

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

July 22, 2024

PERMIT TO INSTALL

85-24

ISSUED TO

Great Lakes Composites, LLC

LOCATED AT

401 South Delaney Road
Owosso, Michigan 48867

IN THE COUNTY OF

Shiawassee

STATE REGISTRATION NUMBER

N2430

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: February 8, 2024	
DATE PERMIT TO INSTALL APPROVED: July 22, 2024	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUGELCOAT1	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials and a shared drying area with a natural gas-fired tube dryer. Operations include the use of gelcoats, patch aids and catalysts. Particulate emissions are controlled by dry filters.	05-01-2017 / 08-29-2018 / 12-09-2020 / 7-22-2024	FGGELCOAT, FGMACTVVVV, FGMACTWWWW
EUGELCOAT2	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials and a shared drying area with a natural gas-fired tube dryer. Operations include the use of gelcoats, patch aids and catalysts. Particulate emissions are controlled by dry filters.	05-01-2017 / 08-29-2018 / 12-09-2020 / 7-22-2024	FGGELCOAT, FGMACTVVVV, FGMACTWWWW
EUGELCOAT3	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials and a shared drying area with a natural gas-fired tube dryer. Operations include the use of gelcoats, patch aids and catalysts. Particulate emissions are controlled by dry filters.	05-27-2020 / 12-09-2020 / 7-22-2024	FGGELCOAT, FGMACTVVVV, FGMACTWWWW
EUGELCOAT4	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials and a shared drying area with a natural gas-fired tube dryer. Operations include the use of gelcoats, patch aids and catalysts. Particulate emissions are controlled by dry filters.	05-27-2020 / 12-09-2020 / 7-22-2024	FGGELCOAT, FGMACTVVVV, FGMACTWWWW
EUEXTRABOOTH	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials, manual applicators for the application of coatings, and a shared drying area with a natural gas-fired tube dryer and a 1.5 MMBtu natural gas-fired curing oven. Operations include the use of gelcoats, patch aids, coatings and catalysts. Particulate emissions are controlled by dry filters.	05-27-2020 / 12-09-2020 / 7-22-2024	FGGELCOAT, FG633, FGMACTVVVV, FGMACTWWWW, FGMACTPPPP

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

**EUEXTRABOOTH
EMISSION UNIT CONDITIONS**

DESCRIPTION

One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials, manual applicators for the application of coatings, and a shared drying area with a natural gas-fired tube dryer and a 1.5 MMBtu natural gas-fired curing oven. Operations include the use of gelcoats, patch aids, coatings and catalysts. Particulate emissions are controlled by dry filters.

Flexible Group ID: FGGELCOAT, FG633, FGMACTVVVV, FGMACTWWWW, FGMACTPPPP.

POLLUTION CONTROL EQUIPMENT

Dry filters.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	5.1 lb/gal (minus water) ^a as applied	Instantaneous	EUEXTRABOOTH coatings	SC V.1	R 336.1702(a)

^a The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound.

2. The permittee shall burn only natural gas in the 1.5 MMBtu curing oven. **(R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1225, R 336.1702(a))**
2. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUEXTRABOOTH unless its exhaust filter is installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1331)**
2. The permittee shall equip and maintain EUEXTRABOOTH with manual applicators, or technology with equivalent or lower VOC emission rates, for applying coatings. **(R 336.1225, R 336.1702(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1225, R 336.1702)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVEXTRABOOTH	30	30	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGGELCOAT	Four spray booths and one multi-purpose booth equipped with mechanical spray applicators for the application of gelcoat materials with a shared drying area. Operations include the use of gelcoats, patch aids and catalysts. Particulate emissions are controlled by dry filters.	EUGELCOAT1, EUGELCOAT2, EUGELCOAT3, EUGELCOAT4, EUEXTRABOOTH
FG633	All miscellaneous plastic parts or pleasure craft coating lines, including those covered in other permits or operating exempt, which are exempted by R 336.1633(3)(a).	EUEXTRABOOTH
FGMACTPPPP	Each new or reconstructed affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.	EUEXTRABOOTH

FGGELCOAT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Four spray booths and one multi-purpose booth equipped with mechanical spray applicators for the application of gelcoat materials with a shared drying area. Operations include the use of gelcoats, patch aids and catalysts. Particulate emissions are controlled by dry filters.

Emission Unit: EUGELCOAT1, EUGELCOAT2, EUGELCOAT3, EUGELCOAT4 and EUEXTRABOOTH.

