ROY COOPER
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Secretary

MICHAEL A. ABRACZINSKAS
Director

NORTH CAROLINA
Environmental Quality

Month XX, 2022

Mr. Scott Ellis
Director of Manufacturing/Engineering
HC Composites, LLC
601 Staton Road
Greenville, NC 27834

Subject: Air Permit No. 10681R00
World Cat Greenville
Greenville, Pitt County, North Carolina
Permit Class: Title V
Facility ID# 7400317

Dear Mr. Ellis:

In accordance with your completed application received March 15, 2022, we are forwarding herewith Permit No. 10681R00 to World Cat Greenville, Pitt County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Additionally, any emissions activities determined from your air permit application as meeting the exemption requirements contained in 15A NCAC 02Q .0503 have been listed for information purposes as an "ATTACHMENT" to the enclosed air permit. Please note the records retention requirements are contained in General Condition 2 of the General Conditions and Limitations.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. Such a request will stay the effectiveness of the entire permit. This hearing request must be in the form of a written petition, conforming to G.S. 150B-23 of the North Carolina General Statutes, and filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Unless a request for a hearing is made pursuant to G.S. 150B-23, this air permit shall be final and binding.

You may request modification of your air permit through informal means pursuant to G.S. 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that the permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under G.S. 150B-23.

Unless exempted by a condition of this permit or the regulations, construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices described in this permit must be covered under a permit issued by the Division of Air Quality prior to construction. Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B.

Pitt County has triggered increment tracking under PSD for NOx. However, this permit modification does not consume or expand increments for any triggered pollutants.

This permit shall be effective from XX XX, 2022 until XX XX, 2030, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Changes have been made to the permit stipulations. The Permittee is responsible for carefully reading the entire permit and evaluating the requirements of each permit stipulation. The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

Should you have any questions concerning this matter, please contact Mr. Jeff Twisdale at 919-707-8472 or at Jeff.Twisdale@ncdenr.gov.

Sincerely,

Mark J. Cuilla, EIT, CPM, Chief, Permitting Section
Division of Air Quality, NC DEQ

Enclosure

c: Washington Regional Office
Central Files
Connie Horne (cover letter only)

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF ENVIRONMENTAL QUALITY

DIVISION OF AIR QUALITY

AIR PERMIT NO. 10681R00

Issue Date: XX XX, 2022 | Effective Date: XX XX, 2022
Expiration Date: XX XX, 2030 | Replaces Permit: N/A

To construct and operate air emission source(s) and/or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere in accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina (NCGS) as amended, and other applicable Laws, Rules and Regulations,

World Cat Greenville
601 Staton Drive
Greenville, Pitt County, North Carolina
Permit Class: Title V
Facility ID# 7400317

(the Permittee) is hereby authorized to construct and operate the air emissions sources and/or air cleaning devices and appurtenances described below:

Emission Source ID	Emission Source Description	Control System ID	Control System Description
ES-LAM01 **[MACT VVVV]**	Resin and gelcoat application area	CD-PF	Panel Filters installed on six exhaust stacks

in accordance with the completed application 7400317.20A received March 15, 2022, including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environmental Quality, Division of Air Quality (DAQ) and are incorporated as part of this permit.

This permit is subject to the following specified conditions and limitations including any TESTING, REPORTING, OR MONITORING REQUIREMENTS:

A. SPECIFIC CONDITIONS AND LIMITATIONS

1. Any air emission sources, or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 02D .0515, 02D .0521, 02D .0535, 02D .0540, 02D .0605, 02D .0611, 02D .1111 (40 CFR 63, Subpart VVVV), 02D .1806, 02Q .0207 and 02Q .0504.

2. PERMIT RENEWAL REQUIREMENT - The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 02Q .0304(d) and (f). Pursuant to 15A NCAC 02Q .0203(i), no permit application fee is required for renewal of an existing air permit (without a modification request). The renewal request (with application Form A) should be submitted to the Regional Supervisor, DAQ.

3. ANNUAL EMISSION INVENTORY REQUIREMENTS - As required by 15A NCAC 02Q .0207 “Annual Emissions Reporting”, the Permittee shall report by June 30 of each year the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

4. PARTICULATE CONTROL REQUIREMENT - As required by 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes," particulate matter emissions from the emission sources shall not exceed allowable emission rates. The allowable emission rates are, as defined in 15A NCAC 02D .0515, a function of the process weight rate and shall be determined by the following equation(s), where P is the process throughput rate in tons per hour (tons/hr) and E is the allowable emission rate in pounds per hour (lbs/hr).

