

# **ADEQ OPERATING AIR PERMIT**

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

**Permit No. : 1624-AOP-R2**

**Renewal #1**

**IS ISSUED TO:**

**Bass Cat Boats**

**Mountain Home, AR 72653**

**Baxter County**

**AFIN: 03-00081**

**THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO  
INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION  
UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE  
FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:**

**September 24, 2003 AND September 23, 2008**

**IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.**

**Signed:**

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Mike Bates  
Chief, Air Division

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Date Modified

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**Table 1 - List of Acronyms**

A.C.A.	Arkansas Code Annotated
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CSN	County Serial Number
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate matter
PM <sub>10</sub>	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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**Section I: FACILITY INFORMATION**

PERMITTEE: Bass Cat Boats

AFIN: 03-00081

PERMIT NUMBER: 1642-AOP-R2

FACILITY ADDRESS: Highway 126 Industrial Park  
Mountain Home, AR 72653

MAILING ADDRESS PO Drawer 1688  
Mountain Home, AR 72654

COUNTY: Baxter

CONTACT POSITION: Fred Atwood

TELEPHONE NUMBER: (870) 481 – 5135

FAX NUMBER (870) 481 - 5743

REVIEWING ENGINEER: Kimberly O’Guinn

UTM North - South (Y): Zone 15 [4025]

UTM East - West (X): Zone 15 [549]

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## **Section II: INTRODUCTION**

### **Summary of Permit Activity**

Bass Cat Boats operates a fiberglass boat manufacturing facility at Highway 126 Industrial Park, Mountain Home, Arkansas 72653. This modification to the facility permit addresses the following issues:

- The inclusion of language outlining specific regulatory requirements of NESHAP VVVV, WWWW, and MMMM.
- The replacement of the annual raw materials throughput limits found in Plantwide Condition #7 with the Annual VOC and HAP emission rates. The annual VOC and HAP emission rates are the maximum annual plantwide emission rates for VOC s and HAPs; therefore when coupled with mass balance recordkeeping as a demonstration of compliance, represents an effective tool for controlling and documenting the authorized emissions from the facility.
- The removal of MDI as regulated air pollutant due to the low level of emissions.

With this modification permitted MDI emissions will decrease by 0.01 tpy.

### **Process Description**

#### **Lay-up Booths SN-01 and SN-02**

The lay-up booth is where the fiberglass and resin are applied to hull, rail, and other parts of the boat. Resin is mainly used in this process. It is stored in 55 gallon drums which are kept inside the booth near the chopper gun. The gun used to apply the resin uses fluid impingement technology to reduce emissions. A catalyst is mixed with the resin to speed up the curing process. Acetone is used to clean the chopper gun. A woven mat of fiberglass is hand applied to the resin/catalyst mix on the hull. When these booths are not being used to apply resins, they are used to apply gel coats.

#### **Spray Paint Booth SN-03**

The spray paint booth is where Bass Cat paints the boat trailers it manufactures on site. The trailers are brought into the paint booth already sandblasted and ready for painting. The primer is applied to the trailer and allowed to dry approximately 10 min. The topcoat is applied, and the trailers are moved outside the spray booth to dry.

#### **Sandblasting Booth SN-04**

The sand blasting booth is where the trailers are cleansed in preparation for painting. This booth consists of three walls and a roof. The sand is either poured out of 100 lb. bags or scooped from the floor of the booth. Approximately 375 lb of sand are used per week for 12-15 trailers. The sand is reused until it is too fine to use.

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**Boxing Department SN-06**

The boxing department is where the rail and the hull are strengthened and joined together. Fiberglass is hand laid on the hull. The hull is foamed for buoyancy.

**Repair Department SN-07**

Many diverse activities take place in the repair department. New molds (plugs) are made here, and repair to existing molds takes place here. This department returns boats to like new condition. Most chemicals used in this area are hand applied.

**Regulations**

The following table contains the regulations applicable to this permit.

