1st Time TITLE V AIR PERMIT APPLICATION REVIEW

APPLICANT:	SITE LOCATION:		COUNTY:
Southport Boat Works	Leland		Brunswick
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APPLICATION NUMBER:	**EXISTING PERMIT NUMBER:**		**NEW PERMIT NUMBER:**
1000106.05A	09416R00		09416T01

I. Introduction

The U.S. Environmental Protection Agency (EPA) has given interim approval to North Carolina's Title V operating permits program effective on December 15, 1995. This EPA approval triggered the requirements for Title V facilities to submit permit applications to the Division of Air Quality (DAQ). Title V facilities are required to obtain an operating permit which addresses all applicable regulations under the State Implementation Plan, Federal Implementation Plan, and other provisions of the Clean Air Act (CAA). The Title V Operating Permit will define all of the facility's obligations under the CAA.

This 1st Time Title V Air Permit Application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the DRAFT Title V operating permit. The primary source of information used to construct the DRAFT permit is the above referenced air permit application.

II. Background Information

The DRAFT Title V operating permit will replace an existing Air Quality Construction and Operation Permit No. 09416R00, which was issued on June 15, 2004 and is currently scheduled to expire on May 31, 2009.

Pursuant to 15A NCAC 2Q .0506 Southport Boat Works submitted its 1st Time Title V application to the DAQ on August 30, 2005. The application was considered complete for processing on September 5, 2005. The DRAFT permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

III. Facility Description

Southport Boat Works, Inc. is a boat manufacturing facility. According to the Title V application, following is a description of the process:

Southport Boat Works will use an open molding process, which consists of the following three steps:

a) The mold is sprayed with a layer of gelcoat, which is a pigmented polyester resin that hardens and becomes the smooth outside surface.
b) The inside of the hardened gelcoat layer is coated with a skin of chopped glass fibers and polyester or vinylester resin.
c) Additional layers of fiberglass cloth or chopped glass fibers saturated with resin are added until the part attains its final thickness.

One 5,000 gallon capacity storage tank will supply the production resin. Gelcoat will be supplied in 55 gallon drums to the gelcoat spray equipment.

HAPS

The polyester and vinylester components contain methyl methacrylate (MMA) as a solvent and styrene, both HAPS, and some evaporation occurs during the mixing and application of these products.

Solvents

Cleaning of the application equipment requires a solvent. Acetone will be used as the primary cleaning solvent, and acetone is not a VOC.

Boat Building

The boat building operation will not involve any wooden parts, so there will be no cutting, sanding, or gluing of wood. The operation will also not use any carpeting. Accordingly, there will be no carpet adhesives.

Mold repair and preparation requires the use of tooling resins, tooling gelcoat, mold cleaners, and mold release agents. The resins and gelcoats are high performance versions of the resins and gelcoats, used in the production operations and will have the same emissions as listed above.

Insignificant Activities

After lamination is conducted, the laminated parts are typically cut, routed, trimmed, ground, or sanded, using hand held power tools. Particulate emissions from this process are primarily discharged inside the building. This operation has been identified in the application process as an insignificant source. Fugitive emissions from this operation have been identified as less than 1 pound per hour and less than 5 tons per year.

Requested Permit Limits

1) Operation will be 8,760 hours per year.
2) VOC emissions will be limited to less than 250 tons per year to avoid the applicability of PSD.
3) The lamination process is anticipated to emit a maximum of 175 lbs/hour of styrene at full production. The dispersion modeling analysis indicates that this rate will result in an impact, which is approximately 48% of the AAL. Since the facility cannot exceed the AAL at full production, it is requested that no hourly styrene limits be placed in the permit.

4) The facility intends to use materials that contain no more HAPs than specified in the NESHAPS (40 CFR Part 63 Subpart VVVV). However, in accordance with the standard, the facility requests that the permit include the option to use plant-wide HAP emission averaging in such cases where a complying material cannot be found for a specific process.
5) It is not requested that any HAP (other than styrene) be covered by a specific annual limit.

IV. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on its latest inspection of August 5, 2005 by Mark Hedrick of the Wilmington Regional Office, the facility was in compliance with all applicable requirements. Mr. Hedrick also noted that records were well-kept, the facility was well ventilated for the employees, and very clean for a fiberglass boat facility.

However, on July 21, 2005, Southport Boat Works was issued an enforcement action and assessed a civil penalty of $1000 for failure to submit their air emissions inventory.

The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. 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 1st Time Title V Operating Permit is being issued:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
MACT ES-L1	One lamination/gelcoat operation	N/A	N/A
ES-RST-1	One 5,000 gallon resin storage tank	N/A	N/A

VI. Emission Source-by-Source Evaluation

MACT

A. One lamination/gelcoat operation (ID No. ES-L1)

1. Description

   In the lamination process, fiberglass boats are manufactured by spraying a mixture of fiberglass and styrene into a mold.