$E = 4.10 * (P)^{0.67}$ for P <= 30 tons/hr, or

$E = 55 * (P)^{0.11} - 40$ for P >30 tons/hr

5. VISIBLE EMISSIONS CONTROL REQUIREMENT - As required by 15A NCAC 02D .0521 "Control of Visible Emissions," visible emissions from the emission sources, manufactured after July 1, 1971, shall not be more than 20 percent opacity when averaged over a six-minute period, except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. However, sources which must comply with a visible emissions standard in 15A NCAC 02D .0524 "New Source Performance Standards" or .1110 "National Emission Standards for Hazardous Air Pollutants" shall meet that standard instead of the 02D .0521 visible emissions standard.

6. NOTIFICATION REQUIREMENT - As required by 15A NCAC 02D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:

   a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
      i. the name and location of the facility,
      ii. the nature and cause of the malfunction or breakdown.
      iii. the time when the malfunction or breakdown is first observed,
      iv. the expected duration, and
      v. an estimated rate of emissions.

   b. Notify the Director or his designee immediately when the corrective measures have been accomplished.

   This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

7. FUGITIVE DUST CONTROL REQUIREMENT - As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints are received or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).
"Fugitive dust emissions" means particulate matter that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

8. PANEL FILTER REQUIREMENTS including other dry filter particulate collection devices - As required by 15A NCAC 02D .0611, particulate matter emissions shall be controlled as described in the permitted equipment list.

   a. Inspection and Maintenance Requirements - To comply with the provisions of this permit and ensure that emissions do not exceed the regulatory limits, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirements shall include weekly inspections of the filters noting their condition.

   b. Recordkeeping Requirements - The results of inspection and maintenance for the panel filters **(ID No. CD-PF)** shall be maintained in a logbook (written or electronic format) on site and made available to an authorized representative upon request. The logbook shall record the following:

      i. the date and time of inspections;
      ii. the results of each inspection;
      iii. the results of maintenance performed on any filters; and
      iv. any variance from manufacturer's recommendations, if any, and corrections made.

   c. Reporting Requirements – The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Section A.8.a and b above postmarked or delivered on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.

      i. The Permittee shall submit the results of any maintenance performed on the panel filters within 30 days of a written request by the DAQ.

9. CONTROL AND PROHIBITION OF ODOROUS EMISSIONS - As required by 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions" the Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

10. 15A NCAC 02D .1111 – The boat manufacturing operations shall comply with all requirements of 15A NCAC 02D .1111 "Maximum Achievable Control Technology" and 40 CFR Part 63 Subpart VVVV "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing."

a. For each boat manufacturing emission source at this facility **(ID No. ES-LAM01)**, the Permittee shall comply with all applicable provisions contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" as promulgated in 40 CFR Part 63, Subpart VVVV "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing," including Subpart A "General Provisions." [40 CFR 63.5683 and 63.5689]

Emission Limits for Open Molding Resin and Gel Coat Operations [40 CFR 63.5698]

b. The Permittee shall limit organic HAP emissions from any of the following open molding operations to the emission limit specified in Section A.9.c below. Operations listed in Section A.9.d are exempt from this limit.
   i Production resin.
   ii. Pigmented gel coat.
   iii. Clear gel coat.
   iv. Tooling resin.
   v. Tooling gel coat.

c. The Permittee shall limit organic HAP emissions from open molding operations to the limit specified by Equation 1 of this condition below, based on a 12-month rolling average.

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

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 A.9.b above, in units of megagrams.
M_{PG}	=	Mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under Section A.9.b above, in units of megagrams.
M_{CG}	=	Mass of clear gel coat used in the past 12 months, excluding any materials exempt under Section A.9.b above, in units of megagrams.
M_T	=	Mass of tooling resin used in the past 12 months, excluding any materials exempt under Section A.9.b iv, above, in units of megagrams.
M_{TG}	=	Mass of tooling gel coat used in the past 12 months, excluding any materials exempt under Section A.9.b above, in units of megagrams.

d. The materials specified in i through iii below are exempt from the open molding emission limit specified in Section A.9.c above.
   i. 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. A record must be kept of the resins which are being used for this exemption.
   ii. 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 the facility on a 12-month rolling-average basis. A record must be kept of the amount of gel coats which are being used for this exemption and copies of calculations showing that

the exempt amount does not exceed 1 percent of all gel coat used.

iii. 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 the facility on a 12-month rolling-average basis. A record must be kept 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.

