

ADEQ

ARKANSAS
Department of Environmental Quality

January 30, 2015

Matt Harbour
Environmental Coordinator
Challenger, Inc. (Bass Cat Boats & Yar-Craft Boats)
P.O. Drawer 1688
Mountain Home, AR 72653

Dear Mr. Harbour:

The enclosed Permit No. 1624-AOP-R4 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 8/28/2013.

After considering the facts and requirements of A.C.A. §8-4-101 et seq. as referenced by §8-4-304, and implementing regulations, I have determined that Permit No. 1624-AOP-R4 for the construction and operation of equipment at Challenger, Inc. (Bass Cat Boats & Yar-Craft Boats) to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

Enclosure: Final Permit

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 1624-AOP-R4

IS ISSUED TO:

Challenger, Inc. (Bass Cat Boats & Yar-Craft Boats)
Highway 126 Industrial Park
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:

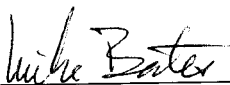
January 30, 2015

AND

January 29, 2020

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:


Mike Bates
Chief, Air Division

January 30, 2015
Date

Challenger, Inc. (Bass Cat Boats & Yar-Craft Boats)
Permit #: 1624-AOP-R4
AFIN: 03-00081

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Challenger, Inc. (Bass Cat Boats & Yar-Craft Boats)
AFIN: 03-00081
PERMIT NUMBER: 1624-AOP-R4
FACILITY ADDRESS: Highway 126 Industrial Park
Mountain Home, AR 72653
MAILING ADDRESS: P.O. Drawer 1688
Mountain Home, AR 72653
COUNTY: Baxter County
CONTACT NAME: Matt Harbour
CONTACT POSITION: Environmental Coordinator
TELEPHONE NUMBER: (870) 481-5135
REVIEWING ENGINEER: Kimberly O'Guinn
UTM North South (Y): Zone 15: 4025609.39 m
UTM East West (X): Zone 15: 548544.52 m

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SECTION II: INTRODUCTION

Summary of Permit Activity

Challenger, Inc. (dba Bass Cat Boats & Yar-Craft Boats) operates a custom fiberglass fishing boat manufacturing facility located at Highway 126 Industrial Park, Mountain Home, Baxter County, Arkansas. This modification is to renew the facility's existing air permit. There are no changes in permitted emission rates at this time.

Process Description

Layup Booths (SN-01, SN-02)

During the manufacturing process, fiberglass and resin are applied to the previously gelcoated molds. These molds include hull, rail, fenders, consoles, live wells, various storage boxes, and any other molds required for boat production. Currently, gelcoats, and resins or some form of modified polyester and either Isophthalic or Orthophthalic with some blended vinyl esters. Both are purchased from several long-term suppliers.

The process begins in the second shift operation. The Layup booths are used in the process of applying gelcoat to the prepared molds. Gelcoat is sprayed into the respective molds using either a Magnum Venus airless gelcoat gun or a Binks gun. The gelcoat is sprayed from 5-gallon containers stored on the rack that carries the gelcoat gun. A catalyst is mixed in during the spray process to accelerate the curing process. Once the gelcoat is applied, a barrier coat is sprayed on as a back-up coat to complete the process.

Polyester resin is the main ingredient used in the resin/glass application process, with Vinyl Ester resin being used as the initial barrier coat. Both are purchased in 55-gallon drums and, while in use, are kept in the respective booths beside the chopper guns during use. The chopper guns used are non-atomizing Fluid Impingement Technology (F.I.T.), which provide reduced emissions. A continuous strand of fiberglass is fed into the spinning blade on the front of the chopper gun and the resulting cut fibers are sprayed out with the resin. Catalyst is, again, mixed in during this application process for accelerated curing. The same catalyst is used in both gelcoat and fiberglass application processes. A woven fiberglass tri-axial or bi-axial cloth, saturated with the resin/catalyst mix, is applied between 2 layers of chopped fiberglass & resin.

