

**AIR EMISSION PERMIT NO. 09700025- 006**

**IS ISSUED TO**

**LARSON/GLASTRON BOATS, INC.**

700 Paul Larson Memorial Drive  
Little Falls, Morrison County, MN 56345

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date	Issue Date	Permit Action Number
Total Facility Operating Permit	06/15/1995	09/28/1998	001
Major Amendment	07/2/1997	09/28/1998	001
Major Amendment	07/23/1999	11/29/1999	002
Major Amendment	01/14/2000	06/23/2000	003
Major Amendment	02/12/2001	06/28/2001	004
Major Amendment	08/20/2003	05/27/04	005
<b>Part 70 Operating Permit</b>	04/01/2003	05/27/04	005
Major Amendment	07/15/04	See below	006

This permit authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

**Permit Type:** Major amendment to Federal; Part 70/Major for NSR

**Issue Date:** September 30, 2004

**Expiration:** May 27, 2009

Title I Conditions do not expire.

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Richard Sandberg  
Air Quality Permits Section Manager  
Industrial Division

for Sheryl A. Corrigan  
Commissioner  
Minnesota Pollution Control Agency

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**NOTICE TO THE PERMITTEE:**

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

**PERMIT SHIELD:**

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

## **FACILITY DESCRIPTION:**

Larson/Glastron manufactures fiberglass recreational boats in open and closed molds using a variety of materials and equipment. Open mold equipment includes atomized and non-atomized spray guns and associated equipment for the application of resin and gelcoat. Closed mold equipment includes atomized and non-atomized gelcoat spray guns and associated equipment and closed mold VEC Cells. The VEC cells are a closed mold resin application technology. Other emission emitting activities include painting, gluing, woodworking, and assembly. Natural gas fired make-up air units provide building heat.

The facility adopted federally-enforceable FlexCap synthetic minor limits of 90 tons/year for PM and PM<sub>10</sub>, and 245 tons/year for volatile organic compounds. These conditions were established in the Part 70 permit issued to the total facility in 1998. This permit amendment changes the status of the facility from a synthetic minor source to a major stationary source as defined by 40 CFR 52.21. More details are provided below.

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing apply to this facility. The compliance date for this NESHAP is August 23, 2004. The National Emission Standard for Asbestos (40 CFR § 61.145) will also apply to this facility as it may be involved with demolition of some of its older buildings in the future. The VEC cells in Plant 7 were considered a major source of hazardous air pollutants when the permit authorizing installation of them was issued. At the time of permit issuance, those closed molding cells were subject to preconstruction review required by 40 CFR 63, subp. B.

## **PERMIT ACTION 006, MAJOR AMENDMENT**

Previously, the facility operated under a total facility emissions cap set in the Part 70 operating permit issued in 1998. Plant 7 was added under a major amendment, issued in 2000, and was restricted along with the rest of the facility to the 245 tons per year of volatile organic compounds (VOC) emissions, and 90 tons per year of PM/PM<sub>10</sub>. At the time the permit amendment was issued that authorized the construction of Plant 7, the facility wished to remain minor.

This permit amendment changes the facility's status. The total facility emissions cap of 245 tons per year of VOC, and 90 tons per year of particulate matter (PM)/particulate matter smaller than 10 microns (PM<sub>10</sub>) has been changed to apply to the facility as it existed prior to the construction of Plant 7, and as it was previously permitted. With this amendment, the entire facility will be limited to 340 tons per year of VOC, and the rest of the facility will operate under the previously set emissions cap of 245 tons per year VOC. This permit retains the 90 tons PM/PM<sub>10</sub> per year limit for the total facility; Plants 1-7. The purpose of the 340 tons per year VOC limit is to avoid the requirement to conduct an environmental assessment worksheet. Completion of an Environmental Assessment Worksheet is required if there is more than a 100 ton per year increase of VOCs in the facility's potential emissions. The 340 ton per year limit allows for only a 95 ton per year increase in the facility's VOC potential.

Unrestricted potential emissions from Plant 7 are less than major as defined by 40 CFR 52.21 (211 tons per year VOC, 3.53 tons per year of PM/PM<sub>10</sub>.) Therefore, the limit is not necessary to avoid new source review requirements.

For the reasons discussed above, the addition of Plant 7 is viewed as a non-major modification to a non-major source. After the issuance of this permit, the facility's potential VOC emissions qualify the facility as a major source under federal new source review.

#### **PERMIT ACTION 005, MAJOR AMENDMENT and TITLE V PERMIT REISSUANCE,:**

Larson/Glastron Boats, Inc. sends liquid and solid VOC containing waste for recycle. This permit amendment offered VOC waste credits that were not previously authorized.

**Waste Credit:** If the Permittee elects to obtain credit for Hazardous Air Pollutant (HAPs), solids, and/or VOC shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC, solids, and/or total and individual HAP content for each credited shipment.

- 1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, solids, total HAP, and each individual HAP, excluding water.
- 2) The Permittee may use supplier data for raw materials to determine the VOC, solids, and total and individual HAP contents of each waste shipment, using the same content data used to determine the content of raw materials. If the waste contains several materials, the content of mixed waste shall be assumed to be the lowest VOC, solids, and total and individual HAP content of any of the materials.

In addition, this permit amendment provided emission factors for catalyst emissions (methyl ethyl ketone), adhesives or putty (MPCA staff in a letter dated January 2, 2003, approved **Plexus** adhesives emissions calculations), Vinyl Toluene emissions from spraycore application, and gel coat closed mold spray layup operations. This information is in the Additional Appendix Material part of the permit.

#### **PERMIT ACTION 004, MAJOR AMENDMENT**

Permit Action 004 authorized a change in the calculation method used in demonstrating compliance with a facility-wide New Source Review cap and updated some of the permit terms and description of emission units.

#### **PERMIT ACTION 003, MAJOR AMENDMENT**

Case by case MACT analysis for the VECTM cells.

#### **PERMIT ACTION 002, MAJOR AMENDMENT**

Authorization of installation of two new boat mold processes, change of emission calculation for the emissions cap, and replacement and relocation of the listed emission units and some new units. Also set a synthetic minor HAP limit on the new emission units to avoid the requirements for preconstruction review that apply to the construction of new major sources of hazardous air pollutants.

# TABLE A: LIMITS AND OTHER REQUIREMENTS

09/30/04

Facility Name: Larson/Glastron Boats Inc

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Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item:	Total Facility
What to do	Why to do it
A. VOC/PM/PM10 FLEX CAP EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 90 tons/year using 12-month Rolling Sum on a monthly basis as specified below in Equation 1. This limit applies to the total facility.	Title I Condition: Limit to avoid major source and modification classification under 40 CFR pt. 52.21.
Equation 1: $PM = [ (PfgEFfg) + (PgcCgc((100 - TEgc) / 100))((100 - \%control) / 100)) + (PrCr((100 - TEr) / 100))((100 - \%control) / 100)) + (PpCp((100 - TEp) / 100))((100 - \%control) / 100)) + (PfngEFng) + (PfpEFfp) ] \times (0.0005)$ Where, Pfg = amount of fiberglass purchased for spray-up operations, lb/month EFfg = PM emission factor from fiberglass chopping process, 0.005 percent weight Pgc = amount of gelcoat purchased, lb/month Cgc = percent composition of PM in Pgc as applied, 70 percent weight TEgc = gelcoating transfer efficiency, 95 percent Pr = amount of resin applied by atomized spray units, lb/month Cr = percent composition of PM in Pr as applied, 70 percent weight TEr = resin application transfer efficiency, 98 percent	Title I Condition: Recordkeeping for limit to avoid major source and modification classification under 40 CFR pt. 52.21.
and where, Pp = amount of paint purchased, lb/month Cp = percent composition of PM in Pp as applied, 55 percent weight TEp = painting transfer efficiency, 30 percent Pfng = amount of natural gas burned as delivered/purchased, MM cf/month EFng = PM emission factor for natural gas burning furnaces, 6.2 lb/MM cf Pfp = amount of propane burned as delivered/purchased, M gal/month EFfp = PM emission factor for propane burning furnaces, 0.6 lb/M gal %control = control efficiency of the particulate control equipment with 100% capture 0.0005 = conversion factor, ton/lb	Title I Condition: Recordkeeping for limit to avoid major source and modification classification under 40 CFR pt. 52.21 (continued).
Particulate Matter < 10 micron: less than or equal to 90 tons/year using 12-month Rolling Sum on a monthly basis as specified below in Equation 2. This limit applies to the total facility.	Title I Condition: Limit to avoid major source and modification classification under 40 CFR pt. 52.21.
Equation 2: $PM10 = [ (PfgEFfg) + (PgcCgc((100 - TEgc) / 100))((100 - \%control) / 100)) + (PrCr((100 - TEr) / 100))((100 - \%control) / 100)) + (PpCp((100 - TEp) / 100))((100 - \%control) / 100)) + (PfngEFng) + (PfpEFfp) ] \times (0.0005)$ Where, Pfg = amount of fiberglass purchased for spray-up operations, lb/month EFfg = PM10 emission factor from fiberglass chopping process, 0.005 percent weight Pgc = amount of gelcoat purchased, lb/month Cgc = percent composition of PM10 in Pgc as applied, 70 percent weight TEgc = gelcoating transfer efficiency, 95 percent Pr = amount of resin applied by atomized spray units, lb/month Cr = percent composition of PM10 in Pr as applied, 55 percent weight TEr = resin application transfer efficiency, 98 percent	Title I Condition: Recordkeeping for limit to avoid major source and modification classification under 40 CFR pt. 52.21.
and where, Pp = amount of paint purchased, lb/month Cp = percent composition of PM10 in Pp as applied, 55 percent weight TEp = painting transfer efficiency, 30 percent Pfng = amount of natural gas burned as delivered/purchased, MM cf/month EFng = PM10 emission factor for natural gas burning furnaces, 6.2 lb/MM cf Pfp = amount of propane burned as delivered/purchased, M gal/month EFfp = PM10 emission factor for propane burning furnaces, 0.6 lb/M gal %control = control efficiency of the particulate control equipment with 100% capture 0.0005 = conversion factor, ton/lb	Title I Condition: Recordkeeping for limit to avoid major source and modification classification under 40 CFR pt. 52.21 (continued).

