

FACILITY: Intrepid Powerboats, Inc.		PERMIT ID: 213	
ADDRESS: 11700 South Belcher Road Largo, FL		DISTRICT: Southwest	
ARMS NO: 1030212 002		PERMIT NO: 1030212-012-AV	
		CONTACT PHONE: 727-548-1260	
		Expiration Date: 11/6/2014 Renewal Date: 3/26/2014 Test Due Date:	
EMISSION UNIT DESCRIPTION : Fiberglass boat manufacturing facility, including styrene based material application, mold care, assembly, and cleanup activities, and a spray booth for paint and other coatings. Approximately 1,350 tons of VOC/HAP based are processed each year.			
CMS INSPECTION DATE: April 8, 2013 ARMS INSPECTION TYPE: ☐ INS1 ☒ INS2 ☐ INS3 ☐ FUT ☒ IN ☐ MNC ☐ SNC COMPLIANCE STATUS: ☒ Initial ☐ Re-inspection ☐ Complaint ☐ Drive-by ☐ Quarterly			
✓ A. General Review:			
1. Permit File Review		☒ Yes ☐ No	
<i>Comments:</i>			
2. Introduction and Entry		☒ Yes ☐ No	
<i>Comments:</i>			
3. Is the Responsible Official/Authorized Representative still: <u>Ken Clinton?</u>		☒ Yes ☐ No	
<i>Comments:</i> The Responsible Official/Authorized Representative's e-mail is: <u>kclinton@intrepidpowerboats.com</u>			
4. Is the facility contact still: Dr. Brett Kovach?		☒ Yes ☐ No	
<i>Comments:</i> The facility contact's e-mail is: <u>bkovach@intrepidpowerboats.com</u>			
B. Specific Conditions:			
<i>Inspection note: This permit renewal became effective on November 6, 2009 and also incorporates the terms and conditions of construction permit No. 1030212-013-AC. This facility is considered an existing facility pursuant to § 63.5692(b)</i> This permit or a copy thereof shall be kept at the work site of the permitted activity. [APPENDIX TV-6, TITLE V CONDITION 12(12)] ☒ IN ☐ MNC ☐ SNC ☐ N/A Comments: A copy of the permit was on-site. 2. <u>General Pollutant Emission Limiting Standards: Objectionable Odor</u> – No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-210.200 (Definition "Objectionable Odor") and 62-296.320(2), F.A.C. and Pinellas County Code, Section 58-178; Construction Permit 1030212-013-AC]			

B. Specific Conditions:

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: No objectionable odors detected during the inspection

3. General Pollutant Emission Limiting Standards: Visible Emissions - Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297.401, F.A.C. [Rules 62-296.320(4)(b)1, 62-296.320(4)(b)4 and 62-297, F.A.C.]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: No visible emissions observed either grinding or buffing of sailboat hulls or accessories.

4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:

- A. A risk management plan (RMP) when, and if, such requirement becomes applicable; and
- B. Certification forms and/or RMPs according to the promulgated rule schedule.

[40 CFR 68]

☐ IN ☐ MNC ☐ SNC ☒ N/A

Comments: Facility has a risk management plan on-site. However, Intrepid says the prevention of accidental releases does not apply to them.

5. Insignificant Emissions Units and/or Activities - Appendix I-1: List of Insignificant Emissions Units and/or Activities, is a part of this permit.

[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: No other insignificant emission units or activities on-site, other than what is listed in the permit.

6. Fugitive Organic Solvents (OS) and Volatile Organic Compounds (VOC) - The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, OS, or VOCs without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following:

- A. All materials containing volatile organic compounds/organic solvents (VOC/OS) shall be stored in closed containers and/or in small automatic closing safety cans.
- B. Clean-up solvent washings (VOC/OS) shall be directed into containers that prevent evaporation into the atmosphere.
- C. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to

B. Specific Conditions:

minimize leaks, fugitive VOC/OS emissions and spills of materials containing VOC/OS.

