
***MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT***

FOP Evaluation Document

**Preliminary Determination - Statement of Basis
for
Renewal of**

FOP Number: 121502114

For:

Duffy Electric Boat Company

Facility:

Duffy Electric Boat Company

Facility Addresses:

**17260 Muskrat Avenue
Adelanto, CA 92301**

**17260 Muskrat Avenue
Adelanto, CA 92301**

Document Date: September 30, 2021
Submittal date to EPA/CARB for review: October 8, 2021
EPA/CARB 45-day Commenting Period ends: November 22, 2021
Public Notice Posted: October 8, 2021
Permit Issue date: On or about December 6, 2021

Permitting Engineer:
Roseana Brasington

14306 PARK AVENUE, VICTORVILLE, CALIFORNIA 92392
PHONE: (760) 245-1661 • FAX: (760) 245-2022 • EMAIL: PERMITTING@MDAQMD.CA.GOV

A. FACILITY IDENTIFYING INFORMATION:

<u>Owner/Company Name:</u>	Duffy Electric Boat Company
<u>Owner Mailing Address:</u>	Duffy Electric Boat Company 17260 Muskrat Avenue Adelanto, CA 92301
<u>Facility Name:</u>	Duffy Electric Boat Company
<u>Facility Location:</u> Adelanto, CA 92301	17260 Muskrat Avenue
<u>MDAQMD Federal Operating Permit Number:</u>	121502114
<u>MDAQMD Company Number:</u>	1215
<u>MDAQMD Facility Number:</u>	02114
<u>Responsible Official:</u>	Marshall Duffield
<u>Title:</u>	Owner
<u>Phone Number:</u>	760-246-1211
<u>Facility "Site" Contact:</u>	Alfonso Figueroa
<u>Title:</u>	Safety Coordinator
<u>Phone Number:</u>	760-246-1211
<u>Nature of Business:</u>	Fiberglass Composite Boat Manufacturer
<u>SIC/NAICS:</u>	3732/336612 – Boat Building and Repairing
<u>Facility Location:</u>	UTM (km) 3824.798 N / 458.600 E

B. BACKGROUND:

The Federal Clean Air Act Amendments of 1990 established a nation-wide permit to operate program commonly known as "Title V". The MDAQMD adopted Regulation XII [Rules 1200 - 1210] and Rule 221 – *Federal Operating Permit Requirement*; [Version in SIP = Current, 40 CFR 52.220(c)(216)(i)(A)(2) - 02/05/96 61 FR 4217], to implement both the Federal Operating Permit and Acid Rain Permit programs locally and have received Final Program Approval from EPA on March 6, 1996.

This facility, Duffy Electric Boat Company – Duffy Boats (Duffy Boats or Duffy), is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and MDAQMD Regulation XII, *Federal Operating Permits*.

Duffy Boats is defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definitions*, as this facility has a Potential to Emit (PTE) greater than 10 tons per year of a single Hazardous Air Pollutant (HAP), i.e. Duffy Boats is a Major Toxic source of emissions [District Rule 1201(S)(1)(c)]. Duffy Boats is a minor emission source of all criteria pollutants.

Pursuant to Regulation XII – *Federal Operating Permits*, the District has reviewed the terms and conditions of this Federal Operating Permit, evaluating them for validity and correctness. This review included an analysis of federal, state, and local applicability determinations for all sources, including those that have been modified or permitted since the issuance of the initial Federal Operating Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. This document, namely, the *Statement of Legal and Factual Basis*, written pursuant to Rule 1203(B)(1)(a)(i), is intended to explain the District's basis in composing the proposed renewal of Duffy Boat's Title V Permit

In the MDAQMD, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. Requirements that are intended as only state and District applicable are designated as such.

The purpose of this action is to renew the Federal Operating Permit.

C. DESCRIPTION OF FACILITY:

Federal Operating Permit (FOP number: 121502114) is for Duffy Electric Boat Company (Duffy Boats), located at 17130 & 17260 Muskrat Avenue, in Adelanto, California. Duffy Boats manufactures fiberglass composite boats. The boat manufacturing process is comprised of process steps such as mold preparation, resin laminations, components installation, and finishing.

