



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

**OPERATING PERMIT**

*Quartermoon, Inc.*

**PERMIT NO. RI-38-09**

(Renewal date: April 24, 2009)  
(Expiration date: April 24, 2014)

**Pursuant to the provisions of Air Pollution Control Regulation No. 29, this operating permit is issued to:**

Quartermoon, Inc.  
200 Highpoint Avenue  
Portsmouth, RI 02871

**This permit shall be effective from the date of its issuance. All terms and conditions of the permit are enforceable by the USEPA and citizens under the federal Clean Air Act, 42 U.S.C. 7401, et seq., unless specifically designated as not federally enforceable.**

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**Douglas L. McVay, Acting Chief  
Office of Air Resources**

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**Date of issuance: 04/24/2009**

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## SECTION I. SOURCE SPECIFIC CONDITIONS

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### A. Requirements for Emission Units P001 and P002

The following requirements are applicable to:

- Emission unit P001, which is a gel coat spray booth.
- Emission unit P002, which is the laminating area.
- Emission units P001 and P002 are the fiberglass boat manufacturing operations where automatic feed rollers, spray guns and vacuum bagging methods are used to manufacture fiberglass hulls, decks or boat parts. Polyester resins and gel coats containing styrene and methyl methacrylate are used in each process. The hulls and decks are bonded together using putty containing styrene and methyl methacrylate.

#### 1. Emission Limitations

##### a. Gel coat and polyester resins for production

- (1) Gel coats used in P001, except those applied by brush, shall not have a VOC content greater than 36.1% by weight. Gel coats applied by brush shall not have a VOC content greater than 40% by weight. The permittee may not replace any gel coat with a gel coat of a higher VOC content. [Approval Nos. 1330-1333 (A)(1)(a)]
- (2) Polyester resin used in P002 for production shall not have a VOC content greater than 41.0% by weight. The permittee may not replace this polyester resin with a polyester resin of a higher VOC content. [Approval Nos. 1330-1333 (A)(1)(b)]

##### b. Gel coat and polyester resins for tooling

- (1) Gel coat used in P001 shall not have a VOC content greater than 50% by weight. The permittee may not replace any gel coat with a gel coat of a higher VOC content. [Approval Nos. 1330-1333 (A)(2)(a)]
- (2) Polyester resin used in P002 for tooling shall not have a VOC content greater than 50.5% by weight. The permittee may not replace this polyester resin with a polyester resin of a higher VOC content. [Approval Nos. 1330-1333 (A)(2)(b)]

- c. The emissions of styrene from the facility shall be limited to 40 pounds/hour, 320 pounds/day and 80,000 pounds/year. [Air Toxics Approval No. ATOP – 1118/2008(B)(3), Approval Nos. 1330-1333 (A)(4)(a)] **Not Federally Enforceable**
- d. The total quantity of VOC discharged to the atmosphere from all cleaning operations, including wipe cleaning, shall not exceed 85 pounds in any one day. [Approval Nos. 1330-1333 (A)(3)(a)]
- e. The permittee must limit organic HAP emissions from the five open molding operations listed below to the emission limit specified in I.A.1.f of this permit. [40 CFR 63.5698(a)(1) – (5)]
- (1) Production resin.
  - (2) Pigmented gel coat.
  - (3) Clear gel coat.
  - (4) Tooling resin.
  - (5) Tooling gel coat.
- f. The permittee must limit organic HAP emissions from open molding operations to the limit specified by the following equation, based on a 12-month rolling average: [40 CFR 63.5698(b)]

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

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

$M_R$  = mass of production resin used in the past 12 months, excluding any materials exempt under Section I.A.1.g, megagrams.

$M_{PG}$  = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under Section I.A.1.g, megagrams.

$M_{CG}$  = mass of clear gel coat used in the past 12 months, excluding any materials exempt under Section I.A.1.g, megagrams.

$M_{TR}$  = mass of tooling resin used in the past 12 months, excluding any materials exempt under Section I.A.1.g, megagrams.

$M_{TG}$  = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under Section I.A.1.g, megagrams.

g. The following materials are exempt from the open molding emission limit specified in Section I.A.1.f of this permit. [40 CFR 63.5698(d)]

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption. [40 CFR 63.5698(d)(1)]

(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. [40 CFR 63.5698(d)(2)]

(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. [40 CFR 63.5698(d)(3)]

h. If a resin application operation meets the definition of closed molding specified in 40 CFR 63.5779, there is no requirement to reduce emissions from that operation. If the resin application operation does not meet the

definition of closed molding specified in 40 CFR 63.5779, then the permittee must comply with the limit for open molding operations specified in condition I.A.1.f. [40 CFR 63.5728(a), 40 CFR 63.5728(b)]

- i. Open molding resin operations that precede a closed molding operation must comply with the limit for open molding resin and gel coat operations specified in Condition I.A.1.f. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding. [40 CFR 63.5728(c)]
- j. The emissions of acetone from the facility shall be limited to 170 pounds/hour and 5,000 pounds/day. [Air Toxics Approval No. ATOP – 1118/2008(B)(1)] **Not Federally Enforceable**
- k. The emissions of methyl methacrylate from the facility shall be limited to 200 pounds/day. [Air Toxics Approval No. ATOP – 1118/2008(B)(2)] **Not Federally Enforceable**

## 2. Operating Requirements

- a. Styrene shall be used only for spray lay up of gel coat, hand lay up of polyester resin with a roller system bonding operations and spray lay up and hand lay up with a roller system of polyester resin for tooling. [Air Toxics Approval No. ATOP – 1118/2008(C)(3)] **Not Federally Enforceable**
- b. Gel coat used in P001 shall be applied with airless spray equipment or by brush. [Approval Nos. 1330-1333 (B)(1)]
- c. All polyester resin used in P002 for production shall be applied to the glass laminate with a resin roller system or flow coater system. The impregnated laminate shall be rolled by hand, or sealed with a vacuum bag and consolidated under vacuum pressure. Resin may also be infused into the laminate in a closed-mold system under a vacuum bag. [Approval Nos. 1330-1333 (B)(2)]
- d. Polyester resin used in P002 for tooling shall be applied with either a resin roller or airless spray equipment and a chopper gun attachment. [Approval Nos. 1330-1333 (B)(3)]
- e. All employees contacting gel coat and/or laminating resins are required to wear either reusable or disposable non-porous gloves whenever they use or apply gel coats and/or resins. [Approval Nos. 1330-1333 (B)(4)]
- f. All VOC solvent containers used in the equipment flushing/wipe cleaning and mold preparation must be equipped with a tight fitting lid which is

kept closed when the container is not in use so as to minimize VOC emissions to the atmosphere. [Approval Nos. 1330-1333 (B)(5)]

- g. All cleaning equipment, which has a solvent container, shall be closed during cleaning operations, except when depositing and removing objects to be cleaned, and shall be closed during non-operation, with the exception of maintenance and repair to the cleaning equipment itself. [Approval Nos. 1330-1333 (B)(6)]
- h. All waste or dirty solvent shall be stored in tight fitting containers which prevent the evaporation or leaking of VOC into the atmosphere before it is shipped offsite. [Approval Nos. 1330-1333 (B)(7)]
- i. The emission characteristics of all sources of listed air toxics shall be consistent with the parameters used in the air quality modeling to determine the increase in the ground level ambient concentration of those substances. The Office of Air Resources, in its sole discretion, may reopen the Air Toxics Operating Permit if it determines that these emission characteristics have changed significantly and that the Air Toxics Operating Permit must be revised to ensure compliance with Air Pollution Control Regulation No. 22.