- D. Work practice controls, when practicable, shall include limiting the amount of clean-up VOC/OS issued to employees and employees shall use gloves whenever handling resins.
- E. Maintain tightly fitting covers, lids, etc. on all containers of VOC/OS when they are not being handled tapped, etc.
- F. Prevent excessive air turbulence across exposed VOC/OS.
- G. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC/OS so that it can be covered when not in use.
- H. All VOC/OS spills shall be properly attended to and any waste, which is collected, shall be properly disposed of, recycled, etc. in order to minimize emissions.
- I. The associated forced air vents/exhaust stacks shall be operating during activities/operations which release VOC/OS emissions and shall remain operating for at least 1 hour after the activities/operations are stopped.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1030212-013-AC]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments:

- A. All materials stored in closed containers. Some small pails of gel coat were exposed but they were being used.
- B. Clean-up solvent washings of brushes, rollers are directed into drums that do not evaporate.
- C. All observed hoses and fittings are maintained to minimize leaks, fugitive emissions and spills.
- D. Workers were observed to be using gloves and have safety glasses when handling the resin
- E. Tightly fitted covers were used on all 55 gallon drums when not use.
- F. Facility tries to prevent air turbulence across exposed VOC/OS.
- G. No open trough or basin observed.
- H. No spills during inspection. However, the facility's procedure is to clean spills immediately and properly dispose of the waste material.
- I. Air vents and stacks were in operation. As previously mentioned, a detailed inspection of the ventilation system was performed in order to determine its efficiency and the integrity of the filters.

7. General Pollutant Emission Limiting Standards: Unconfined Particulates - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, but not be limited to the measures shown below:

- A. Application of water to paved and unpaved areas accommodating vehicular traffic.
- B. Removing particulate matter from buildings or work areas.
- C. Enclosing or covering activities or equipment.
- D. Use of shop-vacuum(s) as necessary and practical.

Whenever the 1 exhaust vent/fan for the paint spray booth, 10 exhaust vents/fans in the southern building, 6 exhaust vents/fans in the western building, and/or 6 exhaust vents/fans in the northern building are operating they shall be equipped with fiber filters. The filters shall be adequately maintained in order to assure proper airflow and particulate matter collection.

As an indicator that adequate control measures are being employed, visible emissions from exhaust fans, doors, and vents shall not exceed 5% opacity. If this level is exceeded, additional controls or work practice changes may be required by the Department.

B. Specific Conditions:

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1030212-013-AC]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: No unconfined particulate matter observed. All exhaust vents were equipped with fiber filters. The 10 exhaust vents/fan filters are changed weekly. The 6 exhaust vent/fan filters in the western building are changed weekly. The 6 exhaust vents/fan filters in the northern building are changed weekly. The small parts finishing fan/vent filter is changed 2-3 times/week. All filters appear to have maintained their integrity.

9. Statement of Compliance - The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to this office and the EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. and 3., F.A.C. (see Condition No. 51 of Appendix TV-6, Title V Conditions)}

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:

A. A risk management plan (RMP) when, and if, such requirement becomes applicable; and

B. Certification forms and/or RMPs according to the promulgated rule schedule.

[40 CFR 68]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: 2012 SOC was received on 1/30/13 and reviewed on 1/30/13.

A.2. EXEMPTION FROM VOC RACT - In order for the coating of miscellaneous metal parts and products to be exempt from the VOC Reasonably Available Control Technology requirements of Rule 62-296.513, F.A.C. - Surface Coating of Miscellaneous Metal Parts and Products, the usage of paint, coatings, and associated solvents (including clean-up) shall not exceed 750 gallons per any consecutive 12 month period when used on metal surfaces of any kind whether inside or outside a boat. {Permitting Note: Rule 62-296.513, F.A.C. is not applicable to the exterior of a marine vessel. However, for recordkeeping simplicity, the permittee accepts the above usage limitation for both the interior and exterior of a marine vessel.}

[Rules 62-296.500(3) and 62-4.040, F.A.C.; Construction Permit No. 1030212-013-AC]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The total paint used is 270 gallons. This is based on the permitted conservative assumption of 2.5 gallons/boat and 108 boats painted in 2012.

A.3. Total volatile organic compound (VOC) emissions shall not exceed 95 tons per any consecutive 12-month period. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE); Construction Permit 1030212-013-AC]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: Highest 12-month consecutive total VOC emissions (Mar, 12' -Feb, 13') = 45.67 tons/yr. A copy of the record is attached to the inspection report.

A.4. Total hazardous air pollutant (HAP) emissions (including VOC emissions) shall not exceed 95 tons per

B. Specific Conditions:

any consecutive 12-month period. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE); Construction Permit No. 1030212- 013-AC]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: Highest 12-month consecutive total HAP emissions (Mar, 12' –Feb, 13') = 24.09 tons/yr. A copy of the record is attached to the inspection report.