D. MODIFICATIONS TO CURRENT FEDERAL OPERATING PERMIT:

GENERAL UPDATES

- General formatting to improve the consistency of the Title V permits program.
- Update rule citations throughout the permit. Each rule citation was reformatted for program consistency which includes relocating the SIP citations to Part VII. The table sufficiently identifies each rule, the SIP status of the rule and the federal enforceability of each rule.

PART I: INTRODUCTORY INFORMATION

This section of the Federal Operating Permit contains general information about the Duffy facility, including facility identifying information (section A), a description of the facility (section B), and a description of the facility's equipment (section C).

Changes made to this section of the FOP:

- Part I, Section A, the introductory information was updated to remove old facility contacts, add the NAICS Code, and latitude and longitude coordinates. The information in this section was also reformatted into a table format.
- Part I, Section B, Permit No. S007856 was removed as this permit unit was cancelled and equipment is no longer in use.

PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (section A), facility-wide monitoring, recordkeeping, and reporting requirements (section B), and facility-wide compliance conditions (section C).

Changes made to this section of the FOP:

- Part II, Section A. Updated to include rule revisions which occurred since the time of the last renewal.
- Part II, Section A, Condition 1. Added the requirements of District Rule 201 – *Permits to Construct*.
- Part II, Section A, Condition 2. Combined previous conditions 2 and 3, as these conditions are from the same District Rule (District Rule 203 – *Permits to Operate*). Combining these conditions prevented renumbering all of Part II, Section A due to adding a new condition 1.
- Part II, Section A, Condition 3. Added purpose of condition which is specifically from District Rule 204 – *Permits Conditions*.
- Part II, Section A, Condition 9. Added the word “District” in front of each rule for clarification purposes.
- Part II, Section A, Condition 13. Updated the operating condition to reflect the current requirements of District Rule 401 – *Visible Emissions*, which was amended on 8/26/2019.

- Part II, Section A, Condition 14. Updated the operating condition to reflect the current requirements of District Rule 403 – *Fugitive Dust Control*, which was amended on 10/28/20.
- Part II, Section A, existing Condition 15. Removed this operating condition as District Rule 403.2 – *Fugitive Dust Control for the Mojave Desert Planning Area*, was rescinded on 10/26/20, as these requirements were incorporated into the recently amended version of District Rule 403 – *Fugitive Dust Control*.
- Part II, Section A, existing Conditions 16-26, renumbered, as they are now Conditions 15-25. Also made minor formatting and typo corrections.
- Part II, Section A, proposed Condition 26. Updated the operating condition to reflect the current requirements of District Rule 1104 – *Organic Solvent Degreasing Operations*, which was amended on 4/23/18.
- Part II, Section A, proposed Condition 27. Updated the operating condition to reflect the current requirements of District Rule 1113 – *Architectural Coatings*, which was amended on 10/26/20.
- Part II, Section A, proposed Condition 28. Updated the operating condition to reflect the current requirements of District Rule 1114 – *Wood Products Coating Operations*, which was amended on 8/24/20.
- Part II, Section A, proposed Condition 29. Updated the operating condition to reflect the current requirements of District Rule 1115 – *Metal Parts & Products Coating Operations*, which was amended on 6/8/20.
- Part II, Section A, proposed Condition 30. Updated the operating condition to reflect the current requirements of District Rule 1162 – *Polyester Resin Operations*, which was amended on 4/23/18.
- Part II, Section A, proposed Condition 31. Added the operating condition to reflect the current requirements of District Rule 1168 – *Adhesive and Sealant Applications*, which was adopted on 4/27/20.
- Part II, Section B, Condition 3(d). Added requirement for the collection of emission data for inventory purposes specific to the District’s criteria and toxic inventory programs.
- Part II, Section C, Condition 10. Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 10(a)(1). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 10(b). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 11(a)(4). Removed duplicate word/corrected typo.
- Part II, Section C, Condition 12(a). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 12(b). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 12(c). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 12(d). Changed the word “You” to “Owner/Operator” for clarification purposes.

- Part II, Section C, Condition 12(e). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 14(a). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 14(b). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 14(c). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 15. Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 16(c). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 17(c)(ii). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 19(a)(1)(i). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 19(a)(4). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 19(a)(5)(i). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 19(a)(5)(ii). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 19(a)(5)(iii). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 19(a)(6). Changed the word “You” to “Owner/Operator” for clarification purposes.
- Part II, Section C, Condition 21. Added provisions of 40 CFR 61, Subpart M as an applicable facility-wide regulation. This regulation governs demolition and renovation projects.