A summary of these emission characteristics is as follows:

Pollutant emissions from P001 and P002 are discharged through two stacks having a height of 44 feet above grade, an exit diameter of 26 inches, a flow rate of 10,000 cfm each, and an exit temperature that is equal to the ambient temperature. [Air Toxics Approval No. ATOP – 1118/2008(C)(4)] **Not Federally Enforceable**

- j. 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 polyputties, must have a cover with no visible gaps in place at all times. [40 CFR 63.5731(a)]
- k. The work practice standard in Condition I.A.2.j of this permit 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. [40 CFR 63.5731(b)]
- l. The permittee must use a cleaning solvent that contains no more than 5 percent organic HAP by weight for routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees). For removing cured resin or gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)]



- m. The permittee 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 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid. [40 CFR 63.5734(b)]
- n. Acetone shall be used only in cleaning operations. [Air Toxics Approval No. ATOP – 1118/2008(C)(1)] **Not Federally Enforceable**
- o. Methyl methacrylate shall be used only for spray lay up of gel coating and bonding operations. [Air Toxics Approval No. ATOP – 1118/2008(C)(2)] **Not Federally Enforceable**

### 3. Compliance Determinations

- a. Compliance with the VOC content limitations for gel coats and polyester resins in Conditions I.A.1.a(1), I.A.1.a(2), I.A.1.b(1) and I.A.1.b(2) of this permit may be determined from manufacturer specifications. Calculations will be used to determine the VOC content of any thinned resin or gel coat. [Approval Nos. 1330-1333 (E)(1)]
- b. Styrene emissions from P001 and P002 shall be calculated using the American Composites Manufacturers Association's (ACMA) Unified Emissions Factors (UEF) model or other methods that have the prior approval of the Office of Air Resources. [Approval Nos. 1330-1333 (E)(2)]
- c. The permittee must use the maximum achievable control technology (MACT) model point value averaging (emissions averaging) option to meet the emission limit in Condition I.A.1.f of this permit for the resins and gel coats used in open molding operations. The permittee must demonstrate that emissions from the open molding resin and gel coat operations that are being averaged meet the emission limit in Condition I.A.1.f of this permit using the following procedures. Compliance with this option is based on a 12-month rolling average. [40 CFR 63.5701, 40 CFR 63.5701(a), 40 CFR 63.5701(a)(1), 40 CFR 63.5704(a)]
  - (1) The permittee must determine the organic HAP content of each resin and gel coat used in open molding resin and gel coat operations by

using one of the following options: [40 CFR 63.5704(a)(1), 40 CFR 63.5758(a)]

- (a) The permittee may use Method 311, 40 CFR 63, Appendix A for determining the mass fraction of organic HAP. The permittee must use the following procedures when determining organic HAP content by Method 311: [40 CFR 63.5758(a)(1)]
  - (i) Include in the organic HAP total each organic HAP that is measured to be 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. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point. [40 CFR 63.5758(a)(1)(i)]
  - (ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point. [40 CFR 63.5758(a)(1)(ii)]
- (b) The permittee may use ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins, available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP. [40 CFR 63.5758(a)(3)]
- (c) The permittee may rely on information other than that generated by the test methods paragraphs (a) and (b) above, such as manufacturer's formulation data, according to the following: [40 CFR 63.5758(a)(5)]
  - (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. [40 CFR 63.5758(a)(5)(i)]
  - (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee 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 Sections 1 and 2 above exceeds the upper limit of the range of total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance. [40 CFR 63.5758(a)(5)(ii)]

(iii) If the organic HAP content is provided as a single value, the permittee 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 organic HAP content using the methods specified in Sections 1 and 2 above is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee 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 the permittee must use the measured organic HAP content to determine compliance. [40 CFR 63.5758(a)(5)(iii)]

(d) 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, the permittee may use the values for organic HAP content that are listed in Appendix D, Table 2 or 3. The permittee may use Table 3 only if the solvent blends in the materials used by the permittee do not match any of the solvent blends in Table 2 and the permittee knows only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 2 or 3, then the test results must be used for determining compliance. [40 CFR 63.5758(a)(6)]

(2) The permittee must complete the following calculations to show that the organic HAP emissions do not exceed the limit specified in Condition I.A.1.f of this permit: [40 CFR 63.5704(a)(2)]

- (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 August 23, 2004. [40 CFR 63.5710(a), 40 CFR 63.5695]
  - (b) At the end of the twelfth month after August 23, 2004 and at the end of every subsequent month, the permittee must use the equation in Appendix A of this permit to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Condition I.A.1.f of this permit calculated for the same 12-month period. (Include terms in the equation from Condition I.A.1.f of this permit and the equation in Appendix A of this permit for only those operations and materials included in the average.) [40 CFR 63.5710(b)]
  - (c) At the end of every month, the permittee must use the equation in Appendix B of this permit to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average. If including a filled resin in the emissions averaging procedure, then use the value of  $PV_F$  calculated using the equation in Appendix C of this permit for the value of  $PV_i$  in the equation in Appendix B of this permit. [40 CFR 63.5714(d), 40 CFR 63.5710(c)]
  - (d) The permittee must use the equations in Appendix D, Table 1 of this permit to calculate the MACT model point value ( $PV_i$ ) for each resin and gel coat used in each operation in the past 12 months. [40 CFR 63.5710(d)]
  - (e) If the organic HAP emissions, as calculated in Appendix A of this permit, are less than the organic HAP limit calculated in Condition I.A.1.f of this permit for the same 12-month period, then the permittee is in compliance with the emission limit in Condition I.A.1.f of this permit for those operations and materials included in the average. [40 CFR 63.5710(e)]
- (3) The permittee must keep records as specified in Condition I.A.4.d(1) and (2) of this permit [40 CFR 63.5704(a)(3)]

- (4) The permittee must keep the implementation plan described in 40 CFR 63.5707 up to date. [40 CFR 63.5704(a)(4)]
  - (5) The permittee must submit semiannual compliance reports as specified in Condition I.A.5.g of this permit. [40 CFR 63.5704(a)(5)]
- d. The permittee must demonstrate compliance with the equipment cleaning standards in Condition I.A.2.l and m of this permit by performing the following steps:
- (1) The permittee must determine and record the organic HAP content of the cleaning solvents subject to the standards in Conditions I.A.2.l of this permit using one of the following methods: [40 CFR 63.5737(a)]
    - (a) The permittee may use Method 311, 40 CFR 63, appendix A for determining the mass fraction of organic HAP. The permittee must use the following procedures when determining organic HAP content by Method 311: [40 CFR 63.5758(a)(1)]
      - (i) Include in the organic HAP total each organic HAP that is measured to be 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. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point. [40 CFR 63.5758(a)(1)(i)]
      - (ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point. [40 CFR 63.5758(a)(1)(ii)]
    - (b) The permittee may use ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins, available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP. [40 CFR 63.5758(a)(3)]
    - (c) The permittee may rely on information other than that generated by the test methods paragraphs (a) and (b) above,

such as manufacturer's formulation data, according to the following: [40 CFR 63.5758(a)(5)]

- (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. [40 CFR 63.5758(a)(5)(i)]
- (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee 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 Sections 1 and 2 above exceeds the upper limit of the range of total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance. [40 CFR 63.5758(a)(5)(ii)]
- (iii) If the organic HAP content is provided as a single value, the permittee 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 organic HAP content using the methods specified in Sections 1 and 2 above is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee 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 the permittee must use the measured organic HAP content to determine compliance. [40 CFR 63.5758(a)(5)(iii)]
- (d) 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, the permittee may use the values for organic HAP content that are listed in Appendix D, Table 2 or 3.

