

**AIR EMISSION PERMIT NO. 09700025- 004  
IS ISSUED TO**

Genmar Industries

**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
Total Facility Operating Permit	6/15/95
Major Amendment	7/2/97
Major Amendment	7/23/99
Major Amendment	01/14/2000
Major Amendment	02/12/2001

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 as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

**Permit Type:** Federal; Part 70

**Issue Date:** June 28, 2001

**Expiration:** September 28, 2003  
All Title I Conditions do not expire.

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Rodney E. Massey  
District Director  
South District

for Karen A. Studders  
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. Certain requirements which have been determined not to apply are listed in Table A of this permit. 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. This permit shield language is not intended to allow you to deviate from permit conditions without obtaining the required prior approvals.

**FACILITY DESCRIPTION:**

Larson-Glastron is a manufacturer of cruisers and sporting fiberglass boats. The predominant method of boat manufacture uses non-atomized spray guns to apply non-vapor suppressed fiberglass resin and gelcoat to open modules. Some atomizing spray guns are also used and the facility operates open and closed mold VEC cells and associated equipment to produce fiberglass boat parts. 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 has 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. This Permit authorizes the replacement and relocation of the listed emission units, and the addition of new emission units, provided that emissions can be tracked directly from usage and delivery/purchase records.

A Maximum Achievable Control Technology Standard for Fiberglass Boat Manufacturing to be promulgated November 15, 2000 (National Emission Standards for Hazardous Air Pollutants, 40 CFR pt. 63) will apply to this facility. 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.

**MODIFICATION DESCRIPTION:**

This permit amendment authorizes:

- A change in the calculation method used in demonstrating compliance with a facility-wide New Source Review cap based upon an evaluation of the best currently available emissions data for this type of manufacturing facility.
- Updates to other terms in the permit as well as in the description of emission units.

# TABLE A: LIMITS AND OTHER REQUIREMENTS

06/28/01

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.	Title I Condition: Limit to avoid major source and modification classification under 40 CFR pt. 52.21.
Equation 1: $PM = [ (PfgEFfg) + (PgcCgc((100 - TEgc) / 100))((100 - \%control) / 100)) + (PrCr((100 - TEr) / 100))((100 - \%control) / 100)) + (PpCp((100 - TEp) / 100))((100 - \%control) / 100)) + (PfngEFfng) + (PfpEFfp) ] \times (0.0005)$ 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 EFfng = 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.	Title I Condition: Limit to avoid major source and modification classification under 40 CFR pt. 52.21.
Equation 2: $PM10 = [ (PfgEFfg) + (PgcCgc((100 - TEgc) / 100))((100 - \%control) / 100)) + (PrCr((100 - TEr) / 100))((100 - \%control) / 100)) + (PpCp((100 - TEp) / 100))((100 - \%control) / 100)) + (PfngEFfng) + (PfpEFfp) ] \times (0.0005)$ 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 EFfng = 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).
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.	Title I Condition: Limit to avoid major source and modification classification under 40 CFR pt. 52.21.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

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Facility Name: Larson-Glastron Boats Inc

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<p>Equation 3:  <math display="block">\text{VOC} = [ (\text{UrCrEFrs}) + (\text{UrCrEFrcm}) + (\text{PgcCgcEFgcvsm}) + (\text{PgcCgcEFgcnvsm}) + (\text{Pgc2Cgc2EFgccm}) + (\text{PpCp}) + (\text{PhpChpEFhp}) + (\text{VOCff}) + (\text{PmCm}) + (\text{PfngEFfng}) + (\text{PfpEFfp}) ] \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 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  EFgcvsm = emission factors for spray layup of open mold vapor-suppressed gelcoat as referenced in Appendix A of this Permit or latest EPA-approved emission factor, as appropriate (lb/lb monomer)  EFgcnvsm = emission factors for spray layup of open mold non-vapor-suppressed gelcoat as referenced in Appendix A of this Permit or latest EPA-approved emission factor, as appropriate (lb/lb monomer)  EFgccm = emission factor for spray layup of closed mold gelcoat as referenced in Appendix A of the Permit or latest EPA-approved emission factor, as appropriate (lb/lb monomer)</p>	<p>(continued from above)</p>
<p>and where,</p> <p>s: spray layup application  cm: closed molding application  vs: vapor-suppressed  nvs: non-vapor-suppressed</p>	<p>(continued from above)</p>
<p>and where,</p> <p>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</p>	<p>(continued from above)</p>
<p>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).</p>	<p>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</p>
<p>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.</p>	<p>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</p>
<p>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.</p>	<p>Minn. Stat. 116D.04, subd. 2b.  Minn. R. 4410.3100, subp. 1</p>
<p>B. NESHAP REQUIREMENTS</p>	<p>hdr</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

