

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

EFFECTIVE DATE: January 12, 2015

ISSUED TO

**Tiara Yachts Division of S2 Yachts**

State Registration Number (SRN): B6619

LOCATED AT

725 East 40th Street, Holland, Michigan 49423-5392

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B6619-2015

Expiration Date: January 12, 2020

Administratively Complete ROP Renewal Application Due Between  
July 12, 2018 and July 12, 2019

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-B6619-2015

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

Mary A. Douglas, Kalamazoo District Supervisor

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## **AUTHORITY AND ENFORCEABILITY**

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

### General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
  - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

### **Equipment & Design**

9. Any 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).<sup>2</sup> **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

### **Emission Limits**

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:<sup>2</sup> **(R 336.1301(1))**
  - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
  - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(R 336.1901(b))**

### **Testing/Sampling**

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).<sup>2</sup> **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

## Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
  - a. The date, location, time, and method of sampling or measurements.
  - b. The dates the analyses of the samples were performed.
  - c. The company or entity that performed the analyses of the samples.
  - d. The analytical techniques or methods used.
  - e. The results of the analyses.
  - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

## Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
  - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
  - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.<sup>2</sup> **(R 336.1912)**

## Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
  - a. The applicable requirements are included and are specifically identified in the ROP.
  - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
  - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
  - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
  - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

## Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

## Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
  - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
  - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
  - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
  - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**



## Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(8))**

## Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

## Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
  - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
  - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

## Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

## Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<sup>2</sup> **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.<sup>2</sup> **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.<sup>2</sup> **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> **(R 336.1201(4))**

### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **B. SOURCE-WIDE CONDITIONS**

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

### C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

#### 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
EUMOLDINGEQUIP	Group includes composites reinforced plastic (composites) molding operations for the production of boats or other reinforced plastic composite parts. The composites parts are produced throughout the facility and production may take place in individual booths or on the production floor in an open floor arrangement.	08-29-85 12-03-97 05-04-06	FGMOLDINGEMISSIONS FGMACTVVVV FGMACTWWWW
EUENGINEERING	Two composite booths with mat/panel filters (engineering booths) and associated clean-up solvents.	04-24-79 12-03-97 05-04-06	FGMOLDINGEMISSIONS FGMACTVVVV FGMACTWWWW
EUSOLVENT	Solvents (primarily acetone and Acrastrip) are used throughout the facility for cleanup operations associated with composites production. Amount used exceeds the exemption threshold provided in Rule 290.	01-01-68 12-03-97 05-04-06	FGMOLDINGEMISSIONS FGMACTVVVV FGMACTWWWW
EUGRINDINGBOOTHS	Six grinding booths with mat/panel filters for medium and small parts grinding located in Plant 1.	04-24-79 05-04-06	FGPARTICULATE
EUHULLDECKGRINDING	Single large booth that will allow three grinding booths to be operated simultaneously for hull and deck grinding. The emissions will be vented internally.	05-04-06 NA	NA
EUWOODSHOP	Wood sawing, cutting, and sanding work stations used for constructing wooden boat parts. Includes Torit & Day fabric filter dust collector.	01-01-68 NA	FGWOODCAM

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUUPHOLSTRYADH	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 287(c). Includes adhesives used during the assembly of upholstery fabrics.	01-01-08	FGRULE287 FGMACTVVVV
EULB2SOUTH	Spray booth used for the application of coatings to wood boat furniture and components. Dry filters used in booth for particulate control.	05-04-06 07-30-09	FGRULE287
EULB3SANDCOAT	This spray booth is used for sanding, but will have the ability to apply coatings to wood boat furniture and components. Dry filters used in booth for particulate control.	05-04-06 07-30-09	FGRULE287
EUNBOOTH	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 287(c). Includes coatings used in the north lacquer booth.	05-04-06	FGRULE287
EUFASEALANTS	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 290. Includes the application of sealants, caulks, and adhesives performed during final assembly.	01-02-78	FGRULE290
EUFAWOODFINISH	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 290. Includes the application of coatings and adhesives to wood surfaces during final assembly.	01-01-78	FGRULE290
EUFAPAINTS	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 287. Includes the application of paints and coatings during final assembly.	01-01-96	FGRULE287
EUHULLPAINT	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 287. Includes the application of paints specifically to paint boat hulls.	01-01-14	FGRULE287
EUBLADEPAINT-1	Painting of 10 meter class windmill blades.	12-07-12	FGRULE287
EUBLADEPAINT-2	Painting of 11.6, 26, and 45 meter windmill blades.	12-07-12	FGRULE287

**EUHULLDECKGRINDING  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Single large booth that will allow three grinding booths to be operated simultaneously for hull and deck grinding. The emissions will be vented internally.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Mat/panel fabric filters.