POLLUTION CONTROL EQUIPMENT

Dry filters on spray booths.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC (including styrene)	29.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGGELCOAT	SC VI.2, SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

- The permittee shall not exceed the monomer content limits listed in the following table for gelcoats used to make miscellaneous fiberglass parts in FGGELCOAT: **(R 336.1702(a))**

Material	Maximum Styrene Content (wt %)	Maximum Methyl methacrylate (MMA) Content (wt %)
a) White Gelcoats	31.0	5.0
b) Clear Gelcoats	32.0	10.0
c) All Other Pigmented Gelcoats	40.0	10.0
d) Tooling Gelcoats	43.0	5.0

- The permittee shall not exceed the weighted-average monomer (styrene, MMA, methylstyrene) VOC content limits listed in the following table for gelcoats used in fiberglass boat manufacturing in FGGELCOAT. Alternatively, the permittee may use the emissions averaging alternative (R 336.1637(4)(c)) to demonstrate compliance for some or all of the gelcoats used in fiberglass boat manufacturing. If the non-monomer VOC content of a gelcoat exceeds 5% by weight, the excess non-monomer VOC must be added to the monomer VOC of the gel coat. **(R 336.1702)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
a) Weighted-Average Monomer VOC Content of pigmented gelcoat	33% by weight*	12-month rolling average as determined at the end of each calendar month	FGGELCOAT	SC VI.2, SC VI.3(i)	R 336.1702(d)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
b) Weighted-Average Monomer VOC Content of clear gelcoat	48% by weight*	12-month rolling average as determined at the end of each calendar month	FGGELCOAT	SC VI.2, SC VI.3(j)	R 336.1702(d)
c) Weighted-Average Monomer VOC Content of tooling gelcoat	40% by weight*	12-month rolling average as determined at the end of each calendar month	FGGELCOAT	SC VI.2, SC VI.3(k)	R 336.1702(d)

* Beginning on the permit issuance date, and continuing for the first 12 calendar months, this limit applies to the cumulative average VOC Content of the prior months. Thereafter, the limit shall become a 12-month rolling limit.

The following formula shall be used to calculate the weighted-average monomer VOC content:

Where:

$$\begin{aligned}
 W_i &= \text{Weight of Material } i \\
 V_i &= \text{Monomer VOC Content of Material } i \\
 M_{WA} &= \text{Weighted Average Monomer VOC Content}
 \end{aligned}$$

$$M_{WA} = \frac{\sum_{i=1}^n (W_i * V_i)}{\sum_{i=1}^n (W_i)}$$

Note: If the non-monomer VOC content of a resin or gel coat exceeds 5% by weight, the excess non-monomer VOC must be added to the monomer VOC (V_i) of the resin or gel coat. The excess non-monomer content shall be calculated as follows:

$$\text{Excess Non-Monomer VOC content} = \text{Non-monomer VOC Content} - 5\%, \text{ by weight}$$

- The permittee shall not exceed the monomer content limits listed in the following table for FGGELCOAT: **(R 336.1702(a))**

Material	Maximum Styrene Content (wt %)	Maximum Methyl methacrylate (MMA) Content (wt %)
a) Patch Aids	50.0	20.0

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste materials used in FGGELCOAT and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
- The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
- The permittee shall handle all VOC and/or HAPs containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booths associated with FGELCOAT unless its respective exhaust filter is installed, maintained, and operated in a satisfactory manner. **(R 336.1301, R 336.1331)**
2. The permittee shall equip and maintain the spray booths in FGELCOAT with mechanical applicators, or technology with equivalent or lower styrene emission rates. **(R 336.1702(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for FGELCOAT:
 - a) The identity and amount (in pounds) of each gelcoat and patch aid used.
 - b) The usage type (miscellaneous parts or boat manufacturing) of each gelcoat used.
 - c) The styrene content (in percent by weight) of each gelcoat and patch aid used.
 - d) The MMA content (in percent by weight) of each gelcoat and patch aid used.
 - e) The methylstyrene content (in percent by weight) of each gelcoat and patch aid used.
 - f) The monomer content of each boat manufacturing gelcoat as defined in SC II.2.
 - g) The VOC (including styrene and MMA) content of each gelcoat and patch aid used.
 - h) The appropriate emission factors for each raw material used:
 - i. The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009, shall be used only for styrene and MMA emission calculations for open molding processes,
 - ii. Mass balance used for non-styrene, non-MMA VOC emissions, or
 - iii. Alternate emission factors may be used with the approval of the AQD District Supervisor.
 - i) VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - j) Calculations determining the weighted-average monomer VOC content of pigmented gelcoat as applied on a calendar month and 12-month rolling time period as determined at the end of each calendar month.
 - k) Calculations determining the weighted-average monomer VOC content of clear gelcoat as applied on a calendar month and 12-month rolling time period as determined at the end of each calendar month.
 - l) Calculations determining the weighted-average monomer VOC content of tooling gelcoat as applied on a calendar month and 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using the UEF table, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request. **(R 336.1702)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVGELCOAT1	24	30	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVGELCOAT2	24	30	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVGELCOAT3	24	30	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVGELCOAT4	24	30	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVEXTRABOOTH	30	30	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart VVVV for Boat Manufacturing. **(40 CFR Part 63, Subparts A and VVVV)**
2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FG633
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All miscellaneous plastic parts or pleasure craft coating lines, including those covered in other permits or operating exempt, under R 336.1633(3)(a).