The Permittee shall comply with the Maximum Achievable Control Technology (MACT) Standard for Fiberglass Boat Manufacturing scheduled for promulgation November 15, 2000.	40 CFR pt. 63
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.
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)
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
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

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

<b>E. MONITORING REQUIREMENTS</b>	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)
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)
<b>F. RECORDKEEPING REQUIREMENTS</b>	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
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
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
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)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

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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)
G. REPORTING REQUIREMENTS	hdr
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
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)
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
See Table B for additional reporting requirements.	hdr

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

**Subject Item: GP 001 Post-1968 Indirect Heating (Bldg. Furnaces)**

**Associated Items:** EU 001 Plant 1 Furnace 1  
EU 002 Plant 1 Furnace 2  
EU 003 Plant 1 Furnace 3  
EU 005 Warehouse 1  
EU 006 Warehouse 1  
EU 007 Warehouse 1  
EU 008 Warehouse 1  
EU 009 Plant 1 Furnace 9  
EU 010 Plant 1 Furnace 10  
EU 011 Plant 1 Furnace 11  
EU 012 Warehouse 1  
EU 013 Warehouse 1  
EU 014 Warehouse 1  
EU 015 Warehouse 1  
EU 016 Plant 2 Furnace 1  
EU 019 Plant 2 Furnace 4  
EU 020 Plant 2 Furnace 5  
EU 021 Plant 2 Furnace 6  
EU 022 Plant 2 Furnace 7  
EU 028 Plant 3 Furnace  
EU 029 Plant 4 Furnace  
EU 030 Plant 5 Furnace 1  
EU 031 Plant 5 Furnace 2  
EU 032 Plant 6 Furnace  
EU 035 Warehouse 2 Furnace 1  
EU 036 Warehouse 2 Furnace 2  
EU 037 Warehouse 3 Furnace 1  
SV 001  
SV 002  
SV 003  
SV 005  
SV 006  
SV 007  
SV 008  
SV 009  
SV 010  
SV 011  
SV 012  
SV 013  
SV 014  
SV 015  
SV 016  
SV 017  
SV 019  
SV 020

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

**Associated Items:** SV 021  
SV 022  
SV 028  
SV 029  
SV 030  
SV 031  
SV 032  
SV 035  
SV 036  
SV 037

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

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

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

**Associated Items:** EU 004 Warehouse 1  
 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  
 EU 038 Warehouse 3 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

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

**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 008 Mat or Panel Filter  
CE 009 Mat or Panel Filter  
CE 010 Mat or Panel Filter  
CE 011 Mat or Panel Filter  
CE 012 Mat or Panel Filter  
CE 013 Mat or Panel Filter  
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CE 018 Mat or Panel Filter  
CE 019 Mat or Panel Filter  
CE 020 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

