

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Application Review**

**Issue Date:**

**Region:** Washington Regional Office  
**County:** Chowan  
**NC Facility ID:** 2100080  
**Inspector's Name:** Samantha Mellott  
**Date of Last Inspection:** 09/02/2021  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>	<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> Edenton Boatworks, LLC</p> <p><b>Facility Address:</b>                  Edenton Boatworks, LLC                  140 Midway Drive                  Edenton, NC 27932</p> <p><b>SIC:</b> 3732 / Boat Building And Repairing  <b>NAICS:</b> 336612 / Boat Building</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>	<p><b>SIP:</b> 15A NCAC 02D .0503, 02D .0515, 02D .0516, 02D .0521, 02D .1100, 02D .1111 (Subpart DDDDD and VVVV), and 02D .1806  <b>NSPS:</b> NA  <b>NESHAP:</b> 40 CFR Part 63, Subpart DDDDD and Subpart VVVV  <b>PSD:</b> NA  <b>PSD Avoidance:</b> NA  <b>NC Toxics:</b> Yes  <b>112(r):</b> NA  <b>Other:</b> MACT ZZZZ</p>

Contact Data			Application Data
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 2100080.21A  <b>Date Received:</b> 09/01/2021  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal</p> <p style="text-align: center;"><b>Existing Permit Data</b></p> <p><b>Existing Permit Number:</b> 08995/T09  <b>Existing Permit Issue Date:</b> 03/11/2019  <b>Existing Permit Expiration Date:</b> 05/31/2022</p>
Bobby Lane EHS Manager (252) 482-7423 140 Midway Drive Edenton, NC 27932	Burch Perry General Manager (252) 482-7423 140 Midway Drive Edenton, NC 27932	Bobby Lane EHS Manager (252) 482-7423 140 Midway Drive Edenton, NC 27932	

**Total Actual emissions in TONS/YEAR:**

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2020	0.1400	0.0400	6.76	0.0100	0.5200	6.20	5.60 [Styrene]
2019	0.1900	0.0500	7.53	---	0.6400	6.56	5.91 [Styrene]
2018	0.1900	0.0500	7.51	---	0.6400	6.22	5.44 [Styrene]
2017	0.1100	0.0300	5.83	---	0.6500	4.81	4.09 [Styrene]
2016	0.1400	0.0400	4.85	---	0.5100	4.03	3.26 [Styrene]

<p><b>Review Engineer:</b> Alice M. Wessner</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue:</b> 08995T10  <b>Permit Issue Date:</b> _____  <b>Permit Expiration Date:</b> _____</p>
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## 1. Purpose of Application

Edenton Boatworks, LLC (Edenton) currently holds Title V Permit No. 08995T09 with an expiration date of May 31, 2022, for a boat manufacturing facility in Edenton, Chowan County, North Carolina. This permit application is for a permit renewal without modification. The renewal application was received on September 1, 2021, or at least six months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

## 2. Facility Description

Excerpts from the most recent inspection reports dated September 2, 2021, and July 8, 2020 state that Edenton manufactures fiberglass sport fishing boats sized 25 to 46 feet; all are Class B (rated for 40-50 miles off the coast) for the European market standards. Modern fluid impingement technology (airless) guns apply the resin and gel coat. Edenton currently employs 65 full-time workers. Only a few employees are qualified to use the resin and gelcoat gun, and only a few others are qualified to use the ‘chop gun.’ All other resin is applied by hand rollers. The facility is designed to build roughly 200 boats per year, but because of the economy, builds roughly 35 boats per year.

The facility is a Title V facility because the potential emissions of hazardous air pollutants (HAPs) exceed 10 tons per year of any one HAP or 25 tons per year of all HAPs combined. In this situation, Edenton is a TV facility specifically because potential emissions of styrene exceed 10 tons per year.

## 3. History/Background/Application Chronology

### History/Background

June 26, 2015	Permit No. 08995T07 issued for ownership and name change from Albemarle Sportfishing Boats to Edenton Boatworks, LLC.
June 8, 2017	TV permit renewal issued for Edenton Boatworks. Air Permit No. 08995T08 was issued on June 8, 2017, with an expiration date of May 31, 2022.
March 11, 2019	Air Permit No. 08995T09 was issued as an Administrative Amendment which was initiated by the Division on March 8, 2019, to correct typographical errors in the permit number on various pages of the permit pursuant to 15A NCAC 02Q .0514(a). The General Conditions were also updated to specify that a permit application for TV renewal is due no later than six months before permit expiration date.
March 22, 2022	An email sent from Samantha Mellott of the Washington Regional Office (WaRO) stated that the initial startup and Notification of Compliance Status were not performed on the boiler as required by Conditions 2.1 B.4.d and e. Therefore, the regional office will be initiating enforcement action.
April 11, 2022	WaRO sent Edenton an NOV for the violation of the Non compliance Statement required by Condition 2.1 B.5.e of Air Permit No. 08995T09 (40 CFR Part 63 Subpart DDDD ‘Boiler MACT).

