

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

EFFECTIVE DATE: July 1, 2019
REVISION DATES: May 27, 2021, January 18, 2022

ISSUED TO

**National Composites,
Owosso Composite, LLC**

State Registration Number (SRN): N2430

LOCATED AT

401 South Delaney Road, Owosso, Shiawassee County, Michigan 48867

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N2430-2019b

Expiration Date: July 1, 2024

Administratively Complete ROP Renewal Application Due Between
January 1, 2023 and January 1, 2024

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 Rule 210(1) of the administrative rules promulgated under Act 451, 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-N2430-2019b

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, 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 Environment, Great Lakes, and Energy



Brad Myott, Lansing 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 Environment 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 is 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).² **(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:"² **(R 336.1301(1))**
 - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% 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.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(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).² **(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 state 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 60604-3507. **(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.² **(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(9))**

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 reclaimer, 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.² **(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.² **(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, ² **(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, , 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.² **(R 336.1201(4))**

Footnotes:

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

²This 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 SPECIAL 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
EUOPENMOLDING1	One open molding spray layup booth with handheld mechanical applicators for the production of fiberglass boats and other plastic parts. Operations include the use of resin, foam, putty, adhesives, and catalyst materials. Particulate emissions are controlled by dry filters.	05-01-2017 / 12-08-2020	FGOPENMOLDING, FGMACTVVVV, FGMACTWWWWW
EUOPENMOLDING2	One open molding spray layup booth with handheld mechanical applicators for the production of fiberglass boats and other plastic parts. Operations include the use of resin, foam, putty, adhesives, and catalyst materials. Particulate emissions are controlled by dry filters.	05-01-2017 / 12-08-2020	FGOPENMOLDING, FGMACTVVVV, FGMACTWWWWW
EUOPENMOLDING3	One open molding spray layup booth with handheld mechanical applicators for the production of fiberglass boats and other plastic parts. Operations include the use of resin, foam, putty, adhesives, and catalyst materials. Particulate emissions are controlled by dry filters.	05-01-2017 / 12-08-2020	FGOPENMOLDING FGMACTVVVV, FGMACTWWWWW
EUOPENMOLDING4	One open molding spray layup booth with handheld mechanical applicators for the production of fiberglass boats and other plastic parts. Operations include the use of resin, foam, putty, adhesives, and catalyst materials. Particulate emissions are controlled by dry filters.	05-27-2020 / 12-08-2020	FGOPENMOLDING FGMACTVVVV, FGMACTWWWWW
EUGELCOAT1	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials and a shared drying area with a natural gas-fired tube dryer. Operations include the use of gelcoats and catalysts. Particulate emissions are controlled by dry filters.	05-01-2017 / 08-29-2018 / 12-08-2020	FGGELCOAT, FGMACTVVVV, FGMACTWWWWW

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUGELCOAT2	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials and a shared drying area with a natural gas-fired tube dryer. Operations include the use of gelcoats and catalysts. Particulate emissions are controlled by dry filters.	05-01-2017 / 08-29-2018 / 12-08-2020	FGGELCOAT, FGMACTVVVV, FGMACTWWWWW
EUGELCOAT3	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials and a shared drying area with a natural gas-fired tube dryer. Operations include the use of gelcoats and catalysts. Particulate emissions are controlled by dry filters.	05-27-2020 / 12-08-2020	FGGELCOAT, FGMACTVVVV, FGMACTWWWWW
EUGELCOAT4	One spray booth equipped with handheld mechanical spray applicators for the application of gelcoat materials and a shared drying area with a natural gas-fired tube dryer. Operations include the use of gelcoats and catalysts. Particulate emissions are controlled by dry filters.	05-27-2020 / 12-08-2020	FGGELCOAT, FGMACTVVVV, FGMACTWWWWW
EUEXTRABOOTH	One spray booth equipped with handheld mechanical applicators for the production of fiberglass boats and other plastic parts; handheld mechanical spray applicators for the application of gelcoat materials; and a shared drying area with a natural gas-fired tube dryer that can be used for either gel coat application or open molding. Operations include the use of gelcoats, resins and catalysts. Particulate emissions are controlled by dry filters.	05-27-2020 / 12-08-2020	FGGELCOAT, FGOPENMOLDING FGMACTVVVV, FGMACTWWWWW
EUBLADE	One spray booth equipped with a handheld mechanical spray applicator for coating metal and plastic fan blades with resin and catalyst materials. Particulate emissions are controlled by dry filters.	05-01-2017	FGMACTWWWWW
EURTM	Resin transfer molding (RTM) operation to manufacture boat(s) and boat parts in a closed mold process. Operations include the use of resin and catalyst materials.	05-01-2017 / 08-29-2018 / 12-08-2020	FGRTM/PRESS, FGMACTVVVV, FGMACTWWWWW
EUPRESS	Compression molding press used to manufacture thermoset plastic parts. Operations include the use of resin and catalyst materials.	05-01-2017 / 08-29-2018 / 12-08-2020	FGRTM/PRESS, FGMACTWWWWW
EUOVEN	Electric pre-form oven used for softening fiberglass sheets that are then wrapped around molds.	05-01-2017 / 08-29-2018 / 12-08-2020	FGRTM/PRESS, FGMACTWWWWW
EUADHESIVEDISPING	A glue adhesive filling station and two (2) mechanical guns for the manual application of methyl methacrylate (MMA) and styrene-based adhesives.	05-01-2017 / 08-29-2018	NA