Complying with the Open Molding Emission Limit [40 CFR 63.5701 and 63.5704]

e. The Permittee shall use one or more of the options listed in paragraphs i and ii below, to meet the emission limit in paragraphs c and d in this section for the resins and gel coats used in open molding operations at the facility.

i. Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option. Demonstrate that emissions from the open molding resin and gel coat operations that are averaged meet the emission limit in paragraphs c and d above using the procedures described in 40 CFR 63.5710. Compliance with this option is based on a 12-month rolling average.

ii. Compliant materials option. Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 1 below. Compliance with this option is based on a 12-month rolling average.

Table 1: Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations [40 CFR Part 63 Subpart VVVV, Table 2]

For this operation -	And this application method -	You must not exceed this weighted-average organic HAP content (weight percent) requirement -
1. Production resin operations	Atomized (spray)	28 percent
2. Production resin operations	Nonatomized (nonspray)	35 percent
3. Pigmented gel coat operations	Any method	33 percent
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent
6. Tooling resin operations	Nonatomized (nonspray)	39 percent
7. Tooling gel coat operations	Any method	40 percent

Demonstrating Compliance using Compliant Materials [40 CFR 63.5704(b) and 63.5713]

f. For each open molding operation complying using the compliant materials option, the Permittee must demonstrate compliance by performing the steps in the following paragraphs i through iv:

i. Use the methods specified in paragraphs g through j of this section to determine the organic HAP content of resins and gel coats.

ii. Complete the calculations described in paragraph j below to show that the weighted-average organic HAP content does not exceed the limit specified in Table 1 above.

iii. Keep records as specified in paragraphs (A) through (D) below for each resin and gel coat.

(A) Hazardous air pollutant content.

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

(C) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.
(D) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in paragraphs h through k of this section.

iv. Submit semiannual compliance reports to the Division as specified in paragraph aa. of this section.

g. Compliance using the organic HAP content requirements listed in Table 1 "Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations," is based on a 12-month rolling average that is calculated at the end of every month. If the Permittee is using filled material (production resin or tooling resin), the Permittee must comply according to the procedure described paragraph l of this section. [40 CFR 63.5713(a)]

h. At the end of the twelfth month after the Permittee's compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 1, then the Permittee is in compliance with the emission limit specified in Section A.9.c for that 12-month period for that operation. In addition, the Permittee does not need to complete the weighted- average organic HAP content calculation contained in paragraph j for that operation. [40 CFR 63.5713(b)]

i. At the end of every month, the Permittee must use Equation 2 of this condition to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\textit{Weighted-Average HAP Content}\ (\%) = \frac{\sum_{i=1}^{n} M_i HAP_i}{\sum_{i=1}^{n} M_i} \qquad \text{(Equation 2)}$$

Where:

M_i = Mass of open molding resin or gel coat "i" used during the past 12 months in an operation, megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in Section A.9.w below to determine organic HAP content.

n = The number of different open molding resins or gel coats used during the past 12 months in an operation.

[40 CFR 63.5713(c)]

j. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 1, then the Permittee is in compliance with the emission limit specified in Section A.9.c. [40 CFR 63.5713(d)]

Demonstrating Compliance using Filled Resins [40 CFR 63.5710(d) and 63.5714]

k. i. If the Permittee is using a filled production resin or filled tooling resin, the Permittee must demonstrate compliance for the filled material on an as-applied basis using Equation 3 of this condition.

$$PV_F = PV_U \frac{100 - \%Filler}{100} \qquad \text{(Equation 3)}$$

Where:

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

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 2 "MACT Model Point Value Formulas for Open Molding Operations" as contained in 40 CFR Part 63, Subpart VVVV (inserted below, for convenience).

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

ii. If the filled resin is used as a production resin and the value of PV_F calculated by Equation 3 of Section A.9.k.i, above, does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

iii. If the filled resin is used as a tooling resin and the value of PV_F calculated by Equation 3 of Section A.9.k.i, above, does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

Table 2: MACT Model Point Value Formulas for Open Molding Operations[1] [40 CFR Part 63 Subpart VVVV, Table 3]

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 roll-out	$0.0110 \times (\text{Resin HAP\%})^{2.275}$
	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	$0.445 \times (\text{Gel coat HAP\%})^{1.675}$

[1]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.