### Application Chronology

September 1, 2021	Received permit application 2100080.21A for renewal.
September 3, 2021	Sent acknowledgment letter indicating that the application for permit renewal was complete.
March 30, 2022	Draft permit and review forwarded for comments to Booker Pullen, Permitting Supervisor.

April 4, 2022 Comments received from Permitting Supervisor

April 7, 2022 Draft permit and review forwarded for comments to Samantha Mellott of the Washington Regional Office (WaRO) and Samir Parekh, DAQ Compliance.

April 11, 2022 Comments received from Regional Office and Samir Parekh with minor comments/edits. Edits made to permit review and draft permit.

April 12, 2022 Draft permit sent to Burch Perry, General Manager, Edenton Boatworks, LLC

April 26, 2022 Burch Perry indicated via e-mail that there were no comments on the draft permit.

April 28, 2022 Draft permit and permit review forwarded to public notice.

June 2, 2022 Public comment period ends. XX comments received.

June 17, 2022 EPA comment period ends. XX comments received.

XXXX XX, 2022 Permit issued.

#### 4. Summary of Changes to Permit

The following changes were made to the Edenton Boatworks, LLC Edenton, Air Permit No. 08995T09:

T09 Page No.	Section	Description of Changes
Cover Letter	N/A	Modified letter to reflect current dates, permit number, new Section Chief name, issuance and effective dates
-----	Cover Letter	Added the <u>NOTICE REGARDING THE RIGHT TO CONTEST A DIVISION OF AIR QUALITY PERMIT DECISION</u>
-----	Attachment 2 Insignificant Activities List	Moved to Section 3 of permit
Permit Cover	Table of Contents	Added Section 3 Insignificant Activities Per 15A NCAC 02Q .0503(8) Added Section 4 General Permit Conditions
-----	All	Updated Permit Revision number in header Made minor corrections in capitalization and wording throughout permit Updated language throughout permit to be consistent with Permit Shell
3	Permitted Emission Sources Table	Deleted reference to 02D .1109 Case by Case MACT Deleted all footnotes from table
5	2.1 B Table	Deleted Hazardous Area Pollutants (HAP) Case by Case MACT reference
6	2.1 B.4	Deleted Condition 2.1 B.4 and renumbered remaining conditions

T09 Page No.	Section	Description of Changes
6	2.1 B.5	Updated 15A NCAC 02D .1111 MACT language conditions Removed 2.1 B.4.a.i Removed 2.1 B.4.e.i and ii Removed 2.1 B.4.f and renumbered following conditions Updated Work Practice Standards language and Energy Assessment Requirements Deleted Sub Category Switch Notification section Updated language in Recordkeeping Requirements and Reporting Requirements
10	2.2 A	Corrected Condition numbers in Summary Table of Limits 2.2 A.2 to 2.2 A.1 and 2.2 A.3 to 2.2 A.2, corrected condition numbering and corrected following condition references
10	2.2 A.1	Updated Condition Reformatted Table of TAPs
11	2.2 A.2	Corrected rule reference 15A NCAC 02D .1100 and corrected numbering
12	2.2 B	Updated rule language in NESHAP for Boat Manufacturing
22-32	3	Updated General Conditions to most recent version 6.0 dated 01/07/2022 Moved to Section 4 of permit
-----	Attachment List of Acronyms	Moved to Page 3 of renewed permit

\* This list is not intended to be a detailed record of every change made to the permit but a summary of those changes.

Only minor modifications to Title V Equipment Editor (TVEE) were required because of this permit renewal. No new equipment or change in emission sources were required.

TVEE was approved on XXXX XX, 2022. See Permit Tracking slip for confirmation.

