

Facility Name: **Recreation Unlimited, LLC**
City: Americus
County: Sumter
AIRS #: 04-13-261-00069

Application #: TV-22926
Date Application Received: October 29, 2014
Date Application Deemed
Administratively Complete: November 29, 2014
Date of Draft Permit:
Permit No: 3732-261-0069-V-05-0

Program	Review Engineers	Review Managers
SSPP	Ginger Payment	Manny Patel
ISMP	Elizabeth Gomez	Dan McCain
SSCP	N/A	N/A
Toxics	Chang Pyo	Michael Odom
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Recreation Unlimited, LLC and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Recreation Unlimited, LLC

2. Parent/Holding Company Name

Recreation Unlimited, LLC

3. Previous and/or Other Name(s)

pka Caravelle Boats
pka SAK Marine Company

4. Facility Location

Plant 1: 111 Matthews Drive, Americus, Georgia 31709 (Sumter County)

Plant 2: 102 Brady Road, Americus, Georgia 31709 (Sumter County)

5. Attainment or Non-attainment Area Location

The facility is located in an attainment area for all pollutants.

B. Site Determination

The facility consists of two plants. Plant 1 is located at 111 Mathews Drive and consists of 4 gel coat guns and 2 resin chop guns. Plant 2 is located at 102 Brady Road and consists of a spray booth and supporting equipment. Both plants will operate as one facility and under the same owner. The plants will consist of one Title V site and will have one Title V permit.

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.

Table 1: List of Current Permits as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
Permit No. 3732-261-0069-E-04-0	January 22, 2016	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
Permit No. 3732-261-0069-E-04-0	Operation of 4 gel coat guns and 2 resin chop guns at Plant 1 and for the construction and operation of a spray booth and supporting equipment at Plant 2. Also for an ownership change and a name change from Sak Marine Company, LLC to Recreation Unlimited, LLC

D. Process Description

1. SIC Codes(s)

3732

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures fiberglass boats.

3. Overall Facility Process Description

The facility produces power boats using an open mold Fiber Reinforced Plastic (FRP) process. The facility produces or purchases various boat components, assembling them into complete power boats on site. Components made on site include various FRP components including the hull, deck, and various sections and parts, upholstery components and metal bimini tops, handrails and other parts. Boat plugs and molds for boat production are also constructed or modified on site.

Gel Coat is sprayed on the molds prior to application of the resin and fiber reinforcing. This operation includes application of Pigmented Gel Coat and a Barrier Coat. Clear Gel Coat may also be used or no Gel Coat depending on the boat type.

Resin and fiber reinforcing are applied to the mold after the Gel Coat has been applied (if the component is painted). Production of the hull, deck, and various small components occur in this department.

After curing and removal of the hulls, decks and other components from the molds, excess material is removed by grinding or trimming to ensure that the components have smooth edges and fit together properly.

Boat components constructed on site (hulls, decks and other components) are assembled as required for the specific boat type. Boat assembly also includes, the addition of floors and stringers (marine quality wood for structural support), flotation foam, upholstery and other components constructed on site, and purchased components and accessories required for the specific type of boat. Final inspection and cleaning of the completed boats are performed along with minor repairs as needed. The units are cleaned and wrapped for shipment. Periodically, boats are brought in for warranty repairs. These repairs are usually performed in the Assembly area.

Metal bimini tops, handrails and other boat parts constructed of aluminum, stainless steel and other metals are fabricated using TIG and MIG welding systems.

Molds and plugs are produced and/or modified involving the use and application of tooling resin and tooling gel. These molds and plugs are used in the production of boats and associated parts.

4. Overall Process Flow Diagram (optional)

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility will avoid PSD requirements by limiting VOC emissions to less than 250 tpy. This limit was established in Permit No. 3732-261-0069-E-04-0.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	yes			✓
PM ₁₀	yes			✓
PM _{2.5}	yes			✓
SO ₂	no			✓
VOC	yes	✓		
NO _x	no			✓
CO	no			✓
TRS	no			✓
H ₂ S	no			✓
Individual HAP	yes	✓		

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
Total HAPs	yes	✓		
Total GHGs	yes			✓

3. MACT Standards

The facility will be subject to 40 CFR 63 Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. All gel coat, lamination, adhesive operations, mixing and the cleaning operations are subject to the requirements of the MACT. There are no control devices for HAP or VOC emissions at the facility.