# TABLE A: LIMITS AND OTHER REQUIREMENTS

09/30/04

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<p>Plants 1-6: Volatile Organic Compounds less than or equal to 245 tons/year using 12-month Rolling Sum on a monthly basis as specified below in Equation 3.</p> <p>Waste Credit: If the Permittee elects to obtain credit for HAPs, solids, and/or VOC shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC, solids, and/or total and individual HAP content for each credited shipment.</p> <p>1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, solids, total HAP, and each individual HAP, excluding water.</p> <p>2) The Permittee may use supplier data for raw materials to determine the VOC, solids, and total and individual HAP contents of each waste shipment, using the same content data used to determine the content of raw materials. If the waste contains several materials, the content of mixed waste shall be assumed to be the lowest VOC, solids, and total and individual HAP content of any of the materials.</p>	<p>Title I Condition: Limit to avoid major source and modification classification under 40 CFR pt. 52.21; Minn. R. 7007.0800, subp. 4 and 5.</p>
<p>Total Facility: Volatile Organic Compounds less than or equal to 340 tons/year using a 12-month Rolling Sum on a monthly basis as specified below in Equation 3.</p> <p>Waste Credit: If the Permittee elects to obtain credit for HAPs, solids, and/or VOC shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC, solids, and/or total and individual HAP content for each credited shipment.</p> <p>1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, solids, total HAP, and each individual HAP, excluding water.</p> <p>2) The Permittee may use supplier data for raw materials to determine the VOC, solids, and total and individual HAP contents of each waste shipment, using the same content data used to determine the content of raw materials. If the waste contains several materials, the content of mixed waste shall be assumed to be the lowest VOC, solids, and total and individual HAP content of any of the materials.</p>	<p>Minn. R. 4410, limit taken to restrict potential emissions and avoid the requirement to complete an environmental assessment worksheet</p>
<p>Equation 3:  <math display="block">\text{VOC} = \{ [ (UrCrEFrs) + (UrCrEFrcm) + (PgcCgcEFgcv) + (PgcCgcEFgcns) + (PgcCgcEFgcnavs) + (PgcCgcEFgcnavs) + (Pgc2Cgc2EFgcmv) + (Pgc2Cgc2EFgcmvns) + (Pgc2Cgc2EFgcmnavs) + (Pgc2Cgc2EFgcmnavs) + (PpCp) + (PpChpEFhp) + (VOCff) + (PmCm) + (Pfngefng) + (PfpEFfp) ] - (\text{waste credit in pounds}) \} \times (0.0005)</math></p> <p>Where,  Ur = amount of VOC containing resin as used by process, lb/month  Cr = percent composition of VOC in Ur as applied, percent weight  EFrs = emission factor for atomized or nonatomized spray layup of non-vapor-suppressed resin as referenced in Appendix A of this Permit, or latest EPA-approved emission factor, as appropriate (lb/lb monomer)  EFrcm = emission factor for closed molding of non-vapor-suppressed resin as referenced in Appendix A of this Permit, or latest EPA-approved emission factor, as appropriate (lb/lb monomer)</p>	<p>Title I Condition: Limit to avoid major source and modification classification under 40 CFR pt. 52.21.</p>
<p>and where,</p> <p>Pgc = amount of VOC containing gelcoat as delivered/purchased for open mold application, lb/month  Cgc = percent composition of VOC in Pgc as applied, percent weight  Pgc2 = amount of VOC containing gelcoat as delivered/purchased for closed mold application, lb/month  Cgc2 = percent composition of VOC in Pgc2 as applied, percent weight  EFgcv = emission factor for gelcoat mechanical atomized spray layup, vapor-suppressed (open mold) as referenced in Appendix A of this permit or latest EPA-approved emission factor as appropriate (lb/lb monomer).  EFgcns = emission factor for gelcoat mechanical atomized spray layup, non-vapor-suppressed (open mold) as referenced in Appendix A of this permit or latest EPA-approved emission factor as appropriate (lb/lb monomer).</p>	<p>(continued from above)</p>



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

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and where,  EFgcnanvs = emission factor for gelcoat mechanical non-atomized spray layup , non-vapor-suppressed (open mold) as referenced in Appendix A of this permit or latest EPA-approved emission factor as appropriate (lb/lb monomer). EFgcmnvs = emission factor for gelcoat closed mold mechanical atomized spray layup, vapor-suppressed as referenced in Appendix A of this permit or latest EPA-approved emission factor as appropriate (lb/lb monomer). EFgcmnvs = emission factor for gelcoat closed mold mechanical atomized spray layup, non-vapor-suppressed as referenced in Appendix A of this permit or latest EPA-approved emission factor as appropriate (lb/lb monomer). EFgcmnvs = emission factor for gelcoat closed mold mechanical non-atomized spray layup, vapor-suppressed as referenced in Appendix A of this permit or latest EPA-approved emission factor as appropriate (lb/lb monomer).	(continued from above)
and where,  EFgcmnanvs = emission factor for gelcoat closed mold mechanical non-atomized spray layup, non-vapor-suppressed as referenced in Appendix A of this permit or latest EPA-approved emission factor as appropriate (lb/lb monomer).  s: spray layup application cm: closed molding application vs: vapor-suppressed nvs: non-vapor-suppressed	(continued from above)
and where,  Pp = amount of VOC-containing paint as delivered/purchased, lb/month Cp = percent composition of VOC in Pp as applied, percent weight Php = amount of VOC-containing hand-applied putty as delivered/purchased, lb/month Chp = percent composition of VOC in Php as applied, percent weight EFhp = emission factor for non-vapor-suppressed hand layup of putty, 0.13 lb/lb monomer VOCff = amount of fugitive VOC emissions from foam seat process, lb/month Pm = amount of miscellaneous VOC-containing materials as delivered/purchased, lb/month Cm = percent composition of VOC in Pm as applied, percent weight Pfng = amount of natural gas burned as delivered/purchased, MM cf/month EFfng = emission factor for natural gas burning furnaces, 2.784 lb/MM cf Pfp = amount of propane burned as delivered/purchased, M gal/month EFfp = emission factor for propane burning furnaces, 0.5lb/M gal 0.0005 = conversion factor, lb/ton	(continued from above)
Nitrogen Oxides: less than or equal to 100.0 tons/year using 12-month Rolling Sum . The Permittee shall calculate and record the Total Nitrogen Oxide emissions based on fuel records of natural gas and propane only.	Title I Condition: Limit to avoid major source and future modification classification under 40 CFR pt. 52.21; Minn. R. 7007.0800, subp. 4 and 5.
The Permittee shall calculate the 12-month Rolling Sum each month for PM, PM10 and VOC emissions. The calculations must be completed by the 15th day of each month for the preceding month. The 12-month Rolling Sum shall be calculated by adding the total emissions of the current month (in tons) to the sum of the previous eleven months' total emissions (in tons).  VOC usage and emissions for Plant 7 shall be tracked and calculated separately from Plants 1-6. Resin, gelcoat and stripe painting specifically, that are used in Plants 1-6 and Plants 7 shall be tracked separately. For miscellaneous activities used facility-wide (space heating, building maintenance, caulking, cleaning, gluing, glue guns, patching, plexus, hand-applied putty and solvent use) emissions shall be calculated based on the overall resin use in Plants 1-6, and in Plant 7.	Title I Condition: Monitoring for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable
For the first 11 months after this permit is issued, the Permittee shall calculate the 12-month Rolling Sum using the previous 11 months of monthly fuel and materials used or purchased (determined prior to permit issuance). All calculations and usages shall be based on verifiable records maintained by the Permittee.	Title I Condition: Monitoring for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable
The Permittee shall not "construct or reconstruct" a major source of hazardous air pollutants as defined in 40 CFR part 63, subpart B, section 63.2 without first obtaining a preconstruction permit.	Title I Condition: Limit to avoid 40 CFR part 63, Sections 63.40 to 63.44 and Minn. R. 7007.3010.
The Permittee shall not begin construction of any single project or projects that are connected or phased which will cause a total increase in actual emissions of greater than 99 tons per year VOC without first getting a permit amendment to authorize the project. Connected and phased have meanings as defined in Minn. R. 4410.0200, subps. 9(b) and 60. Such projects(s) may require the completion of an Environmental Assessment Worksheet prior to the amendment being issued.	Minn. Stat. 116D.04, subd. 2b. Minn. R. 4410.3100, subp. 1
B. NESHAP REQUIREMENTS - Also see NOTIFICATIONS, RECORDKEEPING and REPORTING REQUIREMENTS for additional requirements	hdr

# TABLE A: LIMITS AND OTHER REQUIREMENTS

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<p>The Permittee shall comply with the Maximum Achievable Control Technology (MACT) Standard for Fiberglass Boat Manufacturing by August 23, 2004 (the Compliance Date).</p> <p>The NESHAP Subpart VVVV Requirements are listed below.</p>	<p>40 CFR pt. 63</p>
<p>(a) The Permittee shall limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of 40 CFR Section 63.5698 to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.</p> <p>(1) Production resin. (2) Pigmented gel coat. (3) Clear gel coat. (4) Tooling resin. (5) Tooling gel coat.</p> <p>(b) The Permittee shall limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this section, based on a 12-month rolling average.</p> <p>HAP Limit = <math>[46(MR) + 159 (MPG) + 291 (MCG) + 54 (MTR) + 214 (MTG)]</math> (Eq. 1)</p>	<p>40 CFR Section 63.5698 Open Molding Resin and Gel Coat Operations</p>
<p>Continued.....</p> <p>Where: HAP Limit= total allowable organic HAP that can be emitted from the open molding operations, kilograms. MR = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams. MPG = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams. MCG = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams. MTR = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams. MTG = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams. (c) The open molding emission limit is the same for both new and existing sources.</p>	<p>40 CFR Section 63.5698 Open Molding Resin and Gel Coat Operations (continued)</p>
<p>Continued.....</p> <p>(d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.</p> <p>(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. The permittee shall keep a record of the resins for which you are using this exemption.</p>	<p>40 CFR Section 63.5698 Open Molding Resin and Gel Coat Operations (continued)</p>
<p>Continued.....</p> <p>(d)(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. The permittee shall 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.</p>	<p>40 CFR Section 63.5698 Open Molding Resin and Gel Coat Operations (continued)</p>
<p>Continued.....</p> <p>(d)(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. The permittee shall 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.</p>	<p>40 CFR Section 63.5698 Open Molding Resin and Gel Coat Operations (continued)</p>
<p>The Permittee shall use one or more of the options listed in paragraphs (a) through (c) of this section to meet the emission limit in 40 CFR Section 63.5698 for the resins and gel coats used in open molding operations at the facility.</p> <p>(a) Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.</p> <p>(1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in 40 CFR Section 63.5698 using the procedures described in 40 CFR Section 63.5710. Compliance with this option is based on a 12-month rolling average.</p>	<p>40 CFR Section 63.5701 Open Molding Emission Limit - Compliance Options</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