## 5. Regulatory Review

Edenton is subject to the following regulations, in addition to the requirements in the General Conditions. The facility's equipment and operations have not changed since the last renewal in 2017. The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

- 15A NCAC 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"
- 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
- 15A NCAC 02D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .1100 "Control of Air Toxics"
- 15A NCAC 02D .1111 – 40 CFR 63, Subpart VVVV "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing"
- 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"
- 15A NCAC 02Q .0711 "Toxic Air Pollutants Emissions Limitation Requirement"

A regulatory review for all the requirements listed above are included in this document. The facilities have shown a history of complying with these existing regulations.

- 15A NCAC 02D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”

Allowable particulate matter emissions from the existing No. 2 fuel oil/propane-fired boiler (ID No. ES-5) are determined using the formula  $E = 1.090 \times Q^{-0.2594}$ , where Q is the total heat input at the facility in million Btu per hour (MMBtu/hr), and E is the allowable particulate emission rate in pound per million Btu (lb/MMBtu).

Allowable particulate matter emissions  $E = 1.090 \times (8.9)^{-0.2594} = 0.618$  lb/MMBtu. Note: the existing permit has a value of 0.567 which is the value previously calculated in the 08995T04 permitting action by using 1.00 instead of 1.09 in the equation. This value will be corrected to 0.618 lb/MMBtu during this renewal process.

Estimated particulate matter emissions are obtained from DAQ-approved spreadsheets, which are based on EPA AP-42 emission factors for boilers. Estimated particulate matter emissions for No. 2 Fuel Oil are:

Emission Factor (EF) = 3.3 lb/10<sup>3</sup> gallons (data from DAQ’s ‘Fuel Oil combustion spreadsheet’)  
 Heating Value (HV) = 140,000 Btu/gal (fuel oil)

PM Emissions = EF (lb/10<sup>3</sup> gal) / HV (Btu/gal) \* (1x10<sup>6</sup> Btu/mmBtu)

$$\frac{3.3 \text{ lb PM}}{1000 \text{ gallons}} \times \frac{1 \text{ gallon}}{140,000 \text{ Btu}} \times \frac{1 \times 10^6 \text{ Btu}}{\text{mmBtu}} = \frac{0.0236 \text{ lb PM}}{\text{mmBtu}}$$

The calculated PM emission rate for the primary fuel (No. 2 fuel oil) of 0.0236 lb/mmBtu is well below the allowable emission rate of 0.618 lb/mmBtu. Therefore, based on the size and usage of the boiler, compliance is expected under normal operating conditions. Compliance with 02D .0503 is indicated for No. 2 fuel oil. This boiler also burns propane (same as liquified petroleum gas) and is expected to be in compliance with the 02D .0503 standard because PM emissions are negligible when fired in this boiler.

Additionally, the boiler is used only for heating during colder weather. It operates approximately three months a year and runs primarily on ultra-low sulfur diesel (ULSD) according to the most recent inspection of the facility in 2021. The boiler uses propane to start up, once it is up to temperature, it switches to fuel oil. Combustion under normal conditions would indicate compliance. No monitoring, recordkeeping, or reporting is required for compliance with this Rule. Edenton had an Energy Assessment performed for compliance with MACT, Subpart 5D rule, and showed that the boiler was in good condition and operating correctly.

- 02D .0515 “Particulates from Miscellaneous Industrial Processes”

Particulate matter emissions are lamination/gel coating operations (ID Nos. ES-2, ES-3, and ES-4). Allowable particulate matter emissions are determined by the formula  $E = 4.10 (P)^{0.67}$ , where P is the process rate in tons per hour, and E is the allowable particulate matter emissions rate in pounds per hour for process less than or equal to 30 tons per hour. The maximum process rate in all three cases combined is 18 tons per hour. This yields an allowable particulate matter emissions rate of  $E = 4.10 \times (18)^{0.67} = 28.43$  pounds per hour.

According to previous inspection reports from the Washington Regional Office dated June 5, 2019, and July 8, 2020, respectively, all three processes have basic particulate filters (inherent) as ‘control devices,’ and these filters have been estimated to be 86.3 percent efficient. Estimated actual particulate matter emissions are 0.76, 0.76, and 1.22 pounds per hour for ES-2, ES-3, and ES-4, respectively. Before controls, emissions can be back-calculated as 5.5, 5.5, and 8.9 pounds per hour, respectively. This facility is in compliance with or without particulate controls. The Permittee is unable to exceed the permitted rate when operating continuously; therefore, no monitoring, recordkeeping, or reporting is required for these sources.

The filters in the fiberglass production area are changed weekly and the paint booth filters are cleaned at least once per month. A logbook of the filter inspections and filter changes are kept. Compliance with 02D .0515 is indicated.

