FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Sea Ray Boats, Inc.
100 Sea Ray Drive
Flagler Beach, Florida 32136

Air Permit No.: 0350003-011-AC
Issuance Date: July 11, 2013
Expiration Date: July 11, 2018

Authorized Representative:

Mr. Dan Goddard, Vice President, General Manager

Palm Coast Facility

Air Construction Permit

This is the final air construction permit which authorizes an increase in facility material usage and production such that volatile organic compound (VOC) potential to emit increases emissions 249 to 489.0 tons per any consecutive 12-month period. This construction permit establishes a total facility-wide VOC emissions limit of 489.0 tons per any consecutive 12-month period. This construction permit authorizes construction associated with the relocation of additional boat manufacturing operations from other Brunswick Corporation facilities to the Palm Coast facility.

The boat manufacturing operations to be relocated to the Palm Coast facility consist of Resin/Lamination Operations, Gel Coat Operations, Adhesive Operations, Mold Cleaning and Preparation Operations, Equipment Cleaning Operations, Material Mixing Operations, and Miscellaneous Operations.

The existing facility, Palm Coast facility, is a fiberglass boat manufacturing facility (Standard Industrial Classification No. 3732). The existing facility is located in Flagler County at 100 Sea Ray Drive, Flagler Beach. The UTM Coordinates are Zone 17, 485.49; N-3262.93; and, Latitude: 29° 29’ 45” North and Longitude: 81° 08’ 59”West.

This final permit is organized by the following sections.

Section 1. General Information
Section 2. Administrative Requirements
Section 3. Facility-Wide Conditions
Section 4. Emissions Unit Specific Conditions
Section 5. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate

District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Richard S. Rachal III, P.G. July 11, 2013
Program Administrator
Waste and Air Resource Management Program

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on **July 11, 2013**, to the persons listed below.

Mr. Dan Goddard: dgoddard@searay.com
Mr. Randy Clunie: Randy.Clunie@searay.com
Mr. Craig Wall: Craig.Wall@searay.com
Mr. Scott A. McCann P.E., Golder Associates, Inc: Scott_McCann@GOLDER.com
Ms. Natasha Hazziez, U.S. EPA Region 4: Hazziez.natasha@epa.gov
Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov
Ms. Barbara Friday, DEP DARM: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) July 11, 2013

FACILITY DESCRIPTION

Existing Facility

This facility is fiberglass boat manufacturing facility involving Lamination, Fabrication and Assembly processes.

The "contact open molding" method consists of applying layers of impregnated fiberglass reinforcement (laminate) on an open (to the surrounding air) female or male mold. The laminate is built up to the required thickness and is then allowed to cure. After the cure is completed, the part is removed and the mold is reused. A male mold is convex leaving a smooth inner surface and a female mold is concave leaving a smooth outer surface on the product. Since smooth outer surfaces are normally desired, female molds are most commonly used in fiberglass boat production.

The primary type of resin used in fiberglass boat production is polyester resin. Polyester resins used by Sea Ray typically consist of styrene monomer and polyester solids. Before applying the resin, the necessary catalyst and accelerator are added to initiate curing. During curing, the styrene monomer polymerizes forming a thermo-setting plastic. This is an exothermic process, and because styrene monomer reacts more rapidly at elevated temperatures, the reaction is autocatalytic.

The different composite parts of the boat (deck, hull, and small parts) are primarily fabricated in the lamination area. The first step in the production process is coating the mold with a releasing agent such as wax. This allows the finished laminated part to be pulled or removed from the mold. Next, a gel coat is usually applied on the mold with a spray gun in a ventilated spray booth. The gel coat is a pigmented polyester resin, which forms the outer smooth surface of the molded part. After spraying, the gel coat hardens or cures with a smooth surface against the mold and a tacky outer surface, which enhances later bonding of the first layer of laminate.

After the gel coat cures, the first layer of resin and fiberglass laminate is applied using the lamination method described below. The lamination procedure is repeated until the desired thickness is achieved. Structural reinforcements such as wood, plastic, and metal are also added during lamination. Lamination is a batch process with time between laminates dependent on cure time of the resin. After the final lamination has cured, the part is removed from the mold and the excess is trimmed from the part.

After the parts are removed from the mold, they are then taken to the grinding area where they are sanded, inspected, and repaired if required. Once removed from the inspection area parts are delivered to the assembly area where carpet and accessories are installed to produce the finished product.

At this Sea Ray facility, resin is primarily applied with a flow coater or other non-atomizing applicator. On occasion, however, rollers are also used for resin application. A brush or other device is usually employed to even out the resin. After a thin coat of resin has been applied to the gel coat or previous layer of laminate, fiberglass chop or other reinforcement is placed over the wet resin. The primary fiberglass reinforcements used are woven roving, cloth, and mat. Squeegees or metal rollers are then employed to force the resin up through the reinforcement and remove any entrapped air (wet out). The resin is allowed to gel and the lamination process is repeated until the desired thickness of fiberglass laminate is obtained.

Catalyst injection flow coaters are used in this Sea Ray facility. They mix accelerated resin and the catalyst to the proper proportion inside the gun spray handle and then force the mixture through a single nozzle with multiple orifices.

A chopper gun has been developed and will be used to simultaneously apply non-atomized resin and chopped strands of glass reinforcement. Brushers and rollers are then used to spread the mixture and remove entrapped air. This process is repeated until the desired thickness is obtained.

