

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: DATE 2009

Region: Washington Regional Office
County: Chowan
NC Facility ID: 2100078
Inspector's Name: Steven Daniels
Date of Last Inspection: 05/19/2008
Compliance Code: C / In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Carolina Classic Boats Inc Facility Address: Carolina Classic Boats Inc 109 Anchors Way Edenton, NC 27932 SIC: 3732 / Boat Building And Repairing NAICS: 336612 / Boat Building Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: 2D .0515, .0521, .0958, .1806, .1100, .1111 NSPS: NESHAP: MACT VVVV PSD: PSD Avoidance: 250 VOC NC Toxics: 2D .1100, 2Q .0705, .0711 112(r): Other: Compliance with 2Q .0705 indicated.
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 2100078.07A Date Received: 10/25/2007 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08550/T02 Existing Permit Issue Date: 08/12/2003 Existing Permit Expiration Date: 07/31/2008
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Review Engineer: Mike Benson Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 08550/T03 Permit Issue Date: DATE 2009 Permit Expiration Date: DATE 2014	

I. Introduction:

The U.S. Environmental Protection Agency (EPA) has given interim approval to North Carolina's Title V operating permits program effective on December 15, 1995. Final approval for the Title V program was received October 1, 2001. Title V facilities are required to obtain an operating permit which addresses all applicable regulations under the State Implementation Plan, Federal Implementation Plan, and other provisions of the Clean Air Act (CAA). The Title V Operating Permit will define all of the facility's obligations under the CAA.

This Renewal Title V Air Permit Application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the Title V operating permit. The primary source of information used to construct the permit is the above referenced air permit application. This facility currently has Air Quality Permit No. 08550T02.

II. Background Information:

Pursuant to 15A NCAC 2Q .0506 Carolina Classic Boats, Inc. submitted its initial Title V application to the Division of Air Quality on October 29, 2007. The application was considered to be complete on October 29, 2007. The renewal application is being combined with an internally-generated application (2100078.05A) for Last MACT/Toxics modeling. This application was considered complete on November 28, 2005. The permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

III. Facility Description:

Carolina Classic Boats, Inc. produces fiberglass boats. Currently the emissions sources at the facility are processes to mold and make fiberglass boats. Carolina Classic Boats, Inc. was originally considered major for Title V purposes because styrene emissions exceed the 10 TPY threshold. Styrene emissions are less than 10 TPY at the present time.

IV. Table of Changes:

Old Page(s)	New Page(s)	Section	Description of Change(s)
N/A	N/A	N/A	Cover page, throughout, updated Dates, Permit Nos.
3	3	2.1 table	Added CD-1
3-4	4	2.1.A.1	2D .0530 changed to 2Q .0317, 2Q .0705 and .0711 added to table.
4	5	2.1.A.1	2D .0515 changed to monthly.
5	5-6	2.1.A.2	2D .0521 changed to monthly.
5-7	--	2.1.A.3, 4, 6, 7	Removed 2D .0530, .1806, .1100, and .1111 MACT placeholder.
--	8-10	2.2.A table, 2.2.A.1, 2, 3, 4, 5	Added 2Q .0317, .1806, .1100, .0705, .0711.
--	10-21	2.2.B.1	Added MACT.
--	22-31	3	Updated General Conditions.

V. Statement of Compliance:

This facility was inspected by Mr. Bernie Pittman of the Washington Regional Office on May 19, 2008. The facility appeared to be in compliance with all applicable Air Quality regulations at the time of the inspection. The facility was issued an NOV on September 4, 2008, for late reporting (paperwork violation not emissions limit violation). There have been no other compliance problems within the past five years.

VI. Summary of Emission Sources and Control Devices:

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-01 MACT VVVV	One fiberglass lamination/gelcoating operation	CD-1	dry filter system

VII. Emission Source-by-Source Evaluation:

A. One fiberglass lamination/gelcoating operation (ID No. ES-1) controlled by a dry filter system (ID No. CD-1)

1. Description:

Open molding and other manufacturing operations to make fiberglass boats.