**I. EMISSION LIMIT**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.01 pounds per 1,000 pounds of exhaust gases, determined on a dry gas basis <sup>2</sup>	Reference method 5B or 5C	EUHULLDECKGRINDING	SC VI.1	R336.1331(1)(a) Table 31 J

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER**

- The grinding booth associated with EUHULLDECKGRINDING shall not be operated unless the mat/panel fabric filter is installed and operating properly.<sup>2</sup> (R 336.1910)

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- Each mat/panel filter shall be checked on a minimum weekly basis and replaced as necessary. (R 336.1213(3)(a))

## VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

## 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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
NA	NA	NA	NA

## IX. OTHER REQUIREMENT(S)

NA

### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

### 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
FGMOLDINGMISSIONS	<p>EUMOLDINGEQUIP - Group includes composites reinforced plastic (composites) molding operations for the production of boats or other reinforced plastic composite parts. The composites parts are produced throughout the facility and production may take place in individual booths or on the production floor in an open floor arrangement.</p> <p>EUENGINEERING - Two composites booths with mat/panel filters (engineering booths) and associated clean-up solvents.</p> <p>EUSOLVENT - Solvents (primarily acetone and Acrastrip) are used throughout the facility for cleanup operations associated with composites production. Amount used exceeds the exemption threshold provided in Rule 290.</p> <p>Mat/panel filters are used with the booths.</p>	<p>EUMOLDINGEQUIP            EUENGINEERING            EUSOLVENT</p>
FGMACTVVVV	Composites reinforced plastic operations with resin and gel coat subject to 40 CFR Part 63, Subpart VVVV, including carpet and fabric adhesive operations, mixing operations, and cleanup.	<p>EUMOLDINGEQUIP            EUENGINEERING            EUSOLVENT            EUUPHOLSTRYADH</p>
FGMACTWWWW	Composites reinforced plastic operations with resin and gel coat subject to 40 CFR Part 63, Subpart WWWW.	<p>EUMOLDINGEQUIP            EUENGINEERING            EUSOLVENT</p>
FGPARTICULATE	Grinding booths associated with the composites operations. Mat/panel filters are used with the booths.	EUGRINDINGBOOTHS
FGWOODCAM	Compliance Assurance Monitoring requirements for the woodworking equipment associated with EUWOODSHOP. Includes a high efficiency Torit & Day fabric filter dust collector that exhausts inside the facility.	EUWOODSHOP



Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGRULE287	<p>Any existing and/or future emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 287(c). EUUPHOLSTRYADH includes adhesives used during the assembly of upholstery fabrics. EUNBOOTH includes coatings used in the north lacquer booth. EUFAPAINTS includes the application of paints and coatings during final assembly. EUHULLPAINT includes the application of paints specifically to paint boat hulls. EULB2SOUTH includes spray booth used for the application of coatings to wood boat furniture and components. Dry filters used in booth for particulate control. EULB3SANDCOAT spray booth is used for sanding, but will have the ability to apply coatings to wood boat furniture and components. Dry filters used in booth for particulate control. EUBLADEPAINT-1 is used for the painting of 10 meter class windmill blades. EUBLADEPAINT-2 is used for the painting of 11.6, 26, and 45 meter windmill blades.</p>	EUUPHOLSTRYADH EUNBOOTH EUFAPAINTS EUHULLPAINT EULB2SOUTH EULB3SANDCOAT EUBLADEPAINT-1 EUBLADEPAINT-2
FGRULE290	<p>Any existing and/or future emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 290. EUFASEALANTS includes the application of sealants, caulks, and adhesives performed during final assembly. EUFAWOODFINISH includes the application of coatings and adhesives to wood surfaces during final assembly.</p>	EUFASEALANTS EUFAWOODFINISH

**FGMOLDINGEMISSIONS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

EUMOLDINGEQUIP - Group includes composites reinforced plastic (composites) molding operations for the production of boats or other reinforced plastic composite parts. The composites parts are produced throughout the facility and production may take place in individual booths or on the production floor in an open floor arrangement.

EUENGINEERING - Two composites booths with mat/panel filters (engineering booths) and associated clean-up solvents.

EUSOLVENT- Solvents (primarily acetone and Acrastrip) are used throughout the plant for cleanup operations associated with composites production. Amount used exceeds the exemption threshold provided in Rule 290.

Mat/panel filters are used with the booths.

**Emission Units:** EUMOLDINGEQUIP, EUENGINEERING, EUSOLVENT

**POLLUTION CONTROL EQUIPMENT**

Mat/panel filters are used with the booths.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	100 pounds/hour <sup>1</sup>	Daily average	EUMOLDINGEQUIP	SC VI.1 and SC VI.2	R 336.1225
2. VOC	1,200 lbs/day <sup>1</sup>	Daily average	EUMOLDINGEQUIP	SC VI.1 and SC VI.2	R 336.1225
3. VOC	76 tons/yr <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUMOLDINGEQUIP	SC VI.2	R 336.1702(a)
4. VOC	50 lbs/hr <sup>1</sup>	Daily average	EUENGINEERING	SC VI.2	R 336.1225
5. VOC	300 lbs/day <sup>1</sup>	Daily average	EUENGINEERING	SC VI.2	R 336.1225
6. VOC	5 tons/yr <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUENGINEERING	SC VI.2	R 336.1702(a)

## II. MATERIAL LIMITS

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Solvent	15 tons/yr <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUSOLVENT	SC VI.3	R 336.1702(a)
2. Acetone	16 tons/month <sup>1</sup>	monthly	EUSOLVENT	SC VI.3	R 336.1225
3. Acetone	190 tons/yr <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	EUSOLVENT	SC VI.3	R 336.1225

## III. PROCESS/OPERATIONAL RESTRICTIONS

- Each composites lay-up booth shall not be operated unless its respective mat/panel filter is installed and operating properly.<sup>2</sup> (R 336.1910)

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

## V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

## VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- Daily records of the following for EUMOLDINGEQUIP composites resin/gelcoat operations<sup>1</sup> (R 336.1225):
  - Composites resin usage, in pounds, as monitored in the bulk storage tank.
  - Hours of operation.
  - VOC content (including styrene) of the resin in the bulk storage tank, in pounds per gallon or as a weight percentage.
  - Calculations determining the daily VOC emission rate (including styrene) in pounds per day based upon the resin usage from the bulk storage tank (See Appendix 7).
  - Calculations determining the average hourly VOC emission rate based upon hours of operation.

