

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Rec Boat Holdings LLC - Cruiser Plant		SRN :	N1328
Location : 609 13 TH. St.		District :	Gaylord
		County :	WEXFORD
City : CADILLAC	State: MI	Zip Code : 49601	Compliance Status : Compliance
Source Class : MAJOR	Staff : Sharon LeBlanc		
FCE Begin Date : 3/1/2017	FCE Completion Date :		4/17/2018
Comments : Facility scheduled for fiscal year 2018 compliance evaluation. sgl			

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
04/02/2018	MAERS	Compliance	2017 MAERS, cert forms received for facility- emissions determined primarily using mass balance, and consistent with previous methods.
03/16/2018	Scheduled Inspection	Compliance	Scheduled site inspection for Fiscal Year 2018. Facility was determined to be in general compliance of permit requirements. Supplemental information confirming organic HAP content of adhesives used onsite has been requested and will be reviewed independently as part of the FCE.
03/16/2018	Other	Compliance	Adhesives evaluation of Organic HAP Content.

Activity Date	Activity Type	Compliance Status	Comments
01/29/2018	ROP Other	Compliance	<p>Quarterly Submittal for 4th quarter of 2017. The facility is required under the ROP to submit quarterly material usage and emissions. The cruiser Plant has source emission limits of 225 tons VOC per year (12-month rolling total) and reported total emissions of 117.84 tpy at the end of the quarter.</p> <p>EUACETONECLEANUP requires a minimum of 48% reclaim. Acetone recovery for October, November and December 2017 was reported to be 61.3%, 51.5% and 48.7%, respectively.</p> <p>EUGELCOAT has daily limits of 10K lb gelcoat/day. The daily maximum gelcoat usage reported for October, November and December 2017, was reported to be 4713.32 lb, 4756.63 lb and 4810.51 lbs, respectively. VOC & Styrene emissions for the EU as a 12-month rolling total are 134.4 tpy. 12-month rolling totals for the VOC & Styrene for October, November and December 2017 were reported to be 53.85, 54.31 and 54.72 tpy, respectively.</p> <p>EUADHESIVE has both 484 lb/day VOC & Acetone limit, and a 61 tpy VOC & Acetone. The facility reports a maximum daily use of VOC & Acetone for the months of October, November and December 2017 of 52.45, 98.26 and 104.56 lb/day, respectively. VOC & Acetone 12-month rolling totals for the months of October, November and December 2017 were reported to be 2.68, 2.97 and 3.31 tpy, respectively.</p> <p>Information reported as part of the quarterly report indicated that the facility is operating in general compliance with the ROP conditions.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/25/2018	ROP Annual Cert	Compliance	AQD District Staff received both annual and second semi-annual certifications for the calendar year 2017. The referenced documents indicate that the facility has been in compliance with all terms and conditions of MI-ROP-N1328-2016. The certification forms were signed by the Facilities responsible official.
01/25/2018	ROP SEMI 2 CERT	Compliance	AQD District Staff received both annual and second semi-annual certifications for the calendar year 2017. The referenced documents indicate that the facility has been in compliance with all terms and conditions of MI-ROP-N1328-2016. The certification forms were signed by the Facilities responsible official.

Activity Date	Activity Type	Compliance Status	Comments
01/25/2018	MACT (Part 63)	Compliance	<p>Facility submitted 2nd semi-annual compliance report required under 40 CFR Part 63, Subpart VVV for Boat Manufacturing. The referenced document indicated that the facility is in compliance with the referenced Subpart for the July 1, 2017 through December 31, 2017 reporting period.</p> <p>The document reported meeting the 35% by weight HAP Content for IP production resin, IP Putty and SC 2000 products. The weighted average contents for the three products for the period ranging from 32.27 to 32.3% by weight.</p> <p>The facility reported that the weighted average of all pigmented gelcoats applied with a non-atomized applicator was ranged from 27.71% to 27.84% for the period. Below the 33% HAP limit in Table 2.</p> <p>In addition, the Facility has reported that the following are not applicable to the Facility under the subpart;</p> <ul style="list-style-type: none"> -the facility is not restricted to the 5% HAP limit, because it does not apply to materials in hand-held aerosol cans. -the facility reports that the facility does not use solvents containing more than 5% HAPs to remove cured resin or gelcoat from equipment. -the Resin and Gelcoat Mixing operation report that containers that are 208 L or larger into which other materials are added for mixing are equipped with covers and no visible gaps. and that the covers are kept in place except when activities require the tops to be open (adding or removing equipment and or inserting or removing pumping or mixing equipment).

10/25/2017	ROP Other	Compliance	<p>3rd quarter 2017 - Quarterly material usage and emission report. Information provided by facility included the following information:</p> <p>EULAMINATION reported total resin usage ranging from 0-18.670 lbs/day for period, well below the limit of 45,489 lb/day. In addition resin with v.toluene usage was reported to range from 0-57 lbs/day. well below the limit of 3,600 lbs/day. VOC emissions of 55.28 tpy (12 month rolling total) were also reported, well below the limit of 158.2 tpy (12-month rolling total).</p> <p>No VOC emissions were reported for EURLTM for the 12 month rolling period ending September 30, 2017.</p> <p>Usage and Emissions reported for EUGELCOAT for the period ending September 30, 2017, included a rolling 12-month average VOC (including styrene) emission of 53.03 tpy. Below the limit of 134.4 tpy. Styrene emissions for the same EU were reported to be 41.62 tpy (12-month rolling) and below the limit of 94.8 tpy. Gel coat usage ranged from 0-4869 lbs/day, below the limit of 10K lb/day.</p> <p>EUADHESIVE usage for VOC and acetone was reported to range from 0-88.68 lb/day. Well below the 484 lb/day limit.</p> <p>EUVOCCLEANUP reported VOC and acetone emissions of 23.66 tpy (12-month rolling), and was below the limit of 468.75 ton/yr (937,500 lb/yr). Note that the submittal did not include VOC reclaim values for period.</p> <p>EUACETONECLEANUP was reported to have had 17.10 ton/yr of acetone emissions (12-month rolling) as of September 30, 2017. Limits for acetone emissions for this EU are 125 tpy. Acetone reclaim for the period was reported to range from 50.9 - 55.2%. Per permit the minimum reclaim allowed for acetone is</p>
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10/25/2017	ROP Other	Compliance	48%. SOURCEWIDE limits associated with the facility include 5267 lb/day of VOC and <225 tpy of VOCs. The facility reports the maximum daily VOCs of 1398 lbs, and total VOCs of 114.92 tpy. Both below the limits.
10/03/2017	Other	Unknown	Observed US EPA Region 5 Site Inspection
09/27/2017	Other	Compliance	Rec Boats identifying a product as resin per composition and use.
08/03/2017	ROP Semi 1 Cert	Compliance	Semi 1, January - June 2017. No deviations reported.
08/03/2017	MACT (Part 63)	Compliance	MACT VVVV semiannual compliance report. The facility is using the compliant materials option. AQD staff verified the calculations and determined the facility to be in compliance with the MACT limits.
08/03/2017	ROP Other	Compliance	2nd quarter 2017 - Quarterly material usage and emission report. Material usage and reported emissions are less than permit limits.
04/25/2017	Self Initiated Inspection	Compliance	odor and opacity survey
04/13/2017	ROP Other	Compliance	1st Quarter - Quarterly report including usages and emissions. Reported emissions are below permitted limits.

Name: *Suzanne Lefebvre* Date: *4/17/2018*

Supervisor: *SN*