**Table 2 - Regulations**

<b>Source No.</b>	<b>Regulation Citations</b>
Facility	Regulation 18, <i>Arkansas Air Pollution Control Code</i>
Facility	Regulation 19, <i>Regulations of the Arkansas Plan of Implementation of Air Pollution Control</i>
Facility	Regulation 26, <i>Regulation of the Arkansas Operating Air Permit Program</i>
Facility	40 CFR Part 63, Subpart VVVV – <i>National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.</i>
Facility	40 CFR Part 63, Subpart MMMM – <i>National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products</i>

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The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

**Table 3 – Emission Summary**

<b>EMISSION SUMMARY</b>					
<b>Source No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission Rates</b>		<b>Cross Reference Page</b>
			<b>lb/hr</b>	<b>tpy</b>	
01	Spray Lay-Up Booth	VOC <sup>a</sup>	150.57	114.1	10
02	Spray Lay-Up Booth	Styrene	76.93	56.86	
03	Spray Paint Booth	Methyl Methacrylate	3.6	1.01	
06	Boxing Department	Combined HAPs <sup>b</sup>	40.0	21.5	
07	Repair Department	Acetone <sup>c</sup>	55.07	55.18	
		Tetrafluoroethane <sup>c</sup>	9.0	9.0	
		Pentafluoropropane <sup>c</sup>	9.0	9.0	
04	Sand Blasting Booth	PM/PM <sub>10</sub>	0.2	0.3	17
05	Welding Operation	Insignificant Activity			24

<sup>a</sup> HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

<sup>b</sup> All HAPs except for Styrene, Methyl Methacrylate, and MDI.

<sup>c</sup> Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

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### **Section III: PERMIT HISTORY**

Bass Cat Boats has operated a fiberglass boat manufacturing facility in Mountain Home, Arkansas, since 1978. This facility installed new equipment in 1989, 1992, and 1993.

1624-A was issued to this facility on November 11, 1995. It allowed emission rates of 0.9 tpy for PM/PM<sub>10</sub> and 84.7 tpy for VOC.

An administrative amendment was performed on permit 1624-A in January, 1996, to increase the allowable usages of foam compounds, gelcoat, sand, paints and primers. The emission rates did not change.

1624-AOP-R0 was issued on January 19, 1999, and allowed for the increases in emissions due to production of larger boats and future growth. Sources 01A and 01B, 02A and 02B, 03A and 03B, and 06A and 06B in permit 1624-A were combined and listed as sources SN-01, SN-02, SN-03, and SN-06, respectively. Source numbers 08A and 08B were dropped from this permit. This facility exceeds the emissions threshold of 100 tons per year of volatile organic compound (VOC) and the 10 ton per year threshold for a single HAP set forth by the Title V program and is therefore required to obtain an operating permit.

1624-AOP-R1 was issued on January 31, 2005. This was the first Title V renewal issued to Bass Cat. The facility re-evaluated its method of determining emissions from coating processes and requested to increase acetone and gel coat usage to 15,000 gal/yr and 276,000 lb/yr, respectively. Also, a minor modification was incorporated to include the use of a Threshold Limit Value (TLV) table to demonstrate compliance with permit requirements. Permitted emissions of VOC and styrene were reduced by 54.5 tpy and 22.02 tpy, respectively. Emissions of acetone, pentafluoropropane, and other (non-styrene) HAPs were increased by 20.58 tpy, 9.00 tpy, and 16.00 tpy, respectively.

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## Section IV: SPECIFIC CONDITIONS

SN-01, SN-02, SN-03, SN-06, and SN-07

### Spray Lay-Up Booths, Spray Paint Booth, Boxing Department, and Repair Department

#### Description

The lay-up booth is where the fiberglass is applied to the hull of the boat. This is primarily done by using a chopper gun. The motor on the gun chops the fiberglass into small pieces that, along with the resin, are blown onto the part being sprayed. The resin is purchased in 55 gallon drums that are kept in the booth beside the chopper gun. The resin is mixed with a catalyst to speed the curing process. The fiberglass is a continuous strand located in boxes in the booth with the chopper gun. Other employees in the booth use small hand-held rollers to roll the resin into the fiberglass. A woven mat of fiberglass is also applied at this stage of production. The mat is covered with the resin/catalyst mix and applied to the hull by hand.

The Spray Paint Booth is where Bass Cat paints the boat trailers it manufactures on site. The trailers are brought into the paint booth already sandblasted and ready for painting. The primer is applied to the trailer and allowed to dry approximately 10 minutes. The topcoat is then applied and the trailers are moved outside the spray booth to dry.