The permittee may use Table 3 only if the solvent blends in the materials used by the permittee do not match any of the solvent blends in Table 2 and the permittee knows only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 2 or 3, then the test results must be used for determining compliance. [40 CFR 63.5758(a)(6)]

- (2) If cleaning solvents are recycled on-site, the permittee 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 paragraph (c) above (I.A.3.d(1)(c)) for demonstrating compliance with organic HAP limits. [40 CFR 63.5737(b)]
  - (3) The permittee must, at least once per month, 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 in order to demonstrate compliance with Condition I.A.2.m of this permit. [40 CFR 63.5737(c)]
- e. To demonstrate compliance with the work practice standard in Condition I.A.2.j of this permit, the permittee must visually inspect all mixing containers subject to the standard in Condition I.A.2.j of this permit 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. [40 CFR 63.5731(c)]

#### **4. Recordkeeping Requirements**

- a. The permittee shall maintain the following records: [Approval Nos. 1330-1333 (C)(1)]
  - (1) For each gel coat and resin, the VOC content in weight percent, the total weight per gallon and the application method. [Approval Nos. 1330-1333 (C)(1)(d)]
  - (2) For each clean up material, each VOC component and the content in volume percent. [Approval Nos. 1330-1333 (C)(1)(e)]
- b. The permittee shall, on a daily basis, determine the total quantity of VOC emission discharged to the atmosphere from all cleaning operations, including wipe cleaning. The permittee shall keep records of this

determination and provide such records to the Office of Air Resources upon request. [Approval Nos. 1330-1333 (C)(2)]

- c. The permittee shall, on a monthly basis, no later than 10 days after the first of the month, determine the total quantity of styrene discharged to the atmosphere from P001 and/or P002 for the previous 12-month period. The permittee shall keep records of this determination and provide such records to the Office of Air Resources upon request. [Approval Nos. 1330-1333 (C)(5)]
- d. The permittee must keep the following records for each resin and gel coat: [40 CFR 63.5704(a)(3)]
  - (1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month, the organic HAP content of each resin and gel coat, the application method used for each resin and gel coat and the weighted-average organic HAP contents for each operation, expressed as weight-percent. [40 CFR 63.5704(a)(3)(i-iii), 40 CFR 63.5767(c)(1)]
  - (2) Calculations performed to demonstrate compliance based on MACT model point values, as described in Conditions I.A.3.c(2) of this permit. [40 CFR 63.5704(a)(3)(iv)]
  - (3) The permittee shall maintain records of the total amount of acetone, methyl methacrylate and styrene-containing resin that are purchased and the amount that are used in P001 and P002 per month. [Air Toxics Approval No. ATOP – 1118/2008(D)(1), 40 CFR 63.5704(a)(3)(ii)]
- e. The permittee must keep the records specified in Conditions I.A.1.g.(1)-(3) for each material exempted from the open molding emission limit. [40 CFR 63.5698(d)(1)-(3)]
- f. The permittee must keep the implementation plan described in 40 CFR 63.5707 up to date. [40 CFR 63.5704(a)(4)]
- g. The permittee must keep the implementation plan described in 40 CFR 63.5707 on site and provide it to the Administrator and Office of Air Resources when asked. [40 CFR 63.5707(d)]
- h. The permittee must keep records of which containers are subject to the work practice standard in Condition I.A.2.j of this permit and the results



of the inspections, including a description of any repairs or corrective actions taken. [40 CFR 63.5731(d)]

- i. The permittee must keep records of the monthly inspections required by Condition I.A.3.d(3) of this permit and any repairs made to the covers of any containers holding organic HAP-containing solvents used for removing cured resin and gel coat. [40 CFR 63.5737(c)]
- j. The permittee must keep a copy of each notification and report that is submitted to comply with Section I.A of this permit. [40 CFR 63.5767(a)]
- k. The permittee must keep all documentation supporting any notification or report that is submitted. [40 CFR 63.5767(b)]
- l. The permittee must maintain records of the organic HAP content of the cleaning solvents subject to the standards in Conditions I.A.2.1 of this permit.[40 CFR 63.5737(a)]
- m. The permittee shall estimate on an hourly and daily basis the amounts of acetone, methyl methacrylate and styrene that are emitted to the atmosphere from all operations. The permittee shall keep records of these estimations and provide such records to the Office of Air Resources upon request. [Air Toxics Approval No. ATOP – 1118/2008(D)(2)] **Not Federally Enforceable**
- n. On the first business day of each month the permittee shall determine and record the amounts of acetone, methyl methacrylate and styrene used in each process during the previous month and the total amounts of those substances that have been used in the year to date. [Air Toxics Approval No. ATOP – 1118/2008(D)(3)] **Not Federally Enforceable**
- o. The permittee shall calculate on an annual basis the amounts of acetone, methyl methacrylate and styrene that are emitted to the atmosphere from all operations. The permittee shall keep records of these calculations and provide such records to the Office of Air Resources upon request. [Air Toxics Approval No. ATOP – 1118/2008(D)(4)] **Not Federally Enforceable**

## 5. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources in writing, within 5 business days, whenever the total quantity of styrene discharged to the atmosphere from the entire facility exceeds 24,142 pounds for any consecutive 12-month period. [Approval Nos. 1330-1333 (C)(6)]

- b. The permittee shall notify the Office of Air Resources in writing, within 5 days, whenever the total quantity of VOC discharged to the atmosphere from all clean up operations exceeds 85 pounds in any one day. [Approval Nos. 1330-1333 (C)(3)]
- c. The permittee shall submit information on the annual purchase, usage and emissions of acetone, methyl methacrylate and styrene to the Office of Air Resources as part of its annual air pollution emissions inventory report. [Air Toxics Approval No. ATOP – 1118/2008(E)(3)] **Not Federally Enforceable**
- d. If the permittee revises the implementation plan described in 40 CFR 63.5707, the permittee must submit the revised plan with the next semiannual compliance report specified in Condition I.A 5.g of this permit. [40 CFR 63.5707(e)]
- e. If the permittee changes any information submitted in any notification, the permittee must submit the changes in writing to the Administrator and Office of Air Resources within 15 calendar days after the change. [40 CFR 63.5761(b)]
- f. The permittee must, to the extent possible, organize each report according to the operations covered by Section I.A of this permit and the compliance procedure followed for that operation. [40 CFR 63.5764(a)]
- g. The permittee must submit semiannual compliance reports to the Administrator and Office of Air Resources.[40 CFR 63.5704(a)(5), 40 CFR 63.5764(b)]
  - (1) Each compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. [40 CFR 63.5764(b)(3)]
  - (2) Each compliance report must be postmarked or delivered no later than 45 calendar days after the end of the semiannual reporting period. [40 CFR 63.5764(b)(4), 29.6.4(b)(1)]
- h. The compliance report must include the following information: [40 CFR 63.5764(c)]
  - (1) Company name and address. [40 CFR 63.5764(c)(1)]
  - (2) A statement by a responsible official with that official's name, title and signature certifying the truth, accuracy and completeness of the report. [40 CFR 63.5764(c)(2)]

- (3) The date of the report and the beginning and ending dates of the reporting period. [40 CFR 63.5764(c)(3)]
- (4) A description of any changes in the manufacturing process since the last compliance report. [40 CFR 63.5764(c)(4)]
- (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 the permittee is 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. [40 CFR 63.5764(c)(5)]
- (6) If the permittee was in compliance with the emission limits and work practice standards during the reporting period, the permittee must include a statement to that effect. [40 CFR 63.5764(c)(6)]
- (7) If the permittee deviated from an emission limit or work practice standard during the reporting period, the permittee must also include the following information in the semiannual compliance report: [40 CFR 63.5764(c)(7)]
  - (a) A description of the operation involved in the deviation. [40 CFR 63.5764(c)(7)(i)]
  - (b) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation. [40 CFR 63.5764(c)(7)(ii)]
  - (c) A description of any corrective action taken by the permittee to minimize the deviation and actions taken to prevent it from happening again. [40 CFR 63.5764(c)(7)(iii)]
  - (d) 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. [40 CFR 63.5764(c)(7)(iv)]
- i. The permittee shall notify the Department of Environmental Management, in writing, of any noncompliance with the terms of this permit as soon as becoming aware of such occurrence, but no later than 30 calendar days of

becoming aware of such occurrence and supply the Director with the following information: [Air Toxics Approval No. ATOP – 1118/2008(E)(1)] **Not Federally Enforceable**