Each chopper and gelcoat gun has a small reservoir for acetone. The acetone reservoir is filled from a larger 55-gallon container stored in a separate location. This acetone is used for flushing gelcoat lines between color applications and cleaning the guns after completion of the spraying process. The waste acetone is collected and disposed of off-site. A little less than 1/4 of the acetone used is sent off as waste.

Chemicals used in the Layup and Gelcoat processes included: Vinyl Ester & Polyester Resin; MEKP Organic Peroxide Catalyst; Gelcoat; Fiberglass; Acetone; S-280 (cleaning solvent); and Super Blue resin cleaner. The majority of resin and gelcoat used in the total manufacturing process is from the Layup & Gelcoat areas. A significantly smaller portion is used in the Boxing

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and Repair for hand-lay operations. No areas other than Layup and Gelcoat employ a spray application. Total usage in all other areas, if not in conjunction with Layup and Gelcoats Departments, would be considered as non-reportable.

Spray Paint Booth (SN-03)

Bass Cat/Yar-Craft maintains a single spray booth to paint trailers that are manufactured on site. The booth is approximately 1000 sq/ft (18' x 60') and will hold no more than 2 trailers at any time. Primer is applied to the sandblasted trailers and allowed to dry for approximately 10 minutes. A topcoat is then applied and allowed to partially dry. Striping is applied, once the topcoat surface will allow, and the trailer is moved outside the booth to complete drying. Chemicals used in the Spray Paint Booth include: Paints; Primers; Clear Coats; Acetone; and Catalysts (accelerators & hardeners).

Sandblast Booth (SN-04)

Trailers are prepared for painting by sandblasting. The sandblast booth consists of three walls and a roof with one open end. Sand is placed in the blast hopper from 75 lb bags or swept & scooped from the floor of the sandblast booth. Approximately 250 lbs of sand is used per week to blast 12-15 trailers. Sand is reused until it is too fine to adequately scour the metal surface.

Boxing Department (SN-06)

Boxing completes assembly of the rail, adding storage boxes, live wells, and interior storage compartment walls. Foam boxes are added to the front and rear of the hull to provide floatation and strength and the hull and boxes are injection foamed. Rail and hull are then joined to produce a unitized framework. Fiberglass strips are used to join hull and rail. These strips also seal interior boxes and compartments into individual, watertight units. These fiberglass strips are hand-laid to insure complete compartmentalization of the boat. Chemicals used in the Boxing Department include: Resin; MEKP Organic Peroxide Catalyst; Expanding Foam; Gelcoat; Fiberglass Solvents; and Acetone.

Repair Department (SN-07)

This department is diverse in its operations. In addition to serving as a rigging area for boat motors, the area is also used to repair and refurbish damaged boats to return them to "like new" condition. The area also serves as a mold shop where new molds are designed and built and older molds are repaired and re-conditioned. The majority of chemicals used in this department are hand applied. Chemicals used in the Repair Department include: Resin; MEKP Organic Peroxide Catalyst; Expanding Foam; Gelcoat; Fiberglass; Solvents; and Acetone.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
<i>Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010</i>
<i>Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective September 13, 2014</i>
<i>Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective November 18, 2012</i>
<i>40 CFR Part 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, a major source of HAPs and existing source</i>
<i>40 CFR Part 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, a major source of HAPs and existing source</i>

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Emission Summary

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.2	0.3
		PM ₁₀	0.2	0.3
		VOC	150.6	114.1
HAPs		Styrene	76.93	56.68
		Methyl Methacrylate	3.60	1.01
		Combined HAPs ^b	40.00	21.5
Air Contaminants **		Acetone	55.07	55.18
		Tetrafluoroethane	9.00	9.00
		Pentafluoropropane	9.00	9.00
01	Spray Lay-up Booth #1	VOC	150.6	114.1
02	Spray Lay-up Booth #2	Styrene	76.93	56.68
		MMA	3.60	1.01
03	Spray Paint Booth	Total Combined HAPs	40.00	21.5
.06	Boxing Department	Acetone	55.07	55.18
		Tetrafluoroethane	9.00	9.00
07	Repair Department	Pentafluoropropane	9.00	9.00
04 Sand Blasting Booth		PM	0.2	0.3
		PM ₁₀	0.2	0.3

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

^b All HAPs except for Styrene, Methyl Methacrylate, and MDI.