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

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

**Associated Items:** EU 040 Resin Flow coater gun Plant 1  
 EU 041 Resin Flowcoater gun Plant 1  
 EU 044 Resin Flowcoater gun, Plant 1  
 EU 045 Resin Flowcoater gun, Plant 1  
 EU 046 Resin Flowcoater gun, Plant 1  
 EU 049 Resin flowcoater / atomized spray gun, Plant 1  
 EU 050 Resin flowcoater / atomized spray gun, Plant 1  
 EU 051 Resin Flowcoater gun, Plant 1  
 EU 053 Resin flowcoater gun, Plant 1  
 EU 055 Resin flowcoater gun, Plant 1  
 EU 056 Resin flowcoater gun, Plant 1  
 EU 057 Resin flowcoater gun, Plant 1  
 EU 058 Resin flowcoater gun, Plant 1  
 EU 059 Resin flowcoater gun, Plant 1  
 EU 061 Resin flowcoater gun, Plant 1  
 EU 064 Resin Flow Coater Gun, Plant 6  
 EU 065 Resin Flow Coater Gun, Plant 6  
 EU 066 Resin Flow Coater Gun, Plant 6  
 EU 067 Resin Flow Coater Gun, Plant 6  
 EU 070 Resin Flow Coater Gun, Plant 6  
 EU 071 Resin Flow Coater Gun, Plant 6  
 EU 072 Resin Flow Coater Gun, Plant 6  
 EU 073 Resin Flow Coater Gun, Plant 6  
 SV 045  
 SV 046  
 SV 047  
 SV 069  
 SV 070  
 SV 071  
 SV 072  
 SV 073  
 SV 074  
 SV 075  
 SV 076  
 SV 077  
 SV 078  
 SV 079  
 SV 080  
 SV 081

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**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

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.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

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

**Associated Items:**

- EU 042 Gelcoat spray gun, Plant 1, Spray booth 1
- EU 043 Gelcoat spray gun, Plant 1, Spray booth 1
- EU 052 Gelcoat spray gun, Plant Spray Booth 4
- EU 054 Gelcoat spray gun, Plant 1 Spray booth 5
- EU 060 Gelcoat spray gun, Plant 1 spray booth 6
- EU 062 Gelcoat Spray Gun, Plant 6, Spray Booth 14
- EU 063 Gelcoat Spray Gun, Plant 6, Booth 13
- EU 076 Spraygun 038 (gelcoat)
- EU 077 Spraygun 039 (gelcoat)
- EU 078 Spraygun 040 (gelcoat)
- EU 106 31 Gelcoat Touch-up Guns
- EU 113 Gelcoat Spray Gun, Plant 1 closed mold process
- EU 114 Gelcoat Spray Gun, Plant 1 closed mold process
- EU 115 Gelcoat Spray Gun, Plant 1 closed mold process
- EU 116 Gelcoat Spray Gun, Plant 1 closed mold process
- EU 118 Gelcoat Spray Gun, Plant 7
- EU 119 Gelcoat Spray Gun, Plant 7
- EU 120 Gelcoat Spray Gun, Plant 7
- EU 121 Spraygun 48 (gelcoat)
- EU 123 Gelcoat Spray Gun, Plant 7
- EU 124 Gelcoat Spray Gun, Plant 7
- EU 125 Gelcoat Spray Gun, Plant 7
- EU 126 Spraygun 52 (gelcoat)
- EU 128 Spraygun 53 (gelcoat)
- EU 129 Spraygun 54 (gelcoat)
- EU 130 Spraygun 55 (gelcoat)
- EU 131 Spraygun 56 (gelcoat)
- EU 133 Spraygun 57 (gelcoat)
- EU 134 Spraygun 58 (gelcoat)
- EU 135 Spraygun 59 (gelcoat)
- EU 136 Spraygun 60 (gelcoat)
- EU 137 Spraygun 61 (gelcoat)
- EU 139 Spraygun 62 (gelcoat)
- EU 140 Spraygun 63 (gelcoat)
- EU 141 Spraygun 64 (gelcoat)
- SV 045
- SV 046
- SV 047
- SV 054
- SV 056
- SV 057
- SV 058
- SV 059
- SV 060
- SV 061



