NORTH CAROLINA DIVISION OF AIR QUALITY

Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Northampton
NC Facility ID: 6600166
Inspector's Name:
Date of Last Inspection:
Compliance Code: /

Facility Data

Applicant (Facility's Name): Fineline Industries East, Inc.

Facility Address:
Fineline Industries East, Inc.
400 Cherry Street
Woodland, NC 27897

SIC: 3732
NAICS: /

Facility Classification: Before: none **After:** Title V
Fee Classification: Before: none **After:** Title V

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:

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Les Clark General Manager (252) 587-0405 400 Cherry Street Woodland NC, 27897	Les Clark General Manager (252) 587-0405 400 Cherry Street Woodland NC, 27897	Paul Zawila P.E. (864) 942-7222 123 Watersedge Rd Greenwood SC, 29649

Application Data

Application Number: 6600166.04A
Date Received: 10/13/2004
Application Type: New Permit
Application Schedule: TV-1st Time

Existing Permit Data
Existing Permit Number: none
Existing Permit Issue Date: N/A
Existing Permit Expiration Date: N/A

Review Engineer: Mike Benson

Review Engineer's Signature: **Date:**

Comments / Recommendations:
Issue 09482T00
Permit Issue Date:
Permit Expiration Date:

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 in existence currently (not new construction) but did not have a Title V permit previously as HAP emissions above threshold levels were only recently discovered.

II. Background Information:

This permit does not replace any previously issued permit, and will be issued as Air Permit No. 09482T00.

Pursuant to 15A NCAC 2Q .0506 Fineline Industries Inc. submitted its initial Title V application to the Division of Air Quality on October 13, 2004. The application was considered complete for processing on October 13, 2004. The permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

III. Facility Description:

Fineline Industries Inc. produces fiberglass boats. Currently the emissions sources at the facility from process to mold and make fiberglass boats. Fineline Industries Inc. 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 is 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 appurtences:

Emission Source	Emission Source Description	Control Device	Control Device Description
GC-01	Gelcoat Spray and Brush	N/A	N/A
R-01	Resin Spray and Hand Lay-up	N/A	N/A
MISC-01	Putty & Adhesive Application, and miscellaneous use	N/A	N/A

VI. Emission Source-by-Source Evaluation:

A. Gelcoat Spray and Brush (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 (ID No. GC-01) is the only process at the facility to be expected to emit particuate 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: $E = 55.0 \times (281^{0.11}) - 40 = 62.26$ lb/hr.

Actual estimated particulate emissions are obtained from the application as 0.1 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. 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. Putty & Adhesive Application, and miscellaneous use (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
Gelcoat Spray and Brush (ID No. GC-01)	Styrene (100-42-5)	8.38 lb/hr
Resin Spray and Hand Lay up (ID No. R-01), Putty & Adhesive Application, and miscellaneous use (ID No. MISC-01)	Styrene (100-42-5)	8.56 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 .0711: "Emission Rates Requiring a Permit".

The only NC Toxic Air Pollutant emitted at the facility is methyl ethyl ketone (except styrene as modeled above). Methyl ethyl ketone emissions are estimated to be 0.1 pound per hour, and 0.5 pounds per day. The 2D .0711 limits are 22.4 pounds per hour and 78 pounds per day. 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:

North Hampton County has been triggered for PSD increment tracking for PM10, SO2, and NO2. This facility has been in existence and this First Time Title V permit does not increase emissions from the facility. 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.

VIII. Facility-wide Emissions Summary:

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

Pollutant	**Actual Emissions (TPY)**
CO	0.3
NOx	0.3
PM	0.6
PM10	0.6
PM2.5	0.6
SO2	<0.01
VOC	20.2

The facility is considered to be Title V for having styrene (a Federal HAP) emissions of 22 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 August 2005 to demonstrate full compliance as the standard is a 12-month rolling average.

A statement of compliance (Form E5) was received on October 13, 2004, 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. Virginia is an affected state for this facility.

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.

RRO recommends issuance of Permit No. 09482T00.

Recommend issuance of Permit No. 09482T00.