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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.

Permit #1624-A was issued to this facility on November 11, 1995. It allowed emission rates of 0.9 tpy for PM/PM₁₀ 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.

Permit #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 exceeded 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 was therefore required to obtain an operating permit.

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.

Permit #1624-AOP-R2 was issued on December 20, 2006. This modification to the facility permit addressed the following issues:

1. The inclusion of language outlining specific regulatory requirements of NESHAP VVVV, WWW, and MMMM.
2. 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 were the maximum annual plant-wide emission rates for VOCs and HAPs; therefore when coupled with mass balance recordkeeping as a demonstration of compliance, represented an effective tool for controlling and documenting the authorized emissions from the facility.
3. The removal of MDI as regulated air pollutant due to the low level of emissions.

With this modification permitted MDI emissions decreased by 0.01 tpy.

Permit #1624-AOP-R3 was issued on February 6, 2009 to Challenger, Inc. dba Bass Cat Boats. This renewal contained no changes in the permitted emission limits.

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SECTION IV: SPECIFIC CONDITIONS

SN-01, 02, 03, 06, and 07
 Spray Lay-up and Paint Booths and Boxing and Repair Departments

Source 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 unto 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.

In the Boxing Department the rail and hull are strengthened and joined together. Fiberglass is hand laid on the hull and the hull is foamed for buoyancy.

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

- The permittee shall not exceed the combined emission rates set forth in the following table at the facility. Hourly emissions are based on maximum equipment capacity, a daily boat production limit. The permittee shall demonstrate compliance with this condition by complying with Specific Condition #3, Plantwide Conditions #7, #10 and #12. [Regulation 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	Spray Lay-up Booth #1	VOC	150.6	114.1
02	Spray Lay-up Booth #2			
03	Spray Paint Booth			
06	Boxing Department			
07	Repair Department			

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2. The permittee shall not exceed the emission rates set forth in the following table. Hourly emissions are based on maximum equipment capacity, a daily boat production limit. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions #3, #4, #6, #7 and Plantwide Conditions #10. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Spray Lay-up Booth #1	Styrene MMA Total Combined HAPs Acetone Tetrafluoroethane Pentafluoropropane	76.93	56.68
02	Spray Lay-up Booth #2		3.60	1.01
03	Spray Paint Booth		40.00	21.50
06	Boxing Department		55.07	55.18
07	Repair Department		9.00	9.00
			9.00	9.00

3. The permittee shall not exceed the throughput of the materials listed in the table below at the facility per rolling 12 month period. [Regulation 19 §19.705, Regulation 18 §18.1004, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	Annual Limit (Per Rolling 12 Months)
Resin	1,272,000 lbs
Gelcoat	360,000 lbs
Foam	120,000 lbs
Solvents / Thinners / Adhesive / Mold Release / Wax / Other	96,000 lbs
Paint and Primer	4,000 gallons
Acetone	15,000 gallons

4. The permittee shall not use any material that exceeds the limits (As applied) in the table below at the facility: Material Safety Data Sheets (MSDS) for resins, gelcoats, foam, other solvent based products, paints, and acetone shall be maintained onsite to demonstrate compliance with this specific condition. [Regulation 19 §19.705, Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Coating Material Content Limit	
Pollutant	Maximum Content Limit (weight %)
Styrene	48
Methyl Methacrylate (MMA)	10
Tetrafluroethane	10
Pentafluropropane	10
Combined HAPs	22

5. The permittee shall maintain monthly records to demonstrate compliance with Specific Conditions #3 and #4. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. [Regulation 19 §19.705 and A.C.A. §8 4 203 as referenced by §8 4 304 and §8 4 311]