The advantage of using woven roving or cloth laminate over chopped fiberglass is that a product with a higher strength to weight ratio is produced. However, the fabrication process takes longer when the woven roving or cloth laminate is used. A common practice of Sea Ray is to combine these two techniques. With this combination, parts of a boat that need to be strongest are fabricated using woven roving or cloth laminated while parts that do not need as much strength, such as small parts, are fabricated using chopped fiberglass. This results in a relatively lightweight boat this is produced in the minimum amount of time.

Sea Ray utilizes various closed molding processes to manufacture some of the small parts that are produced at the facility. Examples of closed molding include Resin Transfer Molding (RTM), light RTM, Compression Molding, Cold Press, Vacuum-Assisted Resin Transfer Molding (VARTM), Virtual Engineered Composites (VEC), Seeman Composites Resin Infusion Molding Process (SCRIMP), and other similar closed molding techniques.

This Sea Ray facility does not have an add-on control device to control the HAPs and VOCs emissions from the boat manufacturing activities.

The Lamination Building does have a single, 8-foot diameter, 75-foot high stack (Emissions point E54) with an approximate 300,000 acfm flow rate to reduce the odorous impact to the nearby area.

A workshop area has cutting and grinding tools that are used to cut various boards, as needed. The particulate matter emissions from this operation are vented to baghouses for control.

The existing facility consists of the following emission units.

Facility ID No. 0350003

ID No.	Emission Unit Description
001	Boat manufacturing facility with resin and gel coat operations and carpet and fabric adhesive operations.

Proposed Project

The purpose of this construction permit is to authorize the construction associated with the relocation of additional boat manufacturing operations from other Brunswick Corporation facilities to the Palm Coast facility.

The boat manufacturing operations to be relocated to the Palm Coast facility consist of Resin/Lamination Operations, Gel Coat Operations, Adhesive Operations, Mold Cleaning and Preparation Operations, Equipment Cleaning Operations, Material Mixing Operations, Polyurethane Painting and Finishing Operations, and Miscellaneous Operations:

- Gelcoat booths with associated application equipment
- Gelcoat application robots
- Adhesive spray booths with associated application equipment
- Paint/lacquer spray booths with associated application equipment
- Bottom paint application booth with associated application equipment
- Expanded or additional spray lamination bays with associated application equipment
- Reconfigure lamination bays with associated application equipment to accommodate various boat sizes
- Possible expansion of buildings to accommodate the safe and efficient movement of boats
- Possible expansion and/or construction of adjacent buildings to accommodate the preparation, painting (Polyurethane), and finishing of boats
- Any equipment or changes necessary to mitigate objectionable odor should it become a verifiable concern

Polyurethane Painting Process Description: Scouring pads, rags, and solvent are used to dewax and clean the gelcoat surface of the fiberglass boat/part to be painted. A minimal amount of fairing material (fiberglass fillers, putties), may be used to fill in gaps on the gelcoat surface. This is usually followed by sanding to create a smooth surface for painting operations.

Prior to applying the two-part polyurethane paint, two or three coats of primer are spray applied to the gelcoat surface of the boat or part. Once the boat/part is primed, the surface is sanded again and the dust wiped off with a solvent. The final step involves spray applying three coats of polyurethane topcoat paint along with any final touch-up (spot) repairs.

The primer and topcoat paint is applied inside a spray booth.

FACILITY REGULATORY CATEGORIES

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- Upon permit issuance, the facility is classified as a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63:

Emissions Unit 001 is subject to the requirements of 40 CFR 63, Subpart VVVV- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, and 40 CFR 63 Subpart A - General Provisions, as specified in Table 8 of 40 CFR 63 Subpart VVVV, which are adopted by reference in Rule 62-204.800(8), F.A.C.

The diesel fired engine (EU 004) is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Application for Air Permit Long Form received April 3, 2103
Additional information received May 1, 2013
Additional information received May 2, 2013
Application Revision received June 6, 2013

SECTION 2. ADMINSITRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Waste and Air Resource Management Program, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office. The Permitting Authority's telephone number is (904) 256-1700.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is (904) 256-1700.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.
   e. Appendix E. Unified Emission Factors for Open Molding of Composites dated October 13, 2009.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the owner or operator from compliance with any applicable federal, state, or local permitting or regulations.

   [Rule 62-210.300, F.A.C.]

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

   [Rule 62-4.080, F.A.C.]

6. Modifications: The owner or operator shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Existing Permits and Regulations: The conditions of this permit supplements all other previously issued air construction permits for this facility. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The owner or operator shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, operation of air pollution control devices, and the like. The owner or operator shall also comply with the applicable Rules of 62-4, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.

   [Rule 62-4.070, F.A.C.]

8. Extension of Permit Expiration Date: The expiration date of this construction permit may be extended upon request of the owner or operator and submission of the appropriate fee to the Permitting Authority **at least 60 days prior** to the expiration date of this permit.

   [Rule 62-4.030, 62-4.050, and 62-4.070(3), F.A.C.]

9. Application for Title V Permit: This permit authorizes construction/modification of the permitted emission unit and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the emissions unit as modified in accordance with the authorizations of this construction permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority.

   [Rules 62-4.030, 62-4.050, and Chapter 62-213, F.A.C.]

1. Lamination Building Exhaust Stack. The air emissions from the Lamination Building are vented out through a single, 8-foot diameter, 75-foot high stack (Emissions point E54) with an air flow rate of approximately 300,000 acfm.