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUFOAM	Polyurethane foam production for boat floatation.	05-01-2017	FGMACTVVVV
EUCLEANUP	Miscellaneous cleanup activities including two (2) acetone recycle systems.	05-01-2017 / 08-29-2018	FGMACTVVVV, FGMACTWWWWW

**EUBLADE
 EMISSION UNIT CONDITIONS**

DESCRIPTION

One spray booth equipped with a handheld mechanical spray applicator for coating metal and plastic fan blades with resin and catalyst materials. Particulate emissions are controlled by dry filters.

Flexible Group ID: FGMACTWWWWW

POLLUTION CONTROL EQUIPMENT

Dry filters on spray booth

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Styrene (CAS No. 100-42-5)	800 lb/yr ¹	12-month rolling time period as determined at the end of each calendar month	EUBLADE	SC VI.2, SC VI.3	R 336.1225(2)
2. VOC (including styrene)	1,000 lb/yr ²	12-month rolling time period as determined at the end of each calendar month	EUBLADE	SC VI.2, SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

1. The styrene content of any resin used in EUBLADE shall not exceed 42.0 percent by weight.² (R 336.1225, R 336.1702(a))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUBLADE and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1702(a))
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² (R 336.1224, R 336.1370)
3. The permittee shall handle all VOC and/or HAPs containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² (R 336.1224, R 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booth associated with EUBLADE unless its respective exhaust filter is installed, maintained and operated in a satisfactory manner.² (R 336.1301, R 336.1331)
2. The permittee shall equip and maintain the spray booth in EUBLADE with mechanical spray or HVLP applicators or technology with equivalent or lower styrene emission rates.² (R 336.1225, R 336.1702(a))

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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1225, R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for EUBLADE:
 - a. The identity and amount (in pounds) of each material used.
 - b. The styrene content (in percent by weight) of each resin used.
 - c. The VOC (including styrene) content of each material used.
 - d. The appropriate emission factors for each raw material used. (The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009 may be used, or an alternate factor approved by the AQD District Supervisor.)
 - e. Styrene emission calculations determining the monthly emission rate in pounds per calendar month, and the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.
 - f. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month, and the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request.² **(R 336.1225(2), R 336.1702(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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBLADE	24 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

**EUADHESIVEDISPING
 EMISSION UNIT CONDITIONS**

DESCRIPTION

A glue adhesive filling station and two (2) mechanical guns for the manual application of methyl methacrylate (MMA) and styrene-based adhesives.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC (including styrene)	1.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUADHESIVEDISPING	SC VI.2, SC VI.3	R 336.1225(2), R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUADHESIVEDISPING and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUADHESIVEDISPING with mechanical gun, non-atomizing applicators or comparable technology with equivalent transfer efficiency whenever technically feasible.² (R 336.1225, R 336.1702(a))

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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1225, R 336.1702(a))

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for EUADHESIVEDISPING:
 - a. The identity and amount (in pounds) of each material used.
 - b. The VOC content (including styrene) of each material used.
 - c. The appropriate emission factors for each raw material used. (The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009 may be used, or an alternate factor approved by the AQD District Supervisor.)
 - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request.² **(R 336.1225(2), R 336.1702(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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTM	24 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EUFOAM EMISSION UNIT CONDITIONS

DESCRIPTION

Polyurethane foam production for boat floatation.