The records shall be kept in the format specified in Appendix 4a or an alternative format may be submitted to the District Supervisor, Air Quality Division, for approval<sup>1</sup> (R 336.1225)

- Monthly records of the following for EUMOLDINGEQUIP and EUENGINEERING composites resin/gelcoat operations<sup>2</sup> (R 336.1225, R 336.1702(a)):
  - Amount (in pounds) of each resin, gelcoat, catalyst, etc. used in EUMOLDINGEQUIP.
  - Amount (in pounds) of each resin, gelcoat, catalyst, etc. used in EUENGINEERING.
  - Hours of operation for EUMOLDINGEQUIP and EUENGINEERING.
  - VOC content (including styrene) of each resin, gelcoat, catalyst, etc., in pounds per gallon or as a weight percentage.
  - Calculations determining the total average daily VOC emission rates (including styrene) based upon hours of operation for EUMOLDINGEQUIP and EUENGINEERING separately (See Appendix 7).
  - Calculations determining the total VOC emission rate (including styrene) in tons per month and in tons per 12-month rolling time period for EUMOLDINGEQUIP and EUENGINEERING separately (See Appendix 7).

The records shall be kept in the format specified in Appendix 4b or an alternative format may be submitted to the District Supervisor, Air Quality Division, for approval.<sup>2</sup> (R 336.1225, R 336.1702(a))

3. Monthly records of the following for miscellaneous purge and clean-up operations for EUSOLVENT<sup>1</sup> (R 336.1225):
  - a. Amount of acetone used and reclaimed in gallons.
  - b. Total acetone emissions in tons per month and tons per 12-month rolling time period.
  - c. Amount of cleaning solvents used and reclaimed in gallons.
  - d. VOC content of cleaning solvents in pounds per gallon.
  - e. Calculations determining the entire VOC emission rate due to the use of clean-up and purge solvents in tons per month and in tons per 12-month rolling time period.

The records shall be kept in the format specified in Appendix 4c or an alternative format may be submitted to the District Supervisor, Air Quality Division, for approval.<sup>1</sup> (R 336.1225)

4. Monthly records of the following shall be kept (R 336.1213(3)):
  - a. Usage amounts of resins, gelcoats and catalyst for non-boat operations shall be kept separately for EUMOLDINGEQUIP
  - b. Usage amounts of resins, gelcoats and catalyst for non-boat operations shall be kept separately for EUENGINEERING.

See Appendices 4a, 4b, 4c, and 7

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

**VIII. STACK/VENT RESTRICTIONS**

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSTACK001 through SVSTACK0031, SVSTACK037 and SVSTACK038	42 <sup>2</sup>	41.8 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)
2. SVSTACK039	42 <sup>2</sup>	43.3 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)
3. SVSTACK041 and SVSTACK042	42 <sup>2</sup>	28 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)
4. SVEF-1 through SVEF-8	30.5 <sup>2</sup> (each)	45.6 <sup>2</sup> (each)	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENTS**

1. All waste resins, gelcoats, catalysts, acetone, and cleaning solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner in compliance with all applicable rules and regulations.<sup>2</sup>  
**(R 336.1370)**

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGMACTVVVV  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Composites reinforced plastic operations with resin and gelcoat subject to 40 CFR Part 63, Subpart VVVV, including carpet and fabric adhesive operations, mixing operations, and cleanup.

**Emission Units:** EUMOLDINGEQUIP, EUENGINEERING, EUSOLVENT, EUUPHOLSTRYADH

**POLLUTION CONTROL EQUIPMENT**

Mat/panel filters are used with the booths.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP from open molding production resin, pigmented gelcoat, clear gelcoat, tooling resin, and tooling gelcoat*	Equation 1 of 40 CFR 63.5698	12-month rolling time period	EUMOLDINGEQUIP EUENGINEERING	SC VI.3	<b>40 CFR 63.5698(b)</b>

\* This is for the emissions averaging option A in 40 CFR 63.5701(a). For the compliant materials option B in 40 CFR 63.5701(b) see II. Material Limits below.

