

Air Permit Review

Permit Issue Date:

Region: Wilmington Regional Office
County: Carteret
NC Facility ID: 1600120
Inspector's Name: Ashby Armistead
Date of Last Inspection: 07/09/2009
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Parker Marine Enterprises Inc Facility Address: Parker Marine Enterprises Inc 2570 Highway 101 Beaufort, NC 28516 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: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 1600120.09A Date Received: 09/11/2009 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 06848/T07 Existing Permit Issue Date: 11/30/2005 Existing Permit Expiration Date: 07/31/2010
Eric Denton Engineering Technician (252) 728-5621 2570 Hwy 101 Beaufort, NC 28516	Ernest Parker III President (252) 728-5621 P O Box 2129 Beaufort, NC 28516	Eric Denton Engineering Technician (252) 728-5621 2570 Hwy 101 Beaufort, NC 28516	
Review Engineer: Jenny Sheppard Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 06848/T08 Permit Issue Date: Permit Expiration Date:	

1. Purpose of Application

Parker Marine Enterprises Inc. is currently operating under permit 06848T07 issued on November 30, 2005. The current permit will expire on July 31 2010. The renewal application was received on September 11, 2009, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description

Parker manufactures sport-fishing boats. The processes consist of lamination/gelcoat spray operations where gelcoat, fiberglass mat, and resins are applied to a mold to create various boat parts.

3. Application Chronology/History/Table of Changes

September 11, 2009 – Permit application **1600120.09A** received and deemed complete for processing.

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	Corrected table to current format
Cover		Revised permit revision numbers and all dates
TOC		Revised shell language
All	Header	Amended permit revision number
3 through 8	2.1 A	Updated regulation references and testing conditions
8 through 18	2.2 A	Updated regulation references
18-26	General Conditions	Updated general conditions language

4. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
 15A NCAC 02D .0521, Control of Visible Emissions
 15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions
 15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds
 15A NCAC 02Q .0317, Avoidance Conditions for 15A NCAC 02D .0530: Prevention of Significant Deterioration
 15A NCAC 02D .1100, Toxic Air Pollutant Emissions Limitation and Reporting Requirement
 15A NCAC 02D .1111, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

There are no significant changes to the conditions in the permit for the applicable regulation from the last permit modification. All permit conditions have been updated to current language where ever applicable.

5. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is not currently subject to any New Source Performance Standards. This permit renewal activity does not change that status.

NESHAPS/MACT – The facility is subject to Maximum Achievable Control Technology Standards (Subpart VVVV) for boat manufacturing. The MACT as written applies to the combination of all of the following boat manufacturing operations:

- Open molding resin operations
- Closed molding resin operations
- Resin and gel coat mixing operations
- Resin and gel coat application equipment cleaning operations
- Carpet and fabric adhesive operations, and
- Aluminum hull and deck coating operations.

PSD – The facility is currently subject to a PSD Avoidance limitation of less than 250 tons of VOCs per consecutive 12-month period in order to remain classified as a minor source. The current application will have no impact on the classification.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements since it does not store any of the regulated substances in quantities above the thresholds in the Rule.

CAM – 40 CFR 64 requires that a compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The facility currently employs filters for its spray operation. These filters are in place to collect overspray from the boat manufacturing process and are subject to the

particulate standard of 15A NCAC 02D .0515. However, the facility does not have particulate matter emissions in quantities greater than the major source threshold; therefore, CAM does not apply.

6. Facility Wide Air Toxics

Pursuant to 15A NCAC 2D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the facility is subject to the following limits:

Emission Source	Toxic Air Pollutant	Emission Limit
Laminating operations	Styrene	814.0 pounds per hour
Gelcoating operations	Styrene	124.0 pounds per hour
Resin storage	Styrene	3.6 pounds per hour
Laminating operations	MEK	1.13 pounds per hour 27.12 pounds per day
Gelcoating operations	MEK	1.13 pounds per hour 27.12 pounds per day

To ensure compliance with these limits, the Permittee is required to meet the applicable operating limitations, monitoring requirements and reporting requirements. Continued compliance is expected

7. Facility Emissions Review

There are no changes in emissions for this renewal.

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2008 Actual Emissions (tpy)
VOC	15.79
Total HAP	29.25

8. Public Notice/EPA and Affected State(s) Review

To be completed after public comment period....

9. Conclusions, Comments, and Recommendations

A professional engineer’s seal was not required for this renewal.

A consistency determination was not required for his renewal.

WIRO recommends issuance of the permit and was presented with a DRAFT permit prior to issuance.

RCO concurs with WIRO’s recommendation to issue the renewed air permit.