6. The HAP density of the resins, gel coats, and all other coatings applied at the facility shall not exceed the content limit of 6.5 pounds per gallon (as applied). Material Safety Data Sheets (MSDS) or equivalent documentation shall be maintained onsite to demonstrate compliance with this specific condition. [Regulation 19 §19.705, 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 not use any materials at this facility with a single HAP from any coating materials to an extent which does not pass the PAER (Presumptively Acceptable Emission Rate) for each compound in excess of the daily limit as calculated by the following equation. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the TLV (Threshold Limit Value) (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH). The values can be obtained by using the following formula: [Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Short Term (Daily) HAP Limit

$$\text{PAER (Lb/Day)} = 0.11 \times \text{TLV}_{\text{TWA}}(\text{mg/m}^3) \times 24 \text{ hrs/day}$$

8. The permittee shall maintain records of the ACGIH TLV values as listed on current MSDS sheets or in the 2013, or most recent, ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs) or equivalent data for each HAP-containing material used at the facility. The concentration of individual HAP in pounds per gallon (lb/gal) as applied and the corresponding TLV shall be noted in these records. The permittee shall maintain daily records of material usage and associated HAP emissions to demonstrate compliance with this limit. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These

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records shall be maintained in a spreadsheet, database, or other well-organized format, maintained 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]

9. The permittee shall calculate and maintain monthly emission and usage records (mass balance) which demonstrate compliance with Specific Conditions #6, #7. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. The records clearly demonstrate that the permittee is above major source levels and therefore is subject to the following requirements of 40 CFR Part 63, Subpart VVVV. [Regulation 19 §19.304, Regulation 18 §18.1004, 40 CFR 63.5686(a), and A.C.A. §8 4 203 as referenced by §8 4 304 and §8 4 311]

NESHAP Subpart VVVV Conditions

10. The permittee shall limit organic HAP emissions from open molding operations, which includes Production Resin, Pigmented Gel Coat, Clear Gel Coat, Tooling Resin, and Tooling Gel Coat, to the limit specified in 40 CFR §63.5698(b), (Eq. 1) based on a 12-month rolling average.
(Eq. 1) HAP Limit: $[46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})]$
[Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart VVVV, §63.5698]
11. The permittee shall comply with Specific Condition #10 through the use of the emissions averaging option. Compliance is demonstrated on a 12-month rolling average basis and is determined at the end of every month. The permittee shall demonstrate compliance by performing the steps in §63.5704 (a)(1) through (5):
 - a. Use the methods specified in §63.5758 to determine the organic HAP content of resins and gel coats.
 - b. Complete the calculations described in §63.5710 to show that the organic HAP emissions do not exceed the limit specified in §63.5698.
 - c. Keep records as specified in paragraphs §63.5704 (a)(3)(i) through (iv) for each resin and gel coat.
 - i. Hazardous air pollutant content
 - ii. Amount of material used per month
 - iii. Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
 - iv. Calculations performed to demonstrate compliance based on MACT model point values, as described in §63.5710

- d. Prepare and submit the implementation plan described in §63.5707 to the Department and keep it up to date
- e. Submit semiannual compliance reports to the Department as specified in §63.5764.

[Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart VVVV, §63.5701, §63.5704(a), 63.5710]

12. The permittee shall prepare an implementation plan for all open molding operations. The plan must describe the steps you will take to bring the open molding operations into compliance. The implementation plan must include
- a. A description of each operation included in the average.
 - b. The maximum organic HAP content of the materials used, the application method used, and any other methods used to control emissions.
 - c. Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in §63.5698.