- 15A NCAC 02D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

Emissions of sulfur dioxide (SO<sub>2</sub>) of the No. 2 Fuel Oil and Propane-fired boiler (ID No. ES-5) are limited to 2.3 pounds per million Btu heat input. Estimated SO<sub>2</sub> emissions are obtained from the DAQ spreadsheet for No. 2 fuel oil and propane (same as LFG)-fired boilers (the spreadsheet is based on EPA publication AP-42).

Emissions of SO<sub>2</sub> from No. 2 fuel oil:

Emission Factor (EF) = 142S lb/10<sup>3</sup> gallons (data from DAQ’s ‘Fuel Oil combustion spreadsheet’)

Sulfur content (S) = 0.5% (default value for distillate fuel oil)

EF = 71 lb/10<sup>3</sup> gallons

Heating Value (HV) = 140,000 Btu/gal

SO<sub>2</sub> Emissions = EF (lb/10<sup>3</sup> gal) / HV (Btu/gal) \* CF (1x10<sup>6</sup> Btu/mm Btu)

$$\frac{71 \text{ lb SO}_2}{1000 \text{ gallons}} \times \frac{1 \text{ gallon}}{140,000 \text{ Btu}} \times \frac{1 \times 10^6 \text{ Btu}}{\text{mmBtu}} = \frac{0.51 \text{ lb SO}_2}{\text{mmBtu}}$$

Emissions of SO<sub>2</sub> from Propane (or LPG):

Emission Factor (EF) = 0.02 lbs SO<sub>2</sub>/1000 gallons

Heating Value (HV) = 91,000 Btu/1 gallon

SO<sub>2</sub> Emissions = EF (lb/scf) / HV (BTU/gallon) \* CF (1x10<sup>6</sup> Btu/mm BTU)

$$\frac{0.02 \text{ lbs SO}_2}{1000 \text{ gallons}} \times \frac{1 \text{ gallon}}{91,000 \text{ Btu}} \times \frac{1 \times 10^6 \text{ Btu}}{\text{mmBtu}} = \frac{2.20 \times 10^{-4} \text{ lb SO}_2}{\text{mmBtu}}$$

SO<sub>2</sub> emissions for both No.2 Fuel Oil and Propane are less than the emission limit of 2.3 lb/mmBtu, therefore, compliance with 02D .0516 is indicated for both No. 2 Fuel Oil and Propane.

- 15A NCAC 02D .0521, Control of Visible Emissions

Particulate matter emissions are associated with visible opacity for this facility. In past permits, all sources at this facility were limited to 20 percent visible opacity emissions when averaged over a six-minute period. However, during the annual inspection of this facility in 2012, the Regional Office inspector (Arni Hopkins) stated that boiler ES-5 was manufactured in 1964, and stated again in the July 11, 2020 inspection report by Kurt Tidd. Because the manufacture date of the boiler determines whether the opacity of the unit is 20% or 40% under regulation 02D .0521, the renewal permit will be changed to state that boiler ES-5 is subject to 40% opacity because it was manufactured prior to 1971. The other sources will remain at 20% opacity. Continued compliance is expected.

According to past inspection reports, opacity at this facility, due to good maintenance practices, site policies and processes, no visible emissions from the boiler are expected. Visible emissions from this facility are controlled by filtering systems in each area of production. The filters are inspected and changed when needed. No monitoring, reporting or record keeping requirements are included in this condition. Continued compliance is anticipated.

- 15A NCAC 02D .1111, Maximum Achievable Control Technology (MACT) –Edenton is subject to National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, 40 CFR Part 63 Subpart VVVV. More discussion on MACT is provided below in Section 6.

- 15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions – This regulation is state enforceable only and requires the owner or operator of a facility to prevent objectionable odors beyond the facility’s boundary. There were the typical odors associated with the fiberglass production operation inside the facility, however, no complaints have been logged into IBEAM since the last permit renewal. Continued compliance is anticipated.
- 15A NCAC 02D .1100 “Control of Toxic Air Pollutants”

Edenton performed air dispersion modeling for Arsenic, Styrene and 2,4-Toluene Diisocyanate (TDI) in April 2011. Facility-wide limits were established and included in the permit as follows:

Emission Source	Toxic Air Pollutant	Emission Limit
Facility-Wide	Arsenic (7440-38-2)	0.028 lb/yr
Facility-Wide	Styrene (100-42-5)	63.39 lb/hr
Facility-Wide	2,4- Toluene Diisocyanate* (584-84-9)	0.14 lb/day

\*From the finishing resin on the large boats

A summary report of the maximum emission rate of each toxic air pollutant (TAP) in the appropriate units (pounds/hour or pounds/day) for the pollutants listed in Section 2.2 A.3.a is required to be postmarked 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. Continued compliance with this regulation is anticipated.