   The stack is to reduce the odorous impact to the nearby area and was constructed under air construction permit No.0350003-005-AC.

   [Rule 62-213.440(2), F.A.C.; Construction Permit No. 0350003-005-AC; Construction Permit No. 0350003-010-AC]

2. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

   [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

   The permittee shall continue to use the operational practices listed below:

   a. All solvents and raw material are stored and handled in appropriate containers equipped with tight fitting lids.

   b. Sea Ray Boats, Inc. practices good housekeeping and train personnel in their respective task at the facility.

   [Rule 62-296.320(1), F.A.C.; and Construction Permit No. 0350003-001-AC]

4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.

   [Rule 62-296.320(4)(b)1, F.A.C.]

5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

   The following requirements are "not federally enforceable":

   a) Paving and maintenance of roads, parking areas, and yards.

   b) Landscaping or planting of vegetation.

Facility-Wide Condition 5. Continued:

c) Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.

d) Confining abrasive blasting and grinding where possible.

[Rule 62-296.320(4)(c)2, F.A.C.; and Title V permit application received January 23, 2013]

6. Source Obligation:

(a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
-001	Boat manufacturing facility with resin and gel coat operations and carpet and fabric adhesive operations.

{Permitting notes: This emissions unit is regulated under: 40 CFR 63 Subpart VVVV- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Hyperlink to 40 CFR Part 63, Subpart VVVV -NESHAP for Boat Manufacturing. The potential emissions from this relocation of operations to the Palm Coast facility project itself results in a maximum of 240.0 tons of VOC emissions.

PROPOSED CONSTRUCTION WORK

1. The permittee is authorized to conduct this project for Emission Unit No. 001 as follows:

- Construct additional Gelcoat booths with associated application equipment
- Construct/install Gelcoat application robots
- Construct additional Adhesive spray booths with associated application equipment
- Construct additional Paint/lacquer spray booths with associated application equipment
- Construct an additional Bottom paint application booth with associated application equipment
- Expand existing or construct additional spray lamination bays with associated application equipment
- Reconfigure lamination bays with associated application equipment to accommodate various boat sizes
- Expand existing buildings to accommodate the safe and efficient movement of boats
- Expand existing buildings and/or construct adjacent buildings to accommodate the preparation, painting (Polyurethane), and finishing of boats
- Any equipment or changes necessary to mitigate objectionable odor should it become a verifiable concern

[Application No 0350003-011-AC]

PERFORMANCE RESTRICTIONS

2. Facility-Wide Volatile Organic Compounds (VOC) Emissions. The maximum facility-wide total VOC emissions, including hazardous air pollutants (HAPs), shall not exceed 489.0 tons per any consecutive 12-month period.

[Applicant Requested Emissions Cap; Avoidance of PSD Review; Application No. 0350003-011-AC; Rules 62-4.070(3), and 62-210.200(PTE), F.A.C.]

3. Hours of Operation. The hours of operation are not restricted, i.e. 8,760 hours per any consecutive 12 month period.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C; Air Construction Permit No. 0350003-005-AC; Application No. 0350003-011-AC]

4.a. Method of Operation: The facility shall conduct all major lamination, gelcoat, resin, and mold and equipment cleaning operations, including deck and hull manufacturing in the existing Lamination Building. Air emissions from these operations shall be captured by the existing ventilation system and exhausted through the 8-foot diameter, 75-foot high stack (Emissions point E54) with an air flow rate of approximately 300,000 acfm.

4.b. The capture/ forced draft ventilation system shall be in operation at all times during fiberglass boat manufacturing (application of materials, and curing of resins and gelcoats).

[Rule 62-4.070, F.A.C.; Rule 62-4.160(2), F.A.C.; Air Construction Permit No. 0350003-005-AC, Consent Order, OGC File No. 02-0699, Application No. 0350003-011-AC]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

5. Monthly Recordkeeping Requirements. In order to determine compliance with the VOC Emissions Cap stated in Condition 2., the Permittee shall record on a monthly basis the following data for each material used, that contains VOC. Such materials shall include, but are not limited to solvent and coating storage, cleanup, VOC fugitive emissions, and VOC emissions from the emissions units and pollutant emitting activities that have been identified in the Title V Operation Permit as being insignificant (Appendix I) and unregulated (Appendix U). All valid VOC emissions data shall be used. Styrene and MMA are each considered a VOC as well as a HAP and shall be determined using the method stated in Condition 6. The monthly log shall be maintained for a period of at least 5 years from the date the data is recorded and made available to the Department upon request.

a. Facility Name, Facility ID No. (i.e., 0350003);

b. Month and year of record;

c. The consecutive 12-month totals of Total VOC/HAP emissions, in tons;

d. The consecutive 12-month totals of the usage of gel-coats, resins, and other VOC/HAP containing materials;

e. The total for each month of the usage of gel-coats, resins, and other VOC/HAP containing materials; and

f. The VOC/HAP content of each gel-coat and resin applied and other VOC/HAP containing materials.

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12 months total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total.

Condition 5. Continued:

Facilities or emission units that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months total can be maintained each month.

Logs must document the method, calculations, and formulas used in determining the usage rate and the emission rate. This includes, but is not limited to, the product name, density, individual and total HAP contents, and individual and total VOC content. All calculations, including those used to derive emission credits for mass balance, must be clearly documented, and may be presented **in the form of a template of sample calculations**, which is filed with the logs required in this condition and available for review on site by regulatory inspectors.