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP Content of production resin using atomized application*	28%	Determined monthly based on material content or 12-month rolling average	EUMOLDINGEQUIP EUENGINEERING	SC VI.11	<b>40 CFR 63.5701(b)</b>
2. Organic HAP Content of production resin using non-atomized application*	35%	Determined monthly based on material content or 12-month rolling average	EUMOLDINGEQUIP EUENGINEERING	SC VI.11	<b>40 CFR 63.5701(b)</b>
3. Organic HAP Content of pigmented gelcoat*	33%	Determined monthly based on material content or 12-month rolling average	EUMOLDINGEQUIP EUENGINEERING	SC VI.11	<b>40 CFR 63.5701(b)</b>

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Organic HAP Content of clear gelcoat*	48%	Determined monthly based on material content or 12-month rolling average	EUMOLDINGEQUIP EUENGINEERING	SC VI.11	<b>40 CFR 63.5701(b)</b>
5. Organic HAP Content of tooling resin using atomized application*	30%	Determined monthly based on material content or 12-month rolling average	EUMOLDINGEQUIP EUENGINEERING	SC VI.11	<b>40 CFR 63.5701(b)</b>
6. Organic HAP Content of tooling resin using non- atomized application*	39%	Determined monthly based on material content or 12-month rolling average	EUMOLDINGEQUIP EUENGINEERING	SC VI.11	<b>40 CFR 63.5701(b)</b>
7. Organic HAP Content of tooling gelcoat*	40%	Determined monthly based on material content or 12-month rolling average	EUMOLDINGEQUIP EUENGINEERING	SC VI.11	<b>40 CFR 63.5701(b)</b>
8. Carpet and fabric adhesives	5% organic HAP by weight	Instantaneous	EUUPHOLSTRYAD H	SC VI.16	<b>40 CFR 63.5740(a)</b>
9. Organic HAP content of cleaning solvent for routine flushing of resin and gelcoat application equipment	5% organic HAP by weight	Instantaneous	EUSOLVENT	SC VI.21 and SC VI.22	<b>40 CFR 63.5734(a)</b>

\* These material limits are applicable when using the compliant materials option B (63.5701(b)) to demonstrate compliance.

### **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. All resin and gelcoat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and poly putties, must have a cover with no visible gaps in place at all times except 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(a) and (b))**
2. Store organic HAP-containing solvents used for removing cured resin or gelcoat 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 being placed in or removed from the container. For 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. **(40 CFR 63.5734(b))**
3. The permittee may elect to have reinforced plastic composites that are subject to 40 CFR Part 63, Subpart WWWW covered by 40 CFR Part 63, Subpart VVVV if it can be demonstrated that this will not result in any organic HAP emissions increase compared to complying with Subpart WWWW. **(40 CFR 63.5787(d))**

### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

## **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

Use one of the methods specified in 40 CFR 63.5758 to determine the organic HAP contents of resins and gelcoats. **(40 CFR 63.5704(b)(1))**

### **Emissions Averaging**

1. When using "Option A" Emissions Averaging to comply with the HAP limit in condition I.1 above, the permittee must prepare an implementation plan as specified in 40 CFR 63.5707. **(40 CFR 63.5707)**
2. When using "Option A" Emissions Averaging to demonstrate compliance with the HAP limit in Condition I.1 above, the permittee must calculate the emissions on a 12 month rolling average using Equation 1 from 40 CFR 63.5710 at the end of the twelfth month after the applicable compliance date and at the end of every subsequent month. **(40 CFR 63.5710)**
3. When using "Option A" Emissions Averaging to demonstrate compliance with the Equation 1 computation, use Equation 2 from 40 CFR 63.5710 at the end of each month to determine the weighted-average MACT model point value for each open molding resin and gelcoat operation included in the average required above. **(40 CFR 63.5710)**
4. Use the equations from Table 3 of 40 CFR Part 63, Subpart VVVV to determine  $PV_i$  in Equation 2. **(40 CFR 63.5710)**
5. Maintain records of the HAP content of each resin and gelcoat used in open molding operations. **(40 CFR 63.5704(a)(3)(i))**
6. Maintain records of the amount of resin and gelcoat used per month. **(40 CFR 63.5704(a)(3)(ii))**
7. Maintain records of the application method used in open molding operations for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology. **(40 CFR 63.5704(a)(3)(iii))**

### **Compliant Materials**

8. When using "Option B" Compliant Materials to comply with the HAP limit in Condition I.1 above, if not all resins and gelcoats used have organic HAP contents no greater than the applicable organic HAP content limits then the permittee may use Equation 1 from 40 CFR 63.5713 to calculate the weighted average organic HAP content at the end of every month for all resins and gelcoats used in each operation in the past 12 months. If all resins and gelcoats used have organic HAP contents no greater than the applicable organic HAP content limits, this calculation is not necessary to demonstrate compliance. **(40 CFR 63.5713)**
9. If filled resins are used, Equation 1 from 40 CFR 63.5714 must be used to demonstrate compliance for the filled material on an as-applied basis. **(40 CFR 63.5714)**
10. Complete the calculations described in 40 CFR 63.5713 to show that the weighted-average organic HAP content of each resin and gelcoat does not exceed the limits specified in Table 2 of 40 CFR Part 63, Subpart VVVV. **(40 CFR 63.5704(b)(2))**
11. Maintain records of the Hazardous Air Pollutant content of each open molding resin and gelcoat. **(40 CFR 63.5704(b)(3)(i))**