The Boxing Department is where the rail and hull are strengthened and joined together. Fiberglass is hand laid on the hull and the hull is foamed for buoyancy. This foam consists of 4,4'-Methylenediphenyl diisocyanate (MDI). This material is a VOC and also a HAP, but it has a very low volatility.

Many diverse activities take place in the repair department. New plugs are made here and repair to existing plugs is also done here. This department also returns boats to like new condition. Most chemicals used in this area are hand applied.

#### Specific Conditions

1. The permittee shall not exceed the combined emissions rates from sources SN-01, SN-02, SN-03, SN-06, and SN-07 set forth in the following table. Hourly rates are based on maximum equipment capacity, a boat production limit set forth in Plantwide Condition #9, and the limit on VOC content set forth in Plantwide Condition #11. Compliance with the tpy rates shall be demonstrated through the record keeping requirements set forth in Plantwide Condition #7. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 4 – Maximum Criteria Emission Rates from Coatings**

Pollutant	lb/hr	tpy
VOC	150.5	114.1

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- The permittee shall not exceed the combined emission rates from sources SN-01, SN-02, SN-03, SN-06 and SN-07 set forth in the following table. Hourly rates are based on maximum equipment capacity and the boat production limit set forth in Plantwide Condition #9. Compliance with the annual rates shall be demonstrated through the record keeping requirements set forth in Plantwide Condition #7. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 5 – Maximum Non-Criteria Emission Rates from Coatings**

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
Styrene	76.93	56.68
Methyl Methacrylate (MMA)	1.00	3.60
HAPs*	40.0	21.5
Acetone	55.07	55.18
Tetraflouroethane	9.00	9.00
Pentafluoropropane	9.00	9.00

\* All other HAPs not specifically listed in this table.

- The permittee shall not use a gelcoat, resin, coating, or any other product which exceeds the limits set in the following table. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 6 – Maximum Specific Compound Content**

<b>Pollutant</b>	<b>wt%</b>
Styrene	60.0
Methyl Methacrylate (MMA)	10.0
Tetraflouroethane	15.0
Pentafluoropropane	15.0

- The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #3. The permittee will update the records by the fifteenth day of the month following the month. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- The permittee shall not exceed the formulation of HAPs for the given minimum TLV in the following table in any HAP containing compound used at the facility. Compliance with this table shall be demonstrated through compliance with Specific Conditions #6 and #7. [Regulation No. 18 §18.1004 of the Arkansas Air Pollution Control Code, effective February 15, 1999, (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 7 – Non-Criteria Pollutant TLV for Coatings**

<b>Maximum Single HAP Concentration*</b> <b>lb HAP / gal</b>	<b>Minimum TLV</b> <b>mg / m<sup>3</sup></b>
7.50	Greater than 50.20
7.50	50.20
6.00	40.16
5.00	33.47
4.00	26.77
3.00	20.08
2.00	13.39
1.00	6.69
0.75	5.02
0.50	3.35
0.25	1.67
0.20	1.34
0.10	0.67

\* HDI, MMA, and Styrene are exempt from this table.

6. The permittee shall maintain records of the ACGIH TLV values as listed on current MSDS forms, or in the most recently published ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs) for each HAP-containing material used. The concentration of each HAP in lb/gal and the corresponding TLV should be noted on these records. These records shall be maintained in a spreadsheet, database, or other well organized format. These records shall be kept on-site and made available to Department personnel upon request. [Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
  
7. The permittee shall maintain records of the amount of HAP emissions each month. These records shall indicate the amount of each HAP-containing material used during that month as well as the corresponding HAP content for each HAP in that material. The monthly emissions shall be calculated for each material by multiplying the usage by the corresponding HAP content(s). The total HAP emissions from all products shall also be indicated on these records. A copy of the MSDS sheet for each product used shall accompany these records. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve (12) month rolling total of HAP emissions and each individual month's data shall be kept on-site and shall be made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
  