- 15A NCAC 02Q .0711 “Emission Rates Requiring a Permit”

For each of the TAPS listed in Section 2.2 A.1 of the permit, the facility has made a demonstration that facility-wide actual emissions do not exceed the TPERs’s listed in 15A NCAC 02Q .0711. The facility is required to maintain operational information to demonstrate compliance with this rule. The emission rates documented from 2020 Emissions Inventory are well below the TPERs. Continued compliance with this regulation is anticipated.

The following regulation was removed during this renewal:

- 15A NCAC 02D .1109 “Case by Case MACT”

The requirements for the 15A NCAC 02D .1109, Case-by-Case MACT for the boiler (ID No. ES-5) will be removed from the permit as part of this permit renewal. On May 20, 2019, the boiler became subject to MACT Subpart DDDDD and is no longer subject to the Case-by-Case boiler MACT.

## 6. NSPS/NESHAP/MACT/PSD/112(r)/CAM

**NSPS** – The facility is not currently subject to a New Source Performance Standard (NSPS). This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility is considered a major source of HAP emissions and is subject to the following Maximum Achievable Control Technology (MACT) Standards.

*MACT Subpart VVVV*

40 CFR 63, Subpart VVVV “National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.” The permit includes all specific language for Subpart VVVV, and all compliance options are included in the permit because Edenton is allowed to switch compliance options at any time during the year, as long as DAQ is notified. The facility is complying with the open molding emission limit by using the emissions averaging option. Edenton must ensure that the emission limit established by 40 CFR 63.5698, Equation 1, is not exceeded using the procedures set in 40 CFR 63.5704(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 or twelve times per year. The facility met the compliance date of August 22, 2005, and the initial notification of compliance was received September 16, 2005.

The facility must keep records for each resin and gel coat including hazardous air pollutant content, amount of material used per month, and the application method used for production resin and tooling resin. (This record is not required if all production resins and tooling resins are applied with non-atomized technology). Edenton is required to keep records of calculations performed to demonstrate compliance based on MACT model point values, as described in 40 CFR 63.5710. The facility must keep a copy of each notification and report that the facility submitted to comply with Subpart VVVV. Continued compliance with this requirement is anticipated.

The facility is required to submit reports for each 6-month period ending on June 30 and December 31. The reports must evaluate compliance with the open molding emission limit for each 12-month averaging period ending on each 6-month period that the report covers. The report must be submitted within 60 days after the end of the reporting period and must also describe any deviations from emission limits or work practice standards as required by 40 CFR 63.5764(c)(vii). Continued compliance with this requirement is anticipated.

As far as the cleaning operations of the resin and get coat application equipment, the facility does not use cleaning solvents containing HAPs as they only use acetone and compliance is anticipated.

40 CFR 63.5731 ‘Standards for Resin and Gel Coat Mixing Operations’ has certain requirements for operation that have mixing containers greater than 208 liters. Edenton does not use any mixing containers, nor does it have any containers greater than 208 liters.

Edenton does not use filled resins during the production of boats at this facility and it demonstrated compliance with a supplier safety data sheet (SDS) that certifies that the adhesives used do not contain HAPs.

#### *MACT Subpart DDDDD*

The boiler is subject to 15A NCAC 02D .1111– 40 CFR 63, Subpart DDDDD “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.” According to an inspection report, the boiler was manufactured in 1964 and is, therefore, considered an existing affected source. Work practice standards apply to the boiler. The boiler was required to have a one-time energy assessment which was completed on April 29, 2019, as well as biennial tune-ups. The initial tune-up was preformed December 7, 2018; however, a Notice of Compliance Statement was not submitted by the facility as was required by Condition 2.1 B.5.e of Air Permit No. 08995T09 so the Washington Regional office issued an NOV on April 11, 2022. An updated condition is placed in the permit referencing requirements under Subpart DDDDD. The Case-by-Case MACT was removed from the existing permit during this renewal since this action occurred after May 20, 2019. Continued compliance with the boiler requirements is anticipated.