2. Applicable Regulatory Requirements

This facility intends to use materials that contain no more HAPs than specified in the NESHAPS (40 CFR Part 63 Subpart VVVV). However, in accordance with the standard, the facility requests that the permit include the option to use plant-wide HAP emission averaging in such cases where a complying material cannot be found for a specific process.

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**
particulate matter	E=4.10$P^{0.67}$ where E = allowable emission rate in lbs/hour P = process weight in tons per hour	15A NCAC 2D .0515
visible emissions	20 percent opacity	15A NCAC 2D .0521
Odors	See Section VII.(A)(1); **State enforceable only**	15A NCAC 2D .1806
hazardous air pollutants	See Section VII.(C)(1)	15A NCAC 2D .1111 (Subpart VVVV)
volatile organic compounds	See Section VII.(B)(1); **Less than 250 tons per year**	15A NCAC 2D .0530
volatile organic compounds	See Section VII.(A)(2); **State enforceable only**	15A NCAC 2D .0958

a. 2D .0515 "Particulates from Miscellaneous Industrial Processes"

(1) Regulatory Analysis

The lamination operations are subject to 2D .0515, since particulates could be emitted from overspray. Allowable particulate emission limit is calculated by the following equation:

For process weights up to 30 tons per hour:

$$E=4.10P^{0.67}$$

where: E = allowable emission rate for particulate matter in lbs/hr, and
P = process weight in tons per hour

Lamination process
The lamination process has an estimated process rate of 1,333 lbs./hour (0.667 tons per hour). Thus, the allowable emission rate from this source is:

$$E = 4.10(0.667)^{0.67} = 3.12 \text{ pounds per hour}$$

According to Durr Leonhardt of Leonhardt Environmental, emissions from this process are negligible. According to the Title V application, particulate

emissions are less than 1 pound per hour. Thus, compliance is expected.

b. 2D .0521 "Control of Visible Emissions"

(1) Regulatory Analysis

The lamination operations are subject to 2D .0521(d), since this operation was manufactured after July 1, 1971. The Title V application reports an 1st Time operation date of September 2, 2004. Per this regulation, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period except that six-minute averaging not more than 87 percent opacity may occur not more than once any hour nor more than four times in any 24-hour period.

Compliance is indicated with this regulation, because the latest inspection report did not cite any opacity exceedances.

(2) Monitoring Requirements

The Permittee will either observe the emission points of the sources above once a month for visible emissions above normal or perform a Method 9. Monthly observations should provide reasonable assurance of compliance. The Permittee will establish what normal visible emissions are through recordkeeping.

(3) Recordkeeping Requirements

The results of the observations and tests along with any corrective actions taken to reduce visible emissions shall be recorded in a log book.

(4) Reporting Requirements

A summary report of the observation results will be submitted by January 30 and July 30 of each year.

B. One 5,000 gallon resin storage tank (ID No. ES-RST-1)

1. Description

One 5,000 gallon capacity storage tank will supply the production resin.

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
None	See Section X; **Other Applicable Requirements**.	15A NCAC 2Q .0508(g): "Prevention of Accidental Releases - Section 112 (r) of the Clean Air Act"

VII. Multiple Emission Source Limits

A. Facility-wide affected sources

The above emission sources are subject to this multiple emission source limit.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Odors	Odorous emissions must be controlled**; State enforceable only**	15A NCAC 2D .1806
volatile organic compounds	Work practice standards	15A NCAC 2D .0958

STATE-ENFORCEABLE ONLY

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

a. The Permittee shall not operate 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.

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

a. Pursuant to 15A NCAC 2D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of

VOC are greater than 15 pounds per day; the Permittee shall:

(1) store all material, including waste material, containing volatile organic compounds in tanks or in containers, covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
(2) clean up spills of volatile organic compounds as soon as possible following proper safety procedures,
(3) store wipe rags containing volatile organic compounds in closed containers,
(4) not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
(5) transfer solvents containing volatile organic compounds used to clean supply lines and other coating equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under section 402 of the Clean Water Act,
(6) clean mixing, blending, and manufacturing vats and containers containing volatile organic compounds by adding cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under section 402 of the Clean Water Act. [15A NCAC 2D .0958(c)]

b. When cleaning parts with a solvent containing a volatile organic compound, the Permittee shall:
(1) flush parts in the freeboard area,
(2) take precautions to reduce the pooling of solvent on and in the parts,
(3) tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
(4) not fill cleaning machines above the fill line,
(5) not agitate solvent to the point of causing splashing. [15A NCAC 2D .0958(d)]

Monitoring [15A NCAC 2Q .0508(f)]

c. To assure compliance with paragraphs (a) and (b) above, the Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. If the required inspections are not conducted the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

Recordkeeping [15A NCAC 2Q .0508(f)]

d. The results of the inspections shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
i. the date and time of each inspection; and
ii. the results of each inspection noting whether or not noncompliant conditions were observed.
If the required records are not maintained the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

Reporting [15A NCAC 2Q .0508(f)]

e. The Permittee shall submit a summary report of the observations by January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All

instances of deviations from the requirements of this permit must be clearly identified.

