

Facility Name: **Regal Marine Industries, Inc.**

City: Valdosta

County: Lowndes

AIRS #: 04-13-185-00088

Application #: TV-226248

Date SIP Application Received: February 21, 2018

Date Title V Application Received: February 21, 2018

Permit No: 3732-185-0088-V-05-1

Program	Review Engineers	Review Managers
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SSCP	n/a	n/a
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Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. 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) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
3732-185-0088-V-05-0	7/29/2016	Title V Renewal

B. Regulatory Status**1. PSD/NSR/RACT**

The facility is potentially a major source in regard to the PSD/NSR regulations, but currently has taken a 249-tpy VOC emission limit to avoid a PSD/NSR review. Non-attainment NSR is not applicable since this source is located in an attainment area.

In this modification, the facility requests to take a 100 tpy VOC emission limit for fee reduction. This limit was established in modified Permit Condition 2.1.1.

2. Title V Major Source Status by Pollutant**Table 2: 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	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS				
H ₂ S				
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification**A. Description of Modification**

Changing the facility wide VOC limit from 249 tpy to 100 tpy.

B. Emissions Change**Table 3: Emissions Change Due to Modification**

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	✓	unchanged	unchanged
PM ₁₀	✓	unchanged	unchanged
PM _{2.5}	✓	unchanged	unchanged
SO ₂	✓	unchanged	unchanged
VOC	✓	unchanged	-149
NO _x	✓	unchanged	unchanged
CO	✓	unchanged	unchanged
TRS			
H ₂ S			
Individual HAP	✓	unchanged	unchanged
Total HAPs	✓	unchanged	unchanged

C. PSD/NSR Applicability**PSD/NSR Applicability**

The modification is not subject to PSD.

NSPS Modification

The modification is not subject to NSPS modification.

NESHAP Modification

The modification is not subject to NESHAP modification.

III. Facility Wide Requirements

A. Emission and Operating Caps:

Facility wide VOC limit has been changed from 249 tpy to 100 tpy.

B. Applicable Rules and Regulations

Unchanged.

C. Compliance Status

None applicable.

D. Permit Conditions

Permit Condition 2.1.1 has been changed to reflect the facility wide new VOC limit.

IV. Regulated Equipment Requirements

A. Brief Process Description

Unchanged.

B. Equipment List for the Process

Unchanged.

C. Equipment & Rule Applicability

Emission and Operating Caps –

Unchanged.

Applicable Rules and Regulations -

Unchanged.

D. Permit Conditions

Unchanged.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Unchanged.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Unchanged.

VII. Other Record Keeping and Reporting Requirements

Conditions 6.1.7b.i., 6.2.17, and 6.2.18 have been modified to reflect the change of Condition 2.1.1.

VIII. Specific Requirements

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

Not applicable

B. Alternative Requirements

None applicable

C. Insignificant Activities

None applicable

D. Temporary Sources

None applicable

E. Short-Term Activities

None applicable

F. Compliance Schedule/Progress Reports

None applicable

G. Emissions Trading

Not applicable

H. Acid Rain Requirements/CAIR/CSPAR

Not applicable

I. Prevention of Accidental Releases

Not applicable

J. Stratospheric Ozone Protection Requirements

Not applicable

K. Pollution Prevention

Not applicable

L. Specific Conditions

None applicable

Addendum to Narrative