

AIR EMISSION PERMIT NO. 11100056- 002

IS ISSUED TO

Lund Boats, Inc.

Lund Boats, Inc.
318 Centennial Drive West
New York Mills, Otter Tail County, MN 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 Oper. Permit - Reissuance	02/07/2003

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

Permit Type: Federal; Pt 70 Reissuance/Limits to Avoid NSR

Issue Date: September 23, 2005

Expiration: September 23, 2010
Title I Conditions do not expire.

Richard J. Sandberg, Manager
Air Quality Permits Section
Industrial Division

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

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NOTICE TO THE PERMITTEE:

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

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

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

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

PERMIT SHIELD:

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

FACILITY DESCRIPTION:

Lund Boat Division, (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.

Lund Boat Division has 11 emission units that are associated with stack emissions. These emission units include: six paint spray booths, 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 237.5 tons per year.

With the last total facility permit issued, Lund Boat proposed to install a Re-work paint spray booth. Also, this permit preauthorized changes at the facility and allowed emission units to be added and deleted as long as the Permittee shall follow Title I Conditions: Limit to avoid classification as a major source or modification under 40 CFR § 52.21 and Minn. R. 7007.3000. The potential emissions from the new paint spray booth are 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 dip tank 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.

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/23/05

Facility Name: Lund Boat Co
 Permit Number: 11100056 - 002

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
OPERATIONAL REQUIREMENTS	hdr
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)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
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 EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
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
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
MONITORING REQUIREMENTS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/23/05

Facility Name: Lund Boat Co
 Permit Number: 11100056 - 002

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)
RECORDKEEPING	hdr
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 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)
Recordkeeping: 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)
REPORTING/SUBMITTALS	hdr
Shutdown Notifications: 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
Breakdown Notifications: 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: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
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 Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
PRE-AUTHORIZED CHANGES	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/23/05

Facility Name: Lund Boat Co
 Permit Number: 11100056 - 002

<p>The Permittee is pre-authorized to make the following changes:</p> <ol style="list-style-type: none"> 1) Move or modify GP001, GP002, or GP003 listed emission units; 2) Replace listed emission units with ones similar to those listed in GP002; and 3) Add new emission units with ones similar to those listed in GP002; <p>provided the following conditions are met:</p> <ol style="list-style-type: none"> 1)VOC emissions are tracked and calculated as specified in this permit; and 2) All equipment must meet the requirements for similar emission units in GP001, GP002 and/or GP003. 	<p>Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000</p>
<p>Recordkeeping of Changes: Prior to making any pre-authorized change, the Permittee shall document that the proposed change meets the criteria listed in this permit, and is therefore pre-authorized. The Permittee shall maintain this documentation on-site.</p>	<p>Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Equipment Labeling: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number can be affixed by placard, stencil, or other means. The number shall be maintained so that it is readable and visible at all times from a safe distance.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Equipment Inventory: The Permittee shall maintain a written list of all emissions units and control equipment on site. The Permittee shall update the list to include any replaced, modified, or new equipment prior to making the pre-authorized change.</p> <p>The list shall correlate the units to the numbers used in this permit (EU,GP, CE). The date of construction shall be the date the change was made for replaced, modified, or new equipment.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>This permit establishes limits on the facility to keep it a minor source under New Source Review (See GP002 requirements table.) The Permittee cannot make any change at the source that would make the source a major source under New Source Review until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.</p>	<p>Title I Condition: Limit to avoid classification as a major source or modification under 40 CFR Section 52.21; Minn. R. 7007.3000</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/23/05

Facility Name: Lund Boat Co
 Permit Number: 11100056 - 002

Subject Item: GP 001 Spray painting

- 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 007 Mat or Panel Filter
 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 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)
The Permittee shall operate and maintain panel filters any time that any process equipment controlled by the panel filters is(are) in operation. The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0800, subp. 2 and 14
Daily Inspections: Once each operating day, the Permittee shall visually inspect the condition of each panel filter with respect to alignment, saturation, tears, holes and any other condition that may affect the filter's performance. The Permittee shall maintain a daily written record of filter inspections.	Minn. R. 7007.0800, subp. 4 and 5
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the filters or any of their components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Operation and Maintenance of Filters: The Permittee shall operate and maintain each filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
This permit allows for the modification and/or installation of paint booths. (See TF requirements table.)	Minn. R. 7007.0800, subp. 2
Any modified or new paint booths must meet all requirements above.	