- (1) The name and location of the facility; [Air Toxics Approval No. ATOP – 1118/2008(E)(1)(a)] **Not Federally Enforceable**
- (2) The subject source(s) that caused the noncompliance with the permit term; [Air Toxics Approval No. ATOP – 1118/2008(E)(1)(b)] **Not Federally Enforceable**
- (3) The time and date of first observation of the incident of noncompliance; [Air Toxics Approval No. ATOP – 1118/2008(E)(1)(c)] **Not Federally Enforceable**
- (4) The cause and expected duration of the incident of noncompliance including malfunctions of control equipment; [Air Toxics Approval No. ATOP – 1118/2008(E)(1)(d)] **Not Federally Enforceable**
- (5) The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate; [Air Toxics Approval No. ATOP – 1118/2008(E)(1)(e)] **Not Federally Enforceable**
- (6) The proposed corrective actions and schedule to correct the conditions causing the incident of noncompliance. [Air Toxics Approval No. ATOP – 1118/2008(E)(1)(f)] **Not Federally Enforceable**

## 6. Other Permit Conditions

- a. To the extent consistent with the requirements of Section I.A of this permit and applicable federal and state laws, the equipment shall be designed, constructed and operated in accordance with the representation of the equipment in the preconstruction permit application. [Approval Nos. 1330-1333 (D)(3)]
- b. The permittee shall require and provide employee training with the goal of reducing VOC based clean up solvent usage. [Approval Nos. 1330-1333 (D)(4)]
- c. Cleaning with VOC based clean up solvents shall comply with all applicable general requirements, equipment specifications, and operating requirements

of Air Pollution Control Regulation No. 36 (Control of Emissions from Organic Solvent Cleaning). [Approval Nos. 1330-1333 (D)(5)]

- d. The permittee must comply with the requirements of the General Provisions in 40 CFR Part 63, subpart A as specified in Appendix E of this permit. [40 CFR 63.5773]

**B. Requirements for Emission Unit P006**

The following requirements are applicable to:

- Emission unit P006, which consists of the cleaning operations where acetone is used to clean tools and equipment used in the fiberglass boat manufacturing operations. The acetone is recycled using solvent recovery stills.

There are no specific requirements for P006. This does not relieve the permittee from compliance with the General Provisions, outlined in Section II of this permit, as they apply to P006.

**C. Requirements for Emission Unit P007**

The following requirements are applicable to:

- Emission unit P007, which is the cutting area where fiberglass boats and boat parts are trimmed and sanded. Particulate emissions from cutting and sanding are controlled by air pollution control devices C003, C004 and C005, each of which is a Donaldson Torit ECB Baghouse Filter.

**1. Emission Limitations**

a. Opacity

Visible emissions from the exhaust stack of C003, C004 and C005 shall not exceed 10 percent opacity. [Approval Nos. 1330-1333(D)(6), 1.2] Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this permit. [1.4]

**2. Operating Requirements**

a. C003, C004 and C005 shall be operated according to their design specifications whenever P007 is in operation or is emitting air contaminants. [16.2]

b. In the case of malfunction of C003, C004 and/or C005, all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C003, C004 and/or C005 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P007 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15

of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [16.3]

- (1) Identification of the specific air pollution control system (i. e., C003, C004 and/or C005) and the source on which it is installed; (i. e., P007), [16.3(a)]
- (2) The expected period of time that C003, C004 and/or C005 will be malfunctioning or out of service; [16.3(b)]
- (3) The nature and quantity of air contaminants likely to be emitted during said period, [16.3(c)]
- (4) Measures that will be taken to minimize the length of said period, and [16.3(d)]
- (5) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.3(e)]

### **3. Testing Requirements**

#### **a. Opacity**

Tests for determining compliance with the opacity limitations specified in Condition I.C.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

## **D. Facility Requirements**

### **1. Recordkeeping Requirements**

- a. The permittee shall maintain the following records: [Approval Nos. 1330-1333 (C)(1)]
  - (1) The name, type, and identification number of each material containing VOC and/or HAP used at the facility, including, but not limited to, each resin, gel coat, accelerator, activator, adhesive, epoxy, promoter, putty, paint and cleaner. [Approval Nos. 1330-1333 (C)(1)(a)]
  - (2) A material safety data sheet (MSDS) for each material containing VOC and/or HAP used at the facility, showing the VOC and HAP content. [Approval Nos. 1330-1333 (C)(1)(b)]

- b. For each material containing VOC and/or HAP used at the facility, the permittee shall record the quantity used and the amount of waste generated (in gallons or pounds) at the facility on a monthly basis. [Approval Nos. 1330-1333 (C)(4)]

## 2. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated non-compliance with the terms of this permit or any other applicable air pollution control rules and regulations. [Approval Nos. 1330-1333 (C)(7)]

## 3. Other Permit Conditions

- a. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval Nos. 1330-1333 (D)(2)]
- b. The Air Toxic Permit is based on Air Pollution Control Regulation (APCR) No. 22 requirements and does not relieve your facility from all other applicable State and Federal requirements including, but not limited to, APCR No. 9 and National Emission Standards for Hazardous Air Pollutants. [Air Toxics Approval No. ATOP – 1118/2008(F)(2)] **Not Federally Enforceable**



## SECTION II. GENERAL CONDITIONS

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**A. Annual Emissions Fee Payment**

The permittee shall pay an annual emissions fee as established in Air Pollution Control Regulation No. 28 "Operating Permit Fees". [29.6.8(d)]

**B. Permit Renewal and Expiration**

This permit is issued for a fixed term of 5 years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 12 months prior to the date of permit expiration. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the Office of Air Resources on the renewal application. In such an event, the permit shield in Condition II.Y of this permit shall extend beyond the original permit term until renewal. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by the Office of Air Resources any additional information identified as being needed to process the application. The application for renewal shall include the current permit number, description of permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. [29.6.8(a), 29.4.2(c), 29.4.6]

**C. Transfer of Ownership or Operation**

This permit is nontransferable by the permittee. Future owners and operators must obtain a new operating permit from the Office of Air Resources. A change in ownership or operational control of this source is treated as an administrative permit amendment if no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Office of Air Resources. [29.10.1(a)(4)]

**D. Property Rights**

This permit does not convey any property rights of any sort, or any exclusive privilege. [29.6.8(c)(4)]

**E. Submissions**

1. Reports, test data, monitoring data, notifications, and requests for renewal shall be submitted to :

RIDEM - Office Air Resources  
Compliance Assurance Section  
235 Promenade St. Room 230  
Providence, RI 02908

2. Any records, compliance certifications and monitoring data required by the provisions of this permit to be submitted to USEPA shall be sent to:

USEPA Region I  
Office of Environmental Stewardship  
Director, Air Compliance Program  
Attn: Air Compliance Clerk  
One Congress St. Suite 1100 (SEA)  
Boston, MA 02114 - 2023

3. Any document submitted shall be certified as being true, accurate, and complete by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. [29.6.8(e)]

**F. Inspection and Entry**

1. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter this facility at all reasonable times for the purpose of:
  - a. having access to and copying at reasonable times any records that must be kept under the conditions of this permit;
  - b. inspecting at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - c. sampling or monitoring, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.[Approval Nos. 1330-1333 (D)(1), [Air Toxics Approval No. ATOP – 1118/2008(F)(1), 29.6.8(f)(1-4)]

Nothing in this condition shall limit the ability of USEPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

**G. Compliance**

1. The permittee must comply with all conditions of this permit. Any noncompliance with a federally enforceable permit condition constitutes a violation of the Clean Air Act and is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. Any noncompliance with a permit condition designated as state only enforceable constitutes a violation of state rules only and is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. [29.6.8(c)(1)]
2. For each unit at the facility for which an applicable requirement becomes effective during the permit term, the permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [29.6.5(a)]
3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [29.6.8(c)(2)]

**H. Excess Emissions Due to an Emergency**

As the term is used in this condition an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of this source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes this source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. [29.6.11(b)]

Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain a health based air quality standard.