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

**Associated Items:** SV 062  
SV 064  
SV 065  
SV 066  
SV 067  
SV 068  
SV 069  
SV 070  
SV 071  
SV 072  
SV 073  
SV 074  
SV 075  
SV 076  
SV 077  
SV 078  
SV 079  
SV 080  
SV 081

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

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

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

**Associated Items:** EU 074 Paint Spray Gun, Plant 6  
 EU 075 Paint Spray Gun, Plant 6, sanding room 1  
 EU 081 Paint Spray Gun, Plant 1, near SG001  
 EU 082 Paint Spray Gun, Plant 1, near SG008  
 EU 083 Handheld Spraygun (paint)  
 EU 084 Handheld Spraygun (paint)  
 EU 085 Handheld Spraygun (paint)  
 EU 086 Handheld Spraygun (paint)  
 EU 087 Spraygun 201 (paint)  
 SV 045  
 SV 046  
 SV 047  
 SV 050  
 SV 055  
 SV 063  
 SV 069  
 SV 070  
 SV 071  
 SV 072  
 SV 073  
 SV 074  
 SV 075  
 SV 076  
 SV 077  
 SV 078  
 SV 079  
 SV 080  
 SV 081

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

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

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

**Associated Items:**

- EU 090 Glue Gun 101, Plant 1
- EU 091 Glue Gun 102, Plant 1
- EU 092 Glue Gun 103, Plant 1
- EU 093 Glue Gun 104, Plant 1
- EU 094 Glue Gun 105, Plant 1
- EU 095 General Solvent Cleaning
- EU 097 Bluebooth 001
- EU 098 Bluebooth 002
- EU 099 Hand-applied glue
- 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
- SV 047
- SV 050
- SV 051
- SV 052
- SV 053
- SV 054
- SV 055
- SV 064
- SV 065
- SV 066
- SV 067
- SV 068
- SV 069
- SV 070
- SV 071
- SV 072
- SV 073
- SV 074
- SV 075
- SV 076
- SV 077
- SV 078
- SV 079
- SV 080
- SV 081

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

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

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

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

**Subject Item:** GP 010 VEC Cells

**Associated Items:** EU 113 Gelcoat Spray Gun, Plant 1 closed mold process  
 EU 114 Gelcoat Spray Gun, Plant 1 closed mold process  
 EU 115 Gelcoat Spray Gun, Plant 1 closed mold process  
 EU 116 Gelcoat Spray Gun, Plant 1 closed mold process  
 EU 117 Boat Mold Process Cell 01  
 EU 118 Gelcoat Spray Gun, Plant 7  
 EU 119 Gelcoat Spray Gun, Plant 7  
 EU 120 Gelcoat Spray Gun, Plant 7  
 EU 121 Spraygun 48 (gelcoat)  
 EU 122 Boat Mold Process Cell 02  
 EU 123 Gelcoat Spray Gun, Plant 7  
 EU 124 Gelcoat Spray Gun, Plant 7  
 EU 125 Gelcoat Spray Gun, Plant 7  
 EU 126 Spraygun 52 (gelcoat)  
 EU 127 Boat Mold Process Cell 03  
 EU 128 Spraygun 53 (gelcoat)  
 EU 129 Spraygun 54 (gelcoat)  
 EU 130 Spraygun 55 (gelcoat)  
 EU 131 Spraygun 56 (gelcoat)  
 EU 132 Boat Mold Process Cell 04  
 EU 133 Spraygun 57 (gelcoat)  
 EU 134 Spraygun 58 (gelcoat)  
 EU 135 Spraygun 59 (gelcoat)  
 EU 136 Spraygun 60 (gelcoat)  
 EU 137 Spraygun 61 (gelcoat)  
 EU 138 Boat Mold Process Cell 05  
 EU 139 Spraygun 62 (gelcoat)  
 EU 140 Spraygun 63 (gelcoat)  
 EU 141 Spraygun 64 (gelcoat)  
 EU 142 Spraygun 65 (gelcoat)  
 EU 143 Boat Mold Process Cell 06