12. Maintain records of the application method for open molding production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology. **(40 CFR 63.5704(b)(3)(ii))**
13. Maintain records of the amount of open molding production resins and gelcoats used per month. This record is not required for an operation if all resins and gelcoats used for that operation comply with the organic HAP content requirements. **(40 CFR 63.5704(b)(3)(iii))**
14. Maintain records of the calculations performed in SC VI.8, if required, to demonstrate compliance based on weighted-average organic HAP content as described in 40 CFR 63.5713. **(40 CFR 63.5704(b)(3)(iv))**

#### **General Requirements**

15. Maintain the records required by 40 CFR 63.5767. **(40 CFR 63.5767)**

#### **Carpet and Fabric Adhesives**

16. Use one of the methods specified in 40 CFR 63.5758 to determine the organic HAP contents of carpet and fabric adhesives. **(40 CFR 63.5740(b))**

#### **Mixing Operations**

17. Visually inspect all mixing containers subject to 40 CFR 63.5731 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))**
18. Maintain written records of which mixing containers are subject to 40 CFR 63.5731 and the results of the inspections, including a description of any repairs or corrective actions taken. **(40 CFR 63.5731(d))**

#### **Cleanup Operations**

19. Visually inspect any containers holding organic HAP containing solvents used for removing cured resin and gelcoat to ensure that the containers have covers with no visible gaps at least once per month. **(40 CFR 63.5737(c))**
20. Maintain written records of the monthly inspections and any repairs or corrective actions taken. **(40 CFR 63.5737(c))**
21. Determine and maintain a record of the organic HAP content of the cleaning solvents referred to in the Material Limits Table and subject to the standards specified in 40 CFR 63.5734 using the methods in 40 CFR 63.5758. **(40 CFR 63.5737(a))**
22. 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 may be used to demonstrate compliance for cleaning solvents that are recycled on-site. **(40 CFR 63.5737(b))**

### **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Semiannual reporting of MACT compliance as required in 40 CFR 63.5764. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(40 CFR 63.5764)**

See Appendix 8

**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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENTS**

1. This process is subject to the applicable requirements of 40 CFR Part 63, Subpart VVVV-National Emission Standards for Boat Manufacturing and Subpart A-General Provisions. The applicable requirements include but are not limited to those identified in this table. Should any discrepancies exist between the 40 CFR Part 63 requirements and this table, the requirements of the Standard shall take precedence. **(40 CFR Part 63, Subpart VVVV)**
2. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subparts A and VVVV.<sup>2</sup> **(40 CFR Part 63, Subparts A and VVVV)**

**Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGMACTWWWW  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Composites reinforced plastic operations with resin and gelcoat subject to 40 CFR Part 63, Subpart WWWW.

**Emission Units:** EUMOLDINGEQUIP, EUENGINEERING, EUSOLVENT

**POLLUTION CONTROL EQUIPMENT**

Mat/panel filters are used with the booths.

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/ Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring/ Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. Organic HAP <sup>1</sup>	88 lb/ton resin	Dependent upon compliance method <sup>2</sup>	Open Molding-Mechanical Resin Application (Non-Corrosion Resistant and/or Non-High Strength Resin)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>
2. Organic HAP <sup>1</sup>	188 lb/ton resin	Dependent upon compliance method <sup>2</sup>	Open Molding-Filament Application (Non-corrosion Resistant and/or Non-High Strength Resin)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>
3. Organic HAP <sup>1</sup>	87 lb/ton resin	Dependent upon compliance method <sup>2</sup>	Open Molding-Manual Resin Application (Non-corrosion Resistant and/or Non-High Strength Resin)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>
4. Organic HAP <sup>1</sup>	440 lb/ton gelcoat	Dependent upon compliance method <sup>2</sup>	Open Molding-Gel Coat <sup>3</sup> (Tooling Gel Coat)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>
5. Organic HAP <sup>1</sup>	267 lb/ton gelcoat	Dependent upon compliance method <sup>2</sup>	Open Molding-Gel Coat <sup>3</sup> (White/Off White Pigmented Gel Coat)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>
6. Organic HAP <sup>1</sup>	377 lb/ton gelcoat	Dependent upon compliance method <sup>2</sup>	Open Molding-Gel Coat <sup>3</sup> (Other Pigmented Gel Coat)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
7. Organic HAP <sup>1</sup>	605 lb/ton gelcoat	Dependent upon compliance method <sup>2</sup>	Open Molding-Gel Coat <sup>3</sup> (Corrosion Resistant and/or High Strength or High Performance Gel Coat)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>
8. Organic HAP <sup>1</sup>	854 lb/ton gelcoat	Dependent upon compliance method <sup>2</sup>	Open Molding-Gel Coat <sup>3</sup> (Fire Retardant Gel Coat)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>
9. Organic HAP <sup>1</sup>	522 lb/ton gelcoat	Dependent upon compliance method <sup>2</sup>	Open Molding-Gel Coat <sup>3</sup> (Clear Production Gel Coat)	SC VI.5 and SC VI.6	<b>40 CFR 63.5805(c)</b>

<sup>1</sup> Organic HAP includes: styrene and methyl methacrylate.

<sup>2</sup> The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits using one of the following methods. See Condition VI.6:

- Demonstrate that an individual resin or gelcoat, as applied, meets the applicable emission limit.
- Demonstrate that, on average, they meet the individual organic HAP emissions limits for each combination of operation type and resin application method, or gelcoat type.
- Demonstrate compliance with a weighted average emission limit.
- Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.