A.5. Compliance with the VOC and Total HAP emission limitations of Conditions A.3. and A.4 along with the amount of material used for coating/painting miscellaneous metal parts and products shall be documented on a monthly basis, based upon usage of all VOC/Styrene containing materials (Paints, Coatings, Resin, Gelcoat, Putties, Fillers, etc.) Monthly usage of materials shall be based upon an inventory at the beginning of the month, receipt of material during the month, and inventory of the materials at the end of the month provided the material is not used in multiple applications with different emission factors. The emission summary shall show the following:

- A. The total VOC emissions for the month, in tons.
- B. The total HAP emissions for the month, in tons.
- C. The total usage of paints, coatings, solvents, etc., in gallons, for the painting/coating of miscellaneous metal parts and products as determined in accordance with the following:
 1. The facility's Health, Safety, and Environmental Coordinator shall monthly certify that each boat produced has a maximum total area of 72.5 square feet of metal surface (interior and exterior) and the coating applied to the metal surfaces has a maximum thickness of 7 mills. Note, any increase in either of these values shall be considered a modification, which requires an air pollution construction permit prior to such change.
 2. The monthly certification shall also specify that the paint thickness on each metal part coated was measured at least once using a wet film thickness gauge.
 3. The total number of gallons used shall be based on the constant factor of 2.5 gallons of paints/coatings/solvents per boat produced.
 4. For the painting/coating of miscellaneous metal parts and products, the total usage of paints, coatings, solvents, etc., in gallons, for the most recent consecutive 12-month period.
- D. The total VOC emissions, in tons, for the most recent consecutive 12-month period.
- E. The total HAP emissions, in tons, for the most recent consecutive 12-month period.
- F. Record the method of application for all gel coat and resin usage (see Table below).
- G. Emissions of Styrene, Methyl methacrylate (MMA), and other volatile organic compounds (VOCs) shall be determined as follows until notified by the Department or the Pinellas County Department of Environmental Management. Note, Styrene and MMA are each considered a VOC and a HAP.
 1. Styrene emissions shall be determined using the following equation:

$$\text{Emissions (tons)} = \frac{\text{Ms} \times \text{EF}}{2000 \text{ lb/ton}}$$

where:

Ms = amount of styrene containing material used (in tons)

EF = emission factor (lb/ton) for styrene monomer content (from table below)

The applicable styrene emission factor shall be obtained (interpolated/extrapolated, if applicable) from the following table, in conjunction with the percent of available non-vapor suppressed (NVS) styrene monomer in the resin/gelcoat:

B. Specific Conditions:

% Monomer	Resin** Hand (Non- Spray) Layup	Resin** Mechanical Atomized Spray Layup	Resin Mechanical Nonatomized* Spray Layup	Gel Coat** Mechanical Atomized Spray Layup	Gelcoat Mechanical Nonatomized* Spray Layup
18	39	51	39	138	67
19	41	54	41	148	70
20	43	58	43	158	79
21	45	61	45	168	88
22	48	64	47	178	97
23	50	68	49	189	106
24	52	71	51	200	115
25	55	75	54	211	124
26	57	78	56	221	133
27	59	82	58	233	142
28	62	86	60	244	151
29	64	90	62	256	160
30	67	94	64	269	169
31	69	97	66	281	178
32	71	102	68	295	187
33	74	105	71	308	196
34	77	112	74	322	205
35	80	118	77	336	214
36	83	127	80	354	223
37	86	136	83	371	232
38	90	146	86	390	241
39	92	156	89	408	250
40	95	166	93	427	259
41	98	176	96	446	268
42	100	187	99	466	278
43	112	192	102	477	287
44	117	202	105	495	296
45	122	212	108	513	305
46	127	221	111	532	314
47	133	232	115	551	323
48	138	242	118	571	332
49	143	252	121	590	341
50	148	263	124	609	350

{Permitting Notes: (a) These records are for determining emissions and there are additional record requirements to determine compliance with MACT model point values.

(b) The usage of gallons used on metal as stated in A.5.C.4, is the calculated value, not the actual volumes from usage records.}

* Nonatomized means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, and pressure fed resin rollers. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures.

B. Specific Conditions:

** The emission factors in these columns are based on a weighted average using the following assumptions:

- Using the Unified Emission Factors - 20% by weight of the facility's usage of resins and gelcoats are for reinforced plastic composites production for items such as hatches and doors, but not for hulls and decks.
- Using the National Marine Manufacturer Association's Factors – 80% by weight of the facility's usage of resins and gelcoats are for items such as decks and hulls.