The permittee must submit the implementation plan to the Department with the notification of compliance status specified in §63.5761. The implementation plan must be kept on site and provided to Department personnel upon request. If the permittee revise the implementation plan, the permittee must submit the revised plan with the next semiannual compliance report specified in §63.5764. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart VVVV, §63.5707(a),(b)(1),(2),(3),(c),(d),(e)]

13. The permittee shall demonstrate compliance for the filled resins material on an as-applied basis using equation 1 [$PV_F = PV_u \times ((100 - \% \text{Filler}) / 100)$] of §63.5714. If the filled resin is used as a production resin and the value of PV_F does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance. If the filled resin is used as a tooling resin and the value of PV_F does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance. If the permittee is including a filled resin in the emissions averaging procedure described in §63.5710 then use the value of PV_F for the value of PV_i in equation 2 of §63.5710. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, §63.5714(a), (b), (c), (d)]
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 (55 gallons). 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, §63.5731(a), (b)]
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, §63.5731(c), (d)]

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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 §63.5734(a)]
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 gas 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, §63.5734(b)]
18. The permittee will determine and record the organic HAP content of the cleaning solvents subject to the standards specified in 40 CFR 63.5734 using the methods specified in 40 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, §63.5737(a), (b)]
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, §63.5737(c)]
20. The permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight. To demonstrate compliance the permittee shall determine and record the organic HAP content of the carpet and fabric adhesives using the method in §63.5758. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart VVVV, §63.5740 (a), (b) and §63.5758(a)]
21. 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, §63.5764]
22. 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, §63.5767(a), (b)]
23. 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, 63.5767(c)]

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24. The permittee shall 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, §63.5767(c)]

NESHAP Subpart MMMM Conditions

25. The permittee shall limit HAP emissions to the atmosphere from all coating operations at the facility to no more than 2.6 lb organic HAP per gallon coating solids used per consecutive 12-months. [Regulation 19 §19.304 and 40 CFR Part §63.3890(b)(1)]
26. Compliance with Specific Condition #25 for all surface coating operations constitutes compliance with the other applicable emission limits. The permittee shall use liters (gal) of solids used as a measure of relative surface coating activity over a representative period of operation. [Regulation 19 §19.304, 40 CFR part 63, Subpart MMMM, §63.3890(c)(1)]
27. The permittee may calculate and comply with a facility-specific emission limit as described in §63.3890 (c)(2)(i) through (iii). If the permittee elect to comply using the facility-specific emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this and other applicable surface coating NESHAP. [Regulation 19 §19.304, 40 CFR part 63, Subpart MMMM, §63.3890(c)(2)]
28. The permittee shall demonstrate compliance with Specific Condition #25 by using the emission rate without add-on controls option. The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operations (s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee shall meet all requirements of §63.3950, §63.3951, and §63.3952 to demonstrate compliance with the emission limit using this option. [Regulation 19 §19.304, 40 CFR part 63, Subpart MMMM, §63.3891(b)]
29. The permittee must submit semiannual compliance reports which include all information specified in §63.3920. [Regulation 19 §19.304 and 40 CFR Part §63.3920]
30. The permittee shall maintain records which consist of a copy of each notification of compliance and report that the facility submitted and the documentation supporting each notification and report. [Regulation 19 §19.304 and 40 CFR Part §63.3930(a)]

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31. The permittee shall maintain records which consist of a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data 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 for each coating. [Regulation 19 §19.304 and 40 CFR Part §63.3930(b)]
32. The permittee must maintain records for each compliance period. These records must include: (1.) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used. (2.) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of Sec. §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Sec. §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of Sec. §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of Sec. §63.3951. [Regulation 19 §19.304 and 40 CFR Part §63.3930(c)(1), (3)]
33. The permittee shall maintain records which include: (1.) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. (2.) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. (3.) A record of the volume fraction of coating solids for each coating used during each compliance period. (4.) The density for each coating, thinner and/or other additive, and cleaning material used during each compliance period. (5.) The permittee must keep records of the date, time, and duration of each deviation. [Regulation 19 §19.304 and 40 CFR Part §63.3930(d, e, f, g and j)]
34. The permittee must maintain records for 5 years after the date of occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on-site for at least 2 years. Records may be kept offsite for the remaining 3 years. Records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [Regulation 19 §19.304 and 40 CFR Part §63.3931(a),(b),(c)]
35. To demonstrate continuous compliance the permittee must calculate the HAP emission rate for each compliance period, determined according to §63.3951(a) through (g) must be less than or equal to the limit established in Specific Condition #25. Compliance must be demonstrated each month on a 12 month rolling basis. If the HAP emission rate for any compliance period exceeds the applicable limit, this is a deviation and must be reported as with the Notification of Compliance as specified in §63.3910(c)(6) and semiannual reports as specified in §63.3920(a)(6). [Regulation 19 §19.304 and 40 CFR Part §63.3952]

