

**NORTH CAROLINA DIVISION OF
AIR QUALITY**
Application Review

Region: Washington Regional Office
County: Beaufort
NC Facility ID: 0700151
Inspector's Name: Randall Jones
Date of Last Inspection: 09/20/2024
Compliance Code: 3 / Compliance - inspection

Issue Date: Date needed

Facility Data

Applicant (Facility's Name): Iconic Marine Group, LLC

Facility Address:

Iconic Marine Group, LLC
 1653 Whichards Beach Road
 Chocowinity, NC 27817

SIC: 3732 / Boat Building And Repairing

NAICS: 336612 / Boat Building

Facility Classification: Before: Title V **After:** Title V

Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 02D .0512, .0515, .0521, .1111, and .1806

NSPS: NA

NESHAP: 40 CFR 63, Subpart VVVV

PSD: NA

PSD Avoidance: 15A NCAC 02Q .0317 for 15A NCAC 02D .0530

NC Toxics: 15A NCAC 02D .1100, 15A NCAC 02Q .0711

112(r): NA

Other: NA

Contact Data

Facility Contact

Jeff Harris
 Chief Operating Officer
 (252) 975-2000
 1653 Whichards Beach Road
 Chocowinity, NC 27817

Authorized Contact

Jeff Harris
 Chief Operating Officer
 (252) 975-2000
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Technical Contact

Jeff Harris
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Application Data

Application Number: 0700151.24A

Date Received: 10/25/2024

Application Type: Renewal

Application Schedule: TV-Renewal

Existing Permit Data

Existing Permit Number: 10534/T02

Existing Permit Issue Date: 05/18/2020

Existing Permit Expiration Date: 04/30/2025

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2023	---	---	28.40	---	0.3900	22.67	20.32 [Styrene]
2022	---	---	36.30	---	0.4700	28.41	24.78 [Styrene]
2021	---	---	30.41	---	0.4300	24.89	22.10 [Styrene]
2020	---	---	25.07	---	0.3300	19.54	17.50 [Styrene]
2019	---	---	29.20	---	0.4500	24.53	22.37 [Styrene]

Review Engineer: Luke Mayer

Review Engineer's Signature:

Date:

Comments / Recommendations:

Issue 10534/T03

Permit Issue Date: Date needed

Permit Expiration Date: Date needed

1. Purpose of Application

Iconic Marine Group, LLC currently holds Title V Permit No. 10534T02 with an expiration date of April 30, 2025 for a boat manufacturing facility in Chocowinity, Beaufort County, North Carolina. This permit application is for a permit renewal without modification. The renewal application was received on October 25, 2024, or at least six months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description

The following description is taken from the most recent facility inspection report¹, prepared by engineer Randall Jones of the Washington Regional Office, and dated March 21, 2025.

Iconic Marine Group, LLC manufactures fiberglass boats in open molds. The finished boats are 20-48 feet in length encompassing four (4) brands; Baja, Fountain, Donzi, and Advance Performance Marine. Normal operating hours are: 8-10 hours per day and 4 or 5 days per week. They are currently producing about 3-4 boats per week with 300 employees.

The following permitted sources are present at the facility:

- Building ID No. 3; Small Part Lamination & Mating (**ID No. ES-03**)
- Building ID No. 4; Wood Finishing and Adhesive Spraying (**ID No. ES-04**)
- Building ID No. 5; Deck & Hull Lamination (**ID No. ES-05**)
- Building ID No. 10; Mold Maintenance (**ID No. ES-10**)
- Building ID No. 11; Cruiser Lamination (**ID No. ES-11**)
- Building ID No. 15; Tooling (**ID No. ES-15**)
- Building ID No. 16; Paint Booth #1 (**ID No. ES-16**)
- Building ID No. 17; Paint Booth #2 (**ID No. ES-17**)
- Building ID No. 19; Paint Booth #3 (**ID No. ES-19**)

The following insignificant activities are present at the facility:

- Solvent Cleaning Operations (**ID No. I-1**)
- One (1) resin storage tank (5,500 gallon capacity) (**ID No. I-2**)
- Twenty (20) gas-fired space heaters (125,000 to 175,000 Btu per hour capacity) (**ID No. I-3**)
- Eleven (11) gas-fired space heaters (325,000 to 375,000 Btu per hour capacity) (**ID No. I-4**)
- Three (3) gas-fired space heaters (2,000,000 to 2,600,000 Btu per hour capacity) (**ID No. I-5**)
- Two (2) gas-fired space heaters (3,500,000 to 4,000,000 Btu per hour capacity) (**ID No. I-6**)
- One (1) gas-fired space heater (6,650,000 Btu per hour capacity) (**ID No. I-7**)