2. MMA emissions shall be determined by the following equations:

$$\text{Emissions (tons)} = M_{\text{mma}} \times C_{\text{mma}} \times 0.75$$

where:

M_{mma} = amount of MMA containing material used (in tons)

C_{mma} = MMA content (percent/100)

3. Other VOC emissions shall be determined by the following equation for each material. These values shall be used in conjunction with the above Styrene and MMA emissions to determine total VOC:

$$\text{Emissions (tons)} = M_{\text{voc}} \times 1.00^* \times C_{\text{voc}}$$

where:

M_{voc} = amount of VOC containing material used (in tons)

C_{voc} = VOC content (percent/100)

* The following "Emission Factors" may be used for the chemicals listed below.

Chemical	Emission Factor (lb species emitted per lb of VOC containing material used)
Di-isocyanates, when used as a catalyst for foam production	0.00021
Dimethyl Phthalate, when used as a catalyst for resins/gelcoats	0.001
Methyl Ethyl Ketone Peroxide, when used as a catalyst for resins/gelcoats	0.001

- H. Each log, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle.
- I. When determining the VOC emissions and Total HAP emission rates, the percent of solids in the recovered materials shall be documented and accounted for in the emission calculations, if applicable.
- J. The monthly logs shall be completed by the end of the following month. Supporting documentation (MSDS sheets, purchase orders, etc.) shall be kept for each material which includes sufficient information to determine VOC emissions and Total HAP emissions.
- K. The logs/records shall be kept at the facility for a minimum of 5 years and made available to the Department and PCDEM upon request.

The VOC and Total HAP emission summary, calculations, records used to determine emissions, and records

B. Specific Conditions:

to determine coating/paint/solvent usage shall be recorded in a permanent form suitable for inspection by the Department or PCDEM upon request. The monthly records shall be completed by the end of the following month.

[Rule 62-213.440(1)(b), F.A.C.; Construction Permit 1030212- 013-AC]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility has a monthly record report that covers conditions A-F. The method of application is recorded as describe by item G. The semi-annual report describes the method used. The facility also follows conditions H-K. The entire table under G.1. applies to the facility.

MACT - 40 CFR 63, Subparts A and VVVV, Requirements

A.6. This emission unit shall comply with 40 CFR 63, Subparts A and VVVV (incorporated into ATTACHMENT A, which is a part of this permit). Note, these requirements are for only Open Molding Resin and Gel Coat Operations using Emissions Averaging Option and/or Compliant Materials Option. Requirements relating to add-on-control devices have been deleted, since this emission unit does not utilize add-on-control devices. Additionally, when demonstrating compliance with 40 CFR 63, Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used, it must be used for a minimum of 12 consecutive months before switching to the other option.

[Rule 62-204.800(11)(b), F.A.C.]

☒ IN ☐ MNC ☐ SNC ☐ N/A

See specific comments below:

Subpart VVVV—National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

Section

§ 63.5698 What emission limit must I meet for open molding resin and gel coat operations?

§ 63.5698 (a) You must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.

- (1) Production resin
- (2) Pigmented gel coat.
- (3) Clear gel coat.
- (4) Tooling resin.
- (5) Tooling gel coat.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility uses resin, gel coats, tooling resins and tooling gel coats

§ 63.5698(b) You must limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this section, based on a 12-month rolling average.

$$HAP\ Limit = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad (Eq. 1)$$

B. Specific Conditions:

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility follows this equation for open molding. A copy of Jan, 13' record is attached.

§ 63.5698(d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: Tooling gel reported (Jan, 13') meets the exemption for the MACT standard since it does not exceed 1% of all gel coat. Pure, 100 percent vinylester resin is not used. Pigmented, and clear gel coat is not used.

§ 63.5701 What are my options for complying with the open molding emission limit? You must use one or more of the options listed in paragraphs (a) through (c) of this section to meet the emission limit in §63.5698 for the resins and gel coats used in open molding operations at your facility.

(a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.* (1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in §63.5698 using the procedures described in §63.5710. Compliance with this option is based on a 12-month rolling average.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility demonstrated model point value averaging option. See attached record

§ 63.5704 What are the general requirements for complying with the open molding emission limit?

(a) *Emissions averaging option.* For those open molding operations and materials complying using the emissions averaging option, you must demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section.

(1) Use the methods specified in §63.5758 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in §63.5710 to show that the organic HAP emissions do not exceed the limit specified in §63.5698.

(3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Amount of material used per month.

(iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in

B. Specific Conditions:

§63.5710.