The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that: [29.6.11(a), 29.6.11(c)]

1. an emergency occurred and that the permittee can identify the cause(s) of the emergency; [29.6.11(c)(1)]
2. the permitted facility was at the time being properly operated; [29.6.11(c)(2)]

3. during the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and [29.6.11(c)(3)]
4. the permittee submitted notice of the emergency to the Office of Air Resources within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirements of Condition II.AA.3 of this permit. [29.6.11(c)(4)]

The permittee shall have the burden of proof in seeking to establish the occurrence of an emergency. [29.6.11(d)]

**I. Duty to Provide Information**

The permittee shall furnish to the Office of Air Resources, within a reasonable time, any pertinent information that the Office of Air Resources may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Office of Air Resources copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [29.6.8(c)(5)]

**J. Duty to Supplement**

The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the Office of Air Resources. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit. [29.5.4]

**K. Reopening for Cause**

The Office of Air Resources will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

1. Additional requirements under the Clean Air Act become applicable to a major source 3 or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless this permit or any of its terms and conditions has been extended. [29.6.13(a)]

2. The Office of Air Resources or the Administrator determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. [29.6.13(c)]
3. The Office of Air Resources or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [29.6.13(d)]

Reopenings shall not be initiated before a notice of intent to reopen is provided to the permittee by the Office of Air Resources at least 30 days in advance of the date that this permit is to be reopened, except that the Office of Air Resources may provide a shorter time period (but not less than 5 days) in the case of an emergency. [29.9.5(b)]

Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable. [29.9.5(a)]

All permit conditions remain in effect until such time as the Office of Air Resources takes final action. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [§70.6(a)(6)(iii)]

**L. Severability Clause**

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [29.6.8(b)]

**M. Off-Permit Changes**

1. The permittee is allowed to make certain changes that are not addressed or prohibited by this permit without a permit revision, provided that the following conditions are met: [29.11.2(a)]
  - a. Each such change shall not violate any term or condition of this permit. [29.11.2(b)]
  - b. Each change shall comply with all applicable requirements. [29.11.2(b)]
  - c. Changes under this provision may not include changes or activities subject to any requirement under Title IV or modifications under any provision of Title I of the Clean Air Act. [29.11.2(a)]
  - d. Before the permit change is made, the permittee must provide

contemporaneous written notice to the Office of Air Resources and the USEPA Region I, except for changes that qualify as insignificant activities in Appendix A of APC Regulation No. 29. This notice shall describe each change, including the date, and change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change. [29.11.2(c)]

- e. The permit shield does not apply to changes made under this provision. [29.11.2(d)]
  - f. The permittee shall keep a record describing changes made at the stationary source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes, including any other data necessary to show compliance with applicable ambient air quality standards. The record shall reside at the permittee's facility. [29.11.2(e)]
- 2. Changes made pursuant to this provision shall not be exempt from the requirement to obtain a minor source permit pursuant to the requirements of Air Pollution Control Regulation No. 9, if applicable. [29.11.2(a)]
  - 3. Changes made pursuant to this provision shall be incorporated into this permit at the time of renewal. [29.11.2(f)]

**N. Section 502(b)(10) Changes**

- 1. The permittee is allowed to make changes within this permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit, whether expressed therein as a rate of emissions or in terms of total emissions and are not Title I modifications. This class of changes does not include:
  - a. changes that would violate applicable requirements; or
  - b. changes to federally-enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements. [29.11.1(a), 29.1.36]
- 2. The permittee shall provide written notice to the Office of Air Resources and the USEPA Region I of any change made under this provision. The notice must be received by the Office of Air Resources no later than fourteen (14) days in advance of the proposed changes. The notice shall include information describing the nature of the change, the effect of the change on the emission of any air contaminant, the scheduled completion date of the planned change and identify any permit terms or conditions that are no longer applicable as a result of the change. The permittee shall

attach each notice to its copy of this permit. [29.11.1(a)(1), 29.11.1(a)(2)]

3. The permittee shall be allowed to make such change proposed in its notice the day following the last day of the advance notice described in paragraph 2 if the Office of Air Resources has not responded nor objected to the proposed change on or before that day. [29.11.1(b)]
4. Any permit shield provided in this permit does not apply to changes made under this provision. If subsequent changes cause the permittee's operations and emissions to revert to those anticipated in this permit, the permittee resumes compliance with the terms and conditions of the permit, and has provided the Office of Air Resources and USEPA with a minimum of fourteen (14) days advance notice of such changes in accordance with the provisions of paragraph 2, the permit shield shall be reinstated in accordance with terms and conditions stated in this permit. [29.11.1(c)]
5. Changes made pursuant to this provision shall be incorporated into the operating permit at the time of renewal. [29.11.1(d)]

**O. Emissions Trading**

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. [29.6.6(a)]

**P. Emission of Air Contaminants Detrimental to Person or Property**

The permittee shall not emit any air contaminant which either alone or in connection with other emissions, by reason of their concentration or duration, may be injurious to human, plant or animal life, or cause damage to property or which unreasonably interferes with the enjoyment of life or property. [7.1]

**Q. Odors**

1. The permittee shall not emit or cause to be emitted into the atmosphere any air contaminant or combination of air contaminants which creates an objectionable odor beyond the property line of this facility. [17.1]
2. A staff member of the Office of Air Resources shall determine by personal observation if an odor is objectionable, taking into account its nature, concentration, location, duration and source. [17.2]

**R. Visible Emissions**

1. Except as may be specified in other provisions of this permit, the permittee shall not emit into the atmosphere, from any emission unit, any air contaminant, for a period

or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this permit. [1.4]

2. Tests for determining compliance with the opacity limitations specified in this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

**S. Open Fires**

It shall be unlawful for the permittee to burn any material in an open fire, except as provided in APC Regulation No. 4, Section 4.3. [4.2]

**T. Construction Permits**

It shall be unlawful for the permittee to construct, install, modify or cause the construction, installation or modification of any stationary source subject to the provisions of APC Regulation No. 9 without obtaining either a minor source permit or a major source permit from the Director. [9.2.1]

**U. Sulfur in Fuel**

1. Except as may be specified in other provisions of this permit, unless the Director declares in writing after a hearing that a shortage of low sulfur fuel exists, the permittee shall not use or store fuel oil with a sulfur content greater than 1.0% by weight, except for use with marine vessels or motor vehicles. [8.2, 8.3.6]
2. Compliance with the sulfur in fuel limitations contained in this section shall be determined by the procedures listed below or by another method deemed equivalent by the Director and USEPA: [29.6.3(b)]
  - a. For each shipment of fuel oil, the permittee shall obtain a certification from the fuel supplier which contains:
    - (1) For distillate fuel oil:
      - (a) The name of the supplier;
      - (b) A statement that the oil complies with the specification for fuel oil number 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78 "Standard Specification for Fuel Oils."
    - (2) For residual fuel oil:



- (a) The name of the oil supplier;
  - (b) The sulfur content of the oil and the ASTM method used to determine the sulfur content of the oil,
  - (c) The location of the oil when the sample was drawn for analysis to determine the nitrogen and sulfur content of the oil, specifically including whether the oil was sampled as delivered to the permittee or whether the sample was drawn from oil in storage at the oil suppliers/refiners facility or another location.
- (3) For diesel fuel oil:
- (a) The name of the fuel supplier;
  - (b) a statement that the oil complies with the specification for diesel fuel oil grade 1-D or 2-D, as defined by the American Society for Testing and Materials in ASTM D975-03 "Standard Specification for Fuel Oils." [29.6.3]
- b. As an alternative to fuel oil certification, the permittee may elect to sample the fuel oil prior to combustion. Sampling and analysis shall be conducted after each new shipment of fuel oil is received. Samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any fuel oil is combusted. [8.4.1(b), 29.6.3(b)]
- c. All fuel oil must be sampled and analyzed according to ASTM methods which have the prior approval of or are required by the Office of Air Resources. [8.4.1(b), 29.6.3(b)]
- d. Copies of the fuel oil analysis sheets shall be maintained at the facility and be made accessible for review by the Office of Air Resources or designated personnel of the Office of Air Resources and USEPA. These records shall include a certified statement, signed by a responsible official, that the records represent all of the fuel combusted during each quarter. [29.6.3(b), 29.6.4(a)(1)]
- e. The Director may require, under his supervision, the collection of fossil fuel samples for the purpose of determining compliance with the sulfur limitations in this permit. Sampling and analysis of fossil fuels under Condition II.U.2 of this permit shall not limit the collection of samples under this condition. [8.4.3]

**V. Air Pollution Episodes**

Conditions justifying the proclamation of an air pollution alert, air pollution warning or air pollution emergency shall be deemed to exist whenever the Director determines that the accumulation of air pollutants in any place is attaining or has attained levels which could, if such levels are sustained or exceeded, lead to a substantial threat to the health of persons. If the governor declares an air pollution alert, air pollution warning or air pollution emergency, the permittee shall comply with the applicable requirements contained in APC Regulation No. 10. [10.1]

**W. Fugitive Dust**

The permittee shall not cause or permit any materials, including but not limited to sand, gravel, soil, aggregate and any other organic or inorganic solid matter capable of releasing dust, to be handled, transported, mined, quarried, stored or otherwise utilized in any way so as to cause airborne particulate matter to travel beyond the property line of the facility without taking adequate precautions to prevent particulate matter from becoming airborne. Such precaution shall be in accordance with good industrial practice as determined by the Director and/or shall be other reasonable fugitive dust prevention measures as determined by the Director. [5.2]

**X. Compliance Certifications**

1. The permittee shall submit a certification of compliance with permit terms and conditions annually. [29.6.5(c)(1)]
2. The certification shall describe the following:
  - a. the permit term or condition that is the basis of the certification; [29.6.5(c)(3)a]
  - b. the current compliance status; [29.6.5(c)(3)b]
  - c. whether compliance was continuous or intermittent; and [29.6.5(c)(3)c]
  - d. the methods used for determining compliance, currently and over the reporting period. [29.6.5(c)(3)d]
3. All compliance certifications shall be submitted to the Office of Air Resources and to the USEPA Region I. They shall be submitted within 60 days following the end of the reporting period which is the calendar year unless otherwise specified. [29.6.5(c)(4)]
4. All compliance certifications shall be certified as being true, accurate, and complete by a responsible corporate official. This certification shall state that, based on

information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. [29.6.8(e)]

**Y. Permit Shield**

1. Compliance with the terms and conditions of this permit shall be deemed compliance with all requirements applicable to the source in the following regulations: Approval Nos. 1330-1333, Air Toxics Approval No. ATOP - 1118/2008, 40 CFR 63, Subpart VVVV, and RI APC Regulation Nos. 1, 4, 5, 7, 8, 9, 10, 14, 16, 17, 22, 28 and 29. [29.6.12(a)(1)]
2. The Office of Air Resources has determined that units P001, P002, P006 and P007, are not subject to RI APC Regulation Nos. 3, 6, 11, 12, 13, 15, 19, 20, 21, 23, 24, 25, 26, 27, 30, 31, 32, 33, 35, 36, 39, 41 and 43. [29.6.12(a)(2)]
3. Nothing in this permit shall alter or affect the following:
  - a. the provisions of Section 303 of the Clean Air Act, including the authority of USEPA under that Section. [29.6.12(c)(1)]
  - b. the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [29.6.12(c)(2)]
  - c. the applicable requirements of the acid rain program consistent with Section 408 of the Clean Air Act. [29.6.12(c)(3)]
  - d. the ability of the USEPA to obtain information under Section 114 of the Act. [29.6.12(c)(4)]
4. If it is determined that this operating permit was issued based on inaccurate or incomplete information provided by the permittee, this permit shield shall be void as to the portions of this permit which are affected, directly or indirectly, by the inaccurate or incomplete information. [29.6.12(d)]

**Z. Recordkeeping**

1. The permittee shall, at the request of the Director, maintain records of and provide data on operational processes, fuel usage, raw materials, stack dimensions, exhaust gas flow rates and temperatures, emissions of air contaminants, steam or hot water generator capacities, types of equipment producing air contaminants and air pollution control systems or other data that may be necessary to determine if the facility is in compliance with air pollution control regulations. [14.2.1]
2. All records and supporting information required by this permit shall be maintained at the permittee's 200 Highpoint Avenue for a period of at least 5 years from the date of

sample monitoring, measurement, report or application, and shall be made available to representatives of the Office of Air Resources and USEPA upon request. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [14.2.1, 29.6.4(a)(2), Approval Nos. 1330-1333 (C)(9), 40 CFR 63.5770(a)-(c), 40 CFR 63.10(b)(1), Air Toxics Approval No. ATOP – 1118/2008(D)(5)]

3. The permittee shall keep records of required monitoring information that include the following:
  - a. The date, place and time of sampling or measurements; [29.6.4(a)(1)a]
  - b. The date(s) analyses were performed; [29.6.4(a)(1)b]
  - c. The company or entity that performed the analyses; [29.6.4(a)(1)c]
  - d. The analytical techniques or methods used; [29.6.4(a)(1)d]
  - e. The results of such analyses; and [29.6.4(a)(1)e]
  - f. The operating conditions as existing at the time of sampling or measurement. [29.6.4(a)(1)f]

**AA. Reporting**

1. The information recorded by the permittee pursuant to Condition II.Z.1 of this Section shall be summarized and reported at least annually to the Director. It shall be submitted by April 15<sup>th</sup> unless otherwise specified. Information submitted pursuant to this condition will be correlated with applicable emissions limitations and other applicable emissions information and will be available for public inspection. [14.2.2, 14.2.3]
2. The permittee shall submit reports of any required monitoring for each semi annual period ending 30 June and 31 December of every calendar year. These reports shall be due to the Office of Air Resources no later than forty-five (45) days after the end of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Condition II.X.4 of this permit. [29.6.4(b)(1)]
3. Deviations from permit conditions, including those attributable to upset conditions as defined in this permit, shall be reported, in writing, within five (5) business days of the deviation, to the Office of Air Resources. A copy of any such report shall be sent to the USEPA Region I. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. Each report must be certified by a responsible official consistent with Condition II.X.4 of this permit. [29.6.4(b)(2), Approval Nos. 1330-1333 (C)(8)]
4. The Office of Air Resources shall be notified in writing of any planned physical change or operational change to the emissions units and control devices identified in this permit. Such notification shall include information describing the nature of the change, information describing the effect of the change on the emissions of air

contaminants and the scheduled completion date of the planned change. Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Office of Air Resources. [Approval Nos. 1330-1333 (C)(10), Air Toxics Approval No. ATOP – 1118/2008(E)(2)]

**BB. Credible Evidence**

For the purpose of submitting compliance certifications or establishing whether or not the permittee has violated or is in violation of any provision of this permit, the methods used in this permit shall be used, as applicable. However, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the permittee would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed. [40 CFR 51.212(c), 51.12(c), 52.33(a)]

**CC. Emission Statements**

1. The permittee shall submit annually an emission statement which includes information for both VOC and NO<sub>x</sub> if facility wide actual emissions are 25 tons per year of either pollutant. Emission statements shall be submitted to the Director on April 15<sup>th</sup> of each year unless otherwise specified. The permittee may apply to the Office of Air Resources to be allowed to discontinue submitting annual emission statements if actual emissions at the facility decrease to below 10 tons per year as a result of a permanent process change. [14.3.1]

The permittee shall submit an emission statement in a format approved by the Office of Air Resources. The emission statement shall contain the following information: [14.3.2]

- a. A certification that the information contained in the emission statement is accurate and complete to the best knowledge of the certifying individual.
- b. The full name, title, signature, date of signature, and telephone number of the certifying individual.
- c. Facility identification information, including the full name, physical location, mailing address, latitude, longitude, and four digit SIC code(s).
- d. Process data pertaining to each process emitting VOC and/or NO<sub>x</sub>, including:
  - (1) Annual and typical ozone season daily fuel use,
  - (2) Annual and typical ozone season daily process rate(s), and
  - (3) Process throughput while air pollution control equipment was not in operation.