B. Facility-wide Affected Sources

The following table provides a summary of limits and standards for the emission source(s) describe above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
volatile organic compounds	less than 250 tons per year	Avoidance of 15A NCAC 2D .0530

1. 15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS
15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

a. Regulatory Analysis

The facility will take a limit on the VOC emissions from the facility to avoid applicability of PSD. Volatile organic compound emissions are limited to less than 250 tons per year.

b. Monitoring/ Recordkeeping Requirements

Calculation of the monthly VOC emissions must be made at the end of each month. VOC emissions shall be determined by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. This calculation and the total amount of VOC emissions must be recorded in a monthly emissions log. In addition, the Permittee shall make available to the officials of DAQ, upon request, copies of the monthly emissions log.

c. Reporting Requirements

The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:

i. The monthly VOC emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.

C. Affected Source - All facilities subject to 40 CFR Part 63 Subpart VVVV: NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR BOAT MANUFACTURING

Lamination process **(ID No. ES-L-1)**

APPLICABILITY

1. The boat manufacturing operations (**ID No. ES-L1**) shall comply with all requirements of 15A NCAC 2D .1111 "Maximum Achievable Control Technology" and 40 CFR Part 63 Subpart

VVVV "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing." [40 CFR § 63.5689]

DEFINITIONS AND NOMENCLATURE

2. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR § 63.5779 shall apply.

REGULATED POLLUTANTS

3. Hazardous Air Pollutants (HAPs) as defined in 40 CFR § 63.5779.

STANDARDS FOR OPEN MOLDING RESIN AND GEL COAT OPERATIONS [40 CFR § 63.5698]

4. The facility must limit organic HAP emissions from the following five open molding operations to the emission limit specified in the equation below: 1) Production resin, 2) Pigmented gel coat, 3) Clear gel coat, 4) Tooling resin, and 5) Tooling gel coat.

The facility must limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this section, based on a 12-month rolling average:

HAP Limit = [46(M_R) + [159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) 214(M_{TG})] (Equation 1)

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations
$\mathbf{M_R}$ = mass of production resin used in the last 12 months, excluding any materials exempt under paragraph (a) below, measured in megagrams.
$\mathbf{M_{PG}}$ =mass of pigmented gel coat used in the last 12 months, excluding any materials exempted under paragraph (a) below, measured in megagrams.
$\mathbf{M_{CG}}$ =mass of clear gel coat used in the last 12 months, excluding any materials exempted under paragraph (a) below, measured in megagrams.
$\mathbf{M_{TR}}$ =mass of tooling resin used in the last 12 months, excluding any materials exempted under paragraph (a) below, measured in megagrams.
$\mathbf{M_{TG}}$ =mass of tooling gel coat used in the last 12 months, excluding any materials exempted under paragraph (a) below, megagrams

(a) The following sources are exempt from the open molding emission limit specified in equation:

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life saving appliances. Production resins for which this exemption is used must be applied with nonatomizing resin application equipment, and records must be kept for the resins for which this exemption is being used.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at this facility on a 12-month rolling average basis. The facility must keep a record of the amount of gel coats used per month for which this exemption is

being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of polyester and vinylester skin coats used in resins. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling average. The facility must keep a record of the amount of 100% vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

OPTIONS FOR COMPLYING WITH THE OPEN MOLDING EMISSION LIMIT [40 CFR § 63.5701]

5. One or more of the options in paragraphs (a) through (c) must be used to meet the emission limit in § 63.5698.

(a) MACT model point value averaging (emissions averaging) option:

Compliance with this option is based on a 12-month rolling average, using the procedures in § 63.5710.

(b) Compliant materials option.

Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirement in Table 2 to this subpart, listed under VII.(C)(27). Compliance with this option is based on a 12-month rolling average.

(c) Add-on control option.

Use an enclosure and add-on control device, and demonstrate that the resulting emissions meet the emission limit in § 63.5698. Compliance with this option is based on control device performance testing and control device monitoring.

GENERAL REQUIREMENTS FOR COMPLYING WITH THE OPEN MOLDING EMISSION LIMIT [40 CFR § 63.5704]

6. (a) *Emissions Averaging Option:*

The facility must show compliance with the emissions averaging option by performing the steps in (a)(1) through (a)(5) below:

(1) Use the methods in § 63.5758 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations in § 63.5710 to show that the organic HAP emissions do not exceed the limit in § 63.5758.