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Continued.....  (2) Those operations and materials not included in the emissions average must comply with either paragraph (b) or (c) of this section. (b) Compliant materials option. Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to this subpart. Compliance with this option is based on a 12-month rolling average. (c) Add-on control option. Not applicable to this facility.	40 CFR Section 63.5701 Open Molding Emission Limit - Compliance Options (continued)
(a) Emissions averaging option. For those open molding operations and materials complying using the emissions averaging option, The Permittee shall demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section. (1) Use the methods specified in 40 CFR Section 63.5758 to determine the organic HAP content of resins and gel coats. (2) Complete the calculations described in 40 CFR Section 63.5710 to show that the organic HAP emissions do not exceed the limit specified in 40 CFR Section 63.5698.	40 CFR Section 63.5704 Open Molding Emission Limit General Requirements
Continued..... (3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat. (i) Hazardous air pollutant content. (ii) Amount of material used per month. (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology. (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in 40 CFR Section 63.5710. (4) Prepare and submit the implementation plan described in 40 CFR Section 63.5707 to the Administrator and keep it up to date. (5) Submit semiannual compliance reports to the Administrator as specified in 40 CFR Section 63.5764.	40 CFR Section 63.5704 Open Molding Emission Limit General Requirements (continued)
(b) Compliant materials option. For each open molding operation complying using the compliant materials option, The Permittee shall demonstrate compliance by performing the steps in paragraphs (b)(1) through (4) of this section. (1) Use the methods specified in 40 CFR Section 63.5758 to determine the organic HAP content of resins and gel coats. (2) Complete the calculations described in 40 CFR Section 63.5713 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 to this subpart (see Appendix D attached to the permit).	40 CFR Section 63.5704 Open Molding Emission Limit General Requirements (continued)
Continued..... (3) Keep records as specified in paragraphs (b)(3)(i) through (iv) of this section for each resin and gel coat. (i) Hazardous air pollutant content. (ii) 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. (iii) 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. (iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in 40 CFR Section 63.5713. (4) Submit semiannual compliance reports to the Administrator as specified in 40 CFR Section 63.5764.	40 CFR Section 63.5704 Open Molding Emission Limit General Requirements (continued)
(c) Add-on control option. If you are using an add-on control device, The Permittee shall demonstrate compliance by performing the steps in paragraphs (c)(1) through (5) of this section. (1) Conduct a performance test of the control device as specified in 40 CFR Sections 63.5719 and 63.5722 to demonstrate initial compliance. (2) Use the performance test results to determine control device parameters to monitor after the performance test as specified in 40 CFR Section 63.5725. (3) Comply with the operating limits specified in 40 CFR Section 63.5715 and the control device and emission capture system monitoring requirements specified in 40 CFR Section 63.5725 to demonstrate continuous compliance. (4) Keep the records specified in 40 CFR Section 63.5767. (5) Submit to the Administrator the notifications and reports specified in 40 CFR Sections 63.5761 and 63.5764.	40 CFR Section 63.5704 Open Molding Emission Limit General Requirements (continued)

# TABLE A: LIMITS AND OTHER REQUIREMENTS

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<p>(a) The Permittee shall prepare an implementation plan for all open molding operations for which you comply by using the emissions averaging option described in 40 CFR Section 63.5704(a).</p> <p>(b) The implementation plan must describe the steps you will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, your implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section.</p> <p>(1) A description of each operation included in the average.</p> <p>(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.</p> <p>(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in 40 CFR Section 63.5698.</p>	<p>40 CFR Section 63.5704 Open Molding Operations Implementation Plan</p>
<p>Continued.....</p> <p>(c) The Permittee shall submit the implementation plan to the Administrator with the notification of compliance status specified in 40 CFR Section 63.5761.</p> <p>(d) The Permittee shall keep the implementation plan on site and provide it to the Administrator when asked.</p> <p>(e) If you revise the implementation plan, The Permittee shall submit the revised plan with your next semiannual compliance report specified in 40 CFR Section 63.5764.</p>	<p>40 CFR Section 63.5704 Open Molding Operations Implementation Plan (continued)</p>
<p>(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 the compliance date specified in 40 CFR Section 63.5695.</p> <p>(b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in 40 CFR Section 63.5698 calculated for the same 12-month period. (Include terms in equation 1 of 40 CFR Section 63.5698 and equation 1 of this section for only those operations and materials included in the average.)</p>	<p>40 CFR Section 63.5710 Emissions Averaging Compliance Demonstration (continued)</p>
<p>HAP emissions = [(PVR) (MR) + (PVP) (MP) + (PVC) (MC) + (PVT) (MT)] + (PVTG) (MTG)]</p> <p>Where:</p> <p>HAP emissions= Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.</p> <p>PVR= Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.</p> <p>MR= Mass of production resin used in the past 12 months, megagrams.</p> <p>PVP= Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.</p> <p>MP= Mass of pigmented gel coat used in the past 12 months, megagrams.</p> <p>PVC= Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.</p> <p>MC= Mass of clear gel coat used in the past 12 months, megagrams.</p>	<p>40 CFR Section 63.5710 Emissions Averaging Compliance Demonstration (continued)</p>
<p>Continued.....</p> <p>PVT= Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.</p> <p>MT= Mass of tooling resin used in the past 12 months, megagrams.</p> <p>PVTG= Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.</p> <p>MTG= Mass of tooling gel coat used in the past 12 months, megagrams.</p> <p>(c) At the end of every month, use equation 2 of this section (see Appendix C attached to the permit) to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.</p>	<p>40 CFR Section 63.5710 Emissions Averaging Compliance Demonstration (continued)</p>
<p>(d) The Permittee shall use the equations in Table 3 to this subpart (see Appendix D attached to the permit) to calculate the MACT model point value (PVi) for each resin and gel coat used in each operation in the past 12 months.</p> <p>(e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in 40 CFR Section 63.5698(b) for the same 12-month period, then you are in compliance with the emission limit in 40 CFR Section 63.5698 for those operations and materials included in the average.</p>	<p>40 CFR Section 63.5710 Emissions Averaging Compliance Demonstration (continued)</p>

# TABLE A: LIMITS AND OTHER REQUIREMENTS

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<p>(a) Compliance using the organic HAP content requirements listed in Table 2 (see Appendix D attached to the permit) to this subpart is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in 40 CFR Section 63.5695. If you are using filled material (production resin or tooling resin), The Permittee shall comply according to the procedure described in 40 CFR Section 63.5714.</p> <p>(b) At the end of the twelfth month after your 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.</p>	<p>40 CFR Section 63.5713 Compliant Materials Compliance Demonstration</p>
<p>Continued.....</p> <p>(b)..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 2 (see Appendix D attached to the permit) to this subpart, then you are in compliance with the emission limit specified in 40 CFR Section 63.5698 for that 12-month period for that operation. In addition, you do not need to complete the weighted-average organic HAP content calculation contained in paragraph (c) of this section for that operation.</p> <p>(c) At the end of every month, The Permittee shall use equation 1 (see Appendix C attached to the permit) of this section to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.</p> <p>(d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 to this subpart, then you are in compliance with the emission limit specified in 40 CFR Section 63.5698.</p>	<p>40 CFR Section 63.5713 Compliant Materials Compliance Demonstration (continued)</p>
<p>(a) If you are using a filled production resin or filled tooling resin, The Permittee shall demonstrate compliance for the filled material on an as-applied basis using equation 1 of this section (see Appendix C attached to the permit).</p> <p>(b) If the filled resin is used as a production resin and the value of PVF calculated by equation 1 of this section does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.</p> <p>(c) If the filled resin is used as a tooling resin and the value of PVF calculated by equation 1 of this section does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.</p> <p>(d) If you are including a filled resin in the emissions averaging procedure described in 40 CFR Section 63.5710, then use the value of PVF calculated using equation 1 of this section for the value of PV i in equation 2 of 40 CFR Section 63.5710.</p>	<p>40 CFR Section 63.5714 Filled Resin Compliance Demonstration</p>
<p>(a) If a resin application operation meets the definition of closed molding specified in 40 CFR Section 63.5779, there is no requirement to reduce emissions from that operation.</p> <p>(b) If the resin application operation does not meet the definition of closed molding, then The Permittee shall comply with the limit for open molding resin operations specified in 40 CFR Section 63.5698.</p> <p>(c) 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 40 CFR Section 63.5698. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding.</p>	<p>40 CFR Section 63.5728 Standards for Closed Molding Resin Operations</p>
<p>(a) 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.</p> <p>(b) The work practice standard in paragraph (a) of this section 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.</p>	<p>40 CFR Section 63.5731 Standards for Resin and Gel Coat Mixing Operations</p>
<p>Continued.....</p> <p>(c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, The Permittee shall 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.</p> <p>(d) The Permittee shall 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.</p>	<p>40 CFR Section 63.5731 Standards for Resin and Gel Coat Mixing Operations (continued)</p>
<p>(a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), The Permittee shall 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.</p>	<p>40 CFR Section 63.5734 Standards for resin and gel coat application equipment cleaning operations</p>

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<p>(b) The Permittee shall 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 part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.</p>	40 CFR Section 63.5734 Standards for resin and gel coat application equipment cleaning operations (continued)
<p>(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in 40 CFR Section 63.5734 using the methods specified in 40 CFR Section 63.5758. (b) If you recycle cleaning solvents on site, you 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 40 CFR Section 63.5758 for demonstrating compliance with organic HAP content limits. (c) At least once per month, The Permittee shall 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.</p>	40 CFR Section 63.5737 Resin and gel coat application equipment cleaning standards compliance demonstration
<p>(a) Use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight. (b) Determine and record the organic HAP content of the carpet and fabric adhesives using the methods in 40 CFR Section 63.5758.</p>	40 CFR Section 63.5740 Carpet and Fabric Adhesives
<p>(a) Determine the organic HAP content for each material used. To determine the organic HAP content for each material used in carpet and fabric adhesive operations, use one of the options in paragraphs (a)(1) through (6) of this section. (1) 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 paragraphs (a)(1)(i) and (ii) of this section when determining organic HAP content by Method 311.</p>	40 CFR Section 63.5758 Determining the Organic HAP Content of Materials
<p>Continued..... (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 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 do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP the Permittee measure as a value truncated to four places after the decimal point (for example, 0.1234). (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 (for example, 0.123).</p>	(continued from above)
<p>(2) Method 24 (appendix A to 40 CFR part 60). 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. (3) 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. (4) Alternative method. The Permittee may use an alternative test method for determining mass fraction of organic HAP if the Permittee obtain prior approval by the Administrator. The Permittee must follow the procedure in 40 CFR Section 63.7(f) to submit an alternative test method for approval.</p>	(continued from above)
<p>(5) 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 (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section. (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. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the Permittee do not have to include it in the organic HAP total.</p>	(continued from above)
<p>Continued..... (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 paragraphs (a)(1) through (4) of this section 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.</p>	(continued from above)