- e. Operating data pertaining to each process emitting VOC and/or NO<sub>x</sub> during the reporting year, including:
  - (1) Percentage annual throughput,
  - (2) Average hours of operation per day during the reporting year and on a typical ozone season day,
  - (3) Average number of days of operation per week during the reporting year and during a typical ozone season week, and
  - (4) Weeks of operation during the reporting year and during the peak ozone season.
  
- f. Control equipment information, including:
  - (1) Specific primary and secondary control equipment for each process emitting VOC and/or NO<sub>x</sub>,
  - (2) Current overall control efficiency for each piece of control equipment (indicated by percent capture and percent destruction or removal), and
  - (3) Control equipment downtime during the reporting year and during the peak ozone season.
  
- g. Emissions information, including:
  - (1) Actual annual and typical ozone season daily emissions of VOC and NO<sub>x</sub> for each process. Emissions should be reported in tons per year and in pounds per day.
  - (2) A description of the emission calculation method and, if applicable, emission factor(s) used, and
  - (3) The calendar year for which emissions are reported.
  
- h. Any additional information required by the Director to document the facility's emission statements.

**DD. Miscellaneous Conditions**

- 1. This permit may be modified, revoked, reopened, reissued or terminated for cause. The filing of a request, by the permittee, for a permit modification, revocation and reissuance or termination or of a notification of planned changes or anticipated noncompliance does not release the permittee from the conditions of this permit. [29.6.8(c)(3)]
  
- 2. Any application for a permit revision need only submit information related to the proposed change. [29.4.3(c)]

3. Terms not otherwise defined in this permit shall have the meaning given to such terms in 40 CFR 63.2, the Clean Air Act as amended in 1990 or the referenced regulation as applicable.
4. Where more than one condition in this permit applies to an emission unit and/or the entire facility, the most stringent condition shall apply.



### SECTION III. SPECIAL CONDITIONS

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**A. Prevention of Accidental Releases**

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

Your facility is subject to the requirements of the General Duty Clause, under 112(r)(1) of the CAA Amendments of 1990. This clause specifies that owners or operators of stationary sources producing, processing, handling or storing a chemical in any quantity listed in 40 CFR Part 68 or any other extremely hazardous substance have a general duty to identify hazards associated with these substances and to design, operate and maintain a safe facility, in order to prevent releases and to minimize the consequences of accidental releases which may occur.

SECTION IV. APPENDICES

APPENDIX A

$$HAP\ emissions = [(PV_r)(M_r) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$$

Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV<sub>R</sub> = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

M<sub>R</sub> = Mass of production resin used in the past 12 months, megagrams.

PV<sub>PG</sub> = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

M<sub>PG</sub> = Mass of pigmented gel coat used in the past 12 months, megagrams.

PV<sub>CG</sub> = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

M<sub>CG</sub> = Mass of clear gel coat used in the past 12 months, megagrams.

PV<sub>TR</sub> = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

M<sub>TR</sub> = Mass of tooling resin used in the past 12 months, megagrams.

PV<sub>TG</sub> = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

M<sub>TG</sub> = Mass of tooling gel coat used in the past 12 months, megagrams.

[40 CFR 63.5710(b)]

**APPENDIX B**

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)}$$

Where:

$PV_{OP}$  = Weighted-average MACT model point value for each open molding operation ( $PV_R$ ,  $PV_{PG}$ ,  $PV_{CG}$ ,  $PVPV_{TR}$ , and  $PVPV_{TG}$ ) included in the average, kilograms of HAP per megagram of material applied.

$M_i$  = Mass of resin or gel coat  $i$  used within an operation in the past 12 months, megagrams.

$n$  = Number of different open molding resins and gel coats used within an operation in the past 12 months.

$PV_i$  = The MACT model point value for resin or gel coat  $i$  used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

[40 CFR 63.5710(c)]

**APPENDIX C**

$$PV_F = PV_U \times \frac{(100 - \% \text{ Filler})}{100}$$

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 Appendix D, Table 1 to this permit.

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

[40 CFR 63.5714(a)]

APPENDIX D

*Table 1 --- MACT Model Point Value formulas for Open Molding Operations<sup>1</sup>*

For this operation	And this application method	Use this formula to calculate the MACT model plant value for each resin and gel coat
1. Production resin, tooling resin	a. Atomized	$0.014 \times (\text{Resin HAP}\%)^{2.425}$
	b. Atomized, plus vacuum bagging with roll-out	$0.01185 \times (\text{Resin HAP}\%)^{2.425}$
	c. Atomized, plus vacuum bagging without roll-out	$0.00945 \times (\text{Resin HAP}\%)^{2.425}$
	d. Nonatomized	$0.014 \times (\text{Resin HAP}\%)^{2.275}$
	e. Nonatomized, plus vacuum bagging with rollout	$0.0110 \times (\text{Resin HAP}\%)^{2.275}$
	f. Nonatomized, plus vacuum bagging without roll-out	$0.0076 \times (\text{Resin HAP}\%)^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	$0.445 \times (\text{Gel coat HAP}\%)^{1.675}$

<sup>1</sup>Equations 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.

[40 CFR 63, Subpart VVVV, Table 3]

APPENDIX D (continued)

**Table 2 -- Default Organic HAP Content of Solvents and Solvent Blends**

<b>Solvent/solvent blend</b>	<b>CAS No.</b>	<b>Average Organic HAP content, percent by mass</b>	<b>Typical organic HAP, Percent by mass</b>
1. Toluene	108-88-3	100	Toluene
2. Xylene(s)	1330-20-7	100	Xylenes, ethylbenzene
3. Hexane	110-54-3	50	n-hexane
4. n-hexane	110-54-3	100	n-hexane
5. Ethylbenzene	100-41-4	100	Ethylbenzene
6. Aliphatic 140		0	None
7. Aromatic 100		2	1% xylene, 1% cumene
8. Aromatic 1		9	Naphthalene
9. Aromatic naphtha	64742-95-6	2	1% xylene, 1% cumene
10. Aromatic solvent	64742-94-5	10	Naphthalene
11. Exempt mineral spirits	8032-32-4	0	None
12. Ligroines (VM & P)	8032-32-4	0	None
13. Lactol spirits	64742-89-6	15	Toluene
14. Low aromatic white spirit	64742-82-1	0	None
15. Mineral spirits	64742-88-7	1	Xylenes
16. Hydrotreated naphtha	64742-48-9	0	None
17. Hydrotreated light distillate	64742-47-8	0.1	Toluene
18. Stoddard solvent	8052-41-3	1	Xylenes
19. Super high-flash naphtha	64742-95-6	5	Xylenes
20. Varol solvent	8052-49-3	1	0.5% xylenes, 0.5% ethyl bezene.
21. VM & P naphtha	64742-89-8	6	3% toluene, 3% xylene
22. Petroleum distillate mixture	68477-31-6	8	4% naphthalene, 4% biphenyl