#### *MACT Subpart ZZZZ*

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. Edenton has a 570-kW emergency generator (ID. No. IES-G1) onsite which qualifies as an insignificant activity because it meets the emissions exemptions under 15A NCAC 2Q .0503(8), It is also subject to MACT ZZZZ. The generator meets the definition of an emergency stationary RICE based on 63.6675 and is an existing emergency engine less than 500 bhp located at a major source of HAPs. Below is the overview of requirements for the engine:

- Install a non-resettable hour meter on the engine
- Change oil and filter every 500 hours of operation or annually
- Inspect all hoses and belts every 500 hours of operation or annually and replace if necessary
- Inspect air cleaner every 1,000 hours of operation or annually



- Operate no more than 100 hours for maintenance and readiness testing  
Recordkeeping and reporting requirements.

Continued compliance with MACT is anticipated.

**PSD/Increment** – This facility is classified as a minor source under Prevention of Significant Deterioration (PSD).

Chowan County has not triggered increment tracking for PSD for any pollutants so not tracking is required. This renewal does not change this status.

**112(r)** – This facility is not subject to the requirements of the 112(r) “Prevention of Accidental Releases” program because it does not store any of the regulated substances in quantities above the 112(r) thresholds. No change with respect to 112(r) is anticipated under this permit renewal.

**Compliance Assurance Monitoring (CAM)** - The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at major TV facilities that meets all three following criteria:

- the unit is subject to any (non-exempt: e.g. pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

Edenton currently has dry filters (ID No. CD-1) and synthetic filter media (CD-2, CD-3, and CD-4) for its laminating/gel coating operations. These filters (inherent) are in place to collect overspray from the boat manufacturing process and are used to meet the PM emission standard of 15A NCAC 02D .0515. This facility does not emit PM in quantities greater than the major source threshold; therefore, CAM does not apply. This permit renewal does not change the facility’s CAM status.

## 7. Facility Wide Air Toxics Pollutants

The facility was previously required to provide a facility-wide toxics compliance demonstration in 2011. Three pollutants (arsenic, TDI, and styrene) from ten emission points were modeled with the parameters and emission rates shown in Attachment 1. All rates shown were modeled as being emitted continuously (i.e. 8,760 hr/yr for annual pollutants and 24 hr/day for 24-hr pollutants). For TDI and styrene, emission rates were optimized for operational flexibility, such that modeling impacts reached 95 percent of the NC Acceptable Ambient Levels (AAL). Arsenic was not optimized. The facility used AERMOD with regulatory defaults, and with five years of DAQ-processed meteorology (Norfolk 1988-1992) to model the emissions. Adequate receptors were incorporated, along with digital elevation data, to determine maximum impacts, which occurred on the property lines and reached the levels noted in the table below.

<b>Pollutant / Eval Period</b>	<b>Impact (ug/m<sup>3</sup>)</b>	<b>AAL (ug/m<sup>3</sup>)</b>	<b>% of AAL Optimized to 95%</b>
<b>arsenic / annual</b>	8.0E-5	2.3E-4	35
<b>styrene / 1hr</b>	10,065	10,600	95
<b>TDI / 24hr</b>	0.19	0.2	95

The modeling did demonstrate compliance on a source-by-source basis with the AAL. No modifications that increased toxic air pollutants have occurred since the facility-wide toxics compliance demonstration was performed in 2011. Therefore, this facility is expected to be in compliance with toxic air pollutant requirements at this facility and there is no expected unsafe health risk.

## 8. Facility Emissions Review

This permit renewal is not expected to change potential emissions from the facility. For a historical review of actual emissions from the facility, see the summary table on the first page of this review.

## **9. Compliance History**

Compliance history (5-years) – There have been no compliance issues.

Per latest inspection report – Washington Regional Office Comments, Conclusions and Recommendations:

The facility appeared to operate in compliance with all applicable air quality regulations and permit conditions at the time of inspection. The facility was last inspected on September 2, 2021, by Samantha Mellott of the Washington Regional Office and found to comply at the time of the inspection.

## **10. Public Notice/EPA and Affected State(s) Review**

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above.

The Public Notice and EPA Review periods began on XXXX XX, 2022. The Public Notice period ended on XXXX XX, 2022 and the EPA Review period ended on XXXX XX, 2022.

XX comments were received.

## **11. Other Regulatory Considerations**

### Zoning Consistency Determination

A consistency determination was not required for this permit renewal.

- A P.E. seal is not required for this renewal application.
- A zoning consistency determination is not required for this renewal application.
- No permit fee was required for the application for this renewal application.

## **12. Recommendations**

The permit renewal application for Edenton Boatworks, LLC, located in Edenton, Chowan County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 08995T10.