- (4) Prepare and submit the implementation plan described in §63.5707 to the Administrator and keep it up to date.
- (5) Submit semiannual compliance reports to the Administrator as specified in §63.5764.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility keeps this record on a monthly basis. The last Semiannual Subpart VVVV report reviewed was received on 1/30/12 for July-Dec, 12'.

§ 63.5707 What is an implementation plan for open molding operations and when do I need to prepare one?

- (a) You must prepare an implementation plan for all open molding operations for which you comply by using the emissions averaging option described in §63.5704(a).
- (b) The implementation plan must describe the steps you will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, your implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section.
 - (1) A description of each operation included in the average.
 - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
 - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in §63.5698.
- (c) You must submit the implementation plan to the Administrator with the notification of compliance status specified in §63.5761.
- (d) You must keep the implementation plan on site and provide it to the Administrator when asked.
- (e) If you revise the implementation plan, you must submit the revised plan with your next semiannual compliance report specified in §63.5764.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The implementation plan describes each of the processes. Open Molding Hand Lay-Up, Non-atomized, Vacuum Bag Rollout and Semi-closed Pressure Molding resin applications (see Table 1). For Gel coat; all gel coat systems are applied using non-atomized techniques (see table 2). Tooling Gel application is described (see table 3). Tooling Resin described (table 4). Each table describes the application, % styrene and % MMA. The calculations demonstrating compliance is in the document including the weighted average MACT model point value equation that the facility uses. The RO signed the implementation plan on 8/13/02. The implementation plan meets the conditions under Subpart VVVV.

§ 63.5710 How do I demonstrate compliance using emissions averaging?

- (a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in §63.5695.
- (b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in §63.5698 calculated for the same 12-month period. (Include terms in equation 1 of §63.5698 and equation 1 of this section for only those operations and materials included in the average.)
- (c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

☒ IN ☐ MNC ☐ SNC ☐ N/A

B. Specific Conditions:

Comments: The facility demonstrates this condition on a monthly basis

§ 63.5714 How do I demonstrate compliance if I use filled resins?

Standards for Resin and Gel Coat Mixing Operations

(a) If you are using a filled production resin or filled tooling resin, you must demonstrate compliance for the filled material on an as-applied basis using equation 1 of this section.

$$PV_F = PV_u \times \frac{(100 - \% \text{ Filler})}{100} \quad (Eq. 1)$$

Where:

PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to this subpart.

% Filler = The weight-percent of filler in the as-applied filled resin system.

(b) If the filled resin is used as a production resin and the value of PV_F calculated by equation 1 of this section does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

(c) If the filled resin is used as a tooling resin and the value of PV_F calculated by equation 1 of this section does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

(d) If you are including a filled resin in the emissions averaging procedure described in §63.5710, then use the value of PV_F calculated using equation 1 of this section for the value of PV_i in equation 2 of §63.5710.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility does not use a filled resin.

§ 63.5731 What standards must I meet for resin and gel coat mixing operations?

(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and poly putties, must have a cover with no visible gaps in place at all times.

(b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, you must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

(d) You must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility is not a resin and gel coat mixing operation.

Standards for Resin and Gel Coat Application Equipment Cleaning Operations

§ 63.5734 What standards must I meet for resin and gel coat application equipment cleaning operations?

(a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), you must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing

B. Specific Conditions:

cured resin or gel coat from application equipment, no organic HAP content limit applies.

(b) You must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: Intrepid Powerboats uses cleaning solvents for flushing spray guns and brushes with less 5% organic HAP by weight. Additionally, the HAP-containing solvent sealed containers used have no visible gaps.

§ 63.5737 How do I demonstrate compliance with the resin and gel coat application equipment cleaning standards?

(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in §63.5734 using the methods specified in §63.5758.

(b) If you recycle cleaning solvents on site, you may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in §63.5758 for demonstrating compliance with organic HAP content limits.

(c) At least once per month, you must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: Intrepid cleans its spray guns and brushes on a daily basis. The spent material is recycled. Additionally, the HAP-containing solvent sealed containers used have no visible gaps.

§ 63.5758 Methods for Determining Hazardous Air Pollutant Content How do I determine the organic HAP content of materials?

(a) *Determine the organic HAP content for each material used.* To determine the organic HAP content for each material used in your open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, you must use one of the options in paragraphs (a)(1) through (6) of this section.

(5) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section.

(i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.

(iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total

B. Specific Conditions:

organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

(6) *Solvent blends.* Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart. You may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to this subpart, then the test results must be used for determining compliance.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility determines the HAP content from the suppliers MSDS. They are using the appropriate highest HAP content.