(3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat.
    (i) Hazardous air pollutant content.
    (ii) Amount of material used per month.
    (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomizing technology.
    (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in § 63.5710.

(4) Prepare and submit the implementation plan described in § 63.5707 to the Administrator and keep it up to date.

(5) Submit semiannual compliance reports to the Administrator as specified in § 63.5764.

(b) *Compliant Materials Option:*

For each open molding operation complying using the compliant materials option, the facility must demonstrate compliance by performing the steps in paragraphs (b)(1) through (b)(4) of this section.

(1) Use the methods specified in § 63.5758 to determine the organic HAP content of resins and gel coats.
(2) Complete the calculations described in § 63.5713 to show that the weighted-average organic content does not exceed the limit specified in Table 2 to this Subpart, listed under VII.(C)(27).
(3) Keep records as specified in (b)(3)(i) through (iv) of this section for each resin and gel coat.
    (i) Hazardous air pollutant content.
    (ii) Application method for production resin and tooling resin.
    (iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.
    (iv) Calculations performed, if required, to demonstrate compliance based on weighted-average HAP organic content, as described in § 63.5713.

(4) Submit semiannual compliance reports to the Administrator, as described in § 63.5719.

(c) *Add-on Controls Option:* If the facility is using an add-on control device, they must demonstrate compliance by performing the steps required in this Subpart.

IMPLEMENTATION PLAN FOR OPEN MOLDING OPERATIONS [40 CFR § 63.5707]

7. (a) The facility must prepare an implementation plan for all open molding operations for which they comply using the emissions averaging option in § 63.5704(a).

(b) The implementation plan must describe the steps that the facility will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, the implementations plan must include the elements contained in paragraphs (b)(1) through (3) of this section.

(1) A description of each operation included in the average.

(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.

(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in § 63.5698.

(c) The facility must submit the implementation plan to the Administrator with the notification of the compliance status specified in § 63.5761.

(d) The facility must keep the implementation plan on site and provide it to the Administrator when asked.

(e) If the facility revises the implementation plan, they must submit the revised plan with their next semiannual compliance report specified in § 63.5764.

HOW TO DEMONSTRATE COMPLIANCE USING EMISSIONS AVERAGING [40 CFR § 63.5710]

8. (a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling average basis and is determined at the end of every month (12 times per year). The first 12-month rolling average period begins on the compliance date specified in § 63.5695.

(b) At the end of the twelfth month after the facility's compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in § 63.5698 calculated for the same 12-month period. (Include terms in equation 1 of § 63.5698 and equation 1 of this section for only those operations and materials included in the average.)

HAP emissions = $[(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$ (Eq. 1)

Where:
HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.
PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, in kilograms per megagram.
M_R = Mass of production resin used in the past 12 months, in megagrams.
PV_{PG} =Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, in megagrams.

M_{PG} =Mass of pigmented gel coat used in the past 12 months, in megagrams.
PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months.
M_{CG} =Mass of clear gel coat used in the past 12 months, in megagrams.
PV_{TR} =Weighted-average MACT model point value for tooling resin used in the past 12 months, in megagrams.
M_{TR} =Mass of tooling resin used in the past 12 months, in megagrams.
PV_{TG} =Weighted-average MACT model point value for tooling gel coat used in the past 12 months, in megagrams.
M_{TG} =Mass of tooling gel coat used in the past 12 months, in megagrams.

(c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{op} = \Sigma (M_i)(PV_i) \ / \ \Sigma(M_i) \qquad \textbf{(Equation 2)}$$

This is for the sum i=1 to i=n.

Where:
PV_{OP} = weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, PV_{TR}, and PV_{TG})
M_i = mass of resin or gel coat *i, u*sed within an operation in the past 12 months, in megagrams.
n = number of different open molding resins and gel coats used within the last 12 months.
PV_i = the MACT model point value for resin or gel coat *i* used in the last 12 months, in kilograms of HAP per megagram of material applied.

(d) The facility must use the equation in Table 3 of this subpart to calculate the MACT model point value (Pv_i) for each resin and gel coat used in each operation in the past 12 months.

(e) If the organic HAP emissions, as calculated in paragraph (b) of this section are less than the organic HAP limit calculated in § 63.5698(b) for the same 12-month period, then the facility is in compliance with the emission limit in § 63.5698 for those operations and materials included in the average.

HOW TO DEMONSTRATE COMPLIANCE USING COMPLIANT MATERIALS [40 CFR § 63.5713]

9. (a) Compliance using the organic HAP content in Table 2 to this subpart (found below Section VII.(C)(27)) is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling average period begins on the compliance date specified in § 63.5695. If the facility is using filled material (production resin or tooling resin), the facility must comply according to the procedure described in § 63.5714.

