

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Rec Boat Holdings LLC - Sport and Engineering	SRN : N1470
Location : 925 Frisbie St.	District : Gaylord
	County : WEXFORD
City : CADILLAC State: MI Zip Code : 49601	Compliance Status : Compliance
Source Class : MAJOR	Staff : Sharon LeBlanc
FCE Begin Date : 12/3/2017	FCE Completion Date : 12/3/2018
Comments : FCE for Fiscal Year 2019 - Rec Boats Sport and Engineering.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/03/2018	Scheduled Inspection	Compliance	FCE evaluation for 2019 Fiscal Year. sgl
10/16/2018	ROP Other	Compliance	Quarterly Submittal for 3rd quarter of 2018- see 10/16/2018 document summary/review.
10/16/2018	Other	Compliance	3rd Quarterly 2018 submittal review. sgl
08/21/2018	ROP Semi 1 Cert	Compliance	Facility reports all reporting and record keeping requirements in the ROP were met, and that no deviations from these requirements occurred for the first half of 2018 calendar year.
08/16/2018	MACT (Part 63)	Compliance	First Semi-Annual 40 CFR Part 63, subpart VVVV (Boat Manufacturing) Compliance Report for 2018. See Compliance activity for 8/16/2018 for submittal review. sgl
08/16/2018	Other	Compliance	Review of First Semi-Annual 40 CFR Part 63, subpart VVVV (Boat Manufacturing) Compliance Report for 2018
07/26/2018	ROP Other	Compliance	Quarterly Submittal for 2nd quarter of 2018 - refer to 7/26/2018 compliance activity for detailed evaluation of the data. sgl
07/26/2018	Other	Compliance	2018 2cnd Quarterly Report Evaluation. sgl

Activity Date	Activity Type	Compliance Status	Comments
05/01/2018	ROP Other	Compliance	Quarterly Submittal for 1st quarter of 2018, Submittal was determined complete with regards to required content, and in compliance with regards to permit limits. Data review is summarized in a independent report. sgl
05/01/2018	Other	Compliance	Data Review for 1st quarter of 2018 submittal, Submittal was determined complete with regards to required content, and in compliance with regards to permit limits.
04/18/2018	MAERS	Compliance	2017 MAERS, cert form received. Note that during the audit for this facility it was noted that some discrepancies were noted between this year and the previous year with reference to material use/throughput. Some of the materials were reported using the wrong units (E3 rather than tons, etc). These were corrected for the 2017 calendar year with company permission. Note no errors in the mass balance determined emissions were found. sgl

01/29/2018	ROP Other	Compliance	<p>Quarterly Air Certification Reports for 4th Quarter of 2017. The referenced document dated January 22, 2018, included material usages and associated emissions. A review of the document indicated that the both material usage and associated emissions are below ROP permits. With respect to acetone recovery activities, the ROP requires a minimum of 48% of acetone recovery Acetone recovery (EUACETONECLEANUP) for the months of October, November and December 2017 was reported to be 50.0%, 60.5% and 56.7%, respectively.</p> <p>EUVOCCLEANUP limits the facility to less than 937,500 lb/yr material usage. The facility reported 1.13 tpy (2.281.87 lb) for 2017.</p> <p>EUADHESIVE, limits VOC and acetone to 530.9 lb/day. Maximum daily reported usage for October, November and December 2017 was reported to be 63.93, 61.21 and 56.71 lb/day, respectively. EUENGADHESIVE is limited to 6.5 lb/day VOC & Acetone. Daily maximums of VOC & Acetone for the months of October, November and December 2017 were 5.07, 1.13 and 1.13 lb/day, respectively.</p> <p>EUGELCOAT1, has a limit of 7,700 lb/day. Maximum daily usage for the EU for the months of October, November and December 2017, was reported to be 1029.04 lb/day, 1160.2 lb/day and 1366.09 lb/day, respectively. VOC & styrene limits for the EU was 122.1 tpy. The facility reports VOC & styrene emissions of 14.9 tpy 12-month rolling.</p> <p>EUGELCOAT2, has a maximum daily limit of 1726 lb/day. Records submitted reported maximum daily usage of 219 lb/day, 361 lb/day and 284 lb/day, for the months of October, November and December 2017, respectively.</p> <p>Totals presented appear to be in general compliance with permit</p>
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01/29/2018	ROP Other	Compliance	limits with respect to emissions and material use. It should be noted that the information presented is not summarized in a method consistent with the EUs of the ROPs EU Summary table.
01/25/2018	ROP SEMI 2 CERT	Compliance	AQD District Staff received both annual and second semi-annual certifications for the calendar year 2017. The referenced documents indicate that the facility has been in compliance with all terms and conditions of MI-ROP-N1470-2016. The certification forms were signed by the Facilities responsible official.
01/25/2018	ROP Annual Cert	Compliance	AQD District Staff received both annual and second semi-annual certifications for the calendar year 2017. The referenced documents indicate that the facility has been in compliance with all terms and conditions of MI-ROP-N1470-2016. The certification forms were signed by the Facilities responsible official.

01/25/2018	MACT (Part 63)	Compliance	<p>Facility submitted 2cnd semi-annual compliance report required under 40 CFR Part 63, Subpart VVVV for Boat Manufacturing. The referenced document indicated that the facility is in compliance with the referenced Subpart for the July1, 2017 through December 31, 2017 reporting period.</p> <p>The document reported meiting the 35% by weight HAP Content for IP production resin, IP Putty and SC 2000 products. The weighted average contents for the three products for the period ranging from 32.27 to 32.3% by weight.</p> <p>With respect to compliance with their resin and gelcoat operations, the facility reports that it is showing compliance with the standard for open molding operations by using the Emissions Averaging Option (63,5704(a). The facility has developed an emissions Averaging Implementation Plan to demonstrate future compliance with the standard. The plan was included as an attachment to the submittal. The plan indicates that product resins (non-atomized application), pigmented gelcoats, tooling resins (non-atomized application) and tooling gelcoat operations are part of the emissions averaging. A review of the plan appears to indicate that the plan is consistent with formulas and methods for determining emission limits under the subpart. The HAP limit for the facility was determined to be 26,8691 Kg/yr. HAP emissions were calculated to be 20,901 Kg/yr.</p> <p>In addition, the Facility has reported that the following are not applicable to the Facility under the subpart;</p> <ul style="list-style-type: none"> -the facility is not restricted to the 5% HAP limit with respect to their carpet and fabric adhesive operations, because it does not apply to materials in hand-held aerosol cans. -the facility reports that the
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01/25/2018	MACT (Part 63)	Compliance	<p>facility does not use solvents containing more than 5% HAPs to remove cured resin or gelcoat from equipment or for routine equipment flushing and cleaning operations..</p> <p>-the Resin and Gelcoat Mixing operation report that containers that are 208 L or larger into which other materials are added for mixing are equipped with covers and no visible gaps. and that the covers are kept in place except when activities require the tops to be open (adding or removing equipment and or inserting or removing pumping or mixing equipment).</p>
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Date: _____

Supervisor: _____