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/23/05

Facility Name: Lund Boat Co
 Permit Number: 11100056 - 002

Subject Item: GP 002 Surface coating, cleaning, and adhesives application

- 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 009 Cleaning Area
 EU 010 Finishing Area
 EU 011 Upholstery Shop
 EU 012 Re-work Booth

What to do	Why to do it
Volatile Organic Compounds: less than or equal to 237.5 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period. All emission units or stacks added to GP002 as allowed in this permit shall be included in this calculation.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee is pre-authorized to make the following changes: 1) Move or modify GP002 listed emission units; 2) Replace listed emission units with ones similar to those listed in GP002; and 3) Add new emission units with ones similar to those listed in GP002; provided the following conditions are met: 1) The proposed change does not constitute reconstruction as defined by 40 CFR 63.1; 2) For paint guns, the application method achieves the same or better transfer efficiency; 3) VOC emissions are tracked and calculated as specified in this permit; and 4) All equipment must meet the requirements for similar emission units in GP001, GP002 and GP003.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
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 major source under 40 CFR 52.21 and Minn. R. 7007.3000
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 under 40 CFR Section 52.21 and Minn. R. 7007.3000
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 under 40 CFR Section 52.21 and Minn. R. 7007.3000
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 under 40 CFR Section 52.21 and Minn. R. 7007.3000
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 under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/23/05

Facility Name: Lund Boat Co
 Permit Number: 11100056 - 002

Subject Item: GP 003 Sources Subject to Subp. VVVV

- 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 011 Upholstery Shop
 EU 012 Re-work Booth

What to do	Why to do it
The intent of the section is to incorporate the MACT standard and that the requirements of 40 CFR 63 Subp. VVVV take precedence.	hdr
EMISSION LIMITS	hdr
Use carpet and fabric adhesives to those that contain no more than 5 percent organic HAP by weight.	40 CFR Section 63.5740; Minn. R. 7011.7370
Limit emissions from aluminum wipedown solvents to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied frm aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics.	40 CFR Section 63.5743(a)(1); Minn. R. 7011.7370
Limit emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) to no more than 1.22 kilograms of organic HAP per liter of toal coating solids applied from aluminum primers, clear coats and top coats combined.	40 CFR Section 63.5743(a)(2); Minn. R. 7011.7370
As an alternative to the limits set in (a)(1) and (a)(2), you may choose to limit emissions from the combined aluminum surface coatings and aluminum wipdown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids.	40 CFR Section 63.5743(a)(3); Minn. R. 7011.7370
Limit the organic HAP content of solvents for cleaning paint guns to no more than 5 percent by weight or follow the work practice standards below.	40 CFR Section 63.5743(b); Minn. R. 7011.7370
WORK PRACTICE STANDARDS WHEN USING SOLVENTS THAT CONTAIN MORE THAN 5% ORGANIC HAP BY WEIGHT.	hdr
<p>Clean spray guns in an enclosed device. Keep the device closed except when you place spray guns in or remove them from the device, or</p> <p>Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when you are not using it, or</p> <p>Clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that you keep closed when you are not using it, or</p> <p>Use an alternative cleaning process approved by the Administrator according to the procedures in 40 CFR 63.6(g).</p>	40 CFR Sections 63.5743(b)(1-4)
COMPLIANCE DEMONSTRATION	hdr
Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners and activators). Use the methods in 40 CFR Section 63.5758 to determine organic HAP content.	40 CFR Section 63.5746(a)
Use the methods in 40 CFR Section 63.5758(b) to determine the solids content (liters of solids per liter of coating or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content.	40 CFR Section 63.5746(b)
Use the methods in 40 CFR Section 63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent.	40 CFR Section 63.5746(c)
Compliance is based on a 12 month rolling average calculated at the end of every month. The first 12-month rolling average period begins on the compliance date of August 23, 2004.	40 CFR Section 63.5746(d)
At the end of the twelfth month after your compliance date and at the end of every subsequent month, use the procedures in 40 CFR Section 63.5749 to calculate the organic HAP from aluminum wipedown solvernts per liter of coating solids, and use the procedures in 40 CFR Section 63.5752 to calculate the kilograms of organic HAP from aluminum coating per liter of coating solids.	40 CFR Section 63.5746(e)