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Continued..... (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 paragraphs (a)(1) through (4) of this section 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.	(continued from above)
(6) 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 (see Appendix D attached to the permit) or Table 6 to this subpart. The Permittee may use Table 6 to this subpart only if the solvent blends in the materials the Permittee use do not match any of the solvent blends in Table 5 to this subpart and the Permittee know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or Table 6 to this subpart, then the test results must be used for determining compliance.	(continued from above)
(1) If the Permittee's source is not controlled by an add-on control device (i.e., the Permittee are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for the Permittee's source in 40 CFR Section 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for the Permittee's source in 40 CFR Section 63.5695.	(continued from above)
(3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. (4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period. (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.	(continued from above)
Continued..... (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 are 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. (6) If the Permittee were in compliance with the emission limits and work practice standards during the reporting period, the Permittee must include a statement to that effect.	(continued from above)
Continued.... (iv) A statement of whether or not the Permittee's facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. (d) If the Permittee's facility has an add-on control device, the Permittee must submit semiannual compliance reports and quarterly excess emission reports as specified in 40 CFR Section 63.10(e). The contents of the reports are specified in 40 CFR Section 63.10(e). (e) If the Permittee's facility has an add-on control device, the Permittee must complete a startup, shutdown, and malfunction plan as specified in 40 CFR Section 63.6(e), and the Permittee must submit the startup, shutdown, and malfunction reports specified in 40 CFR Section 63.10 (e)(5).	(continued from above)
C. OPERATIONAL REQUIREMENTS	hdr
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)

# TABLE A: LIMITS AND OTHER REQUIREMENTS

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Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the Administrator or citizens under the Clean Air Act..	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16	Minn. R. 7007.0800, subp. 16
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
D. NOTIFICATION REQUIREMENTS	hdr
Shutdowns: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.  At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
(a) The Permittee must submit all of the notifications in Table 7 to 40 CFR Part 63 Subpart VVVV that apply to 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 to this subpart. (b) If the Permittee changes any information submitted in any notification, the Permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.	40 CFR Section 63.5761 Notifications
Breakdowns: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.  At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: In the event of any deviation, as defined in part 7007.0100, subpart 8a, which could endanger human health or the environment, notify, orally or by facsimile, the commissioner or the state duty officer as soon as possible after discovery of the deviation. Within two working days of the discovery, submit to the commissioner a written description of the deviation stating: A. the cause of the deviation; B. the exact dates of the period of the deviation, if the deviation has been corrected; C. whether or not the deviation has been corrected; D. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and E. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7007.0800, subp. 6(A) and Minn. R. 7019.1000, subp. 1
See Table B for additional notification requirements.	hdr
E. MONITORING REQUIREMENTS	hdr
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued. This requirement shall apply to the monitoring equipment used for weight measurement on the facility's base resin tanks which includes sight glasses, flow meters and/or scales.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment. This requirement shall apply to the equipment used for monitoring the weight of base resin in the facility's resin storage tanks which includes sight glasses, flow meters and/or scales.	Minn. R. 7007.0800, subp. 4(D)



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Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system	Minn. R. 7007.0800, subp. 4(D)
F. RECORDKEEPING REQUIREMENTS	hdr
Equipment List: The Permittee shall maintain a written list of all emission units on site that are not insignificant activities. The list shall include the type of equipment; identifying number; dates of installation, modification and/or reconstruction; and reference to applicable Standards of Performance for New Stationary Sources (40 CFR pt. 60) and National Emission Standards for Hazardous Air Pollutants (40 CFR pt. 63).	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable
The Permittee must keep the records specified in paragraphs (a) through (d) of this section in addition to records specified in individual sections of this subpart. (a) The Permittee must keep a copy of each notification and report that the Permittee submitted to comply with this subpart. (b) The Permittee must keep all documentation supporting any notification or report that the Permittee submitted. (c) If the Permittee's facility is not controlled by an add-on control device (i.e., the Permittee are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the Permittee must keep the records specified in paragraphs (c)(1) through (3) of this section.	40 CFR Section 63.5767 Recordkeeping
(c)(1) through (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 and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the Permittee must also record the amounts of each applied by atomized and nonatomized methods. (2) The total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in 40 CFR Section 63.5752. (3) The total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in 40 CFR Section 63.5749.	40 CFR Section 63.5767 Recordkeeping (continued)
Updating the Equipment List: The list shall be updated to include new or modified equipment before making a change. New emission units may be installed if they are of a type already listed in this permit, and existing units may be modified or moved, without obtaining a permit amendment, provided total facility emissions remain within the limits specified in the permit.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable
(a) The Permittee's records must be readily available and in a form so they can be easily inspected and reviewed. (b) The Permittee must keep each record for 5 years following the date that each record is generated. (c) The Permittee must keep each record 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. (d) The Permittee can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.	40 CFR Section 63.5770 Record Format and Retention
(d) If the Permittee's facility has an add-on control device, the Permittee must keep the records specified in 40 CFR Section 63.10(b) relative to control device startup, shut down, and malfunction events; control device performance tests; and continuous monitoring system performance evaluations.	40 CFR Section 63.5767 Recordkeeping (continued)
Record keeping: The Permittee shall maintain records of the total amount of resins used during each month of operation as specified below in Resin Usage: Equation 4, based on sight glass, flow meter or scale readings. These records shall be used to calculate the monthly totals and 12-month rolling sums as required by other parts of this permit.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable.
Resin Usage: Actual resin usage each month shall be determined using Equation 4 below. Equation 4: $Ur = Urst + Urdp - Urlo$ Where, $Ur$ = total amount of VOC-containing resin as used, lb/month $Urst$ = quantity of resin inventoried at the start of each month using flow meter, sight glass or scale readings for each storage tank, lb/month $Urdp$ = quantity of resin delivered to the facility during the month based upon delivery and/or purchase records, lb/month $Urlo$ = quantity of resin left over at the start of the following month using flow meter, sight glass or scale readings for each storage tank, lb/month	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

Record keeping: The permittee shall maintain records of the total amount of resins applied by atomized spray guns during each month of operation. Estimates of usage shall be based on assumptions representative of the operation conditions specific to this facility. These records shall be used to calculate the monthly totals and 12 month rolling sums as required by other parts of this permit.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable
Record keeping: The Permittee shall maintain records of the total amount of all VOC containing material, other than resins, used each month based on purchase records. These records shall be used to calculate the monthly totals and 12-month rolling sums as required by other parts of this permit.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable
Record keeping: For PM/PM10, and VOC, the solids and VOC content of purchased materials shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, all compliance calculations must use either the highest number in the range, or the Permittee shall obtain a certification from the supplier as to the accuracy of the MSDS, and the material's exact solids and VOC content shall be used. Other methods approved by the MPCA may be used to determine the material content. The Division Manager reserves the right to require the Permittee to take samples of the materials, and to conduct analysis of material content using EPA reference methods. If an EPA reference method is used for material content determination, the data obtained shall supercede the MSDS.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and 40 CFR pt. 51, Appendix S, where applicable
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes. The Permittee is not required to keep records for modifications defined as "Insignificant Activities Not Required to Be Listed" under Minn. R. 7007.1300, subp. 2.	Minn. R. 7007. 0800, subp. 5(B)
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
<b>G. REPORTING REQUIREMENTS</b>	hdr
(a) The Permittee must submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, the Permittee must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation. (b) Unless the Administrator has approved a different schedule for submission of reports under 40 CFR Section 63.10(a), the Permittee must submit each report by the dates in paragraphs (b)(1) through (5) of this section.	40 CFR Section 63.5764 Reports
Continued....  (b)(1)....If the Permittee's source is controlled by an add-on control device, the first compliance report must cover the period beginning on the compliance date specified for the Permittee's source in 40 CFR Section 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the Permittee's source in 40 CFR Section 63.5695. (2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of this section.	(continued from above)
(c) The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section. (1) Company name and address. (2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report. (3) The date of the report and the beginning and ending dates of the reporting period. (4) A description of any changes in the manufacturing process since the last compliance report. (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 are 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.	(continued from above)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

Continued.... (6) If the Permittee were in compliance with the emission limits and work practice standards during the reporting period, the Permittee must include a statement to that effect. (7) If the Permittee deviated from an emission limit or work practice standard during the reporting period, the Permittee must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section in the semiannual compliance report. (i) A description of the operation involved in the deviation. (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation. (iii) A description of any corrective action the Permittee took to minimize the deviation and actions the Permittee have taken to prevent it from happening again.	(continued from above)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). To be submitted on a form approved by the Commissioner	Minn. R. 7019.3000 through Minn. R. 7019.3010
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H)	Minn. R. 7007.1400, subp. 1(H)
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
See Table B for additional reporting requirements.	hdr

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Subject Item: GP 001 Post-1968 Indirect Heating (Make up Air Units and Boilers)**

**Associated Items:** EU 159 Furnace  
EU 160 Wirsbo Boiler  
EU 161 Boiler  
EU 162 Make-up Air Unit 1  
EU 163 Make-up Air Unit 2  
EU 164 Make-up Air Unit 3  
EU 165 Make-up Air Unit 4  
EU 166 Make-up Air Unit 5  
EU 167 Make-up Air Unit 6  
EU 168 Make-up Air Unit 7  
EU 169 Make-up Air Unit 8  
EU 170 Make-up Air Unit 9  
EU 172 Make-up Air Unit 11  
EU 173 Make-up Air Unit 12  
EU 174 Make-up Air Unit 13  
EU 175 Make-up Air Unit 14

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input . This limit applies to each emission unit in this group individually.	Minn. R. 7011.0515, subp. 1 Minn. R. 7011.0550
Opacity: less than or equal to 20 percent ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period, and a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period. This limit applies to each emission unit in this group individually.	Minn. R. 7011.0515, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Subject Item: GP 002 Pre-1968 Indirect Heating (Bldg. Furnaces)**

**Associated Items:** EU 004 Plant 1 Furnace 4  
 EU 018 Plant 2 Furnace 3  
 EU 023 Plant 2 Furnace 8  
 EU 024 Plant 2 Furnace 9  
 EU 025 Plant 2 Furnace 10  
 EU 026 Plant 2 Furnace 11  
 EU 033 Windshield Shop Furnace 1  
 EU 034 Windshield Shop Furnace 2  
 SV 004  
 SV 018  
 SV 023  
 SV 024  
 SV 025  
 SV 026  
 SV 027  
 SV 033  
 SV 034  
 SV 038

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input . This limit applies to each emission unit in this group individually.	Minn. R. 7011.0510, subp. 1 Minn. R. 7011.0545
Opacity: less than or equal to 20 percent ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period, and a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period. This limit applies to each emission unit in this group individually.	Minn. R. 7011.0510, subp. 2

# TABLE A: LIMITS AND OTHER REQUIREMENTS

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Subject Item:** GP 003 Panel Filters