[Rules 62-4.070(3), 62-210.200(PTE), and 62-213.440, F.A.C., Technical Evaluation dated 05/14/13; Application No. 0350003-011-AC /PSD Review Avoidance]

6. VOC Emissions Calculations. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). The emissions calculation methods are:

- Styrene, Methyl Methacrylate, and Methyl styrene (aka vinyl toluene/ Methyl Toluene) emissions from open mold applications of resin, gelcoat, putty, gunk, and gelpatch shall be determined by use of "Unified Emissions Factors (UEF) for Open Molding of Composites (Revised October 13, 2009 UEF Table 1)" per method of open mold application.

- Closed Molding use 1.5% emissions factor for all VOC content components = styrene + methyl methacrylate + other organic HAPs + other VOCs

- Cold Press Closed Molding use 3% emissions factor for all VOC content components = styrene + methyl methacrylate + other organic HAPs + other VOCs

- Methyl Methacrylate two-part adhesives use 75% emissions factor for methyl methacrylate emissions

- Emissions of MDI, other isocyanate ingredients, and polyols (polyglycol) from foams produce negligible emissions and are not required to be included in the VOC calculations.

- Emissions of isocyanate ingredients from polyurethane paint products produce negligible emissions and are not required to be included in the VOC calculations.

- Organic peroxides and dimethyl phthalate produce negligible emissions and are not required to be included in the VOC calculations.

- Other, non-styrene, non-MMA, non-HAP VOC emissions shall be determined by material VOC content, the assumption that all of the VOC is emitted, and material usage.

Condition 6. Continued:

– Supplier-provided emissions data for reactive-based adhesives, foams, and other materials.

Supporting documentation (chemical usage tracking logs, MSD sheets, Safety Data Sheet, supplier-provided Regulatory Data Sheets or equivalent, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) are methods used to determine VOC, HAP, and other emissions. These records shall be kept for each chemical and associated product which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. The log and documents shall be kept at the facility for at least five years and made available to the Department.

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

7. Recordkeeping - VOC. The information required by Condition 5. shall be recorded and maintained at the facility.

[Rules 62-4.070(3); 62-213.440, F.A.C.]

8. Recordkeeping - Material Safety and Data Sheets. MSDS' shall be maintained for all materials that are used by the facility.

[Air Construction Permit No. 0350003-001-AC; Rule 62-4.070(3), F.A.C.]

9. Reporting. A report of the data required by Condition 5. shall be submitted to the Northeast District Office on a semi-annual basis. These reports shall be submitted in accordance with Condition RR.4. of Appendix RR – Facility Wide Reporting Requirements of the Title V Operation Permit.

[Air Construction Permit No. 0350003-001-AC, Rule 62-213.440(1)(b)3.a., F.A.C.]

10. VOC Emissions Cap Exceedance – Notification. Any exceedance of the Facility-Wide Volatile Organic Compounds (VOC) Emissions limitation stated in Condition 2. of this permit shall be reported to the Compliance Authority immediately.

The information reported shall include the following information:

(1) A description of and cause of exceedance; and

(2) The period of exceedance, including dates and times; or, if not corrected, the anticipated time the exceedance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the exceedance. Pursuant to Rule 62-4.160, the permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

Immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the discovery of the exceedance, excluding weekends and holidays.

[Rules 62-4.070, and 62-4.160(8), F.A.C.]

40 CFR 63 Subpart VVVV Requirements:

11. The operations as described by paragraphs (a) through (d) below are subject to the requirements described in Conditions 12 – 53 of this permit.

(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(b) Closed molding resin operations.

(c) Resin and gel coat application equipment cleaning operations.

(d) Carpet and fabric adhesive operations.

(e) Resin and gel coat mixing operations.

[40 CFR 63.5689]

Standards for Open Molding Resin and Gel Coat Operations

12. The owner or operator shall limit organic HAP emissions from the five open molding operations listed in paragraphs (1) through (5) of this condition to the emission limit specified in Condition 13. Operations listed in Condition 14. are exempt from this limit.

(1) Production resin.

(2) Pigmented gel coat.

(3) Clear gel coat.

(4) Tooling resin.

(5) Tooling gel coat.

[40 CFR 63.5698(a)]

13. Organic HAP Emissions Limit. The owner or operator shall limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this condition, based on a 12-month rolling average.

$$HAP\ Limit = \left[46\left(M_R\right) + 159\left(M_{PG}\right) + 291\left(M_{CG}\right) + 54\left(M_{TR}\right) + 214\left(M_{TG}\right)\right] \qquad (Eq.\ 1)$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

M_R = mass of production resin used in the past 12 months, excluding any materials exempt under Condition 14., megagrams.

M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under Condition 14., megagrams.

Condition 13 Continued:

M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under Condition 14., megagrams.

M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under Condition 14., megagrams.

M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under Condition 14., megagrams.

[40 CFR 63.5698 (b)]

14. Exempt Materials. The materials specified in paragraphs (1) through (3) below are exempt from the open molding emission limit specified in Condition 13.

(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 approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. The owner or operator shall keep a record of the resins for which he/she are using this exemption.

(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 the facility on a 12-month rolling-average basis. The owner or operator shall keep a record of the amount of gel coats used per month for which he/she are using this exemption 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 vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. The owner or operator shall keep a record of the amount of 100 percent 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.

[40 CFR 63.5698(d)]

Compliance Options for Open Molding Emissions Limit

15. Compliance Options. The owner or operator shall use one or more of the options listed in paragraphs (a) and (b) of this condition to meet the emission limit in Condition 13. for the resins and gel coats used in open molding operations at the facility.