Standards for Resin and Gel Coat Mixing Operations [40 CFR 63.5731]

l. The Permittee shall cover at all times all resin and gel coat mixing containers with a capacity equal to or greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.

m. The work practice standard in paragraph m above, 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.

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

o. The Permittee must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

Standards for Resin and Gel Coat Application Equipment Cleaning Operations [40 CFR 63.5734 and 63.5737]

p. For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the Permittee must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.

q. 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 (2 gallons), the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning). Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

r. Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in paragraphs q and r above, using the methods specified in Section A.9.w below.

s. If the Permittee recycles cleaning solvents 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 w below demonstrating compliance with organic HAP content limits.

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

Demonstrating Compliance with Carpet and Fabric Adhesive Operations [40 CFR 63.5740]

u. The Permittee must use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.

v. To demonstrate compliance with the emission limit in paragraph v above, you must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in paragraph w below.

Methods for Determining Organic Hazardous Air Pollutant Content [40 CFR 63.5758]

w. To determine the organic HAP content for each material used in the Permittee's open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, the Permittee shall use one of the options in paragraph i through vi.

  i. Method 311 (appendix A to 40 CFR Part 63). The Permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in (A) and (B) below, when determining organic HAP content by Method 311.

    (A) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the Permittee does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP the Permittee measures as a value truncated to four places after the decimal point (e.g., 0.1234).

    (B) 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.

ii. Method 24 (Appendix A to 40 CFR Part 63). The Permittee may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.

iii. ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins). The Permittee may use ASTM D1259-85 (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.

iv. Alternative method. The Permittee may use an alternative test method for determining mass fraction of organic HAP if the Permittee obtains prior approval by EPA Region IV. The Permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

v. Information from the supplier or manufacturer of the material. The Permittee may rely on information other than that generated by the test methods specified in paragraphs i through iv, above, such as manufacturer's formulation data, according to (A) through (C), below.

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

(B) 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 A.9.w.i through iv, above, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the Permittee must use the measured organic HAP content to determine compliance.

(C) 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 paragraphs i through iv, 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.

vi. Solvent blends. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the Permittee may use the values for organic HAP content that are listed in Table 5 "Default Organic HAP Contents of Solvents and Solvent Blends" or Table 6 "Default Organic HAP Contents of Petroleum Solvent Groups" as contained in 40 CFR Part 63, Subpart VVVV. The Permittee may use Table 6 as contained in 40 CFR Part 63, Subpart VVVV, only if the solvent blends in the materials the Permittee use do not match any of the solvent blends in Table 5 as contained in 40 CFR Part 63, Subpart VVVV, 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 5 or 6 as contained in 40 CFR Part 63, Subpart VVVV, then the test results must be used for determining compliance.

Recordkeeping [15A NCAC 02Q .0508(f), 40 CFR 63.5764, 40 CFR 63.5767 and 40 CFR 63.5770]

x. The Permittee shall keep the following records:

i. a copy of each notification and report that the Permittee submitted to comply with 40 CFR Part 63, Subpart VVVV;

ii. all documentation supporting any notification or report that the Permittee submitted; and

iii. the total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the Permittee shall also record the amounts of each applied by atomized and nonatomized methods.

y. The Permittee shall keep each record:
   i. readily available and in a form so they can be easily inspected and reviewed.
   ii. for 5 years following the date that each record is generated.
   iii. on site for at least 2 years after the date that each record is generated. The Permittee can keep the records offsite for the remaining 3 years.
   iv. on paper or an electronic device.

Reporting [15A NCAC 02Q .0508(f), 40 CFR 63.5761 and 40 CFR 63.5764]

z. The Permittee shall submit a semiannual compliance report that covers the period from January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified. Each compliance report must be postmarked no later than 60 days from the end of the semiannual reporting period. At a minimum, the compliance report shall contain:
   i. Company name and address;
   ii. A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report;
   iii. The date of the report and the beginning and ending dates of the reporting period;
   iv. A description of any changes in the manufacturing process since the last compliance report;
   v. 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 facility is complying. The statement or table shall 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;
   vi. If the facility was in compliance with the emission limits and work practice standards during the reporting period, the Permittee shall include a statement to that effect; and
   vii. If the Permittee deviated from an emission limit or work practice standard during the reporting period, they shall also include the following information in the semiannual compliance report:
      (A) A description of the operation involved in the deviation,
      (B) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation,
      (C) A description of any corrective action the Permittee took to minimize the deviation and actions he has taken to prevent it from happening again, and
      (D) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

