emission limits in table -added rule citation -corrected cross reference |
| 9 | 2.2 B.1.c | -corrected cross reference |

| Page | Section | Description of Change |
|-------|----------------------|---|
| 10 | 2.2 A.2.e 2.2 A.3 | -updated shell language -corrected rule citation |
| 11 | 2.2 A.4 2.2 A.4.b | -corrected rule citation -changed toxics reporting requirement from semi-annually to quarterly per General Statutes requirements |
| 24-34 | General Conditions | -updated shell conditions (v3.0) |

Note. The Emission Source Module (ESM) was checked for accuracy with the renewed permit. No modifications/additions/deletions were necessary as part 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 Practices 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 15A NCAC 2D .0530, Prevention of Significant Deterioration)
15A NCAC 2Q .0705, Existing Facilities and SIC Calls
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for the existing sources will not be included in this document.

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

NSPS – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – Applicable equipment is currently subject to the requirements of 40 CFR 63, Subpart VVVV [National Emission Standards for Hazardous Air Pollutants from Boat Manufacturing]. This permit renewal does not affect this status.

PSD – The Permittee currently complies with a Prevention of Significant Deterioration Avoidance Condition limiting facility-wide volatile organic compound emissions to less than 250 tons per consecutive 12-month period. The Permittee is required to calculate VOC emissions by multiplying the total amount of VOC containing materials consumed by their respective VOC contents using specified emission factors. This permit renewal does not affect this status.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. 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. Potential styrene emissions are in excess of 10 tons per year. However, the equipment is subject to a MACT. Per 15A NCAC 2D .0614(b)(1)(A), “the requirements of this rule shall not apply to any of the following emission limitations or standards...emission limits or standards proposed by the Administrator of the Environmental Protection Agency after November 15, 1990 pursuant to Section 111 or 112 of the Federal Clean Air Act.” Therefore, CAM does not apply to the currently permitted control devices.

VII. Facility Wide Air Toxics

The Permittee is subject to the following State-enforceable only requirements:

1. 15A NCAC 2D .1100, Control of Toxic Air Pollutants. This regulation requires that emissions of styrene from the fiberglass boat building operation not exceed 313 pounds per hour per an approved modeling demonstration. The permit currently requires that semi-annual reporting of these emissions be completed. However, as part of this permit renewal, this requirement has been modified to require reporting quarterly per current NC General Statutes.
2. 15A NCAC 2Q .0711, Emission Rates Requiring a Permit. The Permittee has made a demonstration that facility-wide emissions of methyl ethyl ketone, toluene, Xylene, bioavailable chromate pigments (as chromium VI equivalent), benzene, aniline, and hexane are each below their respective toxic pollutant emission rates. Prior to exceeding these rates, the Permittee must obtain a permit to emit the TAP and for demonstrating compliance with the emission rates. This permit renewal does not affect this status.
3. 15A NCAC 2Q .0705, Existing Sources and SIC Calls. This regulation requires that the Permittee demonstrate compliance with NC Air Toxics by the same deadline as the last known MACT to apply to the facility. The subject MACT is 40 CFR 63, Subpart VVVV. The Permittee has made a demonstration that it is in compliance with all applicable air toxics for all sources at the facility. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years’ emission inventories from the facility as compared to the potential emissions for the same pollutant:

| Pollutant(s) | 2007 Actual Emissions (tpy) | 2008 Actual Emissions (tpy) |
|---------------------|------------------------------------|------------------------------------|
| CO | 0.52 | 0.26 |
| NO _x | 1.2 | 0.62 |
| PM ₁₀ | 0.82 | 0.52 |
| SO ₂ | 0.04 | 0.02 |
| VOC | 50.76 | 35.03 |
| Total HAPs/TAPs | 50.63 | 34.89 |

IX. Stipulation Review

As noted above, the facility was last inspected on **July 13, 2009**. The inspectors noted “the facility appeared to be in compliance with all applicable regulations and permit conditions at the time of inspection.”

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 placed in a newspaper of general circulation in the area where the facility is located. 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 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. Virginia 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.

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

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