The following control devices are in use at the facility:

- Dry filters (**ID No. C-3**)
- Dry filters (**ID No. C-4**)
- Dry filters (**ID No. C-5**)
- Dry filters (**ID No. C-10**)
- Dry filters (**ID No. C-11**)

¹ <https://edocs.deq.nc.gov/AirQuality/DocView.aspx?id=543712&dbid=0&repo=AirQuality>

- Dry filters (ID No. C-15)
- Dry filters (ID No. C-16)
- Dry filters (ID No. C-17)
- Dry filters (ID No. C-19)

The facility is a Title V facility because potential emissions of volatile organic compounds (VOCs) exceed 100 tons per year and because HAP emissions exceed 10 tons per year of any single HAP and/or 25 tons per year of any combination of HAPs.

3. History/Background/Application Chronology

History/Background

July 19, 2017	First permit issued. Air Permit No. 10534R00 was issued on July 19, 2017 with an expiration date of June 30, 2025. The operations at the site at that time were re-permitted into two separate air permits: Iconic Marine (Permit No. 10534R00) and Fountain Powerboats, Inc. (Permit No. 06175T12). <i>(See Charles Yirka's TV review for permit No. 10534R00, dated July 19, 2017)</i>
September 13, 2019	Air Permit No. 10534R01 was issued for a modification to consolidate remaining sources left out of the previous permit following Iconic Marine Group's assuming control of Fountain Powerboats' operations. <i>(See Judy Lee's TV review for permit No. 10534R01, dated September 13, 2019)</i>
May 18, 2020	Air Permit No. 10534T02 was issued for a 1 st time Title V permit. <i>(See Judy Lee's TV review for permit No. 10534T02, dated May 18, 2020)</i>

Application Chronology

October 25, 2024	Received permit application 0700151.24A for renewal.
November 13, 2024	Sent acknowledgment letter indicating that the application for permit renewal was complete.
December 4, 2024	Sent request to facility technical contact Jeff Harris for process rate data for sources ES-03, ES-05, ES-10, ES-11, ES-15, ES-16, ES-17, and ES-19 so that the compliance status of the facility with 15A NCAC 02D .0515 could be evaluated.
April 4, 2025	Mr. Paul Zawila of Iconic Marine Group, LLC responded to the above request by phone. Mr. Zawila indicated that the facility-wide maximum potential throughput is 0.79 tons per hour and that all sources can be reasonably assumed to share the same maximum potential process rate because of the nature of productions at the facility.
April 15, 2025	Draft permit and review forward to Supervisor for comments.
May 13, 2025	Comments received from Supervisor. Editorial changes, additional CAM analysis, and revisions to the permit condition and statement of basis segment for MACT VVVV were requested.

May 20, 2025	Engineer Betty Gatano, in the role of Supervisor, indicated that they had no further comments.
May 21, 2025	Draft permit and review forwarded to applicant, SSCB, and regional office for comments.
May 27, 2025	Mary Pinkston of Iconic Marine Group, LLC indicated via email that they had no comments on the draft permit or permit review.
May 29, 2025	Samir Parekh of the SSCB indicated via email that they had no comments on the draft permit or permit review.
June 1, 2025	Randall Jones from the Washington Regional Office indicated via email that they had no comments on the draft permit or permit review.
date	Draft permit and permit review forwarded to public notice via DAQ website.
date	Public comment period ends. Comments were/were not received.
date	EPA comment period ends. Comments were/were not received.
date	Permit issued.

4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the renewal process. This summary is not meant to be an exact accounting of each change but a summary of those changes.