(b) At the end of the twelfth month after the facility's compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the last 12 months in each operation. If all resins and gel coats used in an operation have organic HAP

content no greater than the applicable organic HAP content limits in Table 2 to this subpart (found below Section VII.(C)(27)), then the facility is in compliance with the emission limit specified in § 63.5698 for that 12-month period for that operation. In addition, the facility does not need to complete the weighted-average organic HAP calculation contained in paragraph (c) of this section for that operation.

(c) At the end of every month, the facility must use the equation below to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\textbf{Weighted-average HAP Content (\%)} = \Sigma (Mi)(HAP_i) / \Sigma (M_i)$$

This is for the sum i=1 to i=n.

Where:

$\mathbf{M_i}$ = mass of open molding resin or gel coat *i* used within an operation in the past 12 months, in megagrams.
n = number of different open molding resins and gel coats used within the last 12 months.
$\mathbf{HAP_i}$ = Organic HAP content, by weight percent, of open molding resin or gel coat *i* used in the past 12 months in an operation. Use the methods in § 63.5758 to determine the organic HAP content.

(d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 to this subpart (located in this permit under Section VII.(C)(27)), then the facility is in compliance with the emission limit specified in § 63.5698.

HOW TO DEMONSTRATE COMPLIANCE USING FILLED RESINS [40 CFR § 63.5714]

10. (a) If the facility uses a filled production resin or filled tooling resin, then it must demonstrate compliance for the filled resin material on an as-applied basis using the equation below.

$$\mathbf{PV_F = PV_U \times \frac{(100 - \%\ Filler)}{100}} \qquad \textbf{(Equation 1)}$$

Where:

$\mathbf{PV_F}$ = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.
$\mathbf{PV_U}$ = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to this subpart.
%Filler = The weight-percent of filler in the as-applied filled resin system.
n = number of different open molding resins and gel coats used within the last 12 months.
$\mathbf{HAP_i}$ = Organic HAP content, by weight percent, of open molding resin or gel coat *i* used in the past 12 months in an operation. Use the methods in § 63.5758 to determine the organic HAP content.

(b) If the filled resin is used as a production resin and the value of PV_F calculated by equation 1 of this section does not exceed 46 kilograms of organic HAP per megagram of the filled resin applied, then the filled resin is in compliance.

(c) If the filled resin is used as a tooling resin and the value of PV_F calculated by equation 1 of this section does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

(d) If the facility is including a filled resin in the emissions averaging procedure described in § 63.5710, then use the value of PV_F calculated, using the equation 1 of this section for the value of PV_i in equation 2 of § 63.5710.

HOW TO DEMONSTRATE COMPLIANCE USING AN ADD-ON CONTROL DEVICE [40 CFR §63.5715, § 63.5716, § 63.5719, § 63.5722, and § 63.5725]

11. (a) If the facility decides to implement an add-on control device, use the procedures in § 63.5715, § 63.5716, § 63.5719, § 63.5722, and § 63.5725, to demonstrate compliance.

STANDARDS FOR CLOSED MOLDING RESIN OPERATIONS [40 CFR §63.5728]

12. (a) If the resin application operation meets the definition of closed molding specified in § 63.5779, there is no requirement to reduce emissions from that operation.

(b) If the resin application operation does not meet the definition of closed molding, then the facility must comply with the limit for open molding resin operations specified in § 63.5698.

(c) Open molding resin operations that precede a closed molding operation must comply with the limit for open molding resin and gel coat operations specified in § 63.5698. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding.

STANDARDS FOR RESIN AND GEL COAT MIXING OPERATIONS [40 CFR §63.5731]

13. (a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.

(b) The work practice standards in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, the Permittee must visually inspect all mixing containers subject to this standard at least once per month. The inspection should insure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

(d) The facility must keep records of which mixing containers are subject to this standard and the

results of the inspections, including a description of any repairs or corrective actions taken.

STANDARDS FOR RESIN AND GEL COAT APPLICATION EQUIPMENT CLEANING OPERATIONS [40 CFR §63.5734]

14. (a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the facility must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content applies.

    (b) The facility must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR, Part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

DEMONSTRATING COMPLIANCE WITH THE RESIN AND GEL COAT APPLICATION EQUIPMENT CLEANING STANDARDS [40 CFR §63.5737]

15. (a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in §63.5734 using the methods specified in §63.5758.

    (b) If the facility recycles cleaning solvents on site, the Permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in §63.5758 for demonstrating compliance with the organic HAP content limits.

    (c) At least once per month, the Permittee must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. The Permittee must keep records of the monthly inspections and any repairs made to the covers.

