

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing, Aerospace and Metal Finishing Operations Team PERMIT APPLICATION EVALUATION	Page	1 of 5
	App. number	513804, 513837
	Processed by	J Pandes Villacorte
	Reviewed by	SMKE
	Date	12/22/10

**PERMIT TO OPERATE EVALUATION
(Spray room, change of conditions)**

Applicant's Name: MacGregor Yachts, Inc.
Company ID No.: 14146
Mailing Address: 1631 Placentia Avenue, Costa Mesa, CA 92627
Equipment Address: 1631 & 1647 Placentia Avenue, Costa Mesa, CA 92627

EQUIPMENT DESCRIPTION:

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
Process 1: COATING OPERATION					
SPRAY COATING OPERATION, SOLVENT, GEL COAT, 80 FT W. X 90 FT L. X 16 FT H., 4 EXHAUST SYSTEMS, EACH W/ A 5 HP FAN, TWO WITH 40 @ 20" X 20" FILTERS & TWO WITH 32 @ 20" X 20" FILTERS, WITH SPRAY BOOTH A/N 513804 (formerly under A/N 500106, PO #G8768)	D2			HAP: (10) [40CFR 63 Subpart VVVV, 10-3- 2001]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1106.1, 2-12-1999, RULE 1107,11-9-2001, Rule 1107,1-6-2006; RULE 1162,11-17-2000; RULE 1162,7-8-2005; RULE 1171,11-7-2003; RULE 1171,5-1-2009]	C6.1, D12.1, D322.1, E71.1, E71.2, E175.1, E190.1, H23.1, H116.2, K67.1, K67.2, K67.4

Application no. 513837 (Title V Permit Revision):

HISTORY:

Application no. 513804 from MacGregor Yachts, Inc. was submitted on August 18, 2010 for a change of permit condition on an existing permit for a resin spray room, device no. D2 (PO #G8768, A/N 500106), to allow the use of pleasure craft coatings (Rule 1106.1) in this spray room. The spray room is currently used for the application of polyester resins (Rule 1162), and the application of metal coatings (Rule 1107). All these operations will occur within the one spray room under the existing 100 lbs VOC/day equipment limit. The change of condition will be to add Rule 1106.1 to the emissions and requirements 8iucolumn in Section D of the Title V Facility Permit. The facility is currently operating under a facility cap of 858 lb/day VOC.

A/N	Previous		Equipment	Device No.	Action
	A/N	Permit No.			
513804	500106	G8768	Spray Room, gel coat	D2	P/O – C/C
513837	-	-	Title V permit revision	-	Approve plan

No emission increases are expected at this facility as a result of this project since the equipment and facility VOC caps will remain the same. Therefore, Reg. XIII and Reg. XIV will not be triggered.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing, Aerospace and Metal Finishing Operations Team PERMIT APPLICATION EVALUATION	Page	2 of 5
	App. number	513804, 513837
	Processed by	J Pandes Villacorte
	Reviewed by	SMKE
	Date	12/22/10

MacGregor Yacht has proposed to revise their Title V permit by adding Rule 1106.1 to the spray booth under device D2. This revision is considered as a “minor permit revision” to their Title V permit, as described in the Regulation XXX evaluation. Plan application no. 513837 was submitted for Title V minor permit revision. The Title V renewal facility permit was issued on June 9, 2010. This is the first revision since the renewal.

According to the compliance data base, this company received one Notice of Violation (NOV) in the past two years. NOV #P53470 was issued on July 9, 2009 for falsifying the Title V Semi-Annual Monitoring report for the period of 1/1/09-6/30/09. The report had been completed before the period ended. This matter was resolved by July 17, 2009. No Notices to Comply (NC), and no complaints have been filed against the facility in the past two years.

PROCESS DESCRIPTION:

MacGregor Yachts manufactures sailboats and trailers. They have a total of three spray rooms (device nos. D1, D2 and D3) where polyester resin gel coats and resins are applied (Rule 1162) on molds to make the hull, deck and other smaller parts of the boat. In the first shift, gel coat is sprayed on the molds. In the second shift, polyester resin is hand applied with fiberglass reinforcement over the gel coated molds. This spray room (D2) is also used to paint the metal boat trailers with primer and enamel (Rule 1107), although the applicant has previously indicated that they are transitioning to aluminum trailers that do not need to be painted. Only a small part of the trailer requires painting and that is done by hand. In addition to the three spray rooms, there are several permitted storage tanks on site.

In addition to manufacturing sailboats from polyester resin, the company is planning to build boats (2 boats/year) made entirely of epoxy resin. Both the interior and exterior of these epoxy resin boats will be painted with epoxy primer and polyurethane high gloss marine coatings. As a result, the company is also proposing under this application to use the spray room (D2) for pleasure craft coatings operations (Rule 1106.1). The interiors of the new boats will have a small amount of wood trim including stairs, handrails, counter tops and decorative trim. This woodwork will be painted with varnishes, also subject to Rule 1106.1.

Each of the three spray rooms are permitted to emit up to 100 lbs VOC per day (Rule 1132 exemption limit). The operator is also required by permit condition to turn on all four exhaust fans whenever any spraying takes place in any of the three spray rooms. This ensures that the exhaust air flow in each room is a minimum of 60,000 scfm, per the Rule 1132 exemption level.

Their current production is two sailboats per day. Production is expected to remain the same following the proposed changes. The average and maximum operating schedule is 16 hr/day, 5 days/week, and 50 weeks/year.