4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis**II. Facility Wide Requirements****A. Emission and Operating Caps:**

As established in Permit No. 3732-261-0069-E-04-0, facility-wide VOC emissions are limited to less than 250 tons per year in order for the facility to avoid New Source Review.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

There are no facility wide compliance issues noted in this application.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition 2.1.1 limits the VOC emissions from the entire facility to less than 250 tons during any twelve consecutive month period.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility produces power boats using an open mold Fiber Reinforced Plastic (FRP) process. Gel Coat is sprayed on the molds prior to application of the resin and fiber reinforcing. Resin and fiber reinforcing are applied to the mold after the Gel Coat has been applied (if the component is painted). After curing and removal of the hulls, decks and other components from the molds, excess material is removed by grinding or trimming to ensure that the components have smooth edges and fit together properly. Boat components constructed on site (hulls, decks and other components) are assembled as required for the specific boat type. Metal bimini tops, handrails and other boat parts constructed of aluminum, stainless steel and other metals are fabricated using TIG and MIG welding systems. Molds and plugs are produced and/or modified involving the use and application of tooling resin and tooling gel. These molds and plugs are used in the production of boats and associated parts.

A toxic impact assessment was performed for Application Nos. 22883 and 23153. Styrene and methyl methacrylate emissions were evaluated using the Breeze Dispersion modeling. The model evaluated each stack. Each stack passed with the exception of Stack VF13. Due to the height of the stack, the maximum ground level concentrations (MGLC) were exceeding the acceptable ambient concentrations (AAC) for the pollutants from this stack. As a result, the facility has proposed to install a minimum 15 foot stack for Stack VF13. When emissions were modeled using the proposed modification to Stack VF13, the MGLCs were below the AACs for all stacks and pollutants.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
PLANT 1					
1101	Gel Coat Application (one 8 color gun, one barrier coat gun)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.4.1, 3.4.2, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
2101	Resin and Fiber Application (four resin chop guns with an additional spare gun)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
3101	Grinding and Trimming	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 5.2.1, 5.2.3, 6.2.1 through 6.2.19	BC11	Baghouse
4101	Putty Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.6, 3.3.7, 3.5.3, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
7301	Tooling Resin Application/Mold Construction (one resin chop gun, two cup guns)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
5101	Foam Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.6, 3.3.7, 3.3.8, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
6101	Glue Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.6, 3.3.7, 3.3.8, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
PLANT 2					
1201	Gel Coat Application (five gel coat guns, one barrier coat gun)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
2201	Resin and Fiber application (three resin chop guns with an additional spare gun)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.5.3, 5.2.3, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
3201	Grinding and Trimming	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 5.2.1, 5.2.3, 6.2.1 through 6.2.19	BC21	Baghouse
4201	Putty Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.6, 3.3.7, 3.5.3, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
5201	Foam Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.6, 3.3.7, 3.3.8, 5.2.4, 6.2.1 through 6.2.19	N/A	N/A
6201	Glue Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.6, 3.3.7, 3.3.8, 5.2.4	N/A	N/A

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

C. Equipment & Rule Applicability

Emission and Operating Caps –

There are no equipment related emission or operating caps.

Applicable Rules and Regulations -

Rules and Regulations Assessment:

The facility will be subject to the following:

- Georgia Air Quality Rule 391-3-1-.02(2)(b) - *Visible Emissions*
- Georgia Air Quality Rule 391-3-1-.02(2)(e) - *Particulate Emission from Manufacturing Processes*
- 40 CFR 63 Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

All gel coat, lamination, adhesive operations, mixing and the cleaning operations are subject to the requirements of 40 CFR 63 Subpart VVVV. The facility will comply with the regulation by using compliant coatings and emissions averaging. There are no control devices for HAP or VOC emissions at the facility. Conditions 3.3.1 through 3.3.8 state the requirements of this regulation as they apply to the facility.

Emission and Operating Standards: None applicable.

D. Compliance Status

There are no equipment related compliance issues noted in this application.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Conditions 3.3.1 through 3.3.8 are requirements of 40 CFR 63 Subpart VVVV.