Flexible Group ID: FGMACTVVVV

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use more than 8,000 pounds per 12-month rolling time period of mixed polyol/isocyanate resin two-part foam in EUFOAM.² **(R 336.1224, R 336.1225, R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUFOAM and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1702(a))**

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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1225, R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the amount of mixed polyol/isocyanate resin two-part foam used each month and 12-month rolling time period. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTM	24 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

**EUCLEANUP
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Miscellaneous cleanup activities including two (2) acetone recycle systems.

Flexible Group ID: FGMACTVVVV, FGMACTWWWWW

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Acetone (CAS No. 67-64-1)	13.0 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUCLEANUP	SC VI.2, SC VI.3	R 336.1224, R 336.1225
2. VOC	1.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUCLEANUP	SC VI.2, SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUCLEANUP and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1702(a))

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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1224, R 336.1225, R 336.1702(a))

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for EUCLEANUP:
 - a. The identity of each clean-up solvent used.
 - b. The amount (in gallons or pounds) of each clean-up solvent used, recovered and reclaimed.
 - c. Acetone emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - d. VOC emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702(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)

NA

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

D. FLEXIBLE GROUP SPECIAL 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
FGOPENMOLDING	Four open molding spray layup booths and one multi-purpose booth with handheld mechanical applicators for the production of fiberglass boats and other plastic parts. Operations include the use of resin, putty, and catalyst materials. Particulate emissions are controlled by dry filters.	EUOPENMOLDING1, EUOPENMOLDING2, EUOPENMOLDING3, EUOPENMOLDING4, EUEXTRABOOTH
FGGELCOAT	Four spray booths and one multi-purpose booth equipped with mechanical spray applicators for the application of gelcoat materials with a shared drying area. Operations include the use of gelcoats and catalysts. Particulate emissions are controlled by dry filters.	EUGELCOAT1, EUGELCOAT2, EUGELCOAT3, EUGELCOAT4, EUEXTRABOOTH
FGRTM/PRESS	RTM, electric pre-form oven and compression molding operation to manufacture boat(s) and boat parts in a closed mold process. Operations include the use of resin and catalyst materials.	EURTM, EUPRESS, EUOVEN
FGMACTVVVV	Each new or reconstructed affected source at boat manufacturing facilities as identified in 40 CFR Part 63, Subpart VVVV, 40 CFR 63.5683 and 40 CFR 63.5689. The affected source includes open molding resin and gelcoat operations including production resin, tooling resin, pigmented gelcoat, clear gelcoat, and tooling gelcoat, closed molding resin operations, resin and gelcoat mixing operations, resin and gelcoat application equipment cleaning operations, and carpet and fabric adhesive operations.	EUOPENMOLDING1, EUOPENMOLDING2, EUOPENMOLDING3, EUOPENMOLDING4, EUGELCOAT1, EUGELCOAT2, EUGELCOAT3, EUGELCOAT4, EUEXTRABOOTH, EURTM, EUFOAM, EUCLEANUP

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACTWWWW	Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785. Reinforced plastic composites production also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.	EUOPENMOLDING1, EUOPENMOLDING2, EUOPENMOLDING3, EUOPENMOLDING4, EUGELCOAT1, EUGELCOAT2, EUGELCOAT3, EUGELCOAT4, EUEXTRABOOTH, EUBLADE, EURTM, EUPRESS, EUOVEN, EUCLEANUP

**FGOPENMOLDING
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Four open molding spray layup booths and one multi-purpose booth with handheld mechanical applicators for the production of fiberglass boats and other plastic parts. Operations include the use of resin, putty, and catalyst materials. Particulate emissions are controlled by dry filters.