Page(s)	Section	Description of Changes
Cover letter and throughout permit	--	<ul style="list-style-type: none"> Updated all dates and revision numbers Reformatted permit in accordance with current TV permitting shell
4	1	<ul style="list-style-type: none"> Reformatted emission source table Revised the emission source description for ES-03 for consistency
5	2.1 A	<ul style="list-style-type: none"> Changed the source description of ES-03 to read "Building ID No. 3..." instead of "Building No. 3..."
11	2.2 A	<ul style="list-style-type: none"> Changed the source description of ES-03 to read "Building ID No. 3..." instead of "Building No. 3..."
12	2.2 B	<ul style="list-style-type: none"> Revised and reformatted list of affected sources for clarity
12-19	2.2 B.1	<ul style="list-style-type: none"> Revised permit condition in accordance with the most recent regulatory language for 40 CFR 63, Subpart VVVV
21	3	<ul style="list-style-type: none"> Moved insignificant activities table to Section 3
22	4	<ul style="list-style-type: none"> Updated General Conditions to most recent version (Version 8.0, dated 07/10/2024)

This permit renewal is being processed without modification. The only change to the Title V Equipment Editor that will occur as part of this renewal is to slightly revise the source description for Building ID No. 3 (**ID No. ES-03**). TVEE was reviewed and approved by Connie Horne of DAQ on XX XX, XXXX.

EPA has promulgated a rule (88 FR 47029, July 21, 2023), with an effective date of August 21, 2023, removing the emergency affirmative defense provisions in operating permits programs, codified in both 40 CFR 70.6(g) and 71.6(g). EPA has concluded that these provisions are inconsistent with the EPA's current interpretation of the enforcement structure of the CAA, in light of prior court decisions². Moreover, per EPA, the removal of these provisions is also consistent with other recent EPA actions involving affirmative defenses³ and will harmonize the EPA's treatment of affirmative defenses across different CAA programs.

As a consequence of this EPA action to remove these provisions from 40 CFR 70.6(g), it will be necessary for states and local agencies that have adopted similar affirmative defense provisions in their Part 70 operating permit programs to revise their Part 70 programs (regulations) to remove these provisions. In addition, individual operating permits that contain Title V affirmative defenses based on 40 CFR 70.6(g) or similar state regulations will need to be revised.

Regarding NCDAQ, it has not adopted these discretionary affirmative defense provisions in its Title V regulations (15A NCAC 02Q .0500). Instead, DAQ has chosen to include them directly in individual Title V permits as General Condition (GC) J.

Per EPA, DAQ is required to promptly remove such impermissible provisions, as stated above, from individual Title V permits, after August 21, 2023, through normal course of permit issuance.

5. Regulatory Review

Iconic Marine Group, LLC is subject to the following regulations. The facility's equipment and operations have not changed since the initial Title V permit issuance in 2020. The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

15A NCAC 02D .0512: Particulates from Wood Products Finishing Plants – The facility's wood finishing and adhesive spraying operations, located in Building No. 4 (**ID No. ES-04**), are subject to this rule because these operations involve the finishing of wood products. As specified in the rule, "the facility owner/operator shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, duct work and collectors that are properly designed and adequate to collect particulate to the maximum extent practicable." Particulate matter emissions from Building No. 4 are controlled by a dry filter system (**ID No. C-4**). To ensure compliance with this rule, the facility is required to perform external inspections of the ductwork on a monthly basis and to perform internal inspections of the duct work on an annual basis. The results of these inspections must be maintained in a logbook, and a summary report of these activities must be submitted on a semi-annual basis. The most recent inspection report¹, prepared by engineer Randall Jones of the Washington Regional Office and dated March 21, 2025, indicates that the required monitoring, recordkeeping, and reporting activities are being carried out. Continued compliance is expected.

² NRDC v. EPA, 749 F.3d 1055 (D.C. Cir. 2014).

³ In newly issued and revised New Source Performance Standards (NSPS), emission guidelines for existing sources, and NESHAP regulations, the EPA has either omitted new affirmative defense provisions or removed existing affirmative defense provisions. See, e.g., National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants; Final Rule, 80 FR 44771 (July 27, 2015); National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Final Rule, 80 FR 72789 (November 20, 2015); Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration Units; Final Rule, 81 FR 40956 (June 23, 2016).