EMISSION CALCULATIONS:

The requested change of conditions to the spray room (D2) will not result in any net emission increases. The AEIS and NSR emissions associated with this spray room will be the same as on the previous permit. See this file for AEIS and NSR sheets from the previous permit evaluation (A/N 500106). Below is a table showing AEIS and NSR entries for the spray room, D2.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing, Aerospace and Metal Finishing Operations Team PERMIT APPLICATION EVALUATION	Page	3 of 5
	App. number	513804, 513837
	Processed by	J Pandes Villacorte
	Reviewed by	SMKE
	Date	12/22/10

A/N	Previous A/N (P/O)		NSR, lb/day		AEIS, lb/hr	
			ROG	PM ₁₀	ROG	PM ₁₀
513804	500106	G8768	286	0	4.2*	0

* Note: Spray room D2 (A/N 513804) will be permitted with an equipment cap of 100 lb/day (4.2 lb/hr @ 24 hrs/day).

RULES AND REGULATIONS:

RULE 212: SIGNIFICANT PROJECT PUBLIC NOTIFICATION

A public notice is not required, because there will be no emission increase of criteria or toxic pollutants from the equipment or facility due to this change of permit condition.

RULE 401: VISIBLE EMISSIONS

Visible emissions from the operation of this equipment are not expected. No complaints have been filed on this company in the past two years.

RULE 402: NUISANCE

The operation of this equipment is not expected to cause a public nuisance. No violations or complaints have been filed on this company in the past two years.

RULE 1106.1: PLEASURE CRAFT COATING OPERATIONS

The facility will use coatings that comply with the VOC limits of this rule. An HVLP spray gun will be used to apply the coatings. Compliance is expected.

Material	Rule 1106.1 Category	VOC content of Coating (lb/gal)	
		Actual	Rule 1106.1 Limit
Imron polyurethane high-gloss colors	Topcoats, high-gloss	420 ^(*)	420
Imron epoxy primer	Finish primer/surface	324	420
Z Spar Captain's varnish	Clear wood finishes, varnishes	410	490
Imron polyurethane clearcoat	Other	336	420

Note: (*) See MSDS for product as mixed. Attachment to email from DuPont, dated 12/22/10.

RULE 1107: COATING OF METAL PARTS

The facility will continue to use the same coatings on the metal trailer parts that are subject to this rule. Therefore, the facility will continue to comply with the VOC limits of this rule. An HVLP spray gun is used to apply the coatings. Compliance is expected.

Material	Rule 1107 Category	VOC content of Coating (lb/gal)	
		Actual	Rule 1107 Limit
Topcoat (Imron black)	General Multi-component	2.3	2.8
Primer (Epoxy gray)	General Multi-component	2.1	2.8

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing, Aerospace and Metal Finishing Operations Team PERMIT APPLICATION EVALUATION	Page	4 of 5
	App. number	513804, 513837
	Processed by	J Pandes Villacorte
	Reviewed by	SMKE
	Date	12/22/10

RULE 1132: FURTHER CONTROL OF VOC EMISSIONS FROM HIGH EMITTING SPRAY BOOTH FACILITIES

The allowable VOC emissions from the spray room (D2) was determined in previous evaluations to be 100 lb/day based on a minimum flow of 60,000 cfm in each room. Compliance is expected based on past records. As done previously, the emissions shall be calculated by dividing the total emissions from each spray room for the month by the number of calendar days in that month. This will remain as a permit condition for the spray room.

RULE 1162: POLYESTER RESIN

No changes are being made to the gel coats and resin used in the spray room (D2). They shall continue to comply with the requirements of this rule. The dark blue gel coat is used to make the dark blue stripe along the side of the sailboat. The rest of the sailboat hull is white. They do not fill the resins.

Material	Rule 1162 Category	Monomer % by weight	
		Rule 1162 Limit	Actual
White gel coat	Pigmented gel coat, white	30%	30%
Dark blue gel coat	Pigmented gel coat, non-white	37%	37%
Resin	Lamination resin	35%	35%

RULE 1171: SOLVENT CLEANING OPERATIONS

Acetone is used as a cleanup solvent which is an exempt solvent. Compliance is expected.

REGULATION XIII:

There will be no VOC emission increase from this equipment due to this change of condition, therefore BACT, offsets and modeling are not triggered. The facility will operate this spray room under the same equipment and facility caps.

RULE 1401: MAXIMUM INDIVIDUAL CANCER RISK ASSESSMENT

There will be no toxic emission increases due to this change of condition. Exempt from the requirements of subparagraph (d) by 1401(g)(1)(B), Modification with no increase in risk.

REG XXX GENERAL:

This facility is not in the RECLAIM program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII, New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII, New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP). It is, therefore, considered a “minor permit revision,” pursuant to Rule 3000(b)(12)(A)(vi).

The proposed project is the 1st permit revision to the Title V renewal facility permit, which was issued on June 9, 2010. The following table summarizes the permit revisions since the Title V renewal permit was issued:

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing, Aerospace and Metal Finishing Operations Team PERMIT APPLICATION EVALUATION	Page	5 of 5
	App. number	513804, 513837
	Processed by	J Pandes Villacorte
	Reviewed by	SMKE
	Date	12/22/10

Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
1 st - Minor Permit Revision, change permit conditions for resin spray room (D2) to add R1106.1. (A/N 513804)	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

CONCLUSIONS/RECOMMENDATIONS:

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation requirements under Rule 3006(b). A proposed TV renewal permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, the Title V renewal permit will be issued to this facility.