Emission Units: EUOPENMOLDING1, EUOPENMOLDING2, EUOPENMOLDING3, EUOPENMOLDING4 and EUEXTRABOOTH

POLLUTION CONTROL EQUIPMENT

Dry filters on spray booths

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

- The permittee shall not exceed the styrene content limits listed in the following table for FGOPENMOLDING:² **(R 336.1702(a))**

Material	Maximum Styrene Content (wt %)
a. Flame Resistant Resins	42.0
b. All Other Resins	33.5

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste materials used in FGOPENMOLDING and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1702(a))**
- The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² **(R 336.1224, R 336.1370)**
- The permittee shall handle all VOC and/or HAPs containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate any spray booth associated with FGOPENMOLDING unless its respective exhaust filter is installed, maintained and operated in a satisfactory manner.² **(R 336.1301, R 336.1331)**

2. The permittee shall equip and maintain each of the spray booths in FGOPENMOLDING with mechanical non-atomized applicators or technology with equivalent or lower styrene emission rates.² **(R 336.1702(a))**

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

The permittee shall keep the records using the UEF table, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request.² **(R 336.1702(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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCHOP1	24 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVCHOP2	24 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVCHOP3	24 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVCHOP4	30 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVEXTRABOOTH	30 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

**FGGELCOAT
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

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

Emission Units: EUGELCOAT1, EUGELCOAT2, EUGELCOAT3, EUGELCOAT4 and EUEXTRABOOTH

POLLUTION CONTROL EQUIPMENT

Dry filters on spray booths

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

- The permittee shall not exceed the monomer content limits listed in the following table for FGGELCOAT:² **(R 336.1702(a))**

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste materials used in FGGELCOAT and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1702(a))**
- The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² **(R 336.1224, R 336.1370)**
- The permittee shall handle all VOC and/or HAPs containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booths associated with FGGELCOAT unless its respective exhaust filter is installed, maintained and operated in a satisfactory manner.² **(R 336.1301, R 336.1331)**
2. The permittee shall equip and maintain the spray booths in FGGELCOAT with HVLP applicators or technology with equivalent or lower styrene emission rates. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**

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

The permittee shall keep the records using the UEF table, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request.² **(R 336.1702(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))**

- 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:

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

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

**FGRTM/PRESS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

RTM, electric pre-form oven and compression molding operation to manufacture boat(s) and boat parts in a closed mold process. Operations include the use of resin and catalyst materials.

Emission Unit: EURTM, EUPRESS, EUOVEN

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC (including styrene)	3.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGRTM/PRESS	SC VI.2, SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

1. The styrene content of all resins used in EURTM shall not exceed 44.5 percent by weight.² (R 336.1702(a))

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1702(a))

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for FGRTM/PRESS:
 - a. The identity and amount (in pounds) of each material used.
 - b. The styrene content (in percent by weight) of each resin used.
 - c. The VOC content (including styrene) of each material used.
 - d. The appropriate emission factors for each raw material used:
 - i. The emission factor of 1% by weight of styrene emitted (from EPA-AP-42 Section 4.4 for Polyester Resin Plastics Production Fabrication) shall be used for closed molding processes,
 - ii. Mass balance used for non-styrene VOC emissions, or
 - iii. Alternate emission factors may be used with the approval of the AQD District Supervisor
 - e. VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using AP-42 emission factors, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request.² **(R 336.1702(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:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTM	24 ²	30 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

**FGMACTVVVV
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Each new or reconstructed affected source at boat manufacturing facilities as identified in 40 CFR Part 63, Subpart VVVV, 40 CFR 63.5683 and 40 CFR 63.5689. The affected source includes open molding resin and gelcoat operations including production resin, tooling resin, pigmented gelcoat, clear gelcoat, and tooling gelcoat, closed molding resin operations, resin and gelcoat mixing operations, resin and gelcoat application equipment cleaning operations, and carpet and fabric adhesive operations.

Emission Units: EUOPENMOLDING1, EUOPENMOLDING2, EUOPENMOLDING3, EUOPENMOLDING4, EURTM, EUGELCOAT1, EUGELCOAT2, EUGELCOAT3, EUGELCOAT4, EUEXTRABOOTH, EUFOAM, EUCLEANUP

POLLUTION CONTROL EQUIPMENT

Dry fabric filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total Organic HAP	The organic HAP limit determined in accordance with 40 CFR 63.5698 (including equation 1) ²	12-month rolling time period as determined at the end of each calendar month.	FGMACTVVVV	SC VI.2	40 CFR 63.5698