Notifications, Reports, and Records

§ 63.5761 What notifications must I submit and when?

(a) You must submit all of the notifications in Table 7 to this subpart that apply to you by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: The facility does not need to submit any notifications at this time. The facility submitted its initial notification as required under Subpart VVVV. It is attached to the compliance file.

§ 63.5764 What reports must I submit and when?

(a) You must submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the dates in paragraphs (b)(1) through (5) of this section.

(1) If your source is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for your source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for your source in §63.5695. If your source is controlled by an add-on control device, the first compliance report must cover the period beginning on the compliance date specified for your source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5695.

(2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of this section.

(3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

B. Specific Conditions:

- (4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
- (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.
- (c) The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section.
 - (1) Company name and address.
 - (2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
 - (3) The date of the report and the beginning and ending dates of the reporting period.
 - (4) A description of any changes in the manufacturing process since the last compliance report.
 - (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
 - (6) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.
 - (7) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section in the semiannual compliance report.
 - (i) A description of the operation involved in the deviation.
 - (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
 - (iii) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.
 - (iv) A statement of whether or not your facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: There are three reports required by the facility. First, the compliance report due semiannually. This report is due 60 days after the end date. January 1st – June 30th, the report is due by August 29th. July 1st – December 30th, the report is due by March, 1st.

§ 63.5767 What records must I keep?

You must keep the records specified in paragraphs (a) through (d) of this section in addition to records specified in individual sections of this subpart.

- (a) You must keep a copy of each notification and report that you submitted to comply with this subpart.
- (b) You must keep all documentation supporting any notification or report that you submitted.
- (c) If your facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), you must keep the records specified in paragraphs (c)(1) through (3) of this section.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: Notification documents and supporting documentation is maintained on-site. The facility records its solvent usages based on a 12-mo consecutive total, the total amount of open molding material

B. Specific Conditions:

§ 63.5770 In what form and for how long must I keep my records?

- (a) Your records must be readily available and in a form so they can be easily inspected and reviewed.
- (b) You must keep each record for 5 years following the date that each record is generated.
- (c) You must keep each record on site for at least 2 years after the date that each record is generated. You can keep the records offsite for the remaining 3 years.
- (d) You can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comments: Based on inspection the facility keeps its generated monthly records for a period of 5 years on-site. Both hard copy and computer storage. The records can be provided upon request.

Table 3 to Subpart VVVV of Part 63—MACT Model Point Value Formulas for Open Molding Operations¹ As specified in §§63.5710(d) and 63.5714(a), you must calculate point values using the formulas in the following table:

For this operation	Application method	Use this formula to calculate the MACT model plant value for each resin and gel coat	Must Comply Y/N	Compliance Y/N
1. Production resin, tooling resin	d. Nonatomized	$0.014 \times (\text{Resin HAP}\%)^{2.275}$	Y	Y
	d. Nonatomized	$0.014 \times (\text{Resin HAP}\%)^{2.275}$	Y	Y
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	$0.445 \times (\text{Gel coat HAP}\%)^{1.675}$	Y	Y

¹Equations calculate MACT model point value in kilograms of organic HAP per megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric. HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100 percent. [66 FR 44232, Aug. 22, 2001; 66 FR 50504, Oct. 3, 2001]

☒ IN ☐ MNC ☐ SNC ☐ N/A

Comment: Intrepid only uses the non-atomized production/tooling resin and the pigmented gel coat, and tooling gel coat. A copy of the Feb, 13' record is attached to the inspection report.

Valid Permit [Rule 62-210.300]

Changes to Facility/emission unit [Rule 62-210.300]

Does the emission unit description above match what the facility is operating (Number of emission units or points, model number and serial number, etc.) ☒ Yes ☐ No

Comments:

✓

C. Other:

Pollution Prevention Activities

➤ P2 Handouts Provided: ☐ P2 Brochure; ☐ P2 Manual; ☐ P2 Checklist➤ Have any emissions reductions occurred ☐ Yes / ☐ No _____☐ Chemical Substitution; ☐ Equipment Changes; ☐ Process Changes☐ Chemical/Material Reuse; ☐ On-site Recycling; ☐ Other: _____**Comments:** *There were no pollution prevention activities during the compliance year*

Closing Conference: The inspection results were discussed with facility contact Dr. Kovach.

Inspector(s): Jeffrey Morris, Pinellas County, Air Quality Division

Signature(s):

Date: 9/13/13

ACCESS?

✓

EYES?

✓