<sup>3</sup> If the permittee only applies gelcoat with manual application, for compliance purposes then they must treat the gelcoat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If the permittee uses multiple application methods and any portion of a specific gelcoat is applied using nonatomized spray, then they may use the nonatomized spray gelcoat equation to calculate an emission factor for the manually applied portion of that gelcoat. Otherwise, they should use the atomized spray gelcoat application equation to calculate emission factors.

## II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

- The permittee shall be in compliance with all applicable provisions of National Emissions Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and WWWW on or before the startup date. For compliance options based on a 12-month rolling average the permittee must begin collecting data on startup. **(40 CFR Part 63, Subparts A and WWWW)**
- The permittee shall not operate FGMACTWWWW except in compliance with the applicable work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, as well as the organic HAP emission limits in Table 3 or the organic HAP content limit in Table 7. **(40 CFR 63.5805(c), 40 CFR 63.5835(a))**

3. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. **(40 CFR 63.5805(c))**
4. The permittee shall not use cleaning solvents that contain any HAP except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts the resin. **(40 CFR 63.5805(c))**
5. The compliance date is the startup date. Open molding operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date and demonstrate compliance one year after the compliance date. **(40 CFR 63.5840)**
6. The permittee may elect to have reinforced plastic composites that are subject to 40 CFR Part 63, Subpart WWWW covered by 40 CFR Part 63, Subpart VVVV if it can be demonstrated that this will not result in any organic HAP emissions increase compared to complying with Subpart WWWW. **(40 CFR 63.5787(d))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material i.e. resin, gelcoat, catalyst, clean-up solvent, etc.). The data shall consist of information provided by the material manufacturer and must be adequate for determining the HAP content of each material as specified in 40 CFR Part 63, Subpart WWWW, § 63.5797. **(40 CFR 63.5797)**
2. The permittee shall maintain all applicable records as required by 40 CFR Part 63, Subpart WWWW, §63.5915 and §63.5920. **(40 CFR 63.5915, 40 CFR 63.5920)**
3. The permittee must comply with the recordkeeping requirements as detailed in 40 CFR Part 63 Subpart WWWW, §63.5895(c) and (d) and §63.5900(a)(2) through (4). **(40 CFR 63.5895, 40 CFR 63.5900)**
4. The permittee shall demonstrate initial compliance with the standards in 40 CFR Part 63, Subpart WWWW, § 63.5805(c) that applies by using the procedures shown in Tables 8 and 9 of 40 CFR Part 63, Subpart WWWW or refer to III.6 above. **(40 CFR 63.5860(a))**
5. The equations from Table 1 to Subpart WWWW of 40 CFR Part 63 shall be used to calculate organic HAP emissions factors for the purposes of compliance demonstration with Table 3 or Table 7. **(40 CFR 63.5796)**
6. The permittee shall determine compliance with the applicable emission limits in the FGMACTWWW Emission Limit Table and in Table 3 of 40 CFR Part 63, Subpart WWWW by using one of the following methods **(40 CFR 63.5810)**:
  - a. In accordance with 40 CFR Part 63 Subpart WWWW, §63.5810(a), demonstrate that an individual resin or gelcoat, as applied, meets the applicable emission limit for each open molding operation.
  - b. In accordance with 40 CFR Part 63 Subpart WWWW, §63.5810(b), demonstrate that, on average, the individual organic HAP emissions limits for each combination of operation type and resin application method or gelcoat type are met.
  - c. In accordance with 40 CFR Part 63 Subpart WWWW, §63.5810(c), demonstrate compliance with a weighted average emission limit.

- d. In accordance with 40 CFR Part 63 Subpart WWWW, §63.5810(d), meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.
- e. For compliance purposes the permittee may refer to III.6 above.

**VII. REPORTING**

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
- 4. Semiannual Compliance Reporting pursuant to 40 CFR Part 63, Subpart WWWW. Reports shall be postmarked by March 15 for reporting period July 1 through December 31 and by September 15 for reporting period January 1 through June 30. The first report is due following the end of the first calendar half or six month period after the compliance date. **(40 CFR 63.5910)**
- 5. The permittee shall submit semiannual compliance reports according to the procedures specified in Table 14 of 40 CFR Part 63, Subpart WWWW, to the Department in accordance with 40 CFR Part 63, Subpart WWWW, §63.5910. **(40 CFR 63.5910)**
- 6. The permittee shall submit a Notification of Compliance Status as specified in 40 CFR Part 63, Subpart A, §63.9(h) and Table 13 of 40 CFR Part 63, Subpart WWWW. This report shall include certification of work practice standards. This report is due no later than 30 calendar days after the compliance date or one year plus 30 days after the compliance date if the permittee is complying with organic HAP emissions limit averaging provisions. **(40 CFR 63.5905(a), and 40 CFR 63.9(h))**

See Appendix 8

**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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENTS**

- 1. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subparts A and WWWW.<sup>2</sup> **(40 CFR Part 63, Subparts A and WWWW)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGPARTICULATE  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Grinding booths associated with the composites operations. Mat/panel filters are used with the booths.