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP Content of production resin using atomized application	28% by weight ²	12-month rolling average as determined at the end of each calendar month	FGMACTVVVV	SC VI.11	40 CFR 63.5701(b)
2. Organic HAP Content of production resin using non-atomized application	35% by weight ²	12-month rolling average as determined at the end of each calendar month	FGMACTVVVV	SC VI.11	40 CFR 63.5701(b)
3. Organic HAP Content of pigmented gelcoat	33% by weight ²	12-month rolling average as determined at the end of each calendar month	FGMACTVVVV	SC VI.11	40 CFR 63.5701(b)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Organic HAP Content of clear gelcoat	48% by weight ²	12-month rolling average as determined at the end of each calendar month	FGMACTVVVV	SC VI.11	40 CFR 63.5701(b)
5. Organic HAP Content of tooling resin using atomized application	30% by weight ²	12-month rolling average as determined at the end of each calendar month	FGMACTVVVV	SC VI.11	40 CFR 63.5701(b)
6. Organic HAP Content of tooling resin using non-atomized application	39% by weight ²	12-month rolling average as determined at the end of each calendar month	FGMACTVVVV	SC VI.11	40 CFR 63.5701(b)
7. Organic HAP Content of tooling gelcoat	40% by weight ²	12-month rolling average as determined at the end of each calendar month	FGMACTVVVV	SC VI.11	40 CFR 63.5701(b)

* The material limits in this table are applicable when using the compliant materials option (40 CFR 63.5701(b)) to demonstrate compliance.

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))

Emissions Averaging

1. When using Emissions Averaging to comply with the HAP material limits, the permittee must prepare an implementation plan as specified in 40 CFR 63.5707.² (40 CFR 63.5707)
2. When using Emissions Averaging to demonstrate compliance with the HAP material limits, the permittee must calculate the emissions on a 12 month rolling average using Equation 1 from 40 CFR 63.5710 of Subpart VVVV at the end of the 12th month after the applicable compliance date and at the end of every subsequent month.² (40 CFR 63.5710)
3. Use equation 2 from 40 CFR 63.5710 of Subpart VVVV at the end of each month to determine the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average required above.² (40 CFR 63.5710)

4. Use the equations from Table 3 of Subpart VVVV to determine PV_i in equation 2 from 40 CFR 63.5710 of Subpart VVVV.² **(40 CFR 63.5710)**
5. Maintain records of the HAP content of each resin and gelcoat.² **(40 CFR 63.5704(a)(3)(i))**
6. Maintain records of the amount of each resin and gelcoat used per month.² **(40 CFR 63.5704(a)(3)(ii))**
7. Maintain records of the application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized technology.² **(40 CFR 63.5704(a)(3)(iii))**

Compliant Materials

8. When using Compliant Materials to comply with the HAP limit in SC I.1 above, the permittee may use equation 1 from 40 CFR 63.5713 of Subpart VVVV to calculate the weighted average organic HAP content at the end of every month for all resins and gel coats used in each operation in the past 12 months. If all resins and gel coats used have organic HAP contents no greater than the applicable organic HAP content limits, this calculation is not necessary to demonstrate compliance.² **(40 CFR 63.5713)**
9. If filled resins are used, equation 1 from 40 CFR 63.5714 of Subpart VVVV must be used to demonstrate compliance for the filled material on an as-applied basis.² **(40 CFR 63.5714)**
10. Use the methods specified in 40 CFR 63.5758 to determine the organic HAP contents of resins and gel coats.² **(40 CFR 63.5704(b)(1))**
11. Complete the calculations described in 40 CFR 63.5713 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 of Subpart VVVV.² **(40 CFR 63.5704(b)(2))**
12. Maintain records of the HAP content of each resin and gelcoat.² **(40 CFR 63.5704(b)(3)(i))**
13. Maintain records of the application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized technology.² **(40 CFR 63.5704(b)(3)(ii))**
14. Maintain records of the amount of resin and gelcoat 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.² **(40 CFR 63.5704(b)(3)(iii))**
15. Maintain records of the calculations performed, if required to demonstrate compliance based on weighted-average organic HAP content as described in 40 CFR 63.5713.² **(40 CFR 63.5704(b)(3)(iv))**

General Requirements

16. Maintain the records required by 40 CFR 63.5767 of Subpart VVVV.² **(40 CFR 63.5767)**

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. The permittee shall submit semiannual reporting of compliance as required in 40 CFR 63.5764. The report shall include the following:² **(40 CFR 63.5764)**