aa. The Permittee must submit all of the notifications in Table 7 as contained in 40 CFR Part 63 Subpart VVVV, that apply to the Permittee by the dates in the table. The notifications are described more fully in 40 CFR Part 63, Subpart A "General Provisions," referenced in Table 8 as contained in 40 CFR Part 63 Subpart VVVV. If the Permittee changes any information submitted in any notification, the Permittee must submit the changes in writing to the Division within 15 calendar days after the change.

bb. The Permittee may switch between the compliance options (Emissions Averaging and Compliant Materials) in 40 CFR Part 63, Subpart VVVV per the requirements of paragraphs i. and ii below. In all cases, the Permittee shall submit notification to change options, in writing, to the Division of Air Quality, 15 days prior to changing compliance options. [40 CFR 63.5710 and 40 CFR 63.5713]

i. Changing from compliant materials to 12-month emissions averaging: The Permittee shall begin collecting resin and gel coat usage data on the date the compliance option is switched. The source shall demonstrate compliance using the emissions averaging option for at least 12 consecutive months.
ii. Changing from 12-month emissions averaging to compliant materials: The Permittee shall begin complying with the compliant materials option on the date the compliance option is switched. Until the full 12-month compliance period has ended the Permittee shall continue to collect resin and gel coat usage data and calculate the 12-month emissions average.

11. APPLICATION and REPORTING REQUIREMENT – As required by 15A NCAC 02Q .0504, the Permittee is required to submit a complete application for a Title V permit following the procedures of 15A NCAC 02Q .0500, within one year from the date of beginning of operation of any emissions sources. The Permittee shall notify the Regional Office in writing of the date of beginning operation of any of the sources listed in this permit, postmarked no later than 30 days after such date.

B. GENERAL CONDITIONS AND LIMITATIONS

1. In accordance with G.S. 143-215.108(c)(1), TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to the:

Regional Supervisor
North Carolina Division of Air Quality
Washington Regional Office
943 Washington Square Mall
Washington, NC 27889

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 02D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.

3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 02Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.

4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 02Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.

5. REPORTING REQUIREMENT - In accordance with 15A NCAC 02Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:

a. changes in the information submitted in the application regarding facility emissions;

b. changes that modify equipment or processes of existing permitted facilities; or

c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. In accordance with 15A NCAC 02Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effectuate an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.

7. CHANGES NOT REQUIRING PERMIT REVISIONS - Pursuant to 15A NCAC 02Q .0318, changes to the facility that are not exempt pursuant to 15A NCAC 02Q .0102 may be allowed without first modifying an applicable air permit if the change(s) meet(s) the requirements of 15A NCAC 02Q .0318(b)(1) through (b)(5) and the owner or operator notifies the Director in writing, using forms provided by the Division, seven calendar days before the change is made. Within 10 business days of receipt of the notice, the Division shall notify the owner or operator of its determination of whether the change(s) meet(s) the requirements of 15A NCAC 02Q .0318(b)(1) through (b)(5).

8. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.

9. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.

10. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.

11. In accordance with 15A NCAC 02D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.

12. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.

13. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

14. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.

15. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 02Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.

16. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 02D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.

17. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**

18. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval. Additionally, in accordance with 15A NCAC 02D .0605, the Permittee shall follow the procedures for obtaining any required audit sample and reporting those results.

Permit issued this the XXth of XX, 2022.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

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Mark J. Cuilla, EIT, CPM, Chief, Permitting Section
Division of Air Quality, NC DEQ
By Authority of the Environmental Management Commission

ATTACHMENT to Permit No. 10681R00, XX XX, 2022

Insignificant / Exempt Activities

Source	Exemption Regulation	Source of TAPs?	Source of Title V Pollutants?
IRST01 - resin storage tank (6,000 gallon capacity)	02Q .0503(8)	Yes	Yes
IRST02 - resin storage tank (6,000 gallon capacity)	02Q .0503(8)	Yes	Yes

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1. Because an activity is exempted from being required to have a permit or permit modification does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.

2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."

3. Sample permit conditions showing the regulatory requirements for exempt sources subject to NESHAP, NSPS, and NCAC rules may be found here: https://deq.nc.gov/aqpermitconditions