

**AIR EMISSION PERMIT NO. 11100056- 001
IS ISSUED TO**

Genmar Industries, Inc.

LUND BOAT DIVISION - GENMAR INDUSTRIES INC.
West Centennial Drive
New York Mills, Otter Tail County, Minnesota 56567

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	6/15/1995

This permit authorizes the Permittee to operate and modify 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: August 6, 1998

Expiration: August 6, 2003
All Title I Conditions do not expire.

Michael J. Sandusky
Division Manager
Air Quality Division

for Peder A. Larson
Commissioner
Minnesota Pollution Control Agency

CH:lao

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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.

The permit shield, however does not apply to:

1. Any national ambient air quality standards adopted under section 109 of the Clean Air Act or increment or visibility under Part C of Title I of the Clean Air Act.
2. Any state ambient air quality standard under Minn. R. ch. 7009.
3. The state noise pollution control rules, Minn. R. ch. 7030.

FACILITY DESCRIPTION:

Lund Boat Division, Genmar Industries, Inc., (Lund Boats) operates a boat manufacturing plant located on West Centennial Drive in New York Mills, Minnesota. The plant has been in operation as a manufacturer of aluminum boats since 1948. The primary capability of the facility consists of the manufacture and repair of aluminum fishing boats with models ranging in size from 12 to 24 feet. All phases of the manufacturing process are conducted at this facility, from the receipt of coiled aluminum, marine grade plywood, upholstery materials and inboard engines to the finished product, ready for shipment to boat dealers. Limited repair activities are also conducted at this site for boats manufactured at this facility that have suffered damage in shipment or handling. The facility currently operates 16 hours per day, five to six days per week, 260 days per year, for a total of about 4,160 hours per year.

Lund Boat Division has eleven emission units that are associated with stack emissions. Particulate control equipment is used on all five paint spray booths and the woodshop dust control system. There are no Volatile Organic Compound (VOC) emissions controls on the spray booths. A single natural gas-fired paint curing oven serves the paint spray booths. The calculated potential emissions from all VOC emission units exceed 250 tons per year. The Permittee requests a Synthetic Minor Permit based on a 12-month rolling sum of actual VOC emissions to limit to 230 tons per year.

Lund Boat Division proposes to install a Re-work paint spray booth. The potential emissions from the new paint spray booth will be less than 100 tons per year. The facility is located in an attainment area for all the criteria pollutants (40 CFR pt. 52, Subp. Y). Lund Boat Division is not among the 28 industrial categories listed in the "Prevention of Significant Deterioration (PSD) of Air Quality" rule as a major source if the Potential to Emit (PTE) is equal to or greater than 100 tons per year of any regulated pollutant. This facility has the PTE, inclusive of a federally enforceable plant-wide applicability limit on the use of VOCs, less than 250 tons per year of sulfur dioxide, particulate matter, total organic carbon, carbon monoxide, nitrogen oxides and lead, and hence the PSD rules do not apply. The Permittee requests that this facility be regulated as a Synthetic Minor source under the federal PSD rules.