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SN-04
 Sand Blasting Booth

Source Description

Trailers are cleaned in preparation for painting in the Sand Blasting Booth, SN-04. 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. The sand is reused until it is too fine to use.

Specific Conditions

36. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by operating the sand blasting equipment according to the manufacturer's specifications and usage limits set forth in Specific Conditions #40. [Regulation 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
04	Sand Blasting Booth	PM ₁₀	0.2	0.3

37. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by operating the sand blasting equipment according to the manufacturer's specifications and usage limits set forth in Specific Conditions #40. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
04	Sand Blasting Booth	PM	0.2	0.3

38. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
04	5%	§18.501 and A.C.A.

39. Weekly observations of the opacity from SN-04 shall be conducted by a person trained but not necessarily certified in EPA Reference Method 9. If visible emissions in excess of the permitted levels are detected, the permittee shall immediately take action to identify the cause of the visible emissions in excess of the permit limit, implement corrective action, and document that visible emissions did not appear to be in excess of

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the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, as performed, kept on site, and made available to Department personnel upon request. [Regulation 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- a. The date and time of the observation.
 - b. If visible emissions which appeared to be above the permitted limit were detected.
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.
40. The permittee shall not exceed a throughput of more than 36,000 pounds of sand at the facility per rolling 12 month period. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
41. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #40. These records may be receipts and inventory or usage. The permittee shall update these calculations by the fifteenth day of the month following the month to which the records pertain. The rolling 12 month period totals and each individual month's data shall be in a spreadsheet, database, or other well-organized format, maintained on-site and made available to Department personnel upon request. [Regulation 19 §19.705 and A.C.A. §8 4 203 as referenced by §8 4 304 and §8 4 311]
42. The permittee shall operate the sand blasting equipment in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall follow the manufacturer's operating instructions. [Regulation 19 §19.705 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

Challenger, Inc. (Bass Cat Boats & Yar-Craft 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: PLANTWIDE CONDITIONS

1. The permittee shall 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 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 19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise 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) business days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) calendar days after completing the testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. The permittee must provide:
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.

[Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19 §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 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 gelcoats, resins, coatings, paints, primers, adhesives, foam, and other solvent based products by calculating monthly and rolling 12 month VOC emissions from usage (quantity in gallons) and the VOC content of each such coating based on current individual Material Safety Data Sheets (MSDS). The VOC emissions shall not exceed more than 114.1 tons of VOC per rolling 12 month period. [Regulation 19 §19.405(B) and §19.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall limit total consumption of gelcoats, resins, coatings, paints, primers, adhesives, foam, and other solvent based products by calculating monthly and rolling 12 month HAP emissions from usage (quantity in gallons) and the HAP content of each such coating based on current individual Material Safety Data Sheets (MSDS). The individual HAP emissions shall not exceed per rolling 12 month period as follows: [Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	TPY
Styrene	56.68
Methyl Methacrylate (MMA)	1.01
Total Combined HAPs	21.50
Acetone	55.18
Tetrafluoroethane	9.00
Pentafluoroethane	9.00