**Associated Items:** CE 001 Mat or Panel Filter  
CE 002 Mat or Panel Filter  
CE 003 Mat or Panel Filter  
CE 004 Mat or Panel Filter  
CE 005 Mat or Panel Filter  
CE 006 Mat or Panel Filter  
CE 007 Mat or Panel Filter  
CE 009 Mat or Panel Filter  
CE 011 Mat or Panel Filter  
CE 012 Mat or Panel Filter  
CE 013 Mat or Panel Filter  
CE 014 Mat or Panel Filter  
CE 015 Mat or Panel Filter  
CE 016 Mat or Panel Filter  
CE 017 Mat or Panel Filter  
CE 018 Mat or Panel Filter

What to do	Why to do it
Control Equipment Efficiency: The panel filters must at all times attain at least 92% control efficiency for PM and PM10.	Minn. R. 7011.0700, subp 1 and Minn. R. 7007.0800, subp. 14 to avoid major sources classification under 40 CFR pt. 70.2
Control Equipment Monitoring: The panel filters' alignment and condition (saturation, tears, holes) shall be monitored every 24 hours if in operation.	Minn. R. 7011.0075, subp. 2(F) Minn. R. 7007.0800, subp. 4
Control Equipment Recordkeeping: The panel filters' alignment and condition (saturation, tears, holes) shall be recorded every 24 hours if in operation.	Minn. R. 7011.0075, subp. 2(H) Minn. R. 7007.0800, subp. 5
Control Equipment Maintenance: The Permittee shall maintain an inventory of spare parts that are subject to frequent replacement, as required by the manufacturing specifications.	Minn. R. 7011.0075, subp. 2(A)
Control Equipment Maintenance: The Permittee shall train staff on the operation and monitoring of the panel filters and troubleshooting, and train and require staff to respond to indications of malfunctioning equipment. Torn or plugged filters shall be replaced immediately.	Minn. R. 7011.0075 subp. 2(B)
Control Equipment Maintenance: The Permittee shall maintain a record of parts replaced, repaired, or modified for the previous five years.	Minn. R. 7011.0075 subp. 2(I)
The Permittee may replace listed emission units, move emission units or add new emission units to those listed in GP 003, provided PM and PM less than 10 microns emissions are tracked according to Table A, Section A, Emission Limits; and Table A, Section F, Recordkeeping Requirements. All replaced or added emission units must meet the requirements for GP 003.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21.

# TABLE A: LIMITS AND OTHER REQUIREMENTS

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Subject Item:** GP 004 Resin Spray Guns

**Associated Items:** EU 040 Resin Flow Coater Gun  
 EU 041 Resin Flow Coater Gun  
 EU 044 Resin Flow Coater Gun  
 EU 045 Resin Flow Coater Gun  
 EU 046 Resin Flow Coater Gun  
 EU 049 Resin Flow Coater Gun  
 EU 050 Resin Flow Coater Gun  
 EU 051 Resin Flow Coater Gun  
 EU 053 Resin Flow Coater Gun  
 EU 055 Resin Flow Coater Gun  
 EU 056 Resin Flow Coater Gun  
 EU 057 Resin Flow Coater Gun  
 EU 058 Resin Flow Coater Gun  
 EU 059 Resin Flow Coater Gun  
 EU 064 Resin Flow Coater Gun  
 EU 065 Resin Flow Coater Gun  
 EU 066 Resin Flow Coater Gun  
 EU 067 Resin Flow Coater Gun  
 EU 070 Resin Flow Coater Gun  
 EU 071 Resin Flow Coater Gun  
 EU 072 Resin Flow Coater Gun  
 EU 073 Resin Flow Coater Gun  
 SV 045 Plant 6 Flowcoater  
 SV 046 Plant 6 flowcoater  
 SV 047 Plat 6 flowcoater  
 SV 069 Plant 1 Lamination  
 SV 070 Plant 1 Lamination  
 SV 071 Plant 1 Lamination  
 SV 072 Plant 1 Lamination  
 SV 073 Plant 1 Lamination  
 SV 074 Plant 1 Lamination  
 SV 075 Plant 1 Lamination  
 SV 076 Plant 1 Lamination  
 SV 077 Plant 1 Lamination  
 SV 078 Plant 7 Boiler  
 SV 079 Plant 7 Stripe Painting  
 SV 080 Plant 7 Stripe Painting  
 SV 081 Plant 6 Paint

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A); Minn. R. 7011.0730 and 7011.0735
Opacity: less than or equal to 20 percent .	Minn. R. 7011.0715, subp. 1(B)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/30/04

Facility Name:       Larson/Glastron Boats Inc  
Permit Number:     09700025 - 006

The Permittee may replace listed emission units, move emission units or add new emission units to those listed in GP 004, provided VOC, PM and PM less than 10 microns emissions are tracked according to Table A, Section A, Emission Limits; and Table A, Section F, Recordkeeping Requirements. All replaced or added emission units must meet the requirements for GP 004.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21.
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**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Subject Item: GP 005 Gelcoat Spray Guns**

**Associated Items:**

- EU 042 Gelcoat Spray Gun
- EU 043 Gelcoat Spray Gun
- EU 052 Gelcoat Spray Gun
- EU 054 Gelcoat Spray Gun
- EU 060 Gelcoat Spray Gun
- EU 062 Gelcoat Spray Gun
- EU 063 Gelcoat Spray Gun
- EU 077 Gelcoat Spray Gun
- EU 106 31 Gelcoat Touch-up Guns (4)
- EU 118 Gelcoat Spray Gun
- EU 119 Gelcoat Spray Gun
- EU 120 Gelcoat Spray Gun
- EU 121 Gelcoat Spray Gun
- EU 123 Gelcoat Spray Gun
- EU 124 Gelcoat Spray Gun
- EU 125 Gelcoat Spray Gun
- EU 126 Gelcoat Spray Gun
- EU 128 Gelcoat Spray Gun
- EU 129 Gelcoat Spray Gun
- EU 130 Gelcoat Spray Gun
- EU 131 Gelcoat Spray Gun
- EU 133 Gelcoat Spray Gun
- EU 134 Gelcoat Spray Gun
- EU 135 Gelcoat Spray Gun
- EU 136 Gelcoat Spray Gun
- EU 137 Gelcoat Spray Gun
- SV 045 Plant 6 Flowcoater
- SV 046 Plant 6 flowcoater
- SV 047 Plat 6 flowcoater
- SV 054 Plant 4 glue for formica
- SV 056 Plant 1 Gelcoat
- SV 057 Plant 1 Gelcoat
- SV 058 Plant 1 Gelcoat
- SV 059 Plant 1 Gelcoat
- SV 060 Plant 1 Gelcoat
- SV 061 Plant 6 Gelcoat
- SV 062 Plant 6 Gelcoat
- SV 065 Plant 1 Lamination
- SV 066 Plant 1 Lamination
- SV 067 Plant 1 Lamination
- SV 068 Plant 1 Lamination
- SV 069 Plant 1 Lamination
- SV 070 Plant 1 Lamination
- SV 071 Plant 1 Lamination
- SV 072 Plant 1 Lamination

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Associated Items:** SV 073 Plant 1 Lamination  
SV 074 Plant 1 Lamination  
SV 075 Plant 1 Lamination  
SV 076 Plant 1 Lamination  
SV 077 Plant 1 Lamination  
SV 078 Plant 7 Boiler  
SV 079 Plant 7 Stripe Painting  
SV 080 Plant 7 Stripe Painting  
SV 081 Plant 6 Paint

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A); Minn. R. 7011.0730 and 7011.0735
Opacity: less than or equal to 20 percent .	Minn. R. 7011.0715, subp. 1(B)
The Permittee may replace listed emission units, move emission units or add new emission units to those listed in GP 005, provided VOC, PM and PM less than 10 microns emissions are tracked according to Table A, Section A, Emission Limits; and Table A, Section F, Recordkeeping Requirements. All replaced or added emission units must meet the requirements for GP 005.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21.

## TABLE A: LIMITS AND OTHER REQUIREMENTS

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Subject Item:** GP 006 Paint Spray Guns

**Associated Items:**

- EU 074 Paint Spray Gun
- EU 075 Paint Spray Gun
- EU 081 Paint Spray Gun
- EU 082 Paint Spray Gun
- EU 083 Paint Spray Gun
- EU 084 Paint Spray Gun
- EU 085 Paint Spray Gun
- EU 086 Paint Spray Gun
- SV 045 Plant 6 Flowcoater
- SV 046 Plant 6 flowcoater
- SV 047 Plat 6 flowcoater
- SV 069 Plant 1 Lamination
- SV 070 Plant 1 Lamination
- SV 071 Plant 1 Lamination
- SV 072 Plant 1 Lamination
- SV 073 Plant 1 Lamination
- SV 074 Plant 1 Lamination
- SV 075 Plant 1 Lamination
- SV 076 Plant 1 Lamination
- SV 077 Plant 1 Lamination
- SV 078 Plant 7 Boiler
- SV 079 Plant 7 Stripe Painting
- SV 080 Plant 7 Stripe Painting
- SV 081 Plant 6 Paint

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A); Minn. R. 7011.0730 and 7011.0735
Opacity: less than or equal to 20 percent .	Minn. R. 7011.0715, subp. 1(B)
The Permittee may replace listed emission units, move emission units or add new emission units to those listed in GP 006, provided VOC, PM and PM less than 10 microns emissions are tracked according to Table A, Section A, Emission Limits; and Table A, Section F, Recordkeeping Requirements. All replaced or added emission units must meet the requirements for GP 006.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21.

# TABLE A: LIMITS AND OTHER REQUIREMENTS

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Subject Item:** GP 007 Miscellaneous Emission Sources

**Associated Items:**

- EU 090 Glue Gun 101
- EU 091 Glue Gun 102
- EU 095 Solvent Cleaner
- EU 097 Gluebooth 001
- EU 098 Gluebooth 002
- EU 099 Hand-Applied Glue For Formica
- EU 100 Glue Gun 605
- EU 101 Glue Gun 606
- EU 102 Glue Gun 607
- EU 103 Glue Gun 608
- EU 104 Glue Gun 609
- EU 105 Glue Gun 610
- SV 046 Plant 6 flowcoater
- SV 047 Plat 6 flowcoater
- SV 052 Plant 3 Gluebooth 001
- SV 053 Plant 3 Gluebooth 002
- SV 054 Plant 4 glue for formica
- SV 065 Plant 1 Lamination
- SV 066 Plant 1 Lamination
- SV 067 Plant 1 Lamination
- SV 068 Plant 1 Lamination
- SV 069 Plant 1 Lamination
- SV 070 Plant 1 Lamination
- SV 071 Plant 1 Lamination
- SV 072 Plant 1 Lamination
- SV 073 Plant 1 Lamination
- SV 074 Plant 1 Lamination
- SV 075 Plant 1 Lamination
- SV 076 Plant 1 Lamination
- SV 077 Plant 1 Lamination
- SV 078 Plant 7 Boiler
- SV 079 Plant 7 Stripe Painting
- SV 080 Plant 7 Stripe Painting
- SV 081 Plant 6 Paint

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A); Minn. R. 7011.0730 and 7011.0735
Opacity: less than or equal to 20 percent .	Minn. R. 7011.0715, subp. 1(B)
The Permittee may replace listed emission units, move emission units or add new emission units to those listed in GP 007, provided VOC, PM and PM less than 10 microns emissions are tracked according to Table A, Section A, Emission Limits; and Table A, Section F, Recordkeeping Requirements. All replaced or added emission units must meet the requirements for GP 007.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21.