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc

Permit Number: 11100056 - 001

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
Volatile Organic Compounds: less than or equal to 230 tons/year using 12-month Rolling Sum	Title I Condition: Limit to avoid classification as a major source or modification under 40 CFR Section 52.21
Material Content: VOC and Solids content 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, the highest number in the range shall be used in all compliance calculations. Other alternative methods may be used to determine the material content if approved by the Division Manager. The Division Manager reserves the right to require the Permittee to take samples of the VOC and Solids containing materials, and to conduct analysis of material content as per EPA reference methods. If an EPA reference method is used for material content determination, the data obtained shall supercede the MSDS.	Title I Condition: Monitoring for limit to avoid classification as a major source or modification under 40 CFR 52.21
Record keeping: The Permittee shall maintain a monthly record of all VOC containing materials used at this source.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21
Monitoring: The Permittee is required to calculate VOC emissions each month based on the usage of VOC containing materials and VOC content. When calculating the usage of VOC containing materials purchased in containers less than or equal to 10 gallons, the Permittee may use purchasing records to determine usage. When calculating the usage of VOC containing materials purchased in containers greater than 10 gallons, the Permittee must use monthly inventory records and/or flow meter records to calculate actual quantities used. Calculations must be completed by the 15th day of each month for the preceding month.	Title I Condition: Monitoring for limit to avoid classification as a major source or modification under 40 CFR Section 52.21
Monitoring: For the purpose of calculating a 12-month Rolling Sum, "month" means a calendar month, and all records of fuel and materials use must be on a calendar month or daily basis.	Title I Condition: Monitoring for limit to avoid classification as a major source or modification under 40 CFR Section 52.21
Monitoring: 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 use (determined prior to permit issuance) based on verifiable records maintained by the Permittee.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21
Record keeping: The Permittee shall maintain a record at the facility of the 12 Month Rolling Sum of emissions of each pollutant for which there is an annual limit in this permit.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21
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 above. The Permittee shall update the equipment list inventory including new, modified, or relocated equipment before making a change.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21
Labeling Requirement: The Permittee shall permanently display on each emission unit the Emission Unit (EU) number and on each item of air pollution control equipment, the Control Equipment (CE) number. The identifying number shall be legible from a safe distance.	Title I Condition: Monitoring for limit to avoid classification as a major source or modification under 40 CFR Section 52.21
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). The list shall be updated to include new, modified, or relocated equipment before making a change.	Title I Condition: Record keeping for limit to avoid classification as a major source or modification under 40 CFR Section 52.21
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)
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Operating and/or production limits will be placed on emission units based on operating conditions during compliance testing. Limits set as a result of a compliance test (conducted before or after permit issuance) apply until new operating/production limits are set following formal review of a performance test as specified by Minn. R. 7017.2025.	Minn. R. 7017.2025
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.	Minn. R. 7007.0800, subp. 4(D)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc

Permit Number: 11100056 - 001

Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	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)
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
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
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
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)
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.	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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc

Permit Number: 11100056 - 001

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 federally enforceable.	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)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc

Permit Number: 11100056 - 001

Subject Item: GP 001 Spray painting**Associated Items:** EU 001 Paint Booth No 1

EU 002 Paint Booth No 2

EU 003 Paint Booth No 3

EU 004 Paint Booth No 4

EU 007 Woodshop Spray Booth

EU 012 Re-work Booth

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 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. Limit applies to each unit individually.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity using 6-minute Average . Limit applies to each unit individually.	Minn. R. 7011.0715, subp. 1(B)
Paint Booth Filters: The Permittee shall inspect the filters daily for holes and/or tears in the filters and shall replace them when necessary. The Permittee shall maintain a daily record of filter inspections and maintenance on-site.	Minn. R. 7007.0800, subp. 4(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc

Permit Number: 11100056 - 001

Subject Item: EU 005 Paint Line Oven**Associated Items:** GP 002 Total Facility

SV 005

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 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. 7011.0610, subp. 1(A)(1)
Opacity: less than or equal to 20 percent opacity using 6-minute Average except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0610, subp. 1(A)(2)
Fuel usage: The Permittee shall use only natural gas for fuel in this Emission Unit.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc

Permit Number: 11100056 - 001

Subject Item: EU 006 Woodshop Dust Control System**Associated Items:** CE 005 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

GP 002 Total Facility

SV 006

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 required to further reduce emissions to comply with less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity .	Minn. R. 7011.0715, subp. 1(B)
Visible Emission Observation: The Permittee shall observe the emissions from SV006 (during daylight hours) for visible emissions of particulate matter once a day while in operation. The observers are not required to be Method 9 certified opacity readers.	Minn. R. 7011.0800, subp. 4(B)
Visible Emissions Corrective Actions: If visible emissions (VEs) are observed, the Permittee shall determine the cause and take corrective actions as soon as possible to eliminate the VEs.	Minn. R. 7011.0800, subp. 4(B)
Visible Emissions Record Keeping: The Permittee shall record the time and date of each Visible Emission (VE) inspection, and whether or not any VEs were observed. If VEs were observed, also record a brief description of the type of corrective action taken, and the date the actions were taken.	Minn. R. 7011.0800, subp. 4(B)

TABLE B: SUBMITTALS

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc
Permit Number: 11100056 - 001

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc
Permit Number: 11100056 - 001

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

08/06/98

Facility Name: Lund Boat Division - Genmar Industries Inc

Permit Number: 11100056 - 001

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 of each calendar year covers January 1 - June 30. The second report 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
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility
Emissions 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.	Total Facility
Equipment List	due 30 days after end of each calendar year following Permit Issuance to be submitted with the Compliance Certification. This list shall include 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).	Total Facility

TECHNICAL SUPPORT DOCUMENT
For Lund Boat Division, Genmar Industries, Inc.
DRAFT AIR EMISSION PERMIT NO. 11100056-001

