

NORTH CAROLINA DIVISION OF AIR QUALITY <p style="text-align: center;">Air Permit Review</p>		Region: Asheville Regional Office County: McDowell NC Facility ID: 5600191 Inspector's Name: N/A Date of Last Inspection: N/A Compliance Code: N/A	
Permit Issue Date: DATE 2006		Permit Applicability (this application only) SIP: 2D .0515, .0521, .0958, .1806, .1100, .1111, 2Q .0711 NSPS: NESHAP: MACT Subpart VVVV PSD: PSD Avoidance: NC Toxics: 2D .1100, 2Q .0711 112(r): Other:	
Facility Data Applicant (Facility's Name): Cobia Boat Company, LLC Facility Address: Cobia Boat Company, LLC 1 Cobia Drive Marion, NC 28752 SIC: 3732 NAICS: / Facility Classification: Before: N/A After: Title V Fee Classification: Before: N/A After: Title V			
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 5600191.06A Date Received: 12/21/2005 Application Type: Greenfield Facility Application Schedule: TV-Greenfield Existing Permit Data Existing Permit Number: N/A Existing Permit Issue Date: N/A Existing Permit Expiration Date: N/A
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Review Engineer: Mike Benson Review Engineer's Signature: Date:		Comments / Recommendations: Issue 09605T00 Permit Issue Date: DATE 2006 Permit Expiration Date: DATE 2011	

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 First Time 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 no Air Quality Permit. The facility is not yet in existence (Greenfield - new construction) and will need a Title V permit as HAP emissions are above threshold levels (10/25 TPY).

II. Background Information:

This permit does not replace any previously issued permit, and will be issued as Air Permit No. 09605T00.

Pursuant to 15A NCAC 2Q .0506 Cobia Boat Company, LLC submitted its initial Title V application to the Division of Air Quality on December 21, 2005. The application was considered complete for processing on February 22, 2006. The permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

III. Facility Description:

Cobia Boat Company, LLC produces fiberglass boats. Currently the emissions sources at the facility are from processes to mold and make fiberglass boats. Cobia Boat Company, LLC is considered major for Title V purposes because styrene emissions exceed the 10 TPY threshold.

IV. Statement of Compliance:

This facility has never been inspected by DAQ. However, Form E5, "Title V Compliance Certification" was submitted to DAQ indicating that the Company will be in compliance with all Air Quality regulations.

V. 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	Emission Source Description	Control Device	Control Device Description
GC-01	open molding gelcoat spray and brush application	N/A	N/A
R-01	open molding resin spray and hand lay-up	N/A	N/A
MISC-01	boat assembly & miscellaneous including carpet installation	N/A	N/A

VI. Emission Source-by-Source Evaluation:

A. Open Molding Gelcoat Spray and Brush Application (ID No. GC-01).

1. Description:

Spray and brush application of gelcoat.

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	$E=4.10(P^{0.67})$ where P=process weight in tons per hour	15A NCAC 2D .0515
visible emissions	20 percent opacity	15A NCAC 2D .0521
odorous emissions	State-enforceable only - odorous emissions must be controlled	15A NCAC 2D .1806
hazardous air pollutants	MACT Subpart VVVV	15A NCAC 2D .1111
toxic air pollutants	State-enforceable only	15A NCAC 2D .1100
volatile organic compounds	work practice standards	15A NCAC 2D .0958

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

Gelcoat Spray and Brush Application (ID No. GC-01) is the only process at the facility to be expected to emit particulate emissions. Allowable particulate emissions are determined by the formula $E = 55.0 \times (P^{0.11}) - 40$, where P is the process rate in tons per hour, and E is the allowable emission rate in pounds per hour. All process rate information was obtained from the application. The process rate is considered to be the sum of all materials introduced into the process.

Allowable particulate emissions are: $E = 55.0 \times (102)^{0.11} - 40 = 91.47$ lb/hr.

Actual estimated particulate emissions are obtained from the application as 0.6 lb/hr. Estimated emissions are less than allowable emissions, and the equipment is considered/expected to be in compliance with 2D .0515.

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 percent visible opacity emissions are expected. The equipment is expected to be in compliance with 2D .0521.

- 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. Based on past DAQ inspections of similar facilities, an objectionable odor is not expected beyond the facility boundary. This equipment is expected to be in compliance with 2D .1806.

B. Open Molding Resin Spray and Hand Lay-up (ID No. R-01).

1. Description:

Spray and hand lay-up of resin.

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
visible emissions	20 percent opacity	15A NCAC 2D .0521
odorous emissions	State-enforceable only - odorous emissions must be controlled	15A NCAC 2D .1806
hazardous air pollutants	MACT Subpart VVVV	15A NCAC 2D .1111
toxic air pollutants	State-enforceable only	15A NCAC 2D .1100
volatile organic compounds	work practice standards	15A NCAC 2D .0958

- a. 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). No particulate emissions are expected from this process, and thus, zero percent visible opacity is expected. The equipment is expected to be in compliance with 2D .0521.

- b. 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. Based on past DAQ inspections of similar facilities, an objectionable odor is not expected beyond the facility boundary. This equipment is expected to be in compliance with 2D .1806.

C. Boat Assembly & Miscellaneous Including Carpet Installation (ID No. MISC-01).

1. Description:

Putty and adhesive application as well as miscellaneous use.