15A NCAC 02D .0515: Particulates from Miscellaneous Industrial Processes – The facility’s fiberglass boat manufacturing operations and associated sources (**ID Nos. ES-03, ES-05, ES-10, ES-11, ES-15, ES-16, ES-17, and ES-19**) are subject to this rule because no other particulate matter emission control standards are applicable. Emission rates of particulates from these sources shall not exceed the level calculated with the following equations, based on their process rates in tons per hour:

$$E = 4.10(P)^{0.67} \quad \text{for process rates} \leq 30 \text{ tons per hour}$$
$$E = 55.0(P)^{0.11} - 40 \quad \text{for process rates} > 30 \text{ tons per hour}$$

Where:

$$E = \text{maximum allowable PM emission rate} \quad [\text{lb/hour}]$$
$$P = \text{process rate} \quad [\text{tons/hour}]$$

Particulate matter emissions from fiberglass boat manufacturing operations at the facility are controlled by a dry filter system. To ensure compliance with this rule, the facility is to perform external inspections of the ductwork on a monthly basis and to perform internal inspections of the duct work on an annual basis. The results of these inspections must be maintained in a logbook, and a summary report of these activities must be submitted on a semi-annual basis. The most recent inspection report¹, prepared by engineer Randall Jones of the Washington Regional Office and dated March 21, 2025, indicates that monitoring, recordkeeping, and reporting activities have been carried out as required.

Mr. Paul Zawila of Iconic Marine Group indicated via phone call on April 14, 2025, that the facility as a whole has a maximum throughput of 0.79 tons per hour and that all sources can be reasonably assumed to share the same maximum throughput due to the nature of production operations. Using the equations above, affected sources at the facility are subject to a particulate matter emission rate limit of 3.5 pounds per hour. According to the facility’s Emissions Inventory⁴ for calendar year 2023 (the most recent available), the facility’s total emissions of particulate matter were 0.78 tons per year, equivalent to 1,560 pounds per year or 0.178 pounds per hour (on average). Continued compliance is expected.

15A NCAC 02D .0521: Control of Visible Emissions – All of the facility’s sources are subject to this rule because they can be reasonably expected to generate visible emissions. For all sources, visible emissions shall not be more than 20% opacity when averaged over a six-minute period. Six-minute averaging periods may exceed 20% opacity if: no six-minute period exceeds 87% opacity; no more than one six-minute period exceeds 20% opacity in any hour; and no more than four six-minute periods exceed 20% opacity in any 24-hour period. The facility owner or operator is required to observe the emission points of all sources at least once a month and maintain the results in a logbook. A summary report of these activities must be submitted on a semi-annual basis. The most recent inspection report¹, prepared by engineer Randall Jones of the Washington Regional Office and dated March 21, 2025, indicates that the required monitoring, recordkeeping, and reporting activities are being carried out. Continued compliance is expected.

15A NCAC 02D .1111: Maximum Achievable Control Technology (MACT) – Several of the facility’s sources or activities, including those housed in Buildings 3, 4, 5, 10, 11, and 15 (**ID Nos. ES-03, ES-04, ES-05, ES-10, ES-11, and ES-15**, respectively) are subject to 40 CFR 63, Subpart VVVV: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat

⁴ <https://edocs.deq.nc.gov/AirQuality/DocView.aspx?id=525718&dbid=0&repo=AirQuality>

Manufacturing because they involve fiberglass boat manufacturing, and because the facility is considered a major source of hazardous air pollutants (HAPs). See the NESHAPs/MACT regulatory review section below in Section 6 for more information. The facility owner or operator is required to maintain compliance with any and all applicable NESHAP/MACT standards as applicable.

15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions – This rule is applicable facility-wide and is state-enforceable only. All of the facility’s sources are subject to this rule because they can be reasonably expected to generate emissions with a noticeable odor. The owner or operator of the facility shall not operate it or any of its sources without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary. The most recent inspection report¹, prepared by engineer Randall Jones of the Washington Regional Office and dated March 21, 2025, indicates that no odors were noticeable at the time of inspection. Continued compliance is expected.

6. NSPS, NESHAPs/MACT, PSD, 112(r), CAM

NSPS

The facility is not currently subject to any New Source Performance Standards. This permit renewal does not change the facility’s NSPS status.

NESHAP/MACT

The facility is considered a major source for hazardous air pollutants (HAPs) because emissions of a single HAP (styrene) exceed 10 tons per year, and because potential total emissions of HAPs exceed 25 tons per year. This permit renewal does not change the facility’s MACT status.

The facility is currently subject to one Maximum Achievable Control Technology standard: 40 CFR 63, Subpart VVVV: National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (sometimes known as the “Boat MACT”).