- Condition 3.3.1 subjects the facility to 40 CFR 63 Subpart VVVV.
- Condition 3.3.2 provides an HAP emission limit to be determined by an equation.
- Condition 3.3.3 provides the options for meeting the HAP emission limit.
- Condition 3.3.4 lists the materials exempt from the HAP emission limit of Condition 3.3.2.
- Condition 3.3.5 details the requirements for the mixing operations.
- Condition 3.3.6 details the requirements for flushing equipment and removing cured resin.
- Condition 3.3.7 details the requirements for cleaning solvent storage.
- Condition 3.3.8 details the requirements for carpet and fabric adhesive.
- Condition 3.4.1 subjects the facility to Georgia Rule (b).
- Condition 3.4.2 subjects the facility to Georgia Rule (e).
- Condition 3.5.1 requires routine maintenance on the control equipment.
- Condition 3.5.2 requires a supply of replacement bags for the baghouse.
- Condition 3.5.3 requires the facility to clean all application guns according to the manufacturer's specifications.
- Condition 3.5.4 requires the facility to install a minimum 15 foot stack for Stack VF13 within 6 months in order to comply with their Toxic Impact Assessment.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The standard general testing requirements are included in the permit. There are no exceptions to the general testing requirements.

B. Specific Testing Requirements**1. Individual Equipment**

None applicable.

2. Equipment Groups (all subject to the same test requirements):

None applicable.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)**A. General Monitoring Requirements**

The standard general monitoring requirements are included in the permit. There are no exceptions to the general monitoring requirements.

B. Specific Monitoring Requirements**1. Individual Equipment:**

None applicable

2. Equipment Groups (all subject to the same monitoring requirements):

- Condition 5.2.1 requires the facility to monitor the pressure drop for the baghouses.
- Condition 5.2.2 requires weekly inspections of the baghouses.
- Condition 5.2.3 requires monthly inspections of the mixing containers as required by 40 CFR 63 Subpart VVVV.
- Condition 5.2.4 requires monthly inspections of the solvent storage containers as required by 40 CFR 63 Subpart VVVV.

C. Compliance Assurance Monitoring (CAM)

Not applicable because the potential controlled emissions from the baghouses for Grinding and Trimming 3101 and Grinding and Trimming 3201 do not exceed any major source threshold.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The engineer needs to state that the standard general requirements are included in the permit. Any modifications to these standard requirements should be explained below in item 1.

1. Exceptions to General Record Keeping and Reporting Requirements

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

B. Specific Record Keeping and Reporting Requirements

- Conditions 6.2.1, 6.2.2 and 6.2.3 require the facility to maintain records of materials containing VOCs and to use these records to determine the VOC emissions for each month and each twelve-month consecutive period. The facility is required to notify the Division if VOC emission exceeds 20.75 tons during any month or 249 tons during any twelve-month period.

Conditions 6.2.4 through 6.2.19 are record keeping requirements as required by 40 CFR 63 Subpart VVVV.

- Condition 6.2.4 requires records for all materials that are exempted from the open molding resin and gel coat operations emission limits.
- Condition 6.2.5 details the requirements to meet the emissions averaging option for the open molding resin and gel coat operations emission limits.
- Condition 6.2.6 details the records to be maintained for the compliant materials option for the open molding resin and gel coat operations emission limits.
- Condition 6.2.7 requires an Implementation Plan for the emissions averaging option of the open molding resin and gel coat operations emission limits and lists what must be included in the plan.
- Condition 6.2.8 details the requirements to demonstrate compliance with the compliant materials option for the open molding resin and gel coat operations emission limits.
- Condition 6.2.9 details the requirements to demonstrate compliance with the MACT Model Point Value Averaging option.
- Condition 6.2.10 details the requirements to demonstrate compliance when filled resins are used.
- Condition 6.2.11 details the requirements to demonstrate compliance with the HAP content for the cleaning solvents for resin and gel coat application equipment.
- Condition 6.2.12 details the requirements to demonstrate compliance with the HAP content limit for carpet and fabric adhesives.
- Condition 6.2.13 lists what records to be maintained.
- Condition 6.2.14 requires records to be maintained for 5 years.
- Condition 6.2.15 lists the notifications that need to be submitted.
- Condition 6.2.16 lists the reports to be submitted.

- Condition 6.2.17 lists the references which may be used to determine HAP contents of materials.
- Condition 6.2.18 requires records for containers subject to required covers and any inspections of the covers.
- Condition 6.2.19 requires records for the visual inspections for compliance with the required covers for the cleaning solvents.

VII. Specific Requirements**A. Operational Flexibility**

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Stratospheric Ozone Protection Requirements

- The facility has indicated that they are subject to Title VI since they have air conditioners or refrigeration equipment that uses CFC's, HFC's or other stratospheric ozone-depleting substances listed in 40 CFR Part 82, Subpart A, Appendices A and B.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on March 9, 2016 and ended on April 8, 2016. Comments were not received by the Division.