(a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.*

(1) Demonstrate that emissions from the open molding resin and gel coat operations that the owner or operator averages meet the emission limit in Condition 13. using the procedures described in Condition 19 through 23. Compliance with this option is based on a 12-month rolling average.

(2) Those operations and materials not included in the emissions average must comply with either paragraph (b) of this condition.

(b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 of 40 CFR 63 Subpart VVVV. Compliance with this option is based on a 12-month rolling average.

[40 CFR 63.5701]

General Requirements of Emissions Averaging Option

16. For those open molding operations and materials complying using the emissions averaging option, the owner or operator shall demonstrate compliance by performing the steps in paragraphs (1) through (5) of this condition.

(1) Use the methods specified in Condition 46 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in Condition 19 through 23 to show that the organic HAP emissions do not exceed the limit specified in Condition 13.

(3) Keep records as specified in paragraphs (3)(i) through (iv) of this condition 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 nonatomized technology.

(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in Condition 19 through 23.

(4) Prepare and submit the implementation plan described in Condition 17 to the Department and keep it up to date.

(5) Submit semiannual compliance reports to the Department as specified in Condition 50.

[40 CFR 63.5704 (a)]

17. Implementation Plan for Open Molding Operation. The owner or operator shall prepare an implementation plan for all open molding operations for which he/she complies by using the emissions averaging option described in Condition 16.

(a) The implementation plan must describe the steps the owner or operator will take to bring the open molding operations covered by this subsection into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in paragraphs (1) through (3) as shown below.

(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 Condition 13.

(b) The owner or operator shall submit the implementation plan to the Department with the notification of compliance status specified in Condition 47.

(c) The owner or operator shall keep the implementation plan on site and provide it to the Department when asked.

(d) If the owner or operator revises the implementation plan, he/she shall submit the revised plan with the next semiannual compliance report specified in Condition 50.

[40 CFR 63.5707]

General Requirements of Compliant Materials Option

18. General Requirements of Compliant Materials Option. For each open molding operation complying using the compliant materials option, the owner or operator shall demonstrate compliance by performing the steps in paragraphs (1) through (4) of this condition.

(1) Use the methods specified in Condition 46 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in Condition 24 through 27 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 in 40 CFR 63 Subpart VVVV.

(3) Keep records as specified in paragraphs (i) through (iv) as shown below for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(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.

Condition 18. Continued:

(iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in Condition 24 through 27.

(4) Submit semiannual compliance reports to the Department as specified in Condition 50.

[40 CFR 63.5704 (b)]

Compliance Demonstration Using Emissions Averaging Option

19. 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, August 23, 2004.

[40 CFR 63.5710 (a)]

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

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

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, kilograms per megagram.

M_R = Mass of production resin used in the past 12 months, megagrams.

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.

PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.

PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

M_{TR} = Mass of tooling resin used in the past 12 months, megagrams.

PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

Condition 20. Continued:

M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams.

[40 CFR 63.5710 (b)]

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

$$PV_{OP} = \frac{\sum_{i=1}^{n}(M_i \, PV_i)}{\sum_{i=1}^{n}(M_i)} \qquad (Eq. 2)$$

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}) included in the average, kilograms of HAP per megagram of material applied.

M_i = mass of resin or gel coat i used within an operation in the past 12 months, megagrams.

n = number of different open molding resins and gel coats used within an operation in the past 12 months.

PV_i = the MACT model point value for resin or gel coat i used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

[40 CFR 63.5710 (c)]

22. The owner or operator shall use the equations in Table 3 of 40 CFR 63 Subpart VVVV to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.

[40 CFR 63.5710 (d)]

23. If the organic HAP emissions, as calculated in Condition 20, are less than the organic HAP limit calculated in Condition 13 for the same 12-month period, then the regulated operations are in compliance with the emission limit in Condition 13 for those operations and materials included in the average.

[40 CFR 63.5710 (e)]

Compliance Demonstration Using Compliant Materials Option

24. Compliance using the organic HAP content requirements listed in Table 2 of 40 CFR 63 Subpart VVVV 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, August 23, 2004. If the owner or operator is using filled material (production resin or tooling resin), he/she shall comply according to the procedure described in Condition 28 through 31.

[40 CFR 63.5713 (a)]

25. At the end of the twelfth month after the compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2 of 40 CFR 63 Subpart VVVV, then the regulated operations are in compliance with the emission limit specified in Condition 12 for that 12-month period for that operation. In addition, the owner or operator does not need to complete the weighted-average organic HAP content calculation contained in Condition 26 for that operation.

[40 CFR 63.5713 (b)]

26. At the end of every month, the owner or operator shall use equation 1 of this condition to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\textit{Weighted-Average}\ \text{HAP Content}\ (\%) = \frac{\sum_{i=1}^{n}(M_i\ \text{HAP}_i)}{\sum_{i=1}^{n}(M_i)} \qquad (Eq.\ 1)$$

Where:

M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.

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 Condition 46 to determine organic HAP content.

n = number of different open molding resins or gel coats used in the past 12 months in an operation.

[40 CFR 63.5713 (c)]

27. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 of 40 CFR 63 Subpart VVVV, then the regulated operations are in compliance with the emission limit specified in Condition 13.