40 CFR 63, Subpart VVVV: National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing – Several of the facility’s sources or activities (**ID Nos. ES-03, ES-04, ES-05, ES-10, ES-11, and ES-15**) are subject to this subpart because they are used in fiberglass boat manufacturing, and because the facility is a major source for HAPs. The activities in Building ID Nos. 16, 17, and 19 (**ID Nos. ES-16, ES-17, and ES-19**) are not subject to this subpart because they do not meet the criteria as listed in 40 CFR 63.5689 or are exempted by 40 CFR 63.5683(d).

This subpart sets emission limits for open molding and gel coating operations for boat manufacturing processes, and the facility complies with these limits by using the “compliant material” option outlined in the rule. To use this option, a facility must restrict the materials used in boat manufacturing at the facility to resins and gel coats that meet the organic HAP coating requirements in Table 2 to this subpart. The facility must calculate HAP content and HAP emissions using the equations contained in this subpart and compare the results against the limits in the rule. The facility must maintain records of these calculations and of material usage and must submit records detailing these activities on a semi-annual basis. Compliance is demonstrated on a 12-month rolling-average basis and is determined at the end of every month, 12 times per year. The most recent inspection report¹, prepared by engineer Randall Jones of the Washington Regional Office and dated March 21, 2025, indicates that the facility is currently in compliance with all standards contained in this subpart. Continued compliance is expected.

The PEA has made recent rule revisions to 40 CFR 63, Subpart VVVV (MACT VVVV). The NESHAP General Provisions were revised on November 19, 2020 to accommodate sources that seek to reclassify from major source status to area source status by reducing their potential emissions of HAPs below the regulatory threshold. The effective date of this revision is January 19, 2021, when these revisions were directly implemented into the text of the rule. On March 20, 2020, the EPA finalized the residual risk and technology reviews (RTR) for Subpart VVVV. Among other changes, this RTR addressed emissions during periods of startup, shutdown, and malfunction (SSM) and amended provisions regarding electronic reporting of performance test and evaluation results and semiannual reports. Subpart VVVV was again revised on November 19, 2021 to add technical corrections to address minor errors resulting from the March 20, 2020 revisions. The permit will be updated as part of this renewal to reflect these updates where applicable.

PSD

Iconic Marine Group, LLC is located in Beaufort County, which is either in attainment or unclassifiable/attainment of National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The facility is subject to a PSD avoidance condition under 15A NCAC 02Q .0317 that allows it to remain a minor source for PSD despite the fact that potential emissions of VOCs are greater than 250 tons per year. The facility must calculate facility-wide VOC emissions on a monthly basis using appropriate emission factors in accordance with AP-42 Section 4.4⁵ (updated 5/08) and calculate emissions using ANSI/ACMA/ICPA UEF-1-2004 Estimating Emissions Factors from Open Molding Composite Processes which utilize the Unified Emission Factors (UEF) for open molding of composites dated October 5, 2011. Records of these activities must be maintained, and a summary report must be submitted on a semi-annual basis. According to engineer Judy Lee's Title V permit review⁶ of Air Permit No. 10534T02, dated May 18, 2020, the facility's highest actual VOC emission rate occurred during the 1999 emissions inventory year and totaled 60.48 tons per year. Given the wide margin of compliance between the peak of actual emissions and the PSD major source threshold of 250 tons per year, continued compliance can be expected.

112(r)

The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the 112(r) thresholds. No change with respect to 112(r) is anticipated under this permit renewal.

CAM

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) located at a facility required to obtain a TV permit and that meets all three following criteria:

- the unit is subject to any non-exempt (e.g., pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

⁵ [AP42 4.4 Polyester Resin Plastic Products Fabrication - updated table 4.4-2 May 2008](#)

⁶ See Attachment 1 below.

None of the emissions units at this facility with control devices have potential pre-control emissions of 100 tons per year or more of pollutants for which the control device is applicable. As a result, this facility is not subject to CAM rules.

7. Facility Wide Air Toxics

According to Judy Lee's review⁶ for Air Permit No. 10534R02, dated September 13, 2019, the facility was previously required to provide a facility-wide toxics compliance demonstration in 2005 while operating under the Fountain name. Revised modeling was submitted by Mr. Paul Zawila of Value Environmental, Iconic Marine's consultant, via email on May 23, 2019 for review. As stated in a memorandum⁷ from Mr. Mark Yoder of the Air Quality Analysis Branch, dated July 17, 2019, the modeling adequately demonstrates compliance on a facility-wide basis for styrene. An analysis of this process can be found in Judy Lee's review⁸ for Air Permit No. 10534R01, dated September 13, 2019.