[40 CFR 63, Subpart VVVV, Table 5]

APPENDIX D (continued)

**Table 3 -- Default Organic HAP Content of Petroleum Solvents Groups**

Solvent type	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.).	3	1% Xylene, 1% Toluene, and 1% Ethylbenzene
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.).	6	4% Xylene, 1% Toluene, and 1% Ethylbenzene

[40 CFR 63, Subpart VVVV, Table 6]

**APPENDIX E**

***Applicability of General Provisions (40 CFR Part 63, Subpart A) to  
Subpart VVVV***

<b>Citation</b>	<b>Requirement</b>	<b>Applies to subpart VVVV</b>	<b>Explanation</b>
§63.1(a)	General Applicability	Yes	
§63.1(b)	Initial Applicability Determination	Yes	
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	.....	Yes	Area sources are not regulated by subpart VVVV
§63.1(c)(3)	.....	No	[Reserved]
§63.1(c)(4)-(5)	.....	Yes	
§63.1(d)	.....	No	[Reserved]
§63.1(e)	Applicability of Permit Program	Yes	
§63.2	Definitions	Yes	Additional definitions are found in §63.5779
§63.3	Units and Abbreviations	Yes	
§63.4(a)	Prohibited Activities	Yes	
§63.4(b)-(c)	Circumvention/Severability	Yes	
§63.5(a)	Construction/Reconstruction	Yes	
§63.5(b)	Requirements for Existing, Newly Constructed, and Reconstructed Sources.	Yes	
§63.5(c)	.....	No	[Reserved]
§63.5(d)	Application for Approval of Construction/Reconstruction.	Yes	
§63.5(e)	Approval of Construction/Reconstruction	Yes	
§63.5(f)	Approval of Construction/Reconstruction Based on prior State Review.	Yes	
§63.6(a)	Compliance with Standards and Maintenance Requirements— Applicability.	Yes	
§63.6(b)	Compliance Dates for New and Reconstructed Sources.	Yes	§63.5695 specifies compliance dates, including the compliance date for new area sources that become major sources after the effective date of the rule.
§63.6(c)	Compliance Dates for Existing Sources	Yes	§63.5695 specifies compliance dates, including the compliance date for new area sources that become major sources after the effective date of the rule
§63.6(d)	.....	No	[Reserved]
§63.6(e)(1)-(2)	Operation and Maintenance Requirements.	No	Operating requirements for open molding operations with add-on controls are specified in §63.5725.



Citation	Requirement	Applies to subpart VVVV	Explanation
§63.6(e)(3)	Startup, Shut Down, and Malfunction Plans.	Yes	Only sources with add-on controls must complete startup, shutdown, and malfunction plans.
§63.6(f)	Compliance with Nonopacity Emission Standards.	Yes	
§63.6(g)	Use of an Alternative Nonopacity Emission Standard.	Yes	
§63.6(h)	Compliance with Opacity/Visible Emissions Standards.	No	Subpart VVVV does not specify opacity or visible emission standards.
§63.6(i)	Extension of Compliance with Emission Standards.	Yes	
§63.6(j)	Exemption from Compliance with Emission Standards.	Yes	
§63.7(a)(1)	Performance Test Requirements	Yes	
§63.7(a)(2)	Dates for performance tests	No	§63.5716 specifies performance test dates.
§63.7(a)(3)	Performance testing at other times	Yes	
§63.7(b)-(h)	Other performance testing requirements	Yes	
§63.8(a)(1)-(2)	Monitoring Requirements—Applicability	Yes	All of §63.8 applies only to sources with add-on controls. Additional monitoring requirements for sources with add-on controls are found in §63.5725.
§63.8(a)(3)	.....	No	[Reserved]
§63.8(a)(4)	.....	No	Subpart VVVV does not refer directly or indirectly to §63.11.
§63.8(b)(1)	Conduct of Monitoring	Yes	
§63.8(b)(2)-(3)	Multiple Effluents and Multiple Continuous Monitoring Systems (CMS).	Yes	Applies to sources that use a CMS on the control device stack.
§63.8(c)(1)-(4)	Continuous Monitoring System Operation and Maintenance.	Yes	
§63.8(c)(5)	Continuous Opacity Monitoring Systems (COMS).	No	Subpart VVVV does not have opacity or visible emission standards.
§63.8(c)(6)-(8)	Continuous Monitoring System Calibration Checks and Out-of-Control Periods.	Yes	
§63.8(d)	Quality Control Program	Yes	
§63.8(e)	CMS Performance Evaluation	Yes	
§63.8(f)(1)-(5)	Use of an Alternative Monitoring Method	Yes	
§63.8(f)(6)	Alternative to Relative Accuracy Test	Yes	Applies only to sources that use continuous emission monitoring systems (CEMS).
§63.8(g)	Data Reduction	Yes	
§63.9(a)	Notification Requirements—Applicability	Yes	
§63.9(b)	Initial Notifications	Yes	
§63.9(c)	Request for Compliance Extension	Yes	
§63.9(d)	Notification That a New Source Is Subject to Special Compliance	Yes	

Citation	Requirement	Applies to subpart VVVV	Explanation
	Requirements.		
§63.9(e)	Notification of Performance Test	Yes	Applies only to sources with add-on controls.
§63.9(f)	Notification of Visible Emissions/Opacity Test.	No	Subpart VVVV does not have opacity or visible emission standards.
§63.9(g)(1)	Additional CMS Notifications—Date of CMS Performance Evaluation.	Yes	Applies only to sources with add-on controls.
§63.9(g)(2)	Use of COMS Data	No	Subpart VVVV does not require the use of COMS.
§63.9(g)(3)	Alternative to Relative Accuracy Testing	Yes	Applies only to sources with CEMS.
§63.9(h)	Notification of Compliance Status	Yes	
§63.9(i)	Adjustment of Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	
§63.10(a)	Recordkeeping/Reporting—Applicability	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	§§63.567 and 63.5770 specify additional recordkeeping requirements.
§63.10(b)(2)(i-xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS.	Yes	Applies only to sources with add-on controls.
§63.10(b)(2)(xii-xiv)	General Recordkeeping Requirements	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations.	Yes	§63.5686 specifies applicability determinations for non-major sources.
§63.10(c)	Additional Recordkeeping for Sources with CMS.	Yes	Applies only to sources with add-on controls.
§63.10(d)(1)	General Reporting Requirements	Yes	§63.5764 specifies additional reporting requirements.
§63.10(d)(2)	Performance Test Results	Yes	§63.5764 specifies additional requirements for reporting performance test results.
§63.10(d)(3)	Opacity or Visible Emissions Observations.	No	Subpart VVVV does not specify opacity or visible emission standards.
§63.10(d)(4)	Progress Reports for Sources with Compliance Extensions.	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports.	Yes	Applies only to sources with add-on controls.
§63.10(e)(1)	Additional CMS Reports—General	Yes	Applies only to sources with add-on controls.
§63.10(e)(2)	Reporting Results of CMS Performance Evaluations.	Yes	Applies only to sources with add-on controls.
§63.10(e)(3)	Excess Emissions/CMS Performance Reports.	Yes	Applies only to sources with add-on controls.
§63.10(e)(4)	COMS Data Reports	No	Subpart VVVV does not specify opacity or visible emission standards.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements—Applicability.	No	Facilities subject to subpart VVVV do not use flares as control devices.
§63.12	State Authority and Delegations	Yes	§63.5776 lists those sections of subpart A that are

Citation	Requirement	Applies to subpart VVVV	Explanation
			not delegated.
§63.13	Addresses	Yes	
§63.14	Incorporation by Reference	Yes	
§63.15	Availability of Information/Confidentiality	Yes	

[40 CFR 63, Subpart VVVV, Table 8]