EMISSION LIMIT FOR CARPET AND FABRIC ADHESIVE OPERATIONS [40 CFR §63.5740]

16. (a) You must use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.

    (b) To demonstrate compliance with the emission limit in paragraph (a) of this section, you must determine and record the organic HAP content of the carpet and fabric adhesive using the methods of §63.5758.

STANDARDS FOR ALUMINUM RECREATIONAL BOAT SURFACE COATING OPERATIONS [40 CFR §63.5743]

17. (a) For aluminum wipedown solvent operations and aluminum surface coating operations, you must

comply with either the separate emission limits in paragraphs (a)(1) and (2) of this section, or the combined emission limit in paragraph (a)(3) of this section. Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month.

(1) You must limit emissions from aluminum wipedown solvents to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics.

(2) You must limit emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.

(3) You must limit emissions from the combined aluminum surface coatings and aluminum wipedown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats applied.

(b) You must comply with the work practice standards of (b)(1), (2), (3), or (4) of this section when cleaning aluminum coating spray guns with solvents containing no more than 5 percent organic HAP by weight.

(1) Clean spray guns in an enclosed device. Keep the device closed except when you place spray guns in or remove them from service.

(2) Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when you are not using it.

(3) Clean spray guns by placing the solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that you keep closed when you are not using it.

(4) An alternative gun cleaning process or technology approved by the Administrator according to the procedures in §63.6(g).

HOW TO DEMONSTRATE COMPLIANCE WITH THE EMISSION LIMITS FOR ALUMINUM WIPEDOWN SOLVENTS AND ALUMINUM COATINGS [40 CFR §63.5746]

18. To demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings specified in §63.5743(a), you must meet the requirements of paragraphs (a) through (f) of this section.

(a) Determine and record the organic HAP content (kilograms of organic HAP per kilograms of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in §63.5758 to determine the organic HAP content

(b) Use the methods in §63.5758(b) to determine the solids content (liters of solids per liter of

coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content.

(c) Use the methods in §63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent.

(d) Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling average period begins on the compliance date specified in §63.5695.

(e) At the end of the twelfth month after your compliance date and at the end of every subsequent month, use the procedures in §63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in §63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids.

(f) Keep records of the calculations used to demonstrate compliance.

(g) You may apply to the Administrator for permission to use an alternative means (such as an add-on control system) for limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in §63.5743(a) if all the conditions in §63.5746(g) are met.

HOW TO CALCULATE THE ORGANIC HAP CONTENT OF ALUMINUM WIPEDOWN SOLVENTS [40 CFR §63.5749]

19. (a) Use equation 1 in this section to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the last 12 months.

$$HAP_{WD} = \Sigma(Vol_j)(D_j)(W_j) / \Sigma (Vol_i)(Solids_i)$$

This is for the sums j = 1 to j=n and from i = 1 to i = m.

Where:

HAP_{WD} = weighted-average organic HAP content of aluminum wipedown solvents, in kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.
n = number of different wipedown solvents used within the last 12 months.
Vol_j = volume of aluminum wipedown solvent j used in the last 12 months, liters.
D_j = density of aluminum wipedown solvent j, kilograms per liter.
W_j =mass fraction of organic HAP in aluminum wipedown solvent, j.
m = number of different aluminum surface coatings (primers, topcoats, and clear coats) used within the last 12 months.
Vol_i = volume of aluminum primer, top coat, or clear coat, i, used in the past 12 months, liters.
$Solids_i$ = solids content aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

(b) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then the

facility is in compliance with the emission limit in §63.5743(a)(1).

HOW TO CALCULATE THE ORGANIC HAP CONTENT OF ALUMINUM RECREATIONAL BOAT SURFACE COATINGS [40 CFR §63.5752]

20. (a) Use equation 1 in this section to calculate the weighted-average organic HAP content for all aluminum surface coatings used in the past 12 months.

$$HAP_{SC} = [\Sigma(Vol_i)(D_i)(W_i) + \Sigma (Vol_k)(D_k)(W_k)] / \Sigma (Vol_i)(Solids_i) \quad \textbf{(Equation 1)}$$

This is for the sums i = 1 to i = m and from k=1 to k=p.

Where:

HAP_{SC} = weighted-average organic HAP content for all aluminum coating materials, in kilograms of HAP per liter of coating solids.
m = number of different aluminum primers, topcoats, or clear coats i used within the last 12 months.
Vol_i = volume of aluminum primer, top coat, or clear coat, i, used in the past 12 months, liters.
W_i =mass fraction of organic HAP in coating, i, kilograms of organic HAP per kilogram of coating.
D_i = density of coating i, in kilograms per liter.
p = number of different thinners, activators, and other coating additives used within the past 12 months.
Vol_k = volume of the thinner, activator, or additive, k, used in the past 12 months, liters.
D_k = density of thinner, activator, or additive k, in kilograms per liter.
W_k =mass fraction of organic HAP in thinner, activator, or additive, k, in kilograms of organic HAP per kilogram of thinner or activator.
$Solids_i$ = solids content aluminum primer, top coat, or clear coat i, in liter solids per liter of coating.