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
visible emissions	20 percent opacity	15A NCAC 2D .0521
odorous emissions	State-enforceable only - odorous emissions must be controlled	15A NCAC 2D .1806
hazardous air pollutants	MACT Subpart VVVV	15A NCAC 2D .1111
toxic air pollutants	State-enforceable only	15A NCAC 2D .1100
volatile organic compounds	work practice standards	15A NCAC 2D .0958
toxic air pollutants	State-enforceable only	15A NCAC 2Q .0711

a. 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). No particulate emissions are expected from this process, and thus, zero percent visible opacity is expected. The equipment is expected to be in compliance with 2D .0521.

b. 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. Based on past DAQ inspections of similar facilities, an objectionable odor is not expected beyond the facility boundary. This equipment is expected to be in compliance with 2D .1806.

D. Facility-wide Regulations for ID Nos. GC-01, R-01, and MISC-01.

a. 15A NCAC 2D .0958: "Work Practices for Sources of Volatile Organic Compounds".

This regulation contains stipulations 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. The facility is expected to be in compliance with 2D .0958.

b. 15A NCAC 2D .1100: "Control of Toxic Air Pollutants".

The Company had to perform air dispersion modeling for styrene. Source by source limits were established and included in the permit as follows:

EMISSION SOURCE	TOXIC AIR POLLUTANT	EMISSION LIMIT
Facility-wide	Styrene (100-42-5)	25 lb/hr

The facility is considered to be in compliance with the AAL for styrene based on the memo from Mark Yoder, AQAB. This modeling also makes the Company in compliance with DAQ's requirement that a company must do a facility-wide Toxics demonstration when their last MACT takes effect.

c. 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". 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 Permittee is considered to be in compliance with 2D .1111 at this time.

d. 15A NCAC 2Q .0705: "Existing Facilities and SIC Calls".

In general, 2Q .0705(b) requires a Permittee to submit a permit application to comply with 2D .1100. This application is required to include an "evaluation" for all toxic air pollutants in 2D .1104, for all sources at the facility, excluding exempt sources in 2Q .0702. If the actual emissions from all sources do not exceed the toxic permitting emissions rates (TPERs) in 2Q .0711, no application is required. However, the Permittee must present documentation of those emission rates upon the Director's request.

Evaluation is defined in 2Q .0703(9) as:

- (a) a determination that the *emissions from the facility*, including emissions from sources exempted by Rule .0702 (a) (24) through (27) of this Section, are less than the rate listed in Rule .0711 of this Section; or
- (b) a determination of ambient air concentrations as described under 15A NCAC 2D .1106, including emissions from sources exempted by Rule .0702 (24) through (27) of this Section.

Emphasis added.

The proposed Permit No. 09605T00 contains facility-wide limits on the following:

MEK, MIK, and Xylene, Formaldehyde, and n-Hexane. Each pollutant's emission limit is determined by its respective TPER limitation (2Q .0711).

The facility has also conducted point-source air dispersion modeling for styrene. The facility has shown to be in compliance with 2D .1100.

The proposed first time Title V permit application was issued on October 14, 2005, and contains the specific limits for all pollutants mentioned above.

It is considered that last MACT/Toxics requirements **have been** met in full.

Section 2.2.A.4, "Last MACT/Toxics" language was added.

- e. 15A NCAC 2Q .0711: "Emission Rates Requiring a Permit".

The NC Toxic Air Pollutants emitted at the facility is methyl ethyl ketone, methyl isobutyl ketone, and xylene (except styrene as modeled above). The below table summarizes emissions.

Pollutant	Allowable Emissions	Estimated Emissions
methyl ethyl ketone	78 lb/day 22.4 lb/hr	< .1 lb/day < .1 lb/hr
methyl isobutyl ketone	52 lb/day 7.7 lb/hr	.1 lb/day < .1 lb/hr
xylene	57 lb/day 16.4 lb/hr	.1 lb/day <.1 lb/hr

Expected actual emissions are less than allowable, and the facility is considered to be in compliance with 2Q .0711.

VII. Other Applicable Requirements:

- A. NAA/PSD Issues:

McDowell County has not been triggered for 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 there are no control devices.

- F. NC Air Toxics:

The facility is subject to both 2D .1100 and 2Q .0711. The facility has demonstrated compliance with 2Q .0705.

VIII. Facility-wide Emissions Summary:

Emissions are summarized from the current First Time Title V application.

Pollutant	Actual Emissions (TPY, after controls)	Potential Emissions (TPY, before controls)	Potential Emissions (TPY, after controls)
PM	3.6	15.0	15.0
PM10	3.6	15.0	15.0
PM2.5	3.6	15.0	15.0
SO2	<0.01	0.05	0.05
NOx	0.3	9.1	9.1
CO	0.2	7.6	7.6
VOC	34.5	145.5	145.5

The facility is considered to be Title V for estimated styrene (a Federal HAP) emissions of 29 TPY, which is greater than the 10 TPY threshold for any one HAP.

IX. Facility Compliance Status/Compliance History:

A review of IMPAQ as well as the physical file history located in the Central Files indicated that this facility does not currently possess an Air Quality permit and has not been inspected to date. The facility is considered to be in compliance based on information contained in this application. The facility is considered to be in compliance with the MACT, but has until DATE 2007 to demonstrate full compliance as the standard is a 12-month rolling average.

A statement of compliance (Form E5) was received on December 21, 2005, indicating that the facility is in compliance with all applicable regulations.

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. Tennessee, South Carolina, and Georgia are affected States for this facility. No comments from EPA or the public were received OR INSERT COMMENTS.

XI. Conclusions, Comments, and Recommendations:

A PE seal was not needed for this application.

Form E5, "Title V Compliance Certification", was submitted for this application.

ARO recommends issuance of Permit No. 09605T00.

Recommend issuance of Permit No. 09605T00.