2. Applicable Regulatory Requirements:

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E=4.10P^{0.67}$ where E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 2D .0515
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Volatile organic compounds	Work practice standards	15A NCAC 2D .0958
Volatile organic compounds	less than 250 tons per year (See Section 2.2.A.1)	15A NCAC 2Q .0317
Hazardous air pollutants	40 CFR 63 Subpart VVVV (See Section 2.2.B A.)	15A NCAC 2D .1111
Toxic Air Pollutants	State-enforceable only (See Section 2.2.B.2) Styrene – 48.5 pounds per hour	15A NCAC 2D .1100

Regulated Pollutant	Limits/Standards	Applicable Regulation
Toxic Air Pollutants	State-enforceable only (See Section 2.2.A.3)	15A NCAC 2Q .0705
Toxic Air Pollutants	State-enforceable only (See Section 2.2.A.4)	15A NCAC 2Q .0711
Odorous emissions	State-enforceable only Odorous emissions must be controlled (See Section 2.2.A.2)	15A NCAC 2D .1806

a. 15A NCAC 2D .0515: “Particulates from Miscellaneous Industrial Process”.

The particulate emissions limit for each source is determined by the individual process weight rates for each prospective source. Negligible particulate emissions are expected from this type of manufacturing process. The particulate rates were also evaluated during the initial Title V review. The facility is required to inspect the dry filters each week and report any maintenance performed on a semi-annual basis. Compliance has been confirmed with the Division’s compliance inspection process. The facility is considered to be in compliance with 2D .0515.

No changes to the permitted stipulations are required.

b. 15A NCAC 2D .0521: “Control of Visible Emissions”.

This source will be limited to 20 percent visible opacity emissions. Particulate emissions are generally associated with visible opacity (for most processes, excluding VOC condensation out of the stack). As noted above, this equipment is expected to have very little particulate emissions, and based on past experience and good engineering judgment, zero or nearly-zero percent visible opacity emissions are expected. Past compliance inspections have indicated that the facility is in compliance with 2D .0521.

Permit No. 08183T03 required the facility to conduct a visual inspection every week and keep records regarding maintenance activities similar to the requirements in the above listed 2D .0515.

No changes to the permitted stipulations are required.

- c. 15A NCAC 2D .1806: “Control and Prohibition of Odorous Emissions”.

This rule requires the owner or operator of a facility to prevent objectionable odors beyond the facility’s boundary. A slight odor has been noted *inside* the factory during past inspections. However, no odors have been noted outside. Therefore, based on past DAQ inspections, as well as no history of complaints from the community, the facility is considered to be in compliance with 2D .1806.

No changes to the permitted stipulations are required.

- d. 15A NCAC 2D .0958: “Work Practices for Sources of Volatile Organic Compounds”.

This regulation contains work practice standards that are designed to minimize VOC loss. It contains a variety of procedures ranging from storing VOC containing material in tightly closed containers to not filling machines above the fill lines. As noted in the most recent inspection report the facility was very clean and employed good housekeeping practices. The facility was noted to be in compliance during the last inspection. Monthly observations are required and the facility is required to submit a semi-annual report to the Division summarizing the findings of the observations. The facility is considered to be in compliance with 2D .0958.

No changes to the permitted stipulations are required.

- e. 15A NCAC 2Q .0317: “Avoidance Conditions” (PSD avoidance for VOC).

The facility is limited to a maximum of 250 tons per year of VOC emissions on a rolling 12-month basis. An error in the previous permit has been identified. Currently, the facility is required to submit a summary report of the monitoring and recordkeeping activities on a bi-annual basis. This appears to be misplaced language that is normally used for summary reports for control devices. The facility should be submitting bi-annual reports (January and June) for the preceding six month periods, showing for each of the last rolling 12-month periods the facility did not exceed the 250 tons per year limit.