[40 CFR 63.5713 (d)]

28. If the owner or operator is using a filled production resin or filled tooling resin, he/she shall demonstrate compliance for the filled material on an as-applied basis using equation 1 of this condition.

$$PV_F = PV_u \times \frac{(100 - \%\ \text{Filler})}{100} \qquad (Eq.\ 1)$$

Where:

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.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 of 40 CFR 63 Subpart VVVV.

% Filler = The weight-percent of filler in the as-applied filled resin system.

[40 CFR 63.5714 (a)]

29. If the filled resin is used as a production resin and the value of PV_F calculated by equation 1 of Condition 28. does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

[40 CFR 63.5714 (b)]

30. If the filled resin is used as a tooling resin and the value of PV_F calculated by equation 1 of Condition 28. does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

[40 CFR 63.5714 (c)]

31. If the owner or operator is including a filled resin in the emissions averaging procedure described in Condition 19 through 23, then use the value of PV_F calculated using equation 1 of Condition 28. for the value of PV i in equation 2 of Condition 21.

[40 CFR 63.5714 (d)]

Standards for Closed Molding Resin Operations

32. If a resin application operation meets the definition of closed molding as described below, there is no requirement to reduce emissions from that operation.

Closed molding means any molding process in which pressure is used to distribute the resin through the reinforcing fabric placed between two mold surfaces to either saturate the fabric or fill the mold cavity. The pressure may be clamping pressure, fluid pressure, atmospheric pressure, or vacuum pressure used either alone or in combination. The mold surfaces may be rigid or flexible. Closed molding includes, but is not limited to, compression molding with sheet molding compound,

Condition 32. Continued:

infusion molding, resin injection molding (RIM), vacuum-assisted resin transfer molding (VARTM), resin transfer molding (RTM), and vacuum-assisted compression molding. Processes in which a closed mold is used only to compact saturated fabric or remove air or excess resin from the fabric (such as in vacuum bagging), are not considered closed molding. Open molding steps, such as application of a gel coat or skin coat layer by conventional open molding prior to a closed molding process, are not closed molding.

[40 CFR 63.5728(a) and 40 CFR 63.5779]

33. If the resin application operation does not meet the definition of closed molding, then the owner or operator shall comply with the limit for open molding resin operations specified in Condition 13.

[40 CFR 63.5728 (b)]

34. 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 Condition 13. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding.

[40 CFR 63.5728 (c)]

Standards for Resin and Gel Coat Mixing Operations

35. 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.

[40 CFR 63.5731 (a)]

36. The work practice standard in Condition 35. 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.

[40 CFR 63.5731 (b)]

37. To demonstrate compliance with the work practice standard in Condition 35, the owner or operator shall visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure 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.

[40 CFR 63.5731 (c)]

38. The owner or operator shall 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.

[40 CFR 63.5731 (d)]

Standards for Resin and Gel Coat Application Equipment Cleaning Operations

39. For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the owner or operator shall 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 limit applies.

[40 CFR 63.5734 (a)]

40. The owner or operator shall 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.

[40 CFR 63.5734 (b)]

41. Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Condition 39 & 31 using the methods specified in Condition 46 [40 CFR 63.5737 (a)]

42. If the owner or operator recycles cleaning solvents on site, he/she 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 Condition 46 for demonstrating compliance with organic HAP content limits.

[40 CFR 63.5737 (b)]

43. At least once per month, the owner or operator shall 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. Keep records of the monthly inspections and any repairs made to the covers.

[40 CFR 63.5737 (c)]

Standards for Carpet and Fabric Adhesive Operations

44. The owner or operator shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight. Excluded from this limit are hand held aerosol adhesives.

[40 CFR 63.5740 (a), 40 CFR 63.5683 (d)]

45. To demonstrate compliance with the emission limit in Condition 44, the owner or operator shall determine and record the organic HAP content of the carpet and fabric adhesives using the methods in Condition 46.

[40 CFR 63.5740 (b)]

Methods for Determining Hazardous Air Pollutant Content

46. Determine the Organic HAP Content for Each Material Used. To determine the organic HAP content for each material used in the open molding resin and gel coat operations and carpet and fabric adhesive operations, the owner or operator shall use one of the options in paragraphs (1) through (6) of this condition.

Options	Requirements
1. Method 311 (appendix A to 40 CFR part 63).	The owner or operator may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (i) and (ii) as shown below when determining organic HAP content by Method 311. (i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the owner or operator does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP the owner or operator measures as a value truncated to four places after the decimal point (for example, 0.1234). (ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
2. Method 24 (appendix A to 40 CFR part 60)	The owner or operator may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.
3. ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)	The owner or operator may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
4. Alternative method	The owner or operator may use an alternative test method for determining mass fraction of organic HAP if he/she obtains prior approval by the Administrator. The owner or operator must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
5. Information from the supplier or manufacturer of the material	The owner or operator may rely on information other than that generated by the test methods specified in option (1) through (4) of this condition, such as manufacturer's formulation data, according to option (5)(i) through (iii) of this condition. (i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as

	specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the owner or operator does not have to include it in the organic HAP total. (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the owner or operator shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (1) through (4) of this condition exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the owner or operator shall use the measured organic HAP content to determine compliance. (iii) If the organic HAP content is provided as a single value, the owner or operator may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in option (1) through (4) of this condition is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the owner or operator may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the owner or operator shall use the measured organic HAP content to determine compliance.
6. Solvent blends	Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the owner or operator may use the values for organic HAP content that are listed in Table 5 or 6 of 40 CFR 63 Subpart VVVV. The owner or operator may use Table 6 of 40 CFR 63 Subpart VVVV only if the solvent blends in the materials he/she uses do not match any of the solvent blends in Table 5 of 40 CFR 63 Subpart VVVV and the owner or operator knows only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 of 40 CFR 63 Subpart VVVV, then the test results must be used for determining compliance.