TABLE A: LIMITS AND OTHER REQUIREMENTS

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Keep records of the calculations used to determine compliance.	40 CFR Section 63.5746(f)
Use the equation in 40 CFR Section 63.5749(a) to calculate the weighted average organic HAP content of aluminum wipedown solvents used in the past 12 months.	40 CFR Section 63.5749(a)
Use the equation in 40 CFR Section 63.5752(a) to calculate the weighted average HAP content for all aluminum surface coatings used in the past 12 months	40 CFR Section 63.5752(a)
Use the equation in 40 CFR Section 63.5753(a) to calculate the weighted average organic HAP content of aluminum wipedown solvents and aluminum recreational surface coatings.	40 CFR Section 63.5753(a)
Demonstrate that the solvents used to clean the aluminum coating spray guns contain no more than 5 percent organic HAP by weight by determining organic HAP content with the methods in 40 CFR Section 63.5758. Keep records of the organic HAP content determination, or	40 CFR Section 63.5755
If you are using an enclosed spray gun cleaner, visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings, or If you are manually cleaning the gun or spraying solvent into a container that can be closed, visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps.	continued from above
Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers.	continued from above
RECORDKEEPING	hdr
Keep a copy of each notification and report that you submitted, and all documentation supporting any notification or report that you submitted.	40 CFR Section 63.5767(a) and (b)
Keep a record of the total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted average HAP content, and the total amount of each aluminum wipedown solvent used per month and the weighed average organic HAP content.	40 CFR Section 63.5767(c)(2) and (3)
GENERAL CONDITIONS FOR SOURCES SUBJECT TO A MACT STANDARD	hdr
The Permittee shall maintain files of all information required by this part in a form suitable and readily available for expeditious inspection and review. The files should be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Only the most recent two years of information must be kept on site.	40 CFR Section 63.10(b)(1)
NEW EQUIPMENT	hdr
This permit allows for the modification and/or installation of paint booths and upholstery adhesives. (See TF requirements table.) Any modified or new paint booths and adhesives must meet all requirements above.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/23/05

Facility Name: Lund Boat Co
 Permit Number: 11100056 - 002

Subject Item: EU 006 Woodshop Dust Control System

Associated Items: 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)
No visible emissions.	Minn. R. 7007.0800, subp. 2. Also meets the requirements of Minn. R. 7011.0715, subp. 1(B)
Visible Emissions: The Permittee shall check the fabric filter stack (SV 006) for any visible emissions once each day of operation during daylight hours.	Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions. The Permittee shall record the time and date of each visible emission inspection and whether or not any visible emissions were observed.	Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation. The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0800, subp. 2 and 14
<p>Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur:</p> <ul style="list-style-type: none"> - visible emissions are observed; - the fabric filter or any of its components are found during the inspections to need repair. <p>Corrective actions shall eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.</p>	Minn. R. 7007.0800, subp. 4, 5, and 14
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14

TABLE B: SUBMITTALS

09/23/05

Facility Name: Lund Boat Co
Permit Number: 11100056 - 002

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:

AQ Permit Technical Advisor
Industrial 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:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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

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

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

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

09/23/05

Facility Name: Lund Boat Co
Permit Number: 11100056 - 002

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Notification of compliance status	due before 09/30/2005 that contains the information specified in 40 CFR Section 63.9(b)(2).	GP003

TABLE B: RECURRENT SUBMITTALS

09/23/05

Facility Name: Lund Boat Co
 Permit Number: 11100056 - 002

What to send	When to send	Portion of Facility Affected
Report	due 60 days after end of each calendar half-year starting 08/23/2005 to meet the compliance reporting requirements of 40 CFR Section 63.5764. The report may be submitted with the semi-annual deviations report, and must include the information in 40 CFR Section 63.5764(c)(1-7).	GP003
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
Annual Report	due 30 days after end of each calendar year following Permit Issuance. The Permittee shall submit an annual report by January 30 that describes the changes made at the facility during the previous calendar year using the latest MPCA application forms. The report shall include the emission unit, stack/vent, group and control equipment data for any new or replaced units or control devices. For new and replaced spray equipment, the report shall also include the application method and transfer efficiency. The report shall document the VOC 12-month rolling cum calculations for the previous calendar year. The report shall be submitted with the Compliance Certification. As part of the Annual Report, the Permittee shall verify and certify that the facility has maintained minor status for New Source Review.	Total Facility
Compliance Certification	due 30 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted to the Commissioner on a form approved by the Commissioner. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX MATERIAL

Facility Name:Lund Boat Co

Permit Number: 11100056-002

Insignificant Activities Required to be Listed

Activity	Citation	Applicable Regulations	Comments (Periodic monitoring required?)
Welding and Cutting	Minn. R. 7007.1300, subp. 3.H.(3)	Minn. R. 7011.0715	Unlikely to exceed emission limits
Fugitive Emissions from Paved Roads and Parking Lots	Minn. R. 7007.1300, subp. 3.J.	Minn. R. 7011.0150	Pavement is a good dust control measure
Grinding and Machining Operations	Minn. R. 7007.1300, subp. 3.I(2)	Minn. R. 7011.0715	Unlikely to exceed emission limits
Parts Area Dust Control	Minn. R. 7007.1300, subp. 2.D(3)	Minn. R. 7011.0715	Unlikely to exceed emission limits; vented inside building