This Technical Support Document (TSD) 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 (list both if different)	Facility Address (SIC Code: 3732)
Genmar Industries Inc. (Lund Boats) 100 South 5th Street Suite 2400 Minneapolis, Minnesota 55402	Lund Boat Division West Centennial Drive New York Mills, Minnesota 56567 (218)385-2235

1.2. Description of the facility

Lund Boat Division, Genmar Industries, Inc., (Lund Boats) operates a boat manufacturing plant located on West Centennial Drive in New York Mills, Minnesota. The plant has been in operation as a manufacturer of aluminum boats since 1948. The primary capability of the facility consists of the manufacture and repair of aluminum fishing boats with models ranging in size from 12 to 24 feet. All phases of the manufacturing process are conducted at this facility, from the receipt of coiled aluminum, marine grade plywood, upholstery materials and inboard engines to the finished product, ready for shipment to boat dealers. Limited repair activities are also conducted at this site for boats manufactured at this facility that have suffered damage in shipment or handling. The facility currently operates 16 hours per day, five to six days per week, 260 days per year, for a total of about 4,160 hours per year.

Lund Boat Division has 11 emission units that are associated with stack emissions. These emission units include: six paint spray booths, a paint drying oven, a woodshop dust collector system, a floatation foam area, a cleaning area (prior to painting), and a finishing area. Particulate control equipment is used on all five paint spray booths and the woodshop dust control system. There are no Volatile Organic Compound (VOC) emissions controls on the spray booths. A single natural gas-fired paint curing oven serves the paint spray booths. The calculated potential emissions from all VOC emission units exceed 250 tons per year. Lund Boat requests a Synthetic Minor Permit based on a 12-month rolling sum of actual VOC emissions to limit to 230 tons per year.

A bottleneck exists in the Lund Boat manufacturing process at the paint line oven. The oven has a capacity of curing the paint applied to a maximum of eight boats per hour.

Lund Boat Division proposes to install a Re-work paint spray booth. The potential emissions from the new paint spray booth will be less than 100 tons per year. The facility is located in an attainment area for all the criteria pollutants (40 CFR pt. 52, Subpart Y). Lund Boat Division is not among the 28 industrial categories listed in the "Prevention of Significant Deterioration of Air Quality" (PSD) rule as a major source if the potential to emit is equal to or greater than 100 tons per year of any regulated pollutant. This facility has the potential to emit, inclusive of a federally enforceable plant-wide applicability limit on the use of VOCs, less than 250 tons per year of Sulfur Dioxide (SO₂), particulate matter (PM), total organic carbon, carbon monoxide, Nitrogen Oxides (NO_x) and lead, and hence the PSD rules do not apply. The Permittee requests that this facility be regulated as a Synthetic Minor source under the federal PSD rules.

This facility has a woodshop where certain components of the boats are prepared. A small paint spray booth located in the woodshop is used for applying the flat black paint to certain plywood components of the boats. Lund Boat Division's Standard Industrial Classification Code is 3732 (boat manufacturing) and therefore, the "National Emission Standards for Wood Furniture Manufacturing Operations" (40 CFR § 63 - Subpart JJ) does not apply to this facility.

1.3 Description of any changes allowed with this permit issuance

This permit responds to the Permittee's application to install a new Re-work paint spray booth. Also, this permit preauthorizes changes at the facility and allows emission units to be added and deleted as long as the Permittee shall follow Title I Condition: Limit to avoid classification as a major source or modification under 40 CFR § 52.21.

1.4. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

EU #	SV#	Emission Unit Description	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
001	001	Paint Spray Booth	59.57					178.4			
002	002	Paint Spray Booth	59.57					178.4			
003	003	Paint Spray Booth	59.57					230.0			
004	004	Paint Spray Booth	59.57					230.0			
005	005	Paint Line Oven	0.078		0.0	0.66	0.14	0.04	0.0		
006	006	Woodshop Filter	24.00								
007	007	Woodshop Paint	18.79					161.9			
008	1,2,3,4	Foaming Area						104.8			
009	1,2,3,4	Cleaning Area						141.6			
010	1,2,3,4	Finishing Area						87.1			
011	8,9	Upholstery Shop						87.1			
012	010	Re-work Paint Booth	33.37					230.0			

	PM tpy*	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions*	86.89	**	0.0	0.66	0.14	230.0	0.0	56.6	230.0
Total Facility Actual Emissions	8.45	8.45	0.0	0.56	0.11	136.0	0.0	***	136.0

* The facility total for Particulate Matter is less than the sum of limits for Emission Units, because the facility wide limit on VOCs limits the amount of paint that can be used.