# TABLE A: LIMITS AND OTHER REQUIREMENTS

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

**Subject Item:** GP 010 VEC Cells

**Associated Items:** EU 118 Gelcoat Spray Gun  
 EU 119 Gelcoat Spray Gun  
 EU 120 Gelcoat Spray Gun  
 EU 121 Gelcoat Spray Gun  
 EU 122 Boat Mold Process Cell 01  
 EU 123 Gelcoat Spray Gun  
 EU 124 Gelcoat Spray Gun  
 EU 125 Gelcoat Spray Gun  
 EU 126 Gelcoat Spray Gun  
 EU 127 Boat Mold Process Cell 02  
 EU 128 Gelcoat Spray Gun  
 EU 129 Gelcoat Spray Gun  
 EU 130 Gelcoat Spray Gun  
 EU 131 Gelcoat Spray Gun  
 EU 132 Boat Mold Process Cell 03  
 EU 133 Gelcoat Spray Gun  
 EU 134 Gelcoat Spray Gun  
 EU 135 Gelcoat Spray Gun  
 EU 136 Gelcoat Spray Gun  
 EU 137 Gelcoat Spray Gun  
 EU 138 Boat Mold Process Cell 004

What to do	Why to do it
These units are subject to requirements set under the preconstruction program required by 40 CFR 63, Subpart B. As such, the units are also subject to any applicable requirements in 40 CFR 63, Subpart A, General Conditions.	40 CFR 63.43
OPERATIONAL REQUIREMENTS	hdr
HAPs - Total: less than or equal to 33 percent by weight of gel coat, based on a 12 month rolling average.	40 CFR 63.43
HAPs - Total: less than or equal to 35 percent by weight of resin, based on a 12 month rolling average.	40 CFR 63.43
MONITORING AND RECORDKEEPING	hdr
Certified MSDS sheets shall be obtained from the vendor for each type of catalyst, resin, and gel coat, or batch tickets shall be obtained for each shipment of catalyst, resin, or gel coat.	40 CFR 63.43
Each month, by the 15th of the month, the applicant shall calculate the average HAP content of the catalyst, resin, and gel coat purchased for the previous month.	Minn. R. 7007.0800, subp. 4
Each month, by the 15th of the month, the applicant shall calculate the average HAP content of the catalyst, resin and gel coat for the past 12 months.	Minn. R. 7007.0800, subp. 4
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A); Minn. R. 7011.0730 and 7011.0735
Opacity: less than or equal to 20 percent .	Minn. R. 7011.0715, subp. 1(B)

## TABLE B: SUBMITTALS

09/30/04

Facility Name: Larson/Glastron Boats Inc  
Permit Number: 09700025 - 006

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor  
Permit Section  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

Supervisor  
Compliance Determination Unit  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak  
Air and Radiation Branch  
EPA Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency  
Clean Air Markets Division  
1200 Pennsylvania Avenue NW (6204N)  
Washington, D.C. 20460

**TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**

09/30/04

Facility Name:       Larson/Glastron Boats Inc  
Permit Number:     09700025 - 006

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

**TABLE B: RECURRENT SUBMITTALS**

09/30/04

Facility Name: Larson/Glastron Boats Inc

Permit Number: 09700025 - 006

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 09/28/1998 . The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report period of each calendar year covers January 1 - June 30. The second report period of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Annual Report	due 30 days after end of each calendar year starting 09/28/1998 . This report must include the 12 month rolling sum of VOCs, PM and PM10 emitted.	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 09/28/1998 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year..	Total Facility
Equipment List	due 30 days after end of each calendar year starting 09/28/1998 to be submitted with the Compliance Certification. This report shall describe changes made to the stationary source without applying for an amendment. Such changes may include installation of new emission units of the same type described in this permit, and modification of emission units.	Total Facility



## APPENDIX MATERIAL

Facility Name: **Larson-Glastron Boats Inc.**

Permit Number: **09700025-005**

## APPENDIX A

**Table 1 – Emission Factors for Compliance Demonstration  
(lb/lb of monomer)**

Process	Non-Vapor-Suppressed	Vapor-Suppressed
Non-atomized Spray layup of resin	0.11	0.08
Atomized Spray layup of resin	0.17	
Vinyl Toluene <sup>4</sup>	0.07	
<b>Gelcoat Mechanical Atomized Spray Layup</b>	0.50	0.36
Gel Coat Mechanical Non-Atomized Spray Layup	0.30	.216
Closed molding of resin	0.01	0.01
Gel Coat Closed Mold Mechanical Atomized Spray Layup <sup>1</sup>	0.40	0.288 <sup>2</sup>
Gel Coat Closed Mold Mechanical Non-Atomized Spray Layup <sup>1,3</sup>	0.24	0.173
MMA Adhesives or putty	0.01	
Polyester Adhesives or putty	0.11	

<sup>1</sup>The Permittee may use National Marine Manufacturers Association (NMMA) or Unified Emission Factors for Open Molding of Composites or emission factors developed by the Florida Department of Environmental Protection for these processes upon written approval by the MPCA

<sup>2</sup>Closed mold vapor-suppressed gelcoat mechanical atomized emission factor extrapolated from gelcoat mechanical atomized application vapor-suppressed emission factor.

<sup>3</sup>Closed mold mechanical nonatomized gelcoat application emission factors extrapolated from mechanical nonatomized gelcoat application emission factors.

<sup>4</sup>The permittee shall use the following equation to determine emissions of vinyl toluene from the use of Production Resins which contain vinyl toluene: (Material Used, lbs.) x (Wt. % Vinyl Toluene in Resin) x (Emission Factor of 7% for Vinyl Toluene) = Pounds of Vinyl Toluene Emitted per Time Period.

## APPENDIX B – Insignificant Activities List

Minn. R. 7007.1300 subpart	Rule Description of the Activity	Applicable Requirement
3(D)	Processing operations:	
	<p>2. Equipment venting particulate matter (PM) or particulate matter less than 10 microns (PM-10) inside a building, provided that emissions from the equipment are:</p> <p>a). filtered through an air cleaning system; and</p> <p>b). vented inside of the building 100% of the time.</p> <ul style="list-style-type: none"> <li>• <b>Wood working operations</b> (Plants 1, 2, 4 and 6) controlled with fabric filters vented inside a building. <b>Grinding, cutting and sanding operations</b>, (Plants 1, 4, 6) controlled with fabric filters and vented inside and with less than 2,000 lbs/year of PM10.</li> <li>• <b>2- Five Axis Routers</b> - Plant 7: exhausts to a baghouse that vents back into the building.</li> <li>• <b>Central Vac System</b> – Plant 7: exhausts internally through a filter</li> <li>• <b>Fiberglass Cutting Machine</b> – Plants 1 and 7: exhausts internally through a filter</li> </ul>	Minn. R. 7011.0710/0715
3(E)	Storage Tanks	
	<p>(2) nonhazardous air pollutant storage tanks:</p> <ul style="list-style-type: none"> <li>• <b>Low Vapor Pressure Solvent Tanks</b> – Plant 7: one 6000-gallon virgin low vapor pressure solvent tank and one 5600-gallon waste low vapor pressure solvent tank. These tanks do not contain hazardous air pollutants regulated under 40 CFR Part 63 and have the potential to emit less than 2,000 lbs. per year of volatile organic compounds.</li> </ul>	Minn. R. 7011.0105
3(G)	Emissions from a laboratory	
	<p><b>Laboratory</b> – tests one-pint quantities of resins and gelcoats from each truck load and each batch. Also equipped to test various paints.</p>	Minn. R. 7011.0105
3(H)	Miscellaneous:	
	<p>4. <b>Welding and cutting operations</b> (Plants 1 and 5) with PM10 emissions less than 2,000 lbs/year.</p>	Minn. R. 7011.0105

Minn. R. 7007.1300 subpart	Rule Description of the Activity	Applicable Requirement
	5. blueprint copiers and photographic processes; <ul style="list-style-type: none"> <li>1 Xerox copier</li> </ul>	Minn. R. 7011.0105/0110
3(l)	<p>Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than:</p> <ol style="list-style-type: none"> <li>4,000 lbs/year of carbon monoxide; and</li> <li>2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone.</li> </ol> <ul style="list-style-type: none"> <li><b>Foam application equipment</b> (Plants 1, 6 and 7) which has the potential to emit less than 2,000 lbs./yr of VOC and combined HAP actual emissions of less than one ton per year.</li> <li><b>Fugitive emissions</b> (facility-wide) from paved roads and parking lots.</li> <li><b>Infrequent use of spray paint equipment</b> for routine housekeeping or plant upkeep activities not associated with primary production processes at the facility.</li> <li><b>Limited boat engine testing</b> (Plant 4) emitting less than 4,000 lbs/yr of CO and less than 2,000 lbs/yr each of NOx, SO2, and VOC</li> <li><b>Wax gun</b> (Plant 1) with potential emissions less than 4,000 lbs/yr of CO and less than 2,000 lbs/yr each of NOx, SO2, and VOC.</li> <li><b>Limited truck engine exhaust</b> (Plant 5) resulting from maintenance activities emitting less than 4,000 lbs/yr of CO and less than 2,000 lbs/yr each of NOx, SO2, and VOC.</li> <li><b>Steam Cleaning</b> – Plant 5: truck maintenance and repair involving limited steam cleaning with potential emissions less than 4,000 lbs/yr of CO and less than 2,000 lbs/yr each of NOx, SO2, and VOC.</li> <li><b>Polymeric Foam Tanks: Plant 1 Bulk Tanks</b> – four 1,000-gallon polymeric foam tanks and two 300-gallon totes. Potential emissions from Plant 1 bulk polymeric foam storage is less than one ton per year.</li> <li><b>Polymeric Foam Tanks: Plant 6 Bulk Tanks</b> – four 1,000-gallon polymeric foam tanks. Potential emissions from Plant 6 bulk polymeric foam storage is less than one ton per year.</li> </ul>	Minn. R. 7011.0105, Minn. R. 7011.0715,