**Emission Unit:** EUGRINDINGBOOTHS

**POLLUTION CONTROL EQUIPMENT**

Mat/panel fabric filters.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.1 pounds per 1,000 pounds of exhaust gases, determined on a dry gas basis.	Reference method 5B or 5C	EUGRINDINGBOOTHS	SC VI.1	R336.1331(1)(a) Table 31 J

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

- Each grinding booth in EUGRINDINGBOOTHS shall not be operated unless its respective mat/panel fabric filter is installed and operating properly.<sup>2</sup> (R 336.1910)

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- Each mat/panel filter shall be checked on a minimum weekly basis and replaced as necessary. (R 336.1213(a)(iii))

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTIONS**

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSTACK032	42 <sup>2</sup>	41.75 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)
2. SVSTACK033	42 <sup>2</sup>	41.75 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)
3. SVSTACK034	42 <sup>2</sup>	41.75 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)
4. SVSTACK035	42 <sup>2</sup>	41.75 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)
5. SVSTACK036	42 <sup>2</sup>	41.75 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)
6. SVSTACK040	42 <sup>2</sup>	43.3 <sup>2</sup>	R 336.1225, R 336.1901, and 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).



**FGWOODCAM  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Compliance Assurance Monitoring requirements for the woodworking equipment associated with EUWOODSHOP. Includes a high efficiency Torit & Day fabric filter dust collector that exhausts inside the facility.

**Emission Unit:** EUWOODSHOP

**POLLUTION CONTROL EQUIPMENT**

High efficiency Torit & Day fabric filter dust collector that exhausts inside the facility.

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	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 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. A Magnehelic® gauge shall be installed and pressure drop across the bag house shall be recorded once daily for each day of operation (see section IX.1 below). **(R 336.1213(3), 40 CFR 64.6(c)(1))**
2. The permittee shall record the results of a daily 6-minute inspection during routine operating conditions of outside duct work and the associated bag house for the presence of visible emissions. If visible emissions are observed corrective actions shall be performed and recorded. **(R 336.1213(3), 40 CFR 64.6(c)(1), 40 CFR 64.6(c)(2))**
3. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the

owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64 compliance, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 64.7(c))**

4. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**
5. If pressure drop readings for the operating unit are outside the range of 0.5 – 6.0 inches H<sub>2</sub>O, the permittee shall perform and record the corrective actions taken. **(R 336.1213(3), 40 CFR 64.6(c)(2))**
6. The permittee shall perform QA/QC activities and other maintenance activities on the bag house according to the manufacturer's recommendations. **(R 336.1213(3), 40 CFR 64.3(b)(3))**
7. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**
8. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

**See Appendix 8**

**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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENTS**

1. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**
2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

**Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a)

**FGRULE287**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Any existing and/or future emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 287(c). EUUPHOLSTRYADH includes adhesives used during the assembly of upholstery fabrics. EUNBOOTH includes coatings used in the north lacquer booth. EUFAPAINTS includes the application of paints and coatings during final assembly. EUHULLPAINT includes the application of paints specifically to paint boat hulls. EULB2SOUTH includes spray booth used for the application of coatings to wood boat furniture and components. Dry filters used in booth for particulate control. EULB3SANDCOAT spray booth is used for sanding, but will have the ability to apply coatings to wood boat furniture and components. Dry filters used in booth for particulate control. EUBLADEPAINT-1 is used for the painting of 10 meter class windmill blades. EUBLADEPAINT-2 is used for the painting of 11.6, 26, and 45 meter windmill blades.

**Emission Units:** EUUPHOLSTRYADH, EUNBOOTH, EUFAPAINTS, EUHULLPAINT, EULB2SOUTH, EULB3SANDCOAT, EUBLADEPAINT-1, EUBLADEPAINT-2

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 gallons	Per month, as applied, minus water, per emission unit	NA	<b>R 336.1287(c)(i)</b>

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. Any exhaust system that serves only coating spray equipment shall be equipped with a properly installed and operating particulate control system. **(R 336.1287(c)(ii))**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 287(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. **(R 336.1213(3))**
  - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(c)(iii))**
  - b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. **(R 336.1213(3))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA

## FGRULE290 FLEXIBLE GROUP CONDITIONS

### DESCRIPTION

Any existing and/or future emission unit that emits air contaminants and is exempt from the requirements of Rule 201, pursuant to Rules 278 and 290. EUFASEALANTS includes the application of sealants, caulks, and adhesives performed during final assembly. EUFAWOODFINISH includes the application of coatings and adhesives to wood surfaces during final assembly.