Emission Unit: EUEXTRABOOTH

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	Less than 15.0 lbs per day	Calendar day	All miscellaneous plastic parts or pleasure craft coating lines, including those covered in other permits or operating exempt, under R 336.1633(3)(a).	SC VI.2, SC VI.3	R 336.1702(d)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1702(d))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, thinning agent, and solvent cleaner, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(d))**

3. The permittee shall keep the following information for each calendar day for FG633:
- a) The identity and amount (in pounds) of each coating, thinning agent, and solvent cleaner used
 - b) The VOC content of each coating, thinning agent, and solvent cleaner used.
 - c) VOC mass emission calculations determining the daily emission rate in pounds per calendar day.

The permittee shall keep the records using mass balance or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request. **(R 336.1702(d))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**FGMACTPPPP
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Each new or reconstructed affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.

Emission Units: EUEXTRABOOTH

POLLUTION CONTROL EQUIPMENT

Dry fabric filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.16 lb per lb of coating solids	12-month rolling time period as determined at the end of each calendar month	General Use Coating	SC V.1, VI.1 through VI.5	40 CFR 63.4490(b)(1)

2. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.4490 using at least one of the following three options, which are listed in 40 CFR 63.4491(a) through (c):

- a) Compliant material option,
- b) Emission rate without add-on controls option, or
- c) Emission rate with add-on controls option.

The permittee shall include all coatings, thinners and/or other additives, and cleaning materials used when determining the emission rate. **(40 CFR 63.4491)**

3. Any coating operation(s) using the compliant material option, the emission rate without add-on controls option, or the emission rate with add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.4490 at all times. **(40 CFR 63.4500(a)(1), 40 CFR 63.4500(a)(2)(i))**

II. MATERIAL LIMIT(S)

For the compliant materials option, the permittee shall meet the material limits specified in the following table.

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. Each Thinner and/or Additive	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3, VI.5	40 CFR 63.4491(a)
2. Each Cleaning Material	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3, VI.5	40 CFR 63.4491(a)

* Determined according to 40 CFR 63.4541(a).

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.4500(b))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the organic HAP content of each coating used in accordance with 40 CFR 63.4541, 40 CFR 63.4551, and/or 40 CFR 63.4561. **(40 CFR 63.4541, 40 CFR 63.4551, 40 CFR 63.4561)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.4541, 40 CFR 63.4551, or 40 CFR 63.4561. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months. **(40 CFR 63.4483, 40 CFR 63.4540, 40 CFR 63.4550, 40 CFR 63.4560)**
2. The permittee shall keep all records required by 40 CFR 63.4530 in the format and timeframes outlined in 40 CFR 63.4531. **(40 CFR 63.4542(d), 40 CFR 63.4552(d), 40 CFR 63.4563(j))**
3. The permittee shall maintain, at a minimum, the following records for each compliance period:
 - a) A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart PPPP, and the documentation supporting each notification report. **(40 CFR 63.4530(a))**
 - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. **(40 CFR 63.4530(b))**
 - c) A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.4530(c)(1))**
 - d) For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. **(40 CFR 63.4530(c)(2))**
 - e) For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. **(40 CFR 63.4530(c)(3))**
 - f) The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. **(40 CFR 63.4530(d))**
 - g) The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period. **(40 CFR 63.4530(e))**
 - h) The mass fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.4530(f))**

- i) The information specified in 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4). **(40 CFR 63.4530(g))**
 - j) For each deviation from an emission limitation reported under 40 CFR 63.4520(a)(5) through (7), a record of the information specified in 40 CFR 63.4530(h)(1) through (4), as applicable. **(40 CFR 63.4530(h))**
4. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, using Equation 1 of 40 CFR 63.4541. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.4541(a). **(40 CFR 63.4542(a))**
 5. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, according to 40 CFR 63.4551(a) through (g). **(40 CFR 63.4552(a))**

VII. REPORTING

1. For the compliant material option, the permittee shall report a deviation, as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5), for the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a). **(40 CFR 63.4542(b))**
2. For the emission rate without add-on controls, the permittee shall report a deviation, as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6), if the organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490. **(40 CFR 63.4552(b))**
3. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.4510. **(40 CFR Part 63, Subparts A and PPPP)**
4. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating operations were in compliance. **(40 CFR 63.4520(a), 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f))**
5. The permittee must submit the following:
 - a) Initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in 40 CFR 63.9(h) and 40 CFR 63.4510(c) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF). The applicable notification must be submitted by the deadline specified in this subpart, regardless of the method in which the reports are submitted. **(40 CFR 63.4520(e))**
 - b) On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for 1-year, whichever date is later, the semiannual compliance report required in 40 CFR 63.4520(a) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri>). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year begin submitting all subsequent reports via CEDRI. **(40 CFR 63.4520(f))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products. **(40 CFR Part 63, Subparts A and PPPP)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).