[40 CFR 63.5758 (a)]

Notifications Requirements

47. The owner or operator shall submit all of the notifications in Table 7 of 40 CFR 63 Subpart VVVV that apply to him/her 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 of 40 CFR 63 Subpart VVVV.

[40 CFR 63.5761 (a)]

48. If the owner or operator changes any information submitted in any notification, he/she shall submit the changes in writing to the Department within 15 calendar days after the change.

[40 CFR 63.5761 (b)]

Reporting Requirements

49. The owner or operator shall submit the applicable reports specified in Condition 50 and 51. To the extent possible, the owner or operator shall organize each report according to the operations covered by this subsection and the compliance procedure followed for that operation.

[40 CFR 63.5764(a)]

50. Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the owner or operator shall submit each report by the dates as described by the table below.

Reporting Schedule
▪ If the source is not controlled by an add-on control device (i.e., the owner or operator is 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 (August 23, 2004) 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 (August 23, 2004).
▪ 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 (1) of this table.
▪ Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
▪ Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
▪ For each affected source that is subject to 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), the owner or operator may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (1) through (4) of this table.

[40 CFR 63.5764 (b)]

51. The compliance report must include the information specified in the table below.

(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 the owner or operator was in compliance with the emission limits and work practice standards during the reporting period, the owner or operator shall include a statement to that effect.
(7) If the owner or operator deviated from an emission limit or work practice standard during the reporting period, he/she shall also include the information listed in paragraphs (7)(i) through (iv) of this condition 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 deviation and actions the owner or operator has taken to prevent it from happening again. (iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

[40 CFR 63.5764 (c)]

Recordkeeping Requirements

52. The owner or operator shall keep the records specified in the table below in addition to records specified in other Conditions of this subsection.

(a) The owner or operator shall keep a copy of each notification and report that he/she submitted to comply with this subsection.
(b) The owner or operator shall keep all documentation supporting any notification or report that he/she submitted.

Condition 52. Continued:

(c) If the facility 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 owner or operator shall keep the records of the followings:

- The total amounts 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, the owner or operator shall also record the amounts of each applied by atomized and nonatomized methods.

[40 CFR 63.5767]

53. The owner or operator shall also meet the recordkeeping requirements as described below.

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

(b) The owner or operator shall keep each record for 5 years following the date that each record is generated.

(c) The owner or operator shall keep each record on site for at least 2 years after the date that each record is generated. The owner or operator can keep the records offsite for the remaining 3 years.

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

[40 CFR 63.5770]

Other Applicable Requirements

54. Federal Rule Requirements. In addition to the Conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions as specified in Table 8 of 40 CFR 63 Subpart VVVV. Hyperlink to 40 CFR Part 63 Subpart A - General Provisions

TABLE 8 TO SUBPART VVVV OF PART 63—APPLICABILITY OF GENERAL PROVISIONS (40 CFR PART 63, SUBPART A) TO SUBPART VVVV

As specified in § 63.5773, you must comply with the applicable requirements of the General Provisions according to the following table:

Citation	Requirement	Applies to subpart VVVV	Explanation
§ 63.1(a)	General Applicability	Yes.	
§ 63.1(b)	Initial Applicability Determination	Yes.	
§ 63.1(c)(1)	Applicability After Standard Established	Yes.	

§ 63.1(c)(2)		Yes	Area sources are not regulated by subpart VVVV.
§ 63.1(c)(3)		No	[Reserved]
§ 63.1(c)(4)-(5)		Yes.	
§ 63.1(d)		No	[Reserved]
§ 63.1(e)	Applicability of Permit Program	Yes.	
§ 63.2	Definitions	Yes	Additional definitions are found in § 63.5779.
§ 63.3	Units and Abbreviations	Yes.	
§ 63.4(a)	Prohibited Activities	Yes.	
§ 63.4(b)-(c)	Circumvention/Severability	Yes.	
§ 63.5(a)	Construction/Reconstruction	Yes.	
§ 63.5(b)	Requirements for Existing, Newly Constructed, and Reconstructed Sources	Yes.	
§ 63.5(c)		No	[Reserved]
§ 63.5(d)	Application for Approval of Construction/Reconstruction	Yes.	
§ 63.5(e)	Approval of Construction/Reconstruction	Yes.	
§ 63.5(f)	Approval of Construction/Reconstruction Based on prior State Review	Yes.	
§ 63.6(a)	Compliance with Standards and Maintenance Requirements—Applicability	Yes.	
§ 63.6(b)	Compliance Dates for New and Reconstructed Sources	Yes	§ 63.695 specifies compliance dates, including the compliance date for new area sources that become major sources after the effective date of the rule.
§ 63.6(c)	Compliance Dates for Existing Sources	Yes	§ 63.5695 specifies compliance dates, including the compliance date for existing area sources that become major sources after the effective date of the rule.
§ 63.6(d)		No	[Reserved]
§ 63.6(e)(1)-(2)	Operation and Maintenance Requirements	No	Operating requirements for open molding operations with add-on controls are specified in § 63.5725.
§ 63.6(e)(3)	Startup, Shut Down, and Malfunction Plans	Yes	Only sources with add-on controls must complete startup, shutdown, and malfunction plans.
§ 63.6(f)	Compliance with Nonopacity Emission Standards	Yes.	
§ 63.6(g)	Use of an Alternative Nonopacity Emission Standard	Yes.	
§ 63.6(h)	Compliance with Opacity/Visible Emissions Standards	No	Subpart VVVV does not specify opacity or visible emission standards.
§ 63.6(i)	Extension of Compliance with Emission Standards	Yes.	
§ 63.6(j)	Exemption from Compliance with Emission Standards	Yes.	
§ 63.7(a)(1)	Performance Test Requirements	Yes.	
§ 63.7(a)(2)	Dates for performance tests	No	§ 63.5716 specifies performance test dates.
§ 63.7(a)(3)	Performance testing at other times	Yes.	
§ 63.7(b)-(h)	Other performance testing requirements	Yes.	
§ 63.8(a)(1)-(2)	Monitoring Requirements—Applicability	Yes	All of § 63.8 applies only to sources with add-on controls. Additional monitoring requirements for sources with add-on controls are found in § 63.5725.
§ 63.8(a)(3)		No	[Reserved]
§ 63.8(a)(4)		No	Subpart VVVV does not refer directly or indirectly to § 63.11.
§ 63.8(b)(1)	Conduct of Monitoring	Yes.	
§ 63.8(b)(2)-(3)	Multiple Effluents and Multiple Continuous Monitoring Systems (CMS)	Yes	Applies to sources that use a CMS on the control device stack.
§ 63.8(c)(1)-(4)	Continuous Monitoring System Operation and Maintenance	Yes.	
§ 63.8(c)(5)	Continuous Opacity Monitoring Systems (COMS)	No	Subpart VVVV does not have opacity or visible emission standards.
§ 63.8(c)(6)-(8)	Continuous Monitoring System Calibration Checks and Out-of-Control Periods	Yes.	