- a. The date of the report and the beginning and ending dates of the reporting period.
- b. A description of any changes in the manufacturing process since the last compliance report.
- c. A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
- d. If in compliance with the emission limits and work practice standards during the reporting period include a statement to that effect.
- e. If the permittee deviated from an emission limit or work practice standard during the reporting period, the permittee must also include:
 - i. A description of the operation involved in the deviation.
 - ii. The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
 - iii. A description of any corrective action taken to minimize the deviation and actions taken to prevent it from happening again.
 - iv. A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

**FGMACTWWWW
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785. Reinforced plastic composites production also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

Emission Units: EUOPENMOLDING1, EUOPENMOLDING2, EUOPENMOLDING3, EUOPENMOLDING4, EUBLADE, EUGELCOAT1, EUGELCOAT2, EUGELCOAT3, EUGELCOAT4, EUEXTRABOOTH, EURTM, EUPRESS, EUOVEN, EUCLEANUP

POLLUTION CONTROL EQUIPMENT

Dry fabric filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP from Open Molding – Corrosion Resistant and/or High Strength (CR/HS) Resin, Mechanical Application	113 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
2. Organic HAP from Open Molding – Non CR/HS Resin, Mechanical Application	88 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
3. Organic HAP from Open Molding – Tooling Resin, Mechanical Application	254 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
4. Organic HAP from Open Molding - Low-flame spread/low-smoke products	497 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
5. Organic HAP from Open Molding – Shrinkage controlled resins	354 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
6. Organic HAP from Open Molding – Tooling gel coat	440 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
7. Organic HAP from Open Molding – White/off white pigmented gel coat	267 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
8. Organic HAP from Open Molding – Pigmented gel coat	377 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
9. Organic HAP from Open Molding – CR/HS or high performance gel coat	605 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
10. Organic HAP from Open Molding – Fire retardant gel coat	854 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)
11. Organic HAP from Open Molding – Clear production gel coat	522 lb/ton ²	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	40 CFR 63.5835(a)

12. The permittee shall use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of Subpart WWWW of Part 63.² **(40 CFR 63.5810)**
- Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of Subpart WWWW of Part 63. **(40 CFR 63.5810(a))**
 - Demonstrate that, on average, the facility meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to the facility. **(40 CFR 63.5810(b))**
 - Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 to this subpart that apply the weighted average organic HAP emissions limit for all open molding operations. **(40 CFR 63.5810(c))**
 - Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. **(40 CFR 63.5810(d))**

13. The permittee may switch between the compliance options in SC I.12.a through 12.d. When changing to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option the facility is changing to, unless the facility previously used an option that did not require the facility to maintain records of resin or gel coat. In this case, the facility must immediately begin collecting resin and gel coat and demonstrate compliance 12 months after changing options.² **(40 CFR 63.5810)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not use cleaning solvents that contain 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 resin.² **(40 CFR 63.5805, Table 4)**
2. For each HAP-containing materials storage operation, 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.² **(40 CFR 63.5805, Table 4)**
3. For each mixing operation, the permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.² **(40 CFR 63.5805, Table 4)**
4. For each mixing operation, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.² **(40 CFR 63.5805, Table 4)**
5. For each mixing operation, the permittee shall keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels.² **(40 CFR 63.5805, Table 4)**

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))**

1. The permittee shall determine the HAP content of any resin(s) as received and as applied, using manufacturer's formulation data and safety data sheets, using the procedures outlined in 40 CFR 63.5797 (a) through (c) as applicable. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.² **(40 CFR 63.5797)**

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 conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.5840 and 40 CFR 63.5860.² **(40 CFR 63.5840, 40 CFR 63.5860)**
2. The permittee shall demonstrate continuous compliance with the applicable standards according to the procedures outlined in 40 CFR 63.5895 and 40 CFR 63.5900.² **(40 CFR 63.5895, 40 CFR 63.5900)**