Minn. R. 7007.1300 subpart	Rule Description of the Activity	Applicable Requirement
	<ul style="list-style-type: none"> <li>• <b>Plant 7 Bulk Polymeric Foam</b> – Two 300-gallon polymeric foam totes. Potential emissions from Plant 6 bulk polymeric foam storage is less than one ton per year.</li> <li>• <b>Plant 1 Polyester Resin Bulk Tanks</b> – two 5,200-gallon polyester resin tanks and one 350-gallon polyester resin tote. The combined potential emissions from Plant 1 bulk resin storage is less than 1 ton per year.</li> <li>• <b>Plant 6 Polyester Resin Tanks</b> – one 6,500-gallon polyester resin tank. The combined potential emissions from Plant 6 bulk resin storage is less than 1 ton per year.</li> <li>• <b>Plant 7 Polyester Resin Bulk Tanks</b> - two 5600-gallon polyester resin tanks</li> <li>• <b>Plant 7 Polyester Resin Mix Tank</b> – one 1500-gallon mix tank vented to polyester resin tanks.</li> <li>• <b>Plant 7 Polyester Resin Day Tank</b> – two 2700-gallon day tanks</li> </ul>	
3(J)	<p>Fugitive Emissions from roads and parking lots.</p> <ul style="list-style-type: none"> <li>• Facility has paved parking lots and haul roads</li> </ul>	Minn. R. 7011.0150

# **Natural Gas Combustion Units – NOx facility wide limit to accommodate future changes**

				make up air		4,050,00	
1	AFC. Inc	model #	AMS 2000 Mod	unit	@	0	Btu/hr.
1	Carrier	model #	48 TJE 012-511	Furnace	@	225,000	Btu/hr.
1	Carrier	model #	48 TJF 016	Furnace	@	270,000	Btu/hr.
1	Carrier	model #	48 DD 012 B	Furnace	@	275,000	Btu/hr.
	Co Ray						
1	Vac	model #	CRVB-12	Furnace	@	120,000	Btu/hr.
	Co Ray						
1	Vac	model #	CRV-B-104	Furnace	@	600,000	Btu/hr.
	Co Ray					2,000,00	
1	Vac	model #	CRV-B-104	Furnace	@	0	Btu/hr.
	Co Ray					3,600,00	
1	Vac	model #	CRV-B-104	Furnace	@	0	Btu/hr.
1	Hasting	model #	G7-200	Furnace	@	120,000	Btu/hr.
1	Hasting	model #	G7-250X	Furnace	@	150,000	Btu/hr.
1	Hasting	model #	Unknown	Furnace	@	200,000	Btu/hr.
				make up air		3,120,00	
1	Hasting	model #	LB20-G	unit	@	0	Btu/hr.
				make up air			
1	Hasting	model #	RHFA5006	unit	@		Btu/hr.
				make up air		3,456,00	
1	King	model #	DFOC225BHBL	unit	@	0	Btu/hr.
	King			make up air		3,850,00	
1		model #	DFOC225BHBL	unit	@	0	Btu/hr.
	King			make up air		4,320,00	
1		model #	DFOC225BHBL	unit	@	0	Btu/hr.
	King			make up air		4,950,00	
1		model #	DFOC225BHBL	unit	@	0	Btu/hr.
	King			make up air		3,456,000	
1		model #	DFOC225BHBL	unit	@		Btu/hr.
				make up air			
1	King	model #	DFOC225BHBR	unit	@		Btu/hr.
1	Lennox	model #	G81-220U	Furnace	@	220,000	Btu/hr.
			GC516-1603-220-				
1	Lennox	model #	4Y	Furnace	@	270,000	Btu/hr.
			GC516-1853-330-				
1	Lennox	model #	LY	Furnace	@	330,000	Btu/hr.
			GC 511-2753-450A-				
1	Lennox	model #	50	Furnace	@	450,000	Btu/hr.
1	Modine	model #	DJ250SC	Furnace	@	250,000	Btu/hr.
1	Payne	model #	PG9 MAA 036080	Furnace	@	80,000	Btu/hr.
1	Reznor	model #	F-50	Furnace	@	50,000	Btu/hr.
1	Reznor	model #	FE-75S	Furnace	@	75,000	Btu/hr.
1	Reznor	model #	FE100-S	Furnace	@	137,000	Btu/hr.
1	Reznor	model #	XL-140-5-S	Furnace	@	140,000	Btu/hr.
1	Reznor	model #	EEXL300-S	Furnace	@	150,000	Btu/hr.
1	Reznor	model #	FT200	Furnace	@	200,000	Btu/hr.
1	Reznor	model #	F300-S	Furnace	@	300,000	Btu/hr.
1	Rupp	model #	CFA-18	Furnace	@	810,000	Btu/hr.
1	Tjernlund	model #	Unknown	Furnace	@	500,000	Btu/hr.
1	Trane	model #	F205-SFHB 2006	Furnace	@	470,000	Btu/hr.

**Natural Gas Combustion Units – NOx facility wide limit to accommodate future changes**

1	Weatherite	model #	EOT121HBL	make up air unit	@	1,650,000	Btu/hr.
1	Weatherite	model #	EOT121HBL	make up air unit	@	1,642,000	Btu/hr.
2	Carrier	model #	48 DD 021 B	Furnaces	@	224,000	each Btu/hr.
2	Hasting	model #	RHFA-500-G	Furnaces	@	250,000	each Btu/hr.
2	King	model #	GCTM 75	make up air units	@	937,000	each Btu/hr.
2	Reznor	model #	XL103-3-5	Furnaces	@	105,000	each Btu/hr.
2	Reznor	model #	RDF3-180	make up air units	@	1,900,800	each Btu/hr.
2	Titan	model #	25NGHDR	make up air units	@	1,936,000	each Btu/hr.
2	Weatherite	model #	TOT112HBL	make up air units	@	285,000	each Btu/hr.
2	Weatherite	model #	ETO121HBL	make up air units	@	940,000	each Btu/hr.
2	Weatherite	model #	TOT 224 HBL	make up air units	@	2,500,000	each Btu/hr.
3	Carrier	model #	58 MCA 100-16	Furnaces	@	100,000	each Btu/hr.
3	Hasting	model #	LLB30-F	make up air units	@	4,680,000	each Btu/hr.
3	Modine	model #	PV 145-SEO-130	Furnaces	@	140,000	each Btu/hr.
3	Reznor	model #	F125	Furnaces	@	125,000	each Btu/hr.
3	Weatherite	model #	EOT110HBL	make up air units	@	990,000	each Btu/hr.
5	Weatherite	model #	EOT115HBL	make up air units	@	650,000	each Btu/hr.
7	Reznor	model #	F250-S	Furnaces	@	250,000	each Btu/hr.
8	Weatherite	model #	ETO121HBL	make up air units	@	1,566,000	each Btu/hr.

## APPENDIX C

### 40 CFR Section 63.5710 Emissions Averaging Compliance Demonstration

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)} \quad (Eq. 2)$$

PVOP=weighted-average MACT model point value for each open molding operation (PVR, PVPG, PVCG, PVTR, and PVTG) 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 Section 63.5713 Compliant Materials Compliance Demonstration

$$\text{Weighted-Average HAP Content (\%)} = \frac{\sum_{i=1}^n (M_i HAP_i)}{\sum_{i=1}^n (M_i)} \quad (Eq. 1)$$

Where:

$M_i$  = mass of open molding resin or gel coat  $i$  used in 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 40 CFR Section 63.5758 to determine organic HAP content.

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

#### 40 CFR Section 63.5714 Filled Resin Compliance Demonstration

$$PV_F = PV_u \times \frac{(100 - \% \text{ Filler})}{100} \quad (\text{Eq. 1})$$

Where:

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

$PVu$  = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to this subpart.

$\% \text{ Filler}$  = The weight-percent of filler in the as-applied filled resin system.

#### 40 CFR Section 63.5758 Determining The Organic HAP Content Of Materials

$$\text{Solids} = 1 - [(m_{\text{volatiles}})/D_{\text{avg}}] \quad (\text{Eq. 1})$$

Where:

$\text{Solids}$  = volume fraction of coating solids, liters coating solids per liter coating.

$m_{\text{volatiles}}$  = Total volatile matter content of the coating, including organic HAP, volatile organic compounds, water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

$D_{\text{avg}}$  = average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-90 (available for purchase from ASTM), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-90 test results and other information sources, the test results will take precedence.



## APPENDIX D

**Table 1 to Subpart VVVV -- Compliance Dates for New and Existing Boat Manufacturing Facilities**  
As specified in § 63.5695, you must comply by the dates in the following table:

<b>If your facility is</b>	<b>And</b>	<b>Then you must comply by this date</b>
1. An existing source	Is a major source on August 22, 2001.	or before August 23, 2004 <sup>1</sup> .
2. An existing or new area source	Becomes a major source after August 22, 2001 <sup>1</sup> .	1 year after becoming a major source or August 22, 2002, whichever is later.
3. A new source	Is a major source at startup <sup>1</sup> .	Upon startup or August 22, 2001, whichever is later.

<sup>1</sup>Your facility is a major source if it is a stationary source or group of stationary sources located within a contiguous area and under common control that emits or can potentially emit, considering controls, in the aggregate, 10 tons or more per year of a single hazardous air pollutant or 25 tons or more per year of a combination of hazardous air pollutants.

**Table 2 to Subpart VVVV of Part 63 -- Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations**

As specified in §§ 63.5701(b), 63.5704(b)(2), and 63.5713(a), (b), and (d), when demonstrating compliance for operations and materials using the compliant materials option you must comply with the requirements in the following table:

<b>For this operation</b>	<b>And this application method</b>	<b>You must not exceed this weighted-average organic HAP content (weight percent) requirement</b>
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.

**Table 3 to Subpart VVVV of Part 63 -- MACT Model Point Value Formulas for Open Molding Operations<sup>1</sup>**

As specified in §§ 63.5710(d) and 63.5714(a), to demonstrate compliance for operations and materials using the maximum achievable control technology (MACT) model point value averaging (emissions averaging) option, you must calculate point values using the formulas in the following table:

<b>For this operation</b>	<b>And this application method</b>	<b>Use this formula to calculate the MACT model point value for each resin and gel coat</b>
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	$0.445 \times (\text{Gel coat HAP}\%)^{1.675}$

1Equations 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.[66 FR 44232, Aug. 22, 2001; 66 FR 50504, Oct. 3, 2001]

**Table 5 to Subpart VVVV of Part 63 -- Default Organic HAP Contents of Solvents and Solvent Blends**

As specified in § 63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent/solvent blend	CAS No	Average organic HAP content percent by mass	Typical organic HAP, percent by mass
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 150		9	Naphthalene
9. Aromatic naptha	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 benzene.
21. VM & P naphtha	64742-89-8	6	3% toluene, 3% xylene.
22. Petroleum distillate mixture	68477-31-6	8	4% naphthalene, 4% biphenyl.