9. The permittee shall calculate and maintain monthly emission and usage records (mass balance) which demonstrate compliance with Plantwide Conditions #7 and #8. The permittee shall update these calculations by the fifteenth day of the month following the month to which the records pertain. The rolling 12 month period totals and each individual month's data shall be in a spreadsheet, database, or other well-organized format of the permittee's design, maintained on-site, and made available to Department personnel upon request. A report of total emissions shall be submitted to the Department in accordance with General Provision #7. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall not exceed a throughput of 4.0 boats produced per day at the facility. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The permittee shall maintain records of the number of boats produced per day on a daily basis. These records shall be maintained on-site and made available to Department personnel upon request. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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12. The permittee shall not use any material at the facility that contains more than 6.5 pounds per gallon of VOC. Compliance shall be demonstrated through the recordkeeping requirements set forth in Plantwide Condition #13. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The permittee shall maintain monthly VOC contents of any material used at the facility to demonstrate compliance with Plantwide Condition #12. The permittee shall update these calculations by the fifteenth day of the month following the month to which the records pertain. The rolling 12 month period totals and each individual month's data shall be in a spreadsheet, database, or other well-organized format of the permittee's design, maintained on-site, and made available to Department personnel upon request. [Regulation 19 §19.705 and A.C.A. §8 4 203 as referenced by §8 4 304 and §8 4 311]

Title VI Provisions

14. 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.
15. 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]
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. 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.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. 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)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

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f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

16. 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.
17. 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.

18. 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.

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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated August 7, 1998 and August 28, 2013.

Description	Category
Welding Shop	A-7

SECTION VIII: GENERAL PROVISIONS

1. 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 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 Regulation 26 §26.701(B)]
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 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 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
 - 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.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26 §26.701(C)(2)]

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6. The permittee must retain the records of all required monitoring data and support information for at least five (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 26 §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If the permit establishes no other reporting period, the reporting period shall end on the last day of the month six months after the issuance of the initial Title V permit and every six months thereafter. The report is due on the first day of the second month after the end of the reporting period. The first report due after issuance of the initial Title V permit shall contain six months of data and each report thereafter shall contain 12 months of data. The report shall contain data for all monitoring requirements in effect during the reporting period. If a monitoring requirement is not in effect for the entire reporting period, only those months of data in which the monitoring requirement was in effect are required to be reported. 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:

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

[40 CFR 70.6(a)(3)(iii)(A) and Regulation 26 §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), 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:
 - i. The facility name and location;
 - ii. The process unit or emission source deviating from the permit limit;
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
 - iv. The date and time the deviation started;
 - v. The duration of the deviation;
 - vi. The average emissions during the deviation;
 - vii. The probable cause of such deviations;

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- viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
- ix. The name of the person submitting the report.

The permittee shall 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.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19 §19.601 and §19.602, Regulation 26 §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

- 9. 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 26 §26.701(E), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 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 26 §26.701(F)(1)]
- 11. 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 26 §26.701(F)(2)]
- 12. 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 26 §26.701(F)(3)]

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13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26 §26.701(F)(4)]
14. 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 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26 §26.701(G)]
16. 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 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, 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 26 §26.701(I)(1)]
18. 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 26 §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26 §26.703(A)]
20. 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 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;

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- 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.

- 21. The permittee shall 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. If the 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 on the first day of the second month after the end of the reporting period. 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 26 §26.703(E)(3)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - 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.

- 22. Nothing in this permit will alter or affect the following: [Regulation 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.

- 23. 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]

- 24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:

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- a. Such an extension does not violate a federal requirement;
- b. The permittee demonstrates the need for the extension; and
- c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18 §18.314(A), Regulation 19 §19.416(A), Regulation 26 §26.1013(A), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:

- a. Such a request does not violate a federal requirement;
- b. Such a request is temporary in nature;
- c. Such a request will not result in a condition of air pollution;
- d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18 §18.314(B), Regulation 19 §19.416(B), Regulation 26 §26.1013(B), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:

- a. The request does not violate a federal requirement;
- b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
- c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18 §18.314(C), Regulation 19 §19.416(C), Regulation 26 §26.1013(C), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pamela Owen, hereby certify that a copy of this permit has been mailed by first class mail to Challenger, Inc. (Bass Cat Boats & Yar-Craft Boats), P.O. Drawer 1688, Mountain Home, AR, 72653, on this 30th day of January, 2015.

Pamela Owen

Pamela Owen, ASIII, Air Division