8. The permittee shall limit total HAP concentration of all coatings applied to 7.50 lb/gal. Compliance with this condition shall be demonstrated through compliance with Specific Condition #6. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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9. The permittee shall submit Compliance Reports on a semi-annual basis. Reports must cover the time periods from January 1 through June 30, and July 1 through December 31, each year. All compliance reports must be delivered, or postmarked, no later than 60 calendar days after the end of their respective semiannual reporting period. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall keep a copy of all notifications and reports, including supporting documentation on site. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The permittee shall keep records of the amounts of open molding production resin pigmented gel coat, clear gel coat, tooling resin and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
12. The permittee will maintain records of the amounts of production resin and tooling resin applied by atomized, and non-atomized methods. The records will be maintained at the facility, in a form that can be easily inspected and reviewed. Records must be maintained for a period of no less than five years, with a minimum of two years worth of records maintained on the premises. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The permittee shall limit organic HAP emissions from open molding operations, to include Production Resin, Pigmented Gel Coat, Clear Gel Coat, Tooling Resin, and Tolling Gel Coat, to the limit specified in 40 CFR §63.5698(b), based on a 12-month rolling average using one or more of the options listed in paragraphs (a) through (c) of section §63.5701. The permittee shall comply with the general requirements as stated in § 63.5704 to comply with the open molding emission limits. The permittee shall submit all required information as stated in § 63.5704 to demonstrate compliance. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. The permittee shall maintain a cover, with no visible gaps, at all times on all resin and gel coat mixing containers with a capacity equal to or greater than 208 liters. This does not apply when material is manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee shall demonstrate compliance with Specific Condition #14 by performing monthly visual inspection of all resin and gelcoat containers in excess of 208 liters (55 gallons). The permittee shall maintain records of the inspection to include a list of which containers are subject to the inspections, and description of any repairs or corrective action taken. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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16. The permittee shall not use cleaning solvent with an organic HAP content of more than 5% (by weight) for the routine flushing of non-cured resin and gelcoat from application equipment to include, spray guns, flowcoaters, brushes, rollers, squeegees and other equipment. No organic HAP content limit applies when removing cured resin and gelcoat from application equipment. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. All organic HAP containing cleaning solvents used for the removal of cured resin from application equipment must be stored in containers with covers that give no visible gap between the container and the cover. The containers must remain closed at all times, except when equipment to be cleaned is being placed in, or removed from, the containers. On containers with a volume greater than 7.6 liters (2 gallons) the distance from the top of the container to the surface of the solvent must not exceed 0.75 the diameter of the container. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee will determine and record the organic HAP content of the cleaning solvents subject to the standards specified in CFR 63.5734 using the methods specified in CFR 63.5758. If cleaning solvents are recycled on site, the documentation provided by the solvent manufacturer, or supplier may be used for demonstrating compliance with the applicable organic HAP content limits. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
19. The permittee shall perform monthly visual inspections on all containers holding organic HAP containing solvents used from removing cured resin and gel coat. The permittee shall ensure that the containers have covers with no visible gaps. The permittee shall keep records of the monthly inspections and any repairs made to the covers. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
20. The permittee shall comply with all applicable standards and monitoring, compliance, and recordkeeping requirements of 40 CFR Part 63, Subpart MMMM and be in full compliance with Subpart MMMM by January 2, 2004. [Regulation No. 19 §19.304, 40 CFR Part §63.3881(a) & §63.3883(b) ]
21. The permittee shall maintain records that document the affected source(s) is in compliance with the subpart 3 years after January 2, 2004. [Regulation No. 19 §19.304, 40 CFR Part §63.3881(b) , 40 CFR Part 52, Subpart E]
22. The permittee shall submit a notification of compliance status including all applicable elements as required by §63.9(h) no later than 30 days following the end of the initial compliance period. The notification of compliance status shall include all applicable elements specified in paragraphs §63.3910(c)(1) through (c)(11). [Regulation No. 19 §19.304, 40 CFR Part §63.3910(c)]
23. The permittee shall submit semiannual compliance reports including all applicable elements as required by paragraphs §63.3920(a)(1) through (a)(7) for each affected source. [Regulation No. 19 §19.304 and 40 CFR §63.3920]