** Assuming that all PM emitted is PM₁₀

*** Actual Emissions for individual HAPs is not available at this time.

Table 2. Facility(TF) and Permit Classification

Classification (put x in appropriate box)	Major/Affected Source	*Synthetic Minor	*Minor
PSD (list pollutant)	None	PM, VOC	SO ₂ , NO _x , CO
NAAR (list pollutant)	None	None	None
Part 70 Permit Program (list pollutant)	VOC, HAPs	PM	SO ₂ , NO _x , CO

* 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, GP, or SV #	Applicable Regulations	Comments:
GP001*	Minn. R. 7011.0715, subp. 1 (A) and (B)	Standards of performance for Post-1969 Industrial Process Equipment - Limits for Total Particulate Matter and Opacity; limit applies to each paint booth individually
EU005 and SV005	Minn. R. 7011.0610, subp. 1 (A)(1) and (A)(2)	Standards of performance for Fossil-Fuel-Burning Direct Heating Equipment - Limits for Total Particulate Matter and Opacity; limit applies to paint line oven
EU006, CE005, and SV006	Minn. R. 7011.0715, subp. 1 (A) and (B)	Standards of performance for Post-1969 Industrial Process Equipment - Limits for Total Particulate Matter and Opacity; limit applies to woodshop dust control system
Total Facility	40 CFR § 52.21	Title I Condition: Facility - wide VOC emissions limit to less than or equal to 230 tons/year to avoid classification as a major source or modification

*Group of Spray Painting Booths EU001, EU002, EU003, EU004, EU007, and EU012

3. Technical Information

The PTE PM calculations for different Emission Units are based on the Industrial Process Equipment Rule (IPER).

Sample calculation: One paint spray booth

Paint rate at 6.6 gals/hr and 10 pounds/gal = 66 pounds/hr

IPER allowable emissions, $E = 3.59 (66/2000) \times 0.62 = 0.43$ pounds/hr

Given a air flow of 23,500 cu.ft/min

$$\begin{aligned} \text{PM in terms of grains/cu.ft} &= \frac{[(0.43 \text{ pounds/hr}) \times (7,000 \text{ grains/pound}) \times 60 \text{ min/hr}]}{23,500 \text{ cu.ft/min}} \\ &= 0.002 \text{ grains/cu.ft, use IPER Limit of } 0.0675 \text{ grains/cu.ft} \end{aligned}$$

$$\begin{aligned} \text{PTE PM per booth} &= [(0.0675 \text{ grains/cu.ft}) \times (23,500 \text{ cu.ft/min}) \times (60 \text{ min/hr}) \times (\text{pound}/7000 \text{ grains})] \\ &= 13.60 \text{ pounds/hr or } (13.60 \text{ pounds/hr} \times 8760 \text{ hours/yr} \times \text{ton}/2000 \text{ pounds}) \\ &= 59.57 \text{ tons/yr} \end{aligned}$$

PTE VOC per paint spray booth:

Given paint application rate = 6.6 gals/hr, max. VOC content = 6.17 pounds/gal

$$\begin{aligned} \text{PTE VOC per booth} &= [(6.6 \text{ gals/hr}) \times (6.17 \text{ pounds/gal}) \times (8760 \text{ hours/yr}) \times (\text{ton}/2000 \text{ pounds})] \\ &= 178.4 \text{ tons/yr} \end{aligned}$$

Facility Limit:

$$[(230 \text{ tons VOC})/\text{year} \times (1 \text{ ton paint})/(0.4 \text{ ton VOC}) \times (0.6 \text{ ton solids})/\text{ton paint}] = 345 \text{ tons solids/year}$$

Assuming an application transfer efficiency of 30%

$$\{345 \text{ tons solids/year} \times (1 - 0.30)\} = 241.5 \text{ tons solids/year} \text{ **uncontrolled**}$$

Combined capture and control efficiency of 74%

$$\{241.5 \text{ tons solids/year} \times (1 - 0.74)\} = 62.79 \text{ tons/year}$$

Additional limits on PM from EU 005 = 0.10 tons/year

EU 006 = 24.0 tons/year

Total Facility Limit on VOC that limits PM = **86.89 tons/year**

4. Conclusion

Based on the information provided by the Lund Boat Division, Genmar Industries, Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 11100056-001, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

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