In addition, the Division is now incorporating a boat-specific language for the monitoring/recordkeeping section. Previously, the Permittee was required to record the type and amount of VOC containing material and multiply by the amount of VOC in the material. This always assumed 100 percent emission of the styrene in the product. Which has been shown to not be the case. In addition, the compliance options for the MACT allow for the facility to use a variety of methods to determine compliance. The monitoring/recordkeeping section will be changed to reflect the Division’s current understanding of the boat manufacturing process.

The facility currently has under 10 tons per year VOC emissions. At the height of production, the facility had under 20 tons of VOC emissions per year. The facility is considered to be in compliance with 2Q .0317.

The permit has been changed to require the company to perform reporting on a semi-annual basis. The permit has been changed to reflect the correct emissions factors.

- f. 15A NCAC 2D .1100: “Control of Toxic Air Pollutants”.
- 15A NCAC 2Q .0705: “Existing Facilities and SIC Calls”.
- 15A NCAC 2Q .0711: “Emission Rates Requiring a Permit”.

This facility has been evaluated for toxics. The current permit includes an air dispersion modeling limit of 48.5 pounds per hour (2D .1100 limit). The facility has been noted to be in compliance with this limit during all past compliance demonstrations.

Other TAP emissions were discovered as a result of the permit renewal process. These TAPs are methyl ethyl ketone, toluene, and xylene. These TAPs are emitted at the low pounds per year level (128, 26, and 26 pounds per year, respectively). A 2Q .0711 stipulation will be included in this permit. The only requirement will be that the facility keep operational records to demonstrate compliance.

The facility is considered to be in compliance with 2Q .0705 as of January 17, 2003.

The permit has been changed to include 2Q .0711 limits as well as inserting the standard language to indicate that the facility is considered to be in compliance with 2Q .0705.

- g. 15A NCAC 2D .1111: “Maximum Achievable Control Technology”.

This entire facility is subject to 40 CFR 63, Subpart VVVV, “National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing”. The current permit has “placeholder” language indicating that the facility is subject to the MACT. This permit will include all specific language for Subpart VVVV that has been developed by DAQ. All compliance options are included because the Company is allowed to switch compliance options at any time during the year, as long as DAQ is notified. The facility is currently using the compliant coatings method to demonstrate compliance. The Permittee is considered to be in compliance with 2D .1111 at this time.

The permit has been changed to require the company to include the full MACT language developed by DAQ.

VIII. Other Applicable Requirements:

A. NAA/PSD Issues:

Chowan County has not been triggered for PSD increment tracking. This application does not affect PSD increment tracking. Therefore, PSD increment tracking does not apply.

NAA does not apply.

B. NSPS Issues:

This facility is not subject to NSPS.

C. MACT Issues:

This facility is subject to 40 CFR 63, Subpart VVVV (Boat Manufacturing MACT). Specific MACT language for each source was included in this permit. The MACT reporting requirements were synchronized with other reporting requirements in the permit.

D. 112(r) Issues:

This facility is not subject to 112(r).

E. CAM Issues:

This facility is not subject to CAM because post 1990 MACT requirements are applicable.

F. NC Air Toxics:

As noted above this facility is subject to Air Toxics and is considered to be in compliance.

IX. Facility-wide Emissions Summary:

Emissions are summarized from the 2007 emissions inventory.

Pollutant	Actual Emissions (TPY, after controls)
PM	Not Reported
PM10	Not Reported
PM2.5	Not Reported
SO2	Not Reported
NOx	Not Reported
CO	Not Reported
VOC	10.00

The facility is considered to be Title V for estimated styrene (a Federal HAP) emissions.

X. Public Notice / EPA and Affected State Review:

Pursuant to 2Q. 0521, a notice of the draft Title V Permit will be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice will be sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant was provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit was provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina is an affected State for this facility. No comments from EPA or the public were received. OR INSERT COMMENTS HERE.

XI. Conclusions, Comments, and Recommendations:

A PE seal was not needed for this application.

WARO recommends issuance of Permit No. 08550T03.

Recommend issuance of Permit 08550T03.