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24. The permittee shall collect and keep copies, including supporting documentation, of each notification and report that were submitted to comply with Subpart MMMM. [Regulations No. 19 §19.304 and 40 CFR §63.3930(a)]
25. The permittee shall limit organic HAP emissions to no more than 2.6 lb organic HAP per gallon coating solids used per consecutive 12-months. [Regulation No. 19 §19.304, 40 CFR Part §63.3890(b)(1)]
26. The permittee shall demonstrate compliance with Specific Condition #25 through the use of the Compliant Material Option or the Emission Rate Without Add-On Control Option. Any switch between compliance options shall be documents as required by §63.3930(c) and reported in the next semiannual compliance report as required in §63.3920. [Regulation No. 19 §19.304, 40 CFR Part §63.3891]
27. The permittee shall submit a notification of compliance status including all applicable elements as required by §63.9(h) no later than 30 days following the end of the initial compliance period. The notification of compliance status shall include all applicable elements specified in paragraphs §63.3910(c)(1) through (c)(11). [Regulation No. 19 §19.304, 40 CFR Part §63.3910(c)]
28. The permittee shall maintain current copies of information provided by materials suppliers or manufacturers or data from testing used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. [Regulation No. 19 §19.304, 40 CFR Part §63.3930(b)]
29. For the affected sources complying with the Compliant Material Option , the permittee shall maintain records of the following:
  - a. The beginning and ending dates from which this compliance option is used;
  - b. The organic HAP content calculated using Equation 2 of §63.3941 for each coating used during each compliance period;
  - c. The name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period,
  - d. The mass fraction of each organic HAP, of each coating, thinner and/or other additive, and cleaning material used during each compliance period;
  - e. The volume fraction of solids for each coating used during each compliance period;
  - f. The density of each coating, thinner and/or other additive, and cleaning material used during each compliance period; and
  - g. The date, time, and duration of each deviation.

[Regulation No. 19 §19.304, 40 CFR Part §63.3930]

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30. For the affected sources complying the Emission Rate Without Add-On Control Option, the permittee shall maintain records of the following:

- a. The beginning and ending dates for which this compliance option is used;
- b. The total mass of organic HAP emissions for the coating, thinners, and/or other additives, and cleaning materials used each month using equation 1, 1A through 1C, and 2 of §63.3951, and if applicable, the calculation used to determine the mass of organic HAP in waste materials according to §63.3951(e)(4);
- c. The total volume of coating solids used each month calculated using Equation 2 of §63.3941;
- d. Each 12-month organic HAP rate using Equation 3 of §63.3951
- e. The name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period;
- f. The mass fraction of organic HAP of each coating, thinner and/or other additive, and cleaning material used during each compliance period;
- g. The volume fraction of solids for each coating used during each compliance period;
- h. The density of each coating, thinner and/or other additive, and cleaning material used during each compliance period; and
- i. The date, time, and duration of each deviation;

[Regulation No. 19 §19.304, 40 CFR Part §63.3930]

31. For the affected sources complying with Emission Rate Without Add-On Control Option , the permittee may elect to used Equation 1 of §63.3951 to determine an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951 (e)(4). The permittee shall maintain records of the following:

- a. The date of each shipment and the name and address of each TSDF to which waste material were sent;
- b. A statement of which subparts under 40 CFR Parts 262, 264, 265 and 266 apply;
- c. Identification of the coating operations producing waste materials included in the shipments and the months the allowance was claimed; and
- d. The methodology used in accordance with §63.3951(e)(4) to determine the total amount waste material and the mass of organic HAP contained in these materials sent to or collected, stored, and designated for transport to as TSDF each month.

[Regulation No. 19 §19.304, 40 CFR Part §63.3930(h)]

**SN-04**

**Sandblasting Booth**

**Description**

The sand blasting booth is where the trailers are cleaned in preparation for painting. This booth consists of three walls and a roof. The sand is either poured out of 100 lb bags or scooped from the floor of the booth. Approximately 375 lbs of sand is used per week for 12-15 trailers. The sand is reused until it is too fine to use.