(b) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of total coating solids, then the facility is in compliance with the emission limit in §63.5743(a)(2).

HOW TO CALCULATE THE COMBINED ORGANIC HAP CONTENT OF ALUMINUM WIPEDOWN SOLVENTS AND ALUMINUM RECREATIONAL SURFACE COATINGS [40 CFR §63.5753]

21. (a) Use equation 1 in this section to calculate the combined weighted-average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings.

$$HAP_{Combined} = HAP_{WD} + HAP_{SC} \quad \textbf{(Equation 1)}$$

Where:

HAP_{WD} = weighted-average organic HAP content for all aluminum wipedown solvents used in the past 12 months, calculated using Equation 1 of §63.5749.

$\mathbf{HAP_{SC}}$ = weighted-average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, using equation 1 of §63.5752.

(b) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then the facility is in compliance with the emission limit in §63.5743(a)(3).

HOW TO DEMONSTRATE COMPLIANCE WITH THE ALUMINUM RECREATIONAL BOAT SURFACE COATING SPRAY GUN CLEANING WORK PRACTICE STANDARDS [40 CFR §63.5755]

22. The facility must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of paragraphs (a) or (b) of this section.

(a) Demonstrate that solvents used to clean the aluminum coating spray guns contain no more than 5 percent organic HAP by weight by determining organic HAP content with the methods in §63.5758. Keep records of the organic HAP content determination.

(b) For solvents containing no more than 5 percent organic HAP by weight, comply with the requirement in paragraph (b)(1) or (b)(2) and paragraph (b)(3) of this section.

(1) If you are using an enclosed spray gun cleaner, visually inspect it at least once per month to ensure that the covers are in place and the covers have no visible gaps when the cleaners are not in use, and that there are no leaks from hoses or fittings.

(2) If you are manually cleaning the gun or spraying solvent into a container that can be closed, visually inspect all solvent containers at least once per month to ensure that the containers have covers and that the covers fit with no visible gaps.

(3) Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers.

METHOD FOR DETERMINING HAZARDOUS AIR POLLUTANT CONTENT [40 CFR §63.5758]

23. For the purpose of this permit condition, the methods and procedures contained in 40 CFR § 63.5758 shall apply.

NOTIFICATIONS, REPORTS, AND RECORDS [40 CFR §63.5761, §63.5764, §63.5767]

WHAT NOTIFICATIONS MUST BE SUBMITTED AND WHEN [40 CFR §63.5761]

24. (a) You must submit all of the notifications in Table 7 of this subpart that apply to you by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

WHAT REPORTS MUST BE SUBMITTED AND WHEN [40 CFR §63.5764]

25. (a) You must submit all of the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedures followed for this operation.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit reports by the dates in paragraphs (b)(1) through (b)(5) of this section.

(1) If your source is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for your source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for your source in §63.5695. If your source is controlled by an add-on control device, the first compliance report must cover the period beginning on the compliance date specified for your source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5695.

(2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of this section.

(3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

(5) For each affected source that is subject to the permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates in paragraphs (b)(1) through (b)(4) of this section.

(c) The compliance report must include information specified in paragraphs (c)(1) through (7) of this section.

(1) Company name and address.

(2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.

(3) The date of the report and the beginning and ending dates of the reporting period.

(4) A description of any changes in the manufacturing process since the last compliance report.

(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.

(6) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.

(7) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in paragraphs (c)(7)(i) through (c)(7)(iv) of this section in the semiannual compliance report.
(i) A description of the operation involved in the deviation.
(ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
(iii) A description of any corrective action you took to minimize the deviations and actions taken to prevent it from happening again.
(iv) A statement of whether or not your facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

(d) If your facility has an add-on control device, you must submit semiannual compliance reports and quarterly excess emission reports as specified in §63.10(e). The contents of the reports are specified in §63.10(e).
(e) If your facility has an add-on control device, you must complete a startup, shutdown, and malfunction plan as specified in §63.6(e), and you must submit startup, shutdown, and malfunction reports as specified in §63.10(e)(5).

WHAT RECORDS MUST I KEEP? [40 CFR §63.5767]

26. You must keep the records specified in paragraphs (a) through (d) of this section in addition to records specified in individual sections of this subpart.