§ 63.8(d)	Quality Control Program	Yes.	
§ 63.8(e)	CMS Performance Evaluation	Yes.	
§ 63.8(f)(1)-(5)	Use of an Alternative Monitoring Method	Yes.	
§ 63.8(f)(6)	Alternative to Relative Accuracy Test	Yes	Applies only to sources that use continuous emission monitoring systems (CEMS).
§ 63.8(g)	Data Reduction	Yes	
§ 63.9(a)	Notification Requirements—Applicability	Yes.	
§ 63.9(b)	Initial Notifications	Yes	
§ 63.9(c)	Request for Compliance Extension	Yes.	
§ 63.9(d)	Notification That a New Source Is Subject to Special Compliance Requirements	Yes.	
§ 63.9(e)	Notification of Performance Test	Yes	Applies only to sources with add-on controls.
§ 63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart VVVV does not have opacity or visible emission standards.
§ 63.9(g)(1)	Additional CMS Notifications—Date of CMS Performance Evaluation	Yes	Applies only to sources with add-on controls.
§ 63.9(g)(2)	Use of COMS Data	No	Subpart VVVV does not require the use of COMS.
§ 63.9(g)(3)	Alternative to Relative Accuracy Testing	Yes	Applies only to sources with CEMS.
§ 63.9(h)	Notification of Compliance Status	Yes.	
§ 63.9(i)	Adjustment of Deadlines	Yes.	
§ 63.9(j)	Change in Previous Information	Yes.	
§ 63.10(a)	Recordkeeping/Reporting—Applicability	Yes.	
§ 63.10(b)(1)	General Recordkeeping Requirements	Yes	§§ 63.567 and 63.5770 specify additional recordkeeping requirements.
§ 63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	Yes	Applies only to sources with add-on controls.
§ 63.10(b)(2)(xii)-(xiv)	General Recordkeeping Requirements	Yes.	
§ 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	§ 63.5686 specifies applicability determinations for non-major sources.
§ 63.10(c)	Additional Recordkeeping for Sources with CMS	Yes	Applies only to sources with add-on controls.
§ 63.10(d)(1)	General Reporting Requirements	Yes	§ 63.5764 specifies additional reporting requirements.
§ 63.10(d)(2)	Performance Test Results	Yes	§ 63.5764 specifies additional requirements for reporting performance test results.
§ 63.10(d)(3)	Opacity or Visible Emissions Observations	No	Subpart VVVV does not specify opacity or visible emission standards.
§ 63.10(d)(4)	Progress Reports for Sources with Compliance Extensions	Yes.	
§ 63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Yes	Applies only to sources with add-on controls.
§ 63.10(e)(1)	Additional CMS Reports—General	Yes	Applies only to sources with add-on controls.
§ 63.10(e)(2)	Reporting Results of CMS Performance Evaluations	Yes	Applies only to sources with add-on controls.
§ 63.10(e)(3)	Excess Emissions/CMS Performance Reports	Yes	Applies only to sources with add-on controls.
§ 63.10(e)(4)	COMS Data Reports	No	Subpart VVVV does not specify opacity or visible emission standards.
§ 63.10(f)	Recordkeeping/Reporting Waiver	Yes.	
§ 63.11	Control Device Requirements—Applicability	No	Facilities subject to subpart VVVV do not use flares as control devices.
§ 63.12	State Authority and Delegations	Yes	§ 63.5776 lists those sections of subpart A that are not delegated.
§ 63.13	Addresses	Yes.	
§ 63.14	Incorporation by Reference	Yes.	
§ 63.15	Availability of Information/Confidentiality	Yes.	

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