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

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

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

06/28/01

Facility Name: Larson-Glastron Boats Inc  
Permit Number: 09700025 - 004

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**

06/28/01

Facility Name:       Larson-Glastron Boats Inc  
Permit Number:     09700025 - 004

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**

06/28/01

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025 - 004

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance . 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 following Permit Issuance . 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 following Permit Issuance 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: 09700025-004

APPENDIX MATERIAL

Facility Name:Larson-Glastron Boats Inc

Permit Number: 09700025-003

**APPENDIX A**

Facility Name: Larson-Glastron Boats Inc

Permit Number: 09700025-002

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

Process	Non-Vapor-Suppressed	Vapor-Suppressed
Spray layup of resin	0.11	0.08
Spray layup of gelcoat	0.50	0.36
Closed molding of resin	0.01	0.01
Spray layup of gelcoat, closed mold	0.40	

***Insignificant Activities Required to be Listed:***

VEC™ Cell Sheer Tank, 1431 gallons

Resin Tank 1, 5000 gallons

Resin Tank 2, 5000 gallons

Day Tank, 2637 gallons

These tanks are insignificant under Minn. R. 7007.1300, subp. 4

The tanks are subject to Minn. R. 7011.0715

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**DRAFT AIR EMISSION PERMIT NO. 09700025-004**

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

**1. General Information**

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

Owner and Operator Address and Phone Number	Facility Address (SIC Code: 3732)
Genmar Industries, Inc. 100 South 5 <sup>th</sup> Street, Suite 2400 Minneapolis, MN 55402 (612)337-1859	Larson-Glastron Boats, Inc. 700 Paul Larson Memorial Drive Little Falls, Minnesota 56345 (320) 632-5481

**1.2. Description of the facility**

Larson-Glastron is a manufacturer of cruisers and sporting fiberglass boats. The predominant method of boat manufacture uses non-atomized spray guns to apply non-vapor suppressed fiberglass resin and gelcoat to open modules. Some atomizing spray guns are also used and the facility operates open and closed mold VEC cells and associated equipment to produce fiberglass boat parts. 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 has previously adopted federally enforceable synthetic minor limits of 90 tons/ year for PM and PM10, and 245 tons/year for volatile organic compounds (VOCs) to remain a non-major source under 40 CFR 52.21.

**1.3 Description of any changes allowed with this permit issuance**

This permit amendment revises several items in the permit:

- The transfer efficiency term for gelcoating in equations 1 and 2 in Table A. “ Limits and Other Requirements. ” Equations 1 and 2 are used to determine compliance with the total particulate matter and particulate matter < 10 microns, respectively. This value is revised from 45 % for total particulate matter and particulate matter < 10 microns to 95 % for both.
- In addition, a term to calculate emissions of total particulate matter and particulate matter < 10 microns from resin application by atomized spraying is being added to Equations 1 and 2 in Table A. “ Limits and Other Requirements. ”

- A reporting requirement to estimate the amount of resin which is being applied by atomized spraying is added to support emission calculation changes in Equations 1 and 2.
- This permit is a flexible permit and pre-authorizes certain changes at the facility. This permit action updates the description of the equipment at the facility. Several emission units such as resin flow coaters, paint and glue guns are “portable” within the buildings. Presently, the facility description in delta has specific stacks identified for each emission units, even though it changes constantly. In addition, several of these units are associated to various groups. The permittee has requested that these stack designations be changed to “unassigned”. Changing the stack designations for these units does not affect any of the compliance determination requirements, emission limits or emission inventory database. In the interest of time and resources, the changes to stack designations for these sources should be done upon permit reissuance of the Title V permit, the permittee has been informed of this and agrees to it.
- Other permit updates and minor corrections:
  - The permit shield language has been changed to satisfy the USEPA request documented in the Leads/Lateral minutes dated 8/9/00. The permittee has been advised of the fact that the permit shield language is not intended to allow deviation from permit conditions without obtaining the required prior approvals.
  - The requirement to submit an emission inventory report has been changed to be the C/D screen to reflect recent policy decision to avoid erroneous referrals.
  - Included citation in old CD-01, line No. 53 ( now line 54 )
  - Changed the language for compliance certification for Title V sources on line 50 of the Amendment No. 3, now line No. 51.