3. The permittee shall keep all records required by 40 CFR 63.5915 in the format and timeframes outlined in 40 CFR 63.5920. The records must be kept onsite for a period of at least two years. The records must be kept for a total of at least five years.² **(40 CFR 63.5915, 40 CFR 63.5920)**
4. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date:²
 - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63 Subpart WWWW, and the documentation supporting each notification as specified in 40 CFR 63.5915(a)(1). **(40 CFR 63.5915(a))**
 - b. Records of all data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for operations listed in Table 3 to 40 CFR Part 63 Subpart WWWW. **(40 CFR 63.5915(c))**
 - c. A certified statement demonstrating compliance with all applicable work practice standards identified in Table 4 of 40 CFR Part 63 Subpart WWWW. **(40 CFR 63.5915(d))**
5. The permittee shall keep records documenting that the resin(s) used in FGMACTWWW meet(s) the requirements for corrosion-resistant resin, non-corrosion-resistant resin, or tooling resin as outlined in 40 CFR 63.5935.² **(40 CFR 63.5935)**

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. The permittee shall submit the applicable notifications specified in, and according to the timeframes in 40 CFR 63.5905.² **(40 CFR 63.5905)**
5. The permittee shall submit all applicable reports identified in, and according to the timeframes in 40 CFR 63.5910.² **(40 CFR 63.5910)**

6. The permittee shall submit semiannual reporting of compliance as required in 40 CFR 63.5910(c). The report shall include the following:²
 - a. Company name and address. **(40 CFR 63.5910(c)(1))**
 - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.5910(c)(2))**
 - c. Date of the report and beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(3))**
 - d. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. **(40 CFR 63.5910(c)(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. If the permittee produces reinforced plastic composites that are not used in fiberglass boat manufacture at the facility, the permittee may elect to have the operations covered by 40 CFR Part 63, Subpart VVVV, in lieu of 40 CFR Part 63, Subpart WWWW, if it can be demonstrated that this will not result in any organic HAP emissions increase compared to complying with 40 CFR Part 63, Subpart WWWW.² **(40 CFR 63.5787(c) and (d))**
2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production by the initial compliance date.² **(40 CFR Part 63, Subparts A and WWWW)**

Footnotes:

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

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

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. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

Specific recordkeeping requirement formats and procedures 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 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any Permit to Install and/or Operate, that relates to the identified emission units or flexible groups as of the effective date of this ROP. This includes all Permits to Install and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-N2430-2019a. PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
129-16B	Three (3) open molding spray layup booths, two (2) gelcoat spray booths, one (1) spray booth for resin application to metal and plastic parts, resin transfer molding (RTM) operations, compression molding press and electric pre-form oven used to manufacture thermoset plastic parts, glue adhesive filling station with mechanical guns for adhesive application, polyurethane foam application process, and miscellaneous cleanup activities	EUOPENMOLDING1, EUOPENMOLDING2, EUOPENMOLDING3, EUGELCOAT1, EUGELCOAT2, EUBLADE, EURTM, EUPRESS, EUOVEN, EUADHESIVEDISPING, EUFOAM, EUCLEANUP

The following table lists the ROP amendments or modifications issued after the effective date of ROP No. MI-ROP-N2430-2019.

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
129-16D	202100048 / May 27, 2021	This Minor Modification is to incorporate PTI 129-16D, which modifies the open molding spray layout operations (FGOPENMOLDING) and gelcoat application operations (FGGELCOAT). The PTI increased emission limits and material limits for FGOPENMOLDING and FGGELCOAT by adding an additional open molding spray layout (EUOPENMOLDING4), and three new gelcoat booths (EUGELCOAT3, EUGELCOAT4, EUEXTRABOOTH). The resin transfer molding operation (EURTM) is now in the same flexible group as the compression molding press (EUPRESS) and electric pre-form oven (EUOVEN) in new flexible group FGRTM/PRESS. The flexible group FGPRESS/OVEN, which previously contained EUPRESS and EUOVEN, was removed.	EUOPENMOLDING4, EUGELCOAT3, EUGELCOAT4, EUEXTRABOOTH, EURTM, FGOPENMOLDING, FGGELCOAT, FGRTM/PRESS, FGMACTVVVV, FGMACTWWWW
NA	202100202 / January 18, 2022	This Minor Modification is to update the ROP based on the incorporation of PTI 129-16D. The resin transfer molding operation (EURTM) is now in the same flexible group as the compression molding press (EUPRESS) and electric pre-form oven (EUOVEN) in new flexible group FGRTM/PRESS. With EURTM now in the same flexible group of FGRTM/PRESS, the table with EURTM Conditions are now obsolete, this modification removes these obsolete Conditions.	EURTM

Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the AQD, Report Certification form (EQP 5736) and, 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.