

Facility Name: **Better Way Products**
 City: Valdosta
 County: Lowndes
 AIRS #: 04-13-185-00100

Application #: TV-321291 & 336893
 Date Application Received: February 18, 2019 and April 02, 2019
 Permit No: 3732-185-0100-V-04-0

Program	Review Engineers	Review Managers
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SSCP	N/A	N/A
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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: Better Way Products

2. Parent/Holding Company Name

Patrick Industries, Inc.

3. Previous and/or Other Name(s)

Robalo Boats, LLC
Bayliner Marine

4. Facility Location

600 Gil Harbin Industrial Boulevard
Valdosta, Georgia 31601

5. Attainment, Non-attainment Area Location, or Contributing Area

This facility is located in an attainment area.

B. Site Determination

This Title V site consists of one-half of the original Bayliner boat manufacturing facility. While this site is in close proximity to the Regal Marine boat manufacturing facility (AIRS No. 185-00088), the two facilities are owned by separate corporations and do not share labor force, raw materials, or administrative staff. The half of the facility that Better Way Products occupies is being subleased from Regal Marine Industries, Inc. However, due to the fact that both facilities are completely separate entities, the Better Way Products facility is being considered as a separate single Part 70 site.

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
3732-185-0100-V-03-0	July 30, 2014	Title V Permit renewal

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 and small fiberglass parts related to the boats.

3. Overall Facility Process Description

Raw materials (resins, gel coats, fillers, etc.) are applied to wooden molds to form the boat hulls. The same process is used to produce the miscellaneous small fiberglass parts that are attached to the boats. Before assembly, the hulls and miscellaneous parts are ground or sanded to remove defects and rough edges.

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 is not one of the 28 named source categories per 40 CFR 52.21(b)(1)(i). The facility has accepted a facility wide VOC emission cap of less than 250 tons per year, which ensures that the facility is not a PSD major source.

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	Y			✓
PM ₁₀	Y			✓
PM _{2.5}	Y			✓
SO ₂	Y			✓
VOC	Y	✓		
NO _x	Y			✓
CO	Y			✓
TRS	Y			✓
H ₂ S	Y			✓
Individual HAP	Y	✓		
Total HAPs	Y	✓		

3. MACT Standards

The facility is subject to 40 CFR 63 Subpart VVVV, "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing."

4. Program Applicability (AIRS Program Codes)

Table 3: Air Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	N
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

VOC emissions from the entire facility are limited to less than 250 tons during any twelve consecutive month period in order to avoid regulation under 40 CFR 52.21 (PSD Regulations).

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility is in compliance at this time.

D. Permit Conditions

No changes were made to the permit conditions as a result of this renewal.

Condition No. 2.1.1 limits the VOC emissions from the entire facility to less than 250 tons during any twelve consecutive month period. This emission limit is in place to allow the facility to avoid regulation under 40 CFR 52.21 (PSD Regulations).

III. Regulated Equipment Requirements

A. Equipment List for the Process

Table 4. Emission Units/Groups (Table 3.1 in Permit)

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
RGC	Deck and Hull Gel Coating	GA391-3-1-.02(2)(b) GA391-3-1-.02(2)(e) 40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV	RGF1	Frees Ventilation Unit
			RGF2	Frees Ventilation Unit
RLA	Lamination Operations	GA391-3-1-.02(2)(b) GA391-3-1-.02(2)(e) 40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV	RLF1	Lamination Filter Unit #1
			RLF2	Lamination Filter Unit #2
			RLF3	Lamination Filter Unit #3
			RLF4	Lamination Filter Unit #4
			RLF5	Lamination Filter Unit #5
			RLF6	Lamination Filter Unit #6
RGR	Grinding Operations	GA391-3-1-.02(2)(b) GA391-3-1-.02(2)(e)	GRF1	Grinding Room Filter
			GRF2	Grinding Room Filter
			GRF3	Grinding Room Filter
RSP	Small Parts Gel Coating and Fabrication	GA391-3-1-.02(2)(b) GA391-3-1-.02(2)(e) 40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV	SPF1	Small Parts Frees Exhaust Unit
			SPF2	Small Parts Frees Exhaust Unit

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

B. Equipment & Rule Applicability

Emission and Operating Caps:

None of the emission units listed in the above table have any emission or operating caps imposed on them individually.

