

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

Application #: TV-516036
Date Application Received: October 19, 2020
Permit No: 3732-262-0069-V-06-0

Program	Review Engineers	Review Managers
SSPP	Eddie Gomez	Jeng-Hon Su
ISMU	Joshua Pittman	Dan McCain
SSCP	Samantha LaRose	Stephen Damaske
Toxics	Samantha LaRose	Stephen Damaske
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The 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. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The 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, Non-attainment Area Location, or Contributing Area

Recreation Unlimited, LLC (hereinafter "facility") is located in Sumter County, 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 operate as one facility and under the same owner. The plants consist of one Title V site and 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 Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3723-261-0069-V-05-0	April 20, 2016	Title V Permit Renewal
3723-261-0069-V-05-1	July 20, 2018	Installation of a new paint spray booth

D. Process Description

1. SIC Codes(s)

3723

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.

Also, two spray booths in the Plant 2 area are used to paint and coat mostly metal trailer parts along with other miscellaneous items.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The facility avoids 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 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	yes			✓
PM ₁₀	yes			✓
PM _{2.5}	yes			✓
SO ₂	no			✓
VOC	yes	✓		
NO _x	no			✓
CO	no			✓

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
TRS	no			✓
H ₂ S	no			✓
Individual HAP	yes	✓		
Total HAPs	yes	✓		
Total GHGs	yes			✓

3. MACT Standards

The facility is 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.

Since the surface coating of boats is subject to 40 CFR 63 Subpart VVVV, the boat surface coating process, per 40 CFR 63.3881(c)(15), is not subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. However, the spray painting/spray coating of trailer parts at spray booths is subject to 40 CFR 63 Subpart MMMM.

4. Program Applicability (AIRS Program Codes)

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

Not applicable.

C. Compliance Status

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

D. 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. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		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	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	N/A	N/A
3101	Grinding and Trimming	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BC11	Baghouse
4101	Putty Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	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	N/A	N/A
5101	Foam Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	N/A
6101	Glue Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	N/A
PLANT 2				
1201/1202	Gel Coat Application as #1201 (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	DF1	Dry Filter
	Painting and coating of trailer part and other miscellaneous parts as #1202.	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart MMMM		
1203	Paints and Coatings	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart MMMM	DF2	Dry Filter
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	N/A	N/A
3201	Grinding and Trimming	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BC21	Baghouse
4201	Putty Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	N/A
5201	Foam Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	N/A
6201	Glue Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart VVVV	N/A	N/A

B. Equipment & Rule Applicability

Emission and Operating Caps:

There are no equipment related emission or operating caps.

Rules and Regulations Assessment:

The facility is subject to the following:

Georgia Rules 391-3-1-.02(2)(b) - Visible Emissions

Georgia Rules 391-3-1-.02(2)(e) - Particulate Emission from Manufacturing Processes

40 CFR 63 Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (for coating on trailer parts)

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 would 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.

C. 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.

Conditions 3.3.9 through 3.3.12 establish the general use coating emission limit and the compliance options as stated in 40 CFR 63 Subpart MMMM for emission units #1202 and #1203.

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.

Former Condition 3.5.4 required the facility to install a minimum 15-foot stack for Vent VF13. Because the facility notified the Division of the installation on November 15, 2016, this condition has been removed.

Condition 3.5.4 (formerly Condition 3.5.5) now requires control equipment for dry filters DF1 and DF2 be replaced once per every 40 hours of spraying operations.

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

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

Condition 4.1.3 includes the performance and compliance methods used for 40 CFR 63 Subpart MMMM.

B. Specific Testing Requirements

Not applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific 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)

An emission unit is subject to the provisions of 40 CFR 64, "Compliance Assurance Monitoring" because:

- It is located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- It is subject to an emission limitation or standard for the applicable pollutant. [§64.2(a)(1)]
- The facility uses a control device to achieve compliance. [§64.2(a)(2)]
- Potential pre-controlled emissions of the applicable pollutant (particulate matter) from such emission unit are at least 100 percent of major source threshold. [§64.2(a)(3)]

According to the satellite image on Google map, all of the emission units are fully enclosed, and therefore generate little PM emissions. They are equipped with either filter media or baghouses, which are used to control only fugitive PM emissions. Although these emission units are subject to the GA Rule (e) PM emission limit, they do not rely on the filter media and dust collector to achieve compliance. Also, pre-controlled PM emissions are likely to be less than 100 tpy for each emission unit with a control device. Therefore, the facility is not subject to any CAM requirement.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

Condition 6.1.7 includes the exceedances reporting requirements for 40 CFR 63 Subpart MMMM.

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 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.

Conditions 6.2.20 through 6.2.30 cover the recordkeeping and reporting required under the Compliant Materials Option and the Emission Rate Without Controls Option for 40 CFR 63 Subpart MMMM. Note that Condition 6.2.20 has been modified to reflect rule changes to 40 CFR 63 Subpart MMMM.

Condition 6.2.31 covers the recordkeeping requirement for the dry filters DF1 and DF2.

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

Not applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

None applicable.

E. Short-Term Activities

The facility conducts warranty repair for miscellaneous repair work. Emissions from this activity are included in the facility wide emissions.

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 month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//