NORTH CAROLINA DIVISION OF AIR QUALITY

Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Johnston
NC Facility ID: 5100176
Inspector's Name: Will Wike
Date of Last Inspection: 01/29/2008
Compliance Code: 3/In Compliance - Inspection

Facility Data

Applicant (Facility's Name): May-Craft Fiberglass Products Inc

Facility Address:
May-Craft Fiberglass Products Inc
96 Hillsboro Road
Four Oaks, NC 27524

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

Permit Applicability (this application only)

SIP: 2D .0515, 0521, 1806, .1111., 0958.
NSPS:
NESHAP: MACT VVVV.
PSD:
PSD Avoidance: 250 VOC.
NC Toxics: 2D .1100, 2Q .0705, 0711.
112(r):
Other: Toxics analysis needed within 6 months.

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Kenneth May President (919) 934-3000 96 Hillsborough Road Four Oaks NC, 27524	Kenneth May Owner P O Box 450 Smithfield NC, 27577	Kenneth May President (919) 934-3000 96 Hillsborough Road Four Oaks NC, 27524

Application Data

Application Number: 5100176.05A
Date Received: 12/13/2005
Application Type: Last MACT/Toxics
Application Schedule: TV- State Only

Existing Permit Data
Existing Permit Number: 08183/T03
Existing Permit Issue Date: 08/08/2002
Existing Permit Expiration Date: 07/31/2007

Review Engineer: Mike Benson

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

Comments / Recommendations:
Issue 08183/T04
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 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. 08183T03.

II. Background Information:

Pursuant to 15A NCAC 2Q .0506 May-Craft Fiberglass Products, Inc. submitted its initial Title V application to the Division of Air Quality on December 21, 2005. The application was considered to be complete on November 1, 2006. The permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

III. Facility Description:

May-Craft Fiberglass Products, Inc. produces fiberglass boats. Currently the emissions sources at the facility are from processes to mold and make fiberglass boats. May-Craft Fiberglass, Inc. is considered major for Title V purposes because styrene emissions exceed the 10 TPY threshold.

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.
N/A	N/A	Table of Contents	Removed Part II.
N/A	N/A	Throughout	Changed 2D .0530 reference to 2Q .0317.
5	5	2.1.A.2	Removed monitoring.
7	7	2.2.A table	Added 2Q .0705.
7	N/A	2.2.A.	Removed MACT placeholder.
N/A	8	2.2.A.3	Added 2Q .0705.
N/A	8-19	2.2.B	Added full MACT language.
N/A	20-29	3	Updated General Conditions.

V. Statement of Compliance:

This facility was inspected by Will Wilke of the Raleigh Regional Office on January 29, 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 July 17, 2007, for not submitting an emissions inventory in a timely manner. 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 appurtences:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
R-01 MACT VVVV	Resin Spray and Hand Lay-up Application	N/A	N/A
GC-01 MACT VVVV	Gelcoat Spray and Brush Application	N/A	N/A
MISC-01 MACT VVVV	Tooling Gelcoat, Bonding Material and Adhesive Application	N/A	N/A

VII. Emission Source-by-Source Evaluation:

A. Resin Spray/Hand Lay-up Application (ID No. R-01), Gelcoat Spray/Brush Application (ID No. GC-01), and Tooling Gelcoat, Bonding Material and Adhesive Application (ID No. MISC-01)

1. Description:

   Spray and brush application of gelcoat, 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	$E=4.10(P^{0.67})$ 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".

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. It was determined at that time that the particulate emission rates are low enough that no monitoring, record keeping, or reporting requirements are needed in the permit. 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 six months. This stipulation will be changed. The Region has requested that monitoring, recordkeeping and reporting be removed because there is no possible way for the facility to ever violate 2d .0521 (based on engineering data, emissions levels, and years of compliance inspections). This request is reasonable and the requirement will be removed.

The monitoring, reporting and recordkeeping requirement will be removed.

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, 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. 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. They are currently required to calculate the 12-month rolling average and submit quarterly reports to the Division. The facility is considered to be in compliance with 2Q .0317 (referenced as 2D .0530 in the current permit). A review of the past three years' emissions inventories showed actual VOC emissions at 10 to 13 tons per year. In accordance with the Division's policy the Permitee's reporting requirements will be changed from quarterly to semi-annual. The VOC emissions factors were determined to be incorrect. The facility currently uses UEF factors, which is the same as EPA AP-42 factors. The stipulation was corrected to reflect this change.

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 not been evaluated for Toxics. There are currently no N.C. Air Toxics regulations in the current permit. However, the following TAPs are emitted from the facility: dimethyl phthalate, ethyl acetate, ethyl benzene, methyl ethyl ketone, methyl methacrylate, toluene, xylene, and styrene. The facility is Title V for styrene emissions.

The most likely case is that all TAP emissions except styrene will be emitted at a level below the TPER limits (compliance with 2Q .0711). A facility-wide air dispersion modeling demonstration will need to be conducted for styrene (compliance with 2D .1100). When this is completed it will also demonstrate compliance with 2Q .0705. The facility usually has 9-12 tons per year styrene emissions. Based on past experience with similar facilities, this emission rate is low enough that the facility should have no trouble demonstrating compliance with N.C. Air Toxics through air dispersion modeling.

The Raleigh Regional Office will issued a Notice of Violation for failure to comply with 2Q .0705.

The permit has been changed to require the company to demonstrate compliance with N.C. Air Toxics within 6 months of issuance of this permit.

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 weight-averaging 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:

Johnston County has been triggered for PSD increment tracking for PM10 and SO2. This application does not affect PM10 or SO2 emissions. 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:

As noted above this facility is subject to Air Toxics. It is believed that the facility will need to conduct air dispersion modeling for styrene to demonstrate compliance with 2D .1100. .

IX. Facility-wide Emissions Summary:

Emissions are summarized from the 2007 emissions inventory.

Pollutant	Actual Emissions (TPY, after controls)
PM	0.5
PM10	0.25
PM2.5	0.12
SO2	0
NOx	0
CO	0
VOC	10.78

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

XI. Conclusions, Comments, and Recommendations:

A PE seal was not needed for this application.

RRO recommends issuance of Permit No. 08183T04.

Recommend issuance of Permit 08183T04.