Rules and Regulations Assessment:

40 CFR 63 Subpart VVVV applies to all facilities that are engaged in fiberglass or aluminum recreational boat manufacturing and are major sources of hazardous air pollutants (HAPs). A facility is considered a Major Source if it has the potential to emit more than 10 tpy of an individual HAP and /or 25 tpy of combined HAPs.

Regulatory applicability for Subpart VVVV is triggered as facility is primarily engaged in the manufacture of fiberglass boats and is a major source for the emission of HAP, as defined in 40 CFR 63.5683. The Better Way Products facility is considered an existing source since the boat manufacturing facility was constructed before July 14, 2000. All emission units listed in Table 4 on the previous page are subject to Subpart VVVV. Subpart A “General Provisions” is applicable to a source that is subject to another subpart of Part 63.

Note that the facility has indicated in their application that GA Rule 391-3-1-.02(2)(ff)- Solvent Metal Cleaning is applicable. As the facility does not currently have any unit affected by Rule (ff), therefore, this rule is not applicable. However, the facility has indicated that the facility will observe these requirements if they are put in place again.

Georgia Air Quality Rule 391-3-1-.02(2)(b) applies to all facilities operating in the state of Georgia that are subject to at least one other Georgia Air Quality Rule. This rule limits opacity from emission points to 40%.

Georgia Air Quality Rule 391-3-1-.02(2)(e) applies to all facilities operating in the state of Georgia that engage in manufacturing operations that emit particulate matter (pm). This rule limits emissions of PM from manufacturing process sources. RGC, RLA, RGR, and RSP are subject to the formula-based emission limitations of Rule (e), as specified in Condition 3.4.2. The facility complies with these limitations through the use of properly designed and maintained fabric filters to control emissions from these processes.

C. Permit Conditions

No changes were made to the permit conditions as a result of this renewal.

Condition No. 3.3.1 requires that the Permittee comply with all applicable requirement of 40 CFR 63 Subpart VVVV as it applies to open molding resin and gel coat operations, closed molding resin operations, resin and gel coat mixing operations, carpet and fabric adhesive operations, aluminum deck and deck coating operations.

Condition No. 3.3.2 presents the equation that the Permittee has to use to determine the HAP emissions from all open molding operations and gel coat operations at the facility. This equation is based on the amount of resins and other materials used during the corresponding 12-month period.

Condition No. 3.3.3 presents two methods of complying with the emission limit of Condition No. 3.3.2. One method is to use an equation presented in Condition No. 6.2.6 to determine if the emissions from non-compliant materials meet the emission limit calculated in Condition No. 3.3.2. The second method is to demonstrate that some or all materials used meet the content requirements of Table 2 of Subpart VVVV (Table 3.3.3-1 of the permit).

Condition No. 3.3.4 gives a list of materials that are exempt while calculating the HAP emission limit using the equation in Condition No. 3.3.2. These materials include those that are used in the fabrication of military or Coast Guard vessels or that are regulated under 46 CFR subchapter Q or T, gel coats used for touch-up operations provided that the amount of touch-up gel coat does not exceed 1 percent of all gel coat used at the facility, and resins that are composed of 100 percent vinylester resins.

Condition No. 3.3.5 requires that all mixing vessels that exceed 208 liters in size be equipped with covers that are to be in place at all times except when adding or removing material from them.

Condition No. 3.3.6 limits the organic HAP content of all solvents used for flush cleaning resin and gel coat application equipment to five percent or less, by weight.

Condition No. 3.3.7 requires that the Permittee store all solvents used to remove cured resin and gel coat in closed containers and, for containers with a capacity greater than 7.6 liters, limits the distance from the top of the container to the surface of the liquid to no less than 0.75 times the diameter of the container.