8. Facility Emissions Review

The facility-wide potential emissions have not changed because of this TV permit renewal. Actual emissions for criteria pollutants and HAPs for the previous five years reporting periods are provided in the header of this permit review.

9. Compliance Status

DAQ has reviewed the compliance status of Iconic Marine Group, LLC. During the most recent inspection, conducted on September 20, 2024, the facility appeared to be in compliance with all applicable requirements. Further, the facility has had no air quality violations within the last five years. The facility's Periodic Compliance Certification was received on July 29, 2024, and indicated compliance with all applicable requirements from January 1, 2024 to June 30, 2024. The responsible official for Iconic Marine Group, LLC certified compliance with all applicable requirements through the submittal of an E5 form along with their application for permit renewal.

10. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. No affected states or local agencies are within 50 miles of this facility. However, the DAQ voluntarily sends the public notice and draft permit, including statement of basis, to all neighboring states for all Title V permitting actions (renewals, significant modifications, and reopenings for cause), regardless of whether the state/local agency is deemed an "affected state" with respect to a particular facility.

Public Notice of the Draft Title V Permit ran from XX XX, XXXX to XX XX, XXXX. No comments were received.

⁷ <https://edocs.deq.nc.gov/AirQuality/DocView.aspx?id=73467&dbid=0&repo=AirQuality>

⁸ See Attachment 2 below.

EPA's 45-day review period ran concurrent with the 30-day Public Notice, ran from XX XX, XXXX to XX XX, XXXX. No comments were received.

11. Other Regulatory Considerations

- A P.E. seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- A permit fee is NOT required for this renewal application.

12. Recommendations

The permit renewal application for Iconic Marine Group, LLC has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 10534T03.

Attachment 1:
Excerpts from Judy Lee's Technical Review for Air Permit No. 10534T02

“

- 02Q .0317 “Avoidance Conditions”

This rule allows facilities to accept Federally-enforceable limits in the Title V permit in order to avoid triggering requirements of certain rules. Iconic Marine has accepted a facility-wide limit on Volatile Organic Compounds (VOC) emissions in order to avoid applicability of 02D .0530 “Prevention of Significant Deterioration” (PSD). The limit is 250 tons per year. As long as Iconic Marine continues to comply with this limit, the facility will be a Minor Source for PSD, and thus not subject to [15A NCAC] 02D .0530. This limit was included in the permit under Fountain Powerboats prior to Iconic Marine purchasing and consolidating emission sources.

In order to demonstrate compliance with the limit, Iconic Marine calculates facility-wide VOC emissions monthly using appropriate emission factors (EF) in accordance with AP-42 Section 4.4 (updated 5/08), emissions calculations using ANSI/ACMA/ICPA UEF-1-2004 Estimating Emission Factors from Open Molding Composite Processes which utilize the Unified Emission Factors (UEF) for open molding of composites dated October 5, 2011.

Due to the number of materials used, Iconic Marine's permit will not include a table listing out each material, EF and pollutant associated with each process as other permitted fiberglass boat manufacturing permits do. Records must be reported twice per year. It has been updated with language that reflects similar facilities and current guidance with the exception of the above referenced table.

Based on a historical review of facility records, the highest actual VOC emissions occurred during the 199 emissions inventory (EI) year (60.48 tons of VOC) while operating under Fountain Powerboat's control. Continued compliance is expected.

...

The facility was determined to be in compliance with this rule during the most recent inspection of the facility. Continued compliance will be determined with subsequent inspections and reports.

”

“

7. Facility Wide Air Toxics Pollutants

The facility was previously required to provide a facility-wide toxics compliance demonstration in 2005 while operating under Fountain. Revised modeling was submitted by Mr. Paul Zawila of Value Environmental, Iconic Marine's consultant, via email on May 23, 2019 for review. Per Memorandum dated July 17, 2019 from Mr. Mark Yoder, AQAB, the modeling adequately demonstrates compliance on a facility-wide basis for styrene (Refer to review⁸ for issued permit No. 10534R01 for more details).