#### **1.4. Facility Emissions:**

This permit amendment does not authorize any increase in emissions. Therefore, the potential emissions for the facility remain unchanged.

#### **Permit Amendment Classification**

Classification (put x in appropriate box)	Major/Affected Source	*Synthetic Minor	*Minor
PSD (list pollutant)	NA	PM, PM-10	NA
NAAR (list pollutant)	NA	NA	NA
Section 112(g) of the Clean Air Act	NA	NA	NA

\* Refers to potential emissions that are less than those specified as major by 40 CFR 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

## **2. Regulatory and/or Statutory Basis**

Summary Regulatory and/or Statutory Basis of the Emission or operational Limit

## Regulatory Overview of Facility

*EU, GRP, or SV #	Applicable Regulations	**Comments:
Total Facility	40 CFR Part 52.21	Limit set for PM and PM-10 to avoid major source and modification classification for prevention of significant deterioration, to ensure that the MPCA's environmental review process will not be inadvertently avoided, and to avoid MPCA's policy requiring atmospheric dispersion modeling. Emission calculations and record keeping requirements are defined to show compliance with the limit set for PM and PM-10

### 3. Technical Information

This permit revises the transfer efficiency term for gelcoating in equations 1 and 2 in Table A. "Limits and Other Requirements." Equations 1 and 2 are used to determine compliance with the total particulate matter and particulate matter < 10 microns limits, respectively. Computation of PM and PM-10 by means of equations 1 and 2 is part of the Flex-Cap permit requirements originally established for this facility. These equations are part of a Title I condition that the permittee has assumed to avoid major source and modification classification under 40 CFR pt. 52.21, therefore, this change qualifies as a major modification pursuant to Minn. R. 7007.1500, Subpart 1.C.

The original transfer efficiency for atomized spraying of gelcoat is revised from 45 % for total particulate matter and particulate matter < 10 microns to 95 % for both. This change is authorized based on performance information from the manufacturers of the equipment used at the facility. Transfer efficiency varies depending on the design of the spray gun, the spray pressure and distance to the object. The 95% value was chosen as a conservative number based on the patterns of operation observed by MPCA staff at the facility.

The permittee requested a higher transfer efficiency for atomized gelcoating ( 98.82 % for total particulate matter and 99.88 % particulate matter < 10 microns ) based on site specific testing results at other facilities. These higher levels of efficiency are not being accepted for use at this facility. This is because in order to validate transfer efficiency values higher than the manufacturer's data, it is necessary to conduct site specific testing at the facility to truly represent the design and operating conditions specific to this facility.

Although the predominant method of application of resin at the facility is by means of non-atomizing flowcoaters, there are two flowcoaters used for resin application that have been equipped with airless atomization nozzles. These are in the stringer area in plant and are designated as EU 49 and EU 50. The two guns in the stringer area each account for approximately 3.5% of the resin applied at Larson/Glastron Boats. EU 49 and 50 are Magnum

flowcoaters fitted with a Magnum head. Based on manufacturers testing data a value off 98% transfer efficiency will be Approved for emission calculation purposes.

The facility operators have measure the amount of resin used at the facility, but do not measure the amount of resin used in the atomized spray guns. Instead, they estimate the amount used based on the current pattern of use. The permittee will be allowed to estimate this amount as long as it is based on conditions representative of the operating conditions at the time. The permit requires the facility to maintain records of the estimated resin usage in atomized spray operations.

Besides the transfer efficiency for gelcoat application by atomized spraying, no other recordkeeping requirement is changed.

#### **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. 09700025-001 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: Carolina Espejel-Schutt, Toni Volkmeier and Dave Crowell.

Attachment:

PM/PM10 Transfer Efficiency data from manufacturers

CD-01 Forms

Emission units description