**Specific Conditions**

32. The permittee shall not exceed the emissions rates set forth in the following table. Compliance shall be demonstrated through operating the sand blasting equipment according to the manufacturer's specifications and usage limits set forth in Specific Condition #14. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 8 – Maximum Sand Blasting Criteria Emission Rates**

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
PM <sub>10</sub>	0.2	0.3

33. The permittee shall not exceed the emissions rates set forth in the following table. Compliance shall be demonstrated through operating the sand blasting equipment according to the manufacturer's specifications and usage limits set forth in Specific Condition #14. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 9 – Maximum Sand Blasting Non-Criteria Emission Rates**

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
PM	0.2	0.3

34. The permittee shall not receive more than 18 tons (360 bags) of sand per consecutive twelve month period. Compliance shall be demonstrated through the record keeping requirements set forth in Specific Condition #35. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
35. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #34. The permittee will update the records by the fifteenth day of the month following the month. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
36. Visible emissions from SN-04 shall not exceed 5% opacity. Compliance with this limit shall be demonstrated through compliance with Specific Condition #37. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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37. The permittee shall conduct weekly observations of the opacity from SN-04 and keep a record of these observations. If the permittee detects visible emissions in excess of the opacity limit, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep the records onsite and make the records available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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## **Section V: COMPLIANCE PLAN AND SCHEDULE**

Bass Cat Boats does not currently have an enforcement action. Bass Cat Boats will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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## **Section VI: PLANT WIDE CONDITIONS**

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No.19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods
  - b. Safe sampling platforms
  - c. Safe access to sampling platforms
  - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No.19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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7. The permittee shall limit total consumption of paints, primers, and other solvent based products monthly by calculating monthly VOC emissions and 12-month cumulative VOC emissions from the monthly product usage. The 12-month cumulative VOC emissions will not exceed the 114.1 tons per 12 consecutive months facility limit of Specific Condition # 1. Records will be updated for each new product used. These records shall be updated by the 10th day of the month following the month to which the records pertain. These records shall be maintained on site and made available to Department personnel upon request. A report of total emissions shall be submitted in accordance with General Provision #7. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]
8. The permittee shall limit total consumption of paints, primers, and other solvent based products monthly by calculating monthly HAP emissions and 12-month cumulative VOC emissions from the monthly product usage. The 12-month cumulative HAP emissions will not exceed the following annual limits of Specific Condition # 2. Records will be updated for each new product used. These records shall be updated by the 10th day of the month following the month to which the records pertain. These records shall be maintained on site and made available to Department personnel upon request. A report of total emissions shall be submitted in accordance with General Provision #7.

**Table 10 – Maximum Annual Non-Criteria Emission Rates**

<b>Pollutant</b>	<b>tpy</b>
Styrene	56.68
Methyl Methacrylate (MMA)	3.60
HAPs*	21.5
Acetone	55.18
Tetraflouroethane	9.00
Pentafluoropropane	9.00

\* All other HAPs not specifically listed in this table.

[Regulation No. 18 §18.1004, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

9. The permittee shall not produce more than 4.0 boats per day. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
10. The permittee shall maintain records of the number of boats produced per day on a daily basis. These records shall be kept on site and made available to Department personnel upon request. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
11. The permittee shall not use a primer or paint that contains more than 7.5 lbs/gallon of VOC. Compliance shall be demonstrated through the record keeping requirements set forth in Plantwide Condition #12. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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12. The permittee shall maintain records of the paints and primers used and their VOC contents. These records shall be maintained on site and made available to Department personnel upon request. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

### **Title VI Provisions**

13. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
  - e. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
14. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
- a. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - b. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - c. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
  - d. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
15. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

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16. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

17. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

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### **Section VII: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated April 1, 2003.

**Table 11 - Insignificant Activities**

<b>Description</b>	<b>Category</b>
Welding Operation	Group A, #7
Drum Filling	Group A, #13

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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### **Section VIII: GENERAL PROVISIONS**

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.

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6. The permittee must retain the records of all required monitoring data and support information for at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every 6 months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within 30 days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include: [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]
  - a. The facility name and location
  - b. The process unit or emission source deviating from the permit limit,
  - c. The permit limit, including the identification of pollutants, from which deviation occurs,
  - d. The date and time the deviation started,
  - e. The duration of the deviation,
  - f. The average emissions during the deviation,
  - g. The probable cause of such deviations,
  - h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
  - i. The name of the person submitting the report.

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9. The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]
10. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation No. 26 §26.701(E), and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
11. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]
12. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]
13. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]
14. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]
15. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]
16. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 19. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

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17. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]
18. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]
19. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]
20. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]
21. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
22. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;

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- b. The compliance status;
- c. Whether compliance was continuous or intermittent;
- d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
- e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

23. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]

- a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
- b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
- d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

24. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

## **APPENDIX A**

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**APPENDIX B**