Condition No. 3.3.8 limits the organic HAP content of fabric and carpet adhesives to five percent or less, by weight.

Condition No. 3.4.1 limits the opacity of visible emissions from the entire facility to 40 percent or less.

Condition No. 3.4.2 limits the amount of particulate matter that can be emitted from the different processes at the facility using an equation based on process input weight rate.

Condition No. 3.5.1 specifies that the emissions from all sources should be routed through the control devices (filtration systems).

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.

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

No changes were made to the permit conditions as a result of this renewal.

Condition No. 5.2.1 requires the Permittee to install and operate devices to monitor the pressure drop across the particulate filter media for the gel coating operations (Air Pollution Control Device ID Nos. RGF1 and RGF2), the lamination operations (Air Pollution Control Device ID Nos. RLF1, RLF2, RLF3, RLF4, RLF5, and RLF6), the small parts fabrication operations (Air Pollution Control Device ID Nos. SPF1 and SPF2), and the grinding operations (Air Pollution Control Device ID Nos. GRF1, GRF2, and GRF3). These pressure drop readings are to take place once per shift of operation.

Condition No. 5.2.2 requires the Permittee to inspect, at least once per month, all resin and gel coat mixing vessels subject to the requirements of Condition No. 3.3.5 to ensure that there are no cracks between the cover and the container or between the cover and any equipment passing through the cover.

Condition No. 5.2.3 requires the Permittee to inspect, at least once per month, all solvent storage containers subject to Condition No. 3.3.7 to ensure that the containers have covers with no visible gaps between the cover and the container.

C. Compliance Assurance Monitoring (CAM)

The purpose of 40 CFR 64, *Compliance Assurance Monitoring (CAM)* is to provide a reasonable assurance of compliance with emission limitations and standards for the anticipated range of operations at a pollutant-specific emission unit (PSEU) [§64.3(a)]. Applicability of CAM determination for the emission source is as below:

- They are located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- They are subject to emission limitation or standard. Rule (e) limit] for the applicable regulated air pollutant (PM/PM10). [§64.2(a)(1)]
- They use control device (ESP) to achieve compliance. [§64.2(a)(2)]
- Potential pre-controlled emissions of applicable pollutant (PM/PM10) from the unit are at least 100 percent of major source threshold. [§64.2(a)(3)]
- They are not otherwise exempt. [§64.2(b)]

In accordance with CAM rules, PSEUs are units for which there exists an emission standard for which there is a Part 64 control device and where the pre-control potential emission rate is equal to or greater than 100 percent of the major source threshold.

The calculations submitted by the facility with the Title V application indicate that the uncontrolled emissions from RGA, RLA, RGR, and RSP are less than the major source threshold for PM₁₀ of 100 tpy. Additionally, the facility does not control any other pollutant subject to CAM requirements. Therefore, no emission unit at the facility is subject to CAM.

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.

B. Specific Record Keeping and Reporting Requirements

No changes were made to the permit conditions as a result of this renewal.

Condition No. 6.2.1 requires that the Permittee maintain usage records and, in some instances, certification records for all materials that are exempted from the open molding emission limit of Condition No. 3.3.2.

Condition No. 6.2.2 requires that, for all open molding operations and materials complying with the emissions averaging option, the Permittee follow the steps required in this Condition to certify compliance with the emission limit of Condition No. 3.3.2.

Condition No. 6.2.3 requires that, for all open molding operations and materials complying with the compliant materials option, the Permittee maintain the list of records required in the Condition.

Condition No. 6.2.4 presents the information to be contained in, submission requirements, availability requirements, and revision procedures for the Implementation Plan that the Permittee is required to develop for all open molding operations for which compliance is determined using the emission averaging option using the equation of Condition No. 3.3.2.

Condition No. 6.2.5 presents the methods for certifying compliance with the compliant materials option, if used. These methods include verifying that each resin and gel coat used complies with the content limits of Table 2 of Subpart VVVV (Table 3.3.3-1 of the permit), reviewing the HAP content of each gel coat and resin at the end of each month to determine compliance with the content limits of Table 2, and calculating the average HAP content for each resin and gel coat used during the previous 12 months.