Limited Engine Testing	Minn. R. 7007.1300, subp. 3.I.(1) and (2)	Minn. R. 7011.2300	Gasoline powered engines unlikely to exceed emission limits
Foam Application Equipment	Minn. R. 7007.1300, subp. 3.I.(2)		
3000 Gallon Storage Tank, Polymeric Diphenylmethane Diisocyanate	Minn. R. 7007.1300, subp. 3.I.(2)		
Spray Paint Touch-up Aerosol Cans	Minn. R. 7007.1300, subp. 3.I.(2)	Minn. R. 7011.0715	Less than one ton per year used. Emission limits unlikely to be exceeded
Space Heating Equipment (Listed Below)	Minn. R. 7007.1300, subp. 3.I.(1) and (2)	Minn. R. 7011.0610	Natural gas, unlikely to exceed emission limits
Pressure Washer with 350,000 Btu/hr Water Heater	Minn. R. 7007.1300, subp. 3.I.(2)	Minn. R. 7011.0610	Natural gas, unlikely to exceed emission

			limits
Paint Drying Ovens, 1.2 and 1.5 mmBtu/hr	Minn. R. 7007.1300, subp. 3.I.(2)	Minn. R. 7011.0610	Natural gas, unlikely to exceed emission limits

Space Heating Equipment:

Space Heating Equipment
Lund Boat Company

Location	Description	Mfg	Model No.	Serial #	Rated Input [Btu/hr]
Above shipping/Rec. Assembly	Forced air Unit HtR	RUUD	UGVG10EAMER	CEID302F37921665	100,000
Assembly	Unit HtR	Reznor	FT-150	AXD71U2U61813X	150,000
Assembly	Unit HtR	Reznor	FT-150	AXD71U2n61793X	150,000
Assembly	Unit HtR	Reznor	FT-150	AYA71U2N30516X	150,000
Assembly	Unit HtR	Reznor	FT-150	AXC71U2N57923X	150,000
Assembly	MUA	Duo-aire	MB-230	11671	5,500,000
Carpet	Unit HtR	Reznor	FE-165	AUJ66M4N74487	165,000
Carpet	MUA	Titan	TA-225NGHRHDA		3,630,000
Finishing	Electric	Bryant	FB4ANF030	3199A23766	100,000
Finishing	MUA	Lennox	LLB-12-F	2373	1,440,000
Main Office	Forced Air	Rheem	RGEB-12EE-JS	HN5D307 F1089 0396	125,000
Main Office	Forced Air	Rheem	RGEB-12EE-JS	F-1089-0432	125,000
Main Office	Forced Air	Rheem	RGEB-12EE-JS	F1089-0436	125,000
Maintenance	Unit HtR	Reznor	UDAP75	BBD79X7N55946X	75,000
Maintenance	Unit HtR	Reznor	UDAP75	BBD79X7N55948X	75,000
					12,320,00
Paint	MUA	Titan	TA-242NGHRHDA	5110	0
Parts	Roof Top	Trane	YCD090c3HCBE	R27102061D	90,000
Parts	Boiler	Lochinua r	EBN250	I004384	210,000

Parts	MUA Forced	Titan	TA-225NGH2H	G904	4,400,000
Proto Shop	Air?	Bryant	350maj036006	3297A6100	110,000
Proto Shop	Unit HtR	Lennox	G8-110C	5169B	110,000
Repair	Unit HtR	Reznor	FD125	AWD371U2N10044	125,000
Respirator CLN Room		Life Breath	GO ELE	PFFC051700000048286	50,000
Rigging	Unit HtR	Reznor	UDAP150	BBH79Y2N77632X	150,000
Shipping	Unit HtR	Lennox	LP300A-M	41524	300,000
Shipping	Unit HtR	Reznor	FE165	AUE66M4N34971	165,000
Shipping/Rec.	Boiler	r	RBN 270	8985935	270,000
Shipping/Rec.	Unit HtR	Reznor	FT-150	AYA71U2n29942X	150,000
Shipping/Rec.	Unit HtR	Reznor	FT200	AYA71U2N30507X	200,000
Test Tank Building	Unit HtR	A.D.P.	CUHN-75A-1	6398k00574	75,000
Test Tank Building	Unit HtR	A.D.P.	CUHN-75A-1 548DJX048000AA	6398K00576	75,000
Warehouse	Forced Air	BDT	A	1999G20121	100,000
Woodshop	Unit HtR	Reznor	FT-150	AYI71U2N91306X	150,000
Woodshop	Boiler	r	EBN300	I005000	300,000
Woodshop	Unit HtR	Reznor	FE165	AUI66M4N64112	165,000
					31,575,00
					0

spacehtr.doc

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%

$$\{345 \text{ tons solids/year} \times (1 - .30)\} = 241.5 \text{ tons solids/year } \mathbf{\text{uncontrolled}}$$

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.

Staff Members on Permit Team: John Chikkala, Dave Beil, Cary Hernandez, Rhonda Land, and Dave Vaaler