**Table 6 to Subpart VVVV of Part 63 -- Default Organic HAP Contents of Petroleum Solvent Groups**

As specified in § 63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

<b>Solvent type</b>	<b>Average organic HAP content, percent by mass</b>	<b>Typical organic HAP, percent by mass</b>
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naptha, 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

**Table 7 to Subpart VVVV of Part 63 -- Applicability and Timing of Notifications**

As specified in § 63.5761(a), you must submit notifications according to the following table:

<b>If your facility</b>	<b>You must submit</b>	<b>By this date</b>
1. Is an existing source subject to this subpart.	An initial notification containing the information specified in §63.9(b)(2).	No later than the dates specified in § 63.9(b)(2).
2. Is a new source subject to this subpart.	The notifications specified in § 63.9(b) (3) to (5).	No later than the dates specified in § 63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in § 63.9(c).	A request for a compliance extension as specified in §63.9(c).	No later than the dates specified in § 63.6(i).
4. Is complying with organic HAP content limits, application equipment requirements; or MACT model point value averaging provisions.	A notification of compliance status as specified in § 63.9(h).	No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date.
5. Is complying by using an add-on control device.	<ul style="list-style-type: none"> <li>a. notification of intent to conduct a performance test as specified in §63.9(e).</li> <li>b. A notification of the date for the continuous monitoring system performance evaluation as specified in §63.9(g).</li> <li>c. A notification of compliance status as specified in § 63.9(h).</li> </ul>	<p>No later than the date specified in § 63.9(e).</p> <p>With the notification of intent to conduct a performance test.</p> <p>No later than 60 calendar days after the completion of the add-on control device performance test and continuous monitoring system performance evaluation.</p>

**Table 8 to Subpart VVVV of Part 63 -- Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart VVVV**

As specified in § 63.5773, you must comply with the applicable requirements of the General Provisions according to the following table:

Citation	Requirement	Applies to subpart VVVV	Explanation
§ 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	§ 63.695 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 existing 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.
§ 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	Yes.	

	Standards.		
§ 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.		
§ 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 Requirements.	Yes.	
§ 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	Yes	Applies only to sources with

	CMS Performance Evaluation.		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 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 not delegated.
§ 63.13	Addresses	Yes.	
§ 63.14	Incorporation by Reference.	Yes.	
§ 63.15	Availability of Information/Confidentiality.	Yes.	



**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**PROPOSED AIR EMISSION PERMIT NO. 09700025-006**

This technical support document is intended for all parties interested in the [draft](#) permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp.1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the [preliminary](#) determination to issue the [draft](#) permit.

**1. General Information**

**1.1. Applicant and Stationary Source Location:**

Stationary Source/Address (SIC Code: 3732)
Larson/Glastron Boats, Inc. 700 Paul Larson Memorial Drive Little Falls, MN 56345 Morrison County
Contact: Dave Steinmetz (320) 632-5481

**1.2. Description of the Permit Action**

[This is a major amendment to a total facility Part 70 permit.](#)

**1.3 Description of the Activities Allowed by this Permit Action**

Previously Plant 7, authorized by a major amendment issued in 2000, was included under the total facility emission cap that rendered the facility minor for new source review purposes. That “synthetic minor” emissions cap was set with the issuance of the total facility permit based on Larson’s application submitted in June of 1995. Plant 7 has been constructed and is operational. This amendment removes that plant from under the total facility cap, and sets an emission cap on the total facility of 340 tons per year. Larson has chosen to take an emission cap on the plant of 340 tons per year because it does not wish to complete an environmental assessment worksheet for the construction of the facility. The environmental review regulations (Chapter 4410) require completion of an environmental assessment if there is a potential emission increase of greater than 100 tons per year of a criteria pollutant.

Since the potential emissions of Plant 7 are less than 250 tons per year, the addition to the facility becomes a non-major modification to a non-major source, that, once added, has potential emissions such that the facility meets the definition of major source under the federal new source review regulations.



## 1.4. Facility Emissions:

A summary of the Potential to Emit (PTE) in tons per year is as follows:

Pollutant	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOCs	CO	HAP
Total Facility PTE (Existing Plants 1-6)	90	90	0.26	44.2	245	35.39	245
Total Facility PTE after installation of Plant 7	90	90	0.27	45.4	340	36.4	340

NR – Not Reported

PM = Particulate Matter

SO<sub>2</sub> = Sulfur Dioxide

VOCs = Volatile Organic Compounds

HAPs = Hazardous Air Pollutants

\* Reported as part of emissions inventory

PM<sub>10</sub> = PM smaller than 10 microns

NO<sub>x</sub> = Nitrogen Oxides

CO = Carbon Monoxide

**Table 2. Facility Classification**

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD	VOC	PM/PM <sub>10</sub>	CO, NO <sub>x</sub> , SO <sub>2</sub> , Pb
Part 70 Permit Program	VOC, HAPs	PM <sub>10</sub>	CO, NO <sub>x</sub> , SO <sub>2</sub> , Pb
Part 63 NESHAP	HAPs		

## 2. Regulatory and/or Statutory Basis

### New Source Review

Until issuance of this permit, the facility was rendered minor by virtue of permit conditions that restricted potential emissions to less than 250 tons per year. Limits were necessary for PM/PM<sub>10</sub> and VOC.

This permit amendment authorizes the entire facility up to 340 tons per year, and sets the total facility emissions caps on the facility as it existed prior to the construction of Plant 7.

Because potential emissions of the facility are now greater than 250 tons per year, the source is considered major under new source review. The construction of Plant 7, however, with its potential emissions (and with cap) is not major in and of itself, and so the construction is not subject to the requirements of federal new source review, 40 CFR 52.21. In addition, the cap was not necessary for the modification to be considered non-major. Potential PM emissions from Plant 7 are 3.53 tons per year, and 211 tons per year of VOC without the cap. The limit was set to eliminate the requirement for the facility to complete an environmental assessment worksheet.

To demonstrate that the facility is meeting its 245 ton VOC per year limit for Plants 1-6, and the total facility limit of 340 tons per year, the permit requires the Permittee to specifically track

usage/purchase and subsequent emissions separately for Plants 1-6 and Plant 7. This is performed by tracking resin, gelcoat, and paint used/purchased for Plants 1-6 separately from that used/purchased for Plant 7. For miscellaneous activities such as space heating, building maintenance, caulking, cleaning, gluing, glue guns, patching, plexus, and hand applied putty, the facility may apportion emissions based on total resin use in Plants 1-6 and Plant 7. Those activities are responsible for less than 10% of emissions, and should be proportional to overall production in the plants, as is total resin use.

#### Part 70 Permit Program

The facility is a major source under the Part 70 permit program.

#### New Source Performance Standards (NSPS)

There are no New Source Performance Standards applicable to the operations at this facility.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is a major HAP emission source, is subject to requirements determined by a case-by-case MACT determination, and is subject to 40 CFR 63, Subpart VVVV for Fiberglass Boat Manufacturing and the compliance date is August 23, 2004. See the permit and the appendices for all applicable NESHAP requirements.

#### Minnesota State Rules

Plant 7 is not subject to Minnesota Performance Standards

**Table 5. Regulatory Overview of Units Affected by the Modification/Permit Amendment**

EU, GP, or SV	Applicable Regulations	Comments:
EU	Minn. R. 4410	Limit taken to restrict potential emissions to less than 340 tons per year so that the company need not complete an environmental assessment worksheet for the construction of Plant 7
GP001	40 CFR 52.21	Limit set on emission units in Plants 1-6 that restrict the facility as it existed prior to the construction of Plant 7 to less than major source levels

### 3. Technical Information Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

**Table 6. Periodic Monitoring**

<b>Emission Unit or Group</b>	<b>Requirement (basis)</b>	<b>Additional Monitoring</b>	<b>Discussion</b>
Plants 1-6	VOC = 245 tons per year, on a 12 month rolling basis	Product purchase and usage	Records of purchases and usages are quantified monthly by the 15 <sup>th</sup> of the month, and the previous 12 months emissions calculated.
Plant 1-7	VOC = 340 tons per year, on a 12 month rolling basis	Product purchase and usage	Records of purchases and usages are quantified monthly by the 15 <sup>th</sup> of the month, and the previous 12 months emissions calculated.

### 3.2 Insignificant Activities

Larson has several operations which are classified as insignificant activities. These are listed in the Appendix material to the permit.

### 3.3 Comments Received

A letter was received from the Charles Lippert of the MilleLacs Band of Ojibwe Indians. That letter expressed concern with the air emissions that may result from the proposed expansion and requested the preparation of an Environmental assessment Worksheet (EAW).

The letter requested the preparation of an EAW to evaluate the potential environmental effects of the proposed expansion to air quality. Specifically of concern, was the Larson/Glastron Boats Facility's contribution to ozone levels measured in Mille Lacs at Site 27-095-3051.

However, according to Minn. R. 4410.4300, subp. 15, the preparation of an EAW would not be mandatory for the proposed expansion as the increase in air emissions do not exceed the 100 ton-per-year threshold of any single air pollutant. Other than the mandatory category thresholds, there are two other possible actions to call for an EAW; a Discretionary EAW or a Petition.

A Discretionary EAW, according to Minn. R. 4410.1000, subp. 3, would be required if a governmental unit with approval authority over the proposed project determines that, because of the nature or location of the project, the project may have the potential for significant environmental effects. The MPCA is the governmental unit with approval authority for this proposed project and the MPCA has no evidence that the proposed project would necessitate the preparation of a Discretionary EAW.

In response to Mr. Lippert's letter, MPCA staff analyzed data for 18 ozone episodes recorded at the Mille Lacs monitor. These episodes include the four highest one-hour ozone concentrations recorded in 2000 through 2003, and the two highest in 1999. Backward trajectory analyses were completed for all 18 episodes to determine the origin and movement of the air mass responsible

for each episode. In general, 16 of the 18 episodes at Mille Lacs were the result of air masses passing near or through the Twin Cities metropolitan area. Transport of ozone and precursor pollutants from the south dominated each of these episodes. One air mass originated to the northeast that passed near or through Duluth, and one originated to the northwest. Based upon this analyses, it is evident that emissions from the Little Falls area did not contribute to elevated ozone levels at the Mille Lacs monitor.

The maximum one-hour ozone concentrations for 16 of the 18 episodes were recorded between 2 P.M. and 6 P.M. The maximum concentration for the remaining two episodes was recorded at 11 A.M. and 11 P.M. Ozone levels for each episode fell over the night-time hours to 30 to 40 parts per billion, which is considered to be background concentrations. Degradation of ozone may be slowed in rural areas due primarily to the absence of fresh nitrogen oxide emissions from vehicles rather than the emissions of volatile organic compounds.

#### **4. Conclusion**

Based on the information provided by [Larson](#), the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 09700025-006 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team:      Jenny Reinertsen (permit writer/engineer)  
   [Dave Crowell](#) (enforcement)  
   [Marshall Cole](#) (peer reviewer)