Condition No. 6.2.6 presents the methods for determining compliance with Condition No. 3.3.2 using the MACT model point option specified in Condition No. 3.3.3a.

Condition No. 6.2.7 presents the methods for demonstrating compliance with Condition No. 3.3.2 if filled resins are used at the facility.

Condition No. 6.2.8 presents the requirements for demonstrating compliance with the resin and gel coat application equipment cleaning operations (Condition Nos. 3.3.6 and 3.3.7). These requirements include two separate methods for determining the organic HAP content of each of the solvents.

Condition No. 6.2.9 requires that the Permittee demonstrate compliance with Condition No. 3.3.8 using the methods presented in 40 CFR 63.5758. This condition is the same as the existing Title V Permit condition.

Condition No. 6.2.10 requires that the Permittee maintain records of all notifications and compliance reports and any supporting documentation, and that total amount of resins and gel coats used at the facility and the weighted-average HAP content for each operation.

Condition No. 6.2.11 requires that the Permittee maintain all records onsite for two years and gives the accepted media that these records may be stored on if they are moved off-site after the initial two year period. Records that are moved off-site after the initial two year period must be maintained for an additional three years.

Condition No. 6.2.12 requires that the Permittee send to the Division all notifications required by Table 6.2.12-1 and that if any material submitted in those notifications changes, the Permittee must notify the Division within 15 days after the change is made.

Condition No. 6.2.13 presents the content and reporting schedule for the compliance reports that the facility must submit to the Division.

Condition No. 6.2.14 requires the Permittee to maintain monthly usage records of all materials containing VOC and any containerized waste material which the Permittee may want to subtract the VOC content of from any emissions calculations.

Condition No. 6.2.15 requires the Permittee to calculate the monthly VOC emissions from the entire facility using the procedures described in Division's Procedures for Testing and Monitoring Sources of Air Pollutants and the usage records of Condition No. 6.2.14, and notify the Division in writing if the monthly VOC emissions from the entire facility equal or exceed 20.75 tons during any month.

Condition No. 6.2.16 requires the Permittee to calculate the 12-month rolling total VOC emissions from the entire facility using the monthly emission calculations of Condition No. 6.2.15, and notify the Division in writing if the 12-month rolling total VOC emissions from the entire facility equal or exceed 250 tons during any consecutive 12 month period.

Condition No. 6.2.17 requires the Permittee to maintain records of all visual inspections and corrective actions taken conducted in accordance with Condition No. 5.2.2. The written inspection records are to be kept in a logbook.

Condition No. 6.2.18 requires the Permittee to maintain records of all visual inspections and corrective actions taken conducted in accordance with Condition No. 5.2.3. The written inspection records are to be kept in a logbook.

VII. Specific Requirements

A. Operational Flexibility

None requested.

B. Alternative Requirements

No alternative requirements apply to the facility or any equipment used there.

C. Insignificant Activities

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

D. Temporary Sources

There are no temporary sources in use at the facility at this time.

E. Short-Term Activities

There are no short term activities identified by the Permittee.

F. Compliance Schedule/Progress Reports

The facility is operating in compliance with all applicable standards at this time; therefore, no compliance schedule or progress reports are required by the Division at this time.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

Better Way Products has indicated in their renewal application that the facility does have air conditioners or refrigeration equipment that uses CFC's, HFC's or other stratospheric ozone depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B. Therefore, the facility is subject to 40 CFR Part 82, Subpart A-“Production and Consumption Control.”

The Title V permit application also indicates that the facility does not have any air conditioner or piece of refrigeration equipment that contains a refrigerant charge of greater than 50 lbs, and the facility personnel do not maintain, service, repair or dispose of any motor vehicle air conditioners (MVAC's) or appliances. Therefore, the facility is not subject to 40 CFR 82, Subpart B-“Servicing of Motor Vehicle Air Conditioners.”

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not Applicable.

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.//