(a) You must keep a copy of each notification and report that you submitted to comply with this subpart.
(b) You must keep all documentation supporting any notification or report that you submitted.
(c) If your facility not controlled by an add-on control device (i.e., you are complying with the organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), you must keep the records specified in paragraphs (c)(1) through (c)(3) of this section.
(1) The total amount of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month, and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.
(2) The total amount of each aluminum coating used per month (including primers, top coats, thinners, and activators), and the weighed-average organic HAP content as determined in §63.5752.
(3) The total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in §63.5749.
(d) If your facility has add-on control device, you must keep the records specified in §63.10(b) relative to control device startup, shutdown, and malfunction event; control device performance tests; and continuous monitoring system performance evaluations.

IN WHAT FORM AND FOR HOW LONG MUST I KEEP RECORDS? [40 CFR §63.5770]

27. (a) Your records must be readily available and in a form so they can be easily inspected and

reviewed.

(b) You must keep each report for 5 years following the date that each record is generated.

(c) You must keep each record on site for at least 2 years after the date that each record is generated. You can keep the records offsite for the remaining 3 years.

(d) You can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or microfiche.

SUMMARY OF EMISSION LIMITS

Table 2 to Subpart VVVV - Alternative Organic HAP Requirements for Open Molding Resin and Gel Coat Operations

As specified in §63.5701(b), §63.5704(b)(2), §63.5713(a), (b), and (d), you must comply with the requirements in the following table.

For this operation -	And this application method-	You must not exceed this weighted-average organic HAP (weight-percent) requirement-
1. Production resin operations	Atomized (spray)	28 percent
2. Production resin operations	Nonatomized (nonspray)	35 percent
3. Pigmented gel coat operations	Any method	33 percent
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent
6. Tooling resin operations	Nonatomized (nonspray)	39 percent
7. Tooling gel coat operations	Any method	40 percent

Table 3 to Subpart VVVV -MACT Model Point Value Formulas for Open Molding Operations

As specified in §63.5710(d) and §63.5714(a), you must calculate point values using the formulas in the following table.

For this operation -	And this application method-	Use this formula to calculate the MACT Model plant value for each resin and gel coat-
1. Production resin, tooling resin	a. Atomized	$0.014 \times (\text{Resin HAP\%})^{2.425}$
	b. Atomized, plus vacuum bagging with rollout	$0.01185 \times (\text{Resin HAP\%})^{2.425}$
	c. Atomized, plus vacuum bagging without rollout	$0.00945 \times (\text{Resin HAP\%})^{2.425}$

	d. Nonatomized	0.014 x (Resin HAP%)$^{2.275}$
	e. Nonatomized, plus vacuum bagging with rollout	0.0110 x (Resin HAP%)$^{2.275}$
	f. Nonatomized, plus vacuum bagging without rollout	0.0076 x (Resin HAP%)$^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	0.445 x (Gel coat HAP%)$^{1.675}$

VIII. MACT Applicability and Requirements

Based on a review of the facility's current operations and emission sources, the facility is subject to 40 CFR Part 63 Subpart VVVV "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing." The facility intends to use materials that contain no more HAPs than specified in the NESHAPS (40 CFR Part 63 Subpart VVVV). However, in accordance with the standard, the facility requests that the permit include the option to use plant-wide HAP emission averaging in such cases where a complying material cannot be found for a specific process. The coating components contain both styrene and methyl methacrylate, both of which are hazardous air pollutants (HAPs.)

IX. Permit Shield (including non-applicable requirements)

In accordance with 2Q .0512 the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

X. Other Applicable Requirements

The resin storage vessel (500 gallons capacity, ID No. ES-RST-1) is subject to 15A NCAC 2Q .0508(g): "Prevention of Accidental Releases - Section 112 (r) of the Clean Air Act" and shall comply with all applicable requirements in accordance with 40 CFR Part 68 [15A NCAC 2Q .0508(g)]. The Permittee shall submit a Risk Management Plan to EPA pursuant to 40 CFR § 68.150, as specified in 40 CFR § 68.10.

XI. General Conditions

The "General Conditions" section of the Title V Operating Permit 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, severability, etc.

XII. Insignificant Activities

The insignificant activities listed in the application have been reviewed and verified. The only insignificant activity for this facility is:

One cut-off booth for laminated parts (ID No. IES-COB-1)

Although each insignificant activity is not listed in the Title V permit, a general condition is placed in the Title V permit stating that all insignificant activities shall comply with the applicable requirements. Those sources which qualify for exemption from permitting under regulation 2Q .0102(b)(2) will be attached to the cover letter of the permit.

XIII. Public Notice

Pursuant to 15A NCAC 2Q. 0521, a notice of the draft Title V Operating 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.

XIV. Recommendations

Southport Boat Work's 1st Time Title V application 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 preliminary determination that the facility is complying or will achieve compliance as specified in the draft permit with all applicable requirements. Therefore, the DAQ is proposing to issue the Title V Operating Permit upon completion of the public comment period and the EPA review.