**Emission Units:** EUFASEALANTS, EUFAWOODFINISH

### POLLUTION CONTROL EQUIPMENT

NA

### I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**
2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**
  - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**
  - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**
  - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**
  - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**
3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**
  - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**
  - b. The visible emissions from the emission unit are not more than five percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**

- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

## **II. MATERIAL LIMIT(S)**

NA

## **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**

## **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

## **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**
  - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
  - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
  - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
  - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
  - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**
2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
  - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
  - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA



## **E. NON-APPLICABLE REQUIREMENTS**

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

## APPENDICES

### Appendix 1. Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
GC	General Condition	psig	Pounds per square inch gauge
gr	Grains	PeTE	Permanent Total Enclosure
HAP	Hazardous Air Pollutant	PTI	Permit to Install
Hg	Mercury	RACT	Reasonable Available Control Technology
hr	Hour	ROP	Renewable Operating Permit
HP	Horsepower	SC	Special Condition
H <sub>2</sub> S	Hydrogen Sulfide	scf	Standard cubic feet
HVLP	High Volume Low Pressure *	sec	Seconds
ID	Identification (Number)	SCR	Selective Catalytic Reduction
IRSL	Initial Risk Screening Level	SO <sub>2</sub>	Sulfur Dioxide
ITSL	Initial Threshold Screening Level	SRN	State Registration Number
LAER	Lowest Achievable Emission Rate	TAC	Toxic Air Contaminant
lb	Pound	Temp	Temperature
m	Meter	THC	Total Hydrocarbons
MACT	Maximum Achievable Control Technology	tpy	Tons per year
MAERS	Michigan Air Emissions Reporting System	µg	Microgram
MAP	Malfunction Abatement Plan	VE	Visible Emissions
MDEQ	Michigan Department of Environmental Quality	VOC	Volatile Organic Compounds
mg	Milligram	yr	Year
mm	Millimeter		

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

## **Appendix 2. Schedule of Compliance**

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. **(R 336.1213(4)(a), R 336.1119(a)(ii))**

## **Appendix 3. Monitoring Requirements**

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

## **Appendix 4. Recordkeeping**

The permittee shall use the following approved formats and procedures (Appendices 4a, 4b, and 4c) for the recordkeeping requirements referenced in FGMOLDINGEMISSIONS. Alternative formats must be approved by the AQD District Supervisor.

**Appendix 4a**

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in FGMOLDINGEMISSIONS. Alternative formats must be approved by the AQD District Supervisor.

**APPENDIX 4a**

**PLANT NO. 1**

**DATE: \_\_\_\_\_**

	A	B	C	D = AxBxC	E	F = D/E
Resin Identification	Amount Used (Pounds)	VOC Content (% by weight)	Emission Factor <sup>1</sup>	VOC Emissions	Hours of Operation	Hourly Emissions
TOTAL TONS VOC EMITTED, G = SUM OF D/2000 →				<input type="text"/>	TOTAL---->	<input type="text"/>

12 MONTH ROLLING PERIOD TONS, G<sup>2</sup> --->

12 MONTH ROLLING PERIOD LIMIT, TONS --->

**Notes:**

1. Emission Factors = 0.13 for Resin Operations, 0.33 for Gelcoat Operations, and 0.0 for MEKP catalyst
2. 12 Month Rolling Period = TOTAL OF PREVIOUS ELEVEN MONTHS + Current Month

**Appendix 4b**

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in FGMOLDINGEMISSIONS. Alternative formats must be approved by the AQD District Supervisor.

**APPENDIX 4b**

**PLANT NO.**

**MONTH/YEAR:** \_\_\_\_\_

	A	B	C	D = AxBxC	E	F = D/(E/16)
Resin, Gel-coat, Catalyst, Etc. Identification	Amount Used (Pounds)	VOC Content (% by weight)	Emission Factor <sup>1</sup>	VOC Emissions (Pounds)	Hours of Operation	Daily Emissions
TOTAL TONS VOC EMITTED, G = SUM OF D/2000-->				<input type="text"/>	TOTAL---->	<input type="text"/>

12 MONTH ROLLING PERIOD TONS, G<sup>2</sup> --->

12 MONTH ROLLING PERIOD LIMIT, TONS --->

**Notes:**

1. Emission Factors = 0.13 for Resin Operations, 0.33 for Gelcoat Operations, and 0.0 for MEKP
2. 12 Month Rolling Period = TOTAL OF PREVIOUS ELEVEN MONTHS + Current Month

**Appendix 4c**

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in FGMOLDINGEMISSIONS. Alternative formats must be approved by the AQD District Supervisor.

**APPENDIX 4c**

**MONTH/YEAR:** \_\_\_\_\_

	A	B	C	D=A(B-C)
Cleanup or purge solvent with Acetone	Lbs of Acetone per gallon of solvent (or as weight % /100)	Actual gallons of solvent used	Gallons of solvent reclaimed	Lbs of Acetone

Total tons of Acetone emitted from solvent, E = sum of all D's/2000	E	
12 month rolling period, F = total of 11 previous months + E	F	

	G	H	I	J=G(H-I)
Cleanup or purge solvent	Lbs of VOCs per gallon of solvent	Actual gallons of solvent used	Gallons of solvent reclaimed	Lbs of VOC

**Appendix 5. Testing Procedures**

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

**Appendix 6. Permits to Install**

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B6619-2010. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B6619-2010 is being reissued as Source-Wide PTI No. MI-PTI-B6619-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

**Appendix 7. Emission Calculations**

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGMOLDINGEMISSIONS.

The VOC emission calculations shall be performed using emission factors of 13 percent of the VOC content, including styrene, for composites resin spray lay-up; and 33 percent of the VOC content, including styrene, for gel-coat lay-up. Upon prior approval from the AQD Kalamazoo District Supervisor, alternate emission factors may be used for these calculations.

**Appendix 8. Reporting**

**A. Annual, Semiannual, and Deviation Certification Reporting**

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

**B. Other Reporting**

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.