”

Attachment 2:

Excerpt from Judy Lee's Technical Review for Air Permit No. 10534T01

“

- 15A NCAC 02Q .0711 – Toxic Air Pollutants Emissions Limitations Requirement

In accordance with Iconic Marine's current permit, the Permittee shall maintain records of operational information demonstrating that the TAP emissions do not exceed the TPERs as listed below:

TPERs Limitations				
Pollutant (CAS Number)	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Ethyl Acetate (141-78-6)			36	
Methyl Ethyl Ketone (78-93-3)		78		22.4
Methyl Isobutyl Ketone (108-10-1)		52		7.6
Toluene (108-88-3)		98		14.4
Xylene (1330-20-7)		57		16.4
Formaldehyde (50-0-0)				0.04
n-Hexane (110-54-3)		23		

Per email received on May 28, 2019, Iconic Marine is no longer using any materials with methylene chloride. Particularly, K-Grip 201 adhesive will no longer be used; thus, methylene chloride was removed from the 02D .1100 modeled emissions limitations and will be placed on the TPER lists in the revised permit.

TPERs Limitations				
Pollutant (CAS Number)	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Methylene Chloride (75-09-2)	1600		0.39	

As per the last inspection a review of the records indicated emission rates are well below the TPERs. Continued compliance is expected.

- 15A NCAC 02D .1100 – Toxic Air Pollutants Emissions Limitation Requirement

Iconic Marine's current permit contains the following modeled emission limitations:

EMISSION SOURCE	TOXIC AIR POLLUTANT	EMISSION LIMIT (lb/hr)	MAXIMUM ACTUAL (lb/hr)
Building No. 3 (ID No. ES-3), Building No. 5 (ID No. ES-5)	Styrene (100-42-5)	41.3	13.0*
Building No. 4 (ID No. ES-4)	Methylene Chloride (75-09-02)	1.41 lb/hr	0*
Building Nos. 16, 17, and 19 (ID Nos. ES-16, 17, and 19)	Styrene (100-42-5)	1.00 lb/hr	<0.01*

*Emissions from last inspection

An Air Toxics Dispersion Modeling was provided in Appendix C of the application and was received by RCO on February 20, 2019. It was a hard copy of the previously submitted Air Toxic Pollutant Air Dispersion Modeling Analysis dated August 1, 2005, performed by Value Environmental for Fountain Powerboats. A review of the IBEAM documents module and Air Quality Analysis Branch (AQAB) modeling files was conducted; however, no modeling memorandum was available. The review for issued Air Permit No. 06175T09 indicates that modeling was submitted for increased styrene emissions due to an NOV issued during the previous inspection for being over the currently permitted styrene limit. The review further indicates that the proposed changes to the current permit are considered to be in compliance with 02D .1100 based on a memorandum from Mr. Mark Yoder, AQAB.

The facility was sent an additional information request on March 26, 2019, indicating that new modeling would be needed due to the age of the modeling (e.g., changes in meteorological data, NC Acceptable Ambient Levels (AALs) since 2005, etc.) and to reflect emissions from the combined future facility. The letter indicated that AQAB could perform modeling on the facility. Iconic Marine performed their own modeling and submitted via email on May 23, 2019 for AQAB to review. The email was forwarded to Mr. Tom Anderson, AQAB. A Memorandum dated July 17, 2019 prepared by Mr. Yoder, AQAB indicates the modeling adequately demonstrates compliance on a facility-wide basis for styrene. As discussed under 02Q .0711, methylene chloride will no longer be used at the facility; thus, it was removed from the 02D .1100 modeled limits table and added to the 02Q .0711 TPER table. The new facility-wide styrene limit will be placed in the revised permit.

Iconic Marine's new modeled limit for styrene is summarized in the following table:

EMISSION SOURCE	TOXIC AIR POLLUTANT	EMISSION LIMIT (lb/hr)	% AAL
Building No. 3 (ID No. ES-3), Building No. 5 (ID No. ES-5), Building No. 11 (ID No. ES-11), Building No. 15 (ID No. ES-15)	Styrene (100-42-5)	45.0	96%
Building Nos. 16, 17, and 19 (ID Nos. ES-16, 17, and 19)			
Building No. 4 (ID No. ES-4)			

To demonstrate compliance, the facility is required to report within 30 days after each calendar year quarter, the maximum emission rate of each TAP listed above from the various sources. The 2018 reports have been submitted as required and indicate compliance with the emission limits. The last report was received on January 29, 2019. Continued compliance is expected.

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