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring and recordkeeping, reporting and testing, and compliance plans.

Changes made to this section of the FOP:

- Updated Part III, Section A. Removed permit unit number S007586 as this equipment is no longer in service and has been removed.
- Updated Part III, Section B. Corrected typo of permit unit number.

PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS

This section of the Federal Operating Permit contains standard federal operating permit conditions.

Changes made to this section of the FOP:

- Adjusted the formatting only. Aligned text left.

PART V: OPERATIONAL FLEXIBILITY

This section of the Federal Operating Permit contains information on Off Permit Changes.

Changes made to this section of the FOP: None

PART VI: CONVENTIONS, ABBREVIATIONS, DEFINITIONS, MDAQMD APPLICABLE SIP

This section of the Federal Operating Permit contains information on conventions, abbreviations and definitions.

Changes made to this section of the FOP: None

PART VII: DISTRICT SIP HISTORY AND CITATIONS

This section of the Federal Operating Permit contains a SIP table of all applicable District Rules and includes a link to the table of MDAQMD SIP rules and regulations.

Changes made to this section of the FOP:

- SIP table updated to include rule revisions which occurred since the time of the last renewal.

Appendix A: 40 CFR 63, Subpart VVVV: Tables 1, 2, 3, 5, 6, 7 and 8

This section of the Federal Operating Permit contains the tables of applicable federal regulation under 40 CFR 63, Subpart VVVV for clarification of requirements.

Changes made to this section of the FOP:

- Clarified that “You” is equivalent to “Owner/Operator”.

E. RULE APPLICABILITY

District Rules

Rule 201/203 – *Permits to Construct/Permit to Operate*. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. Duffy is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintain District permits for all residing equipment per Part II, section A of their FOP.

Rule 204 – *Permit Conditions*. To assure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. Duffy complies with all applicable regulations per Part II, section A.3 and A.4 of their FOP.

Rule 206 – *Posting of Permit to Operate*. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. Duffy complies with this regulation per Part II, section A.5 of their FOP.

Rule 207 – *Altering or Falsifying of Permit*. A person shall not willfully deface, alter, forge, or falsify any issued permit. Duffy complies with this regulation per Part II, section A.6 of their FOP.

Rule 209 – *Transfer and Voiding of Permits*. Duffy shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. Duffy complies with this regulation per Part II, section A.7 of their FOP.

Rule 217 – *Provisions for Sampling and Testing Facilities*. This rule stipulates that the APCO may require the applicant to provide and maintain requirements for sampling and testing. In the event that facilities be equipped to accommodate testing the APCO shall notify the Owner/Operator in writing of the required size, number and location of sampling ports; the size and location of the sampling platform; the access to the sampling platform, and the utilities for operating the sampling and testing equipment. Duffy is in compliance with this rule per Part II, section A.8 of their FOP.

Rule 219 – *Equipment not Requiring a Permit*. This rule exempts certain equipment from District Permit. Duffy is in compliance with this rule per Part II, section A.9.

Rule 221 – *Federal Operating Permit Requirement*. Duffy is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301/312 – *Permit Fees/Fees for Federal Operating Permits*. Duffy annual permit fees are due by the applicable amounts.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed

20 percent opacity. Duffy has specific operating conditions that enforce compliance with this rule, specifically Part II, section A.13.

Rule 403 – *Fugitive Dust*. This rule prohibits fugitive dust beyond the property line of any emission source. Duffy has specific operating conditions to ensure compliance with this condition, specifically Part II, section A.14.

Rule 404 – *Particulate Matter Concentration*. Duffy shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a).

(a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.

(b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.

(c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

Duffy adheres to this rule per Part II, section A.15 of their FOP.

Rule 405 – *Solid Particulate Matter, Weight*. Duffy shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a):

(a) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.

(b) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

Duffy adheres to this rule per Part II, section A.16 of their FOP.

Rule 406 – *Specific Contaminants*. This rule limits single source of emissions of sulfur compounds. Duffy meets this requirement by complying with operating condition listed in Part II, section A.17 of their FOP. Note that Duffy currently has no permitted combustion source.

Rule 407 – *Liquid and Gaseous Air Contaminants*. This rule limits CO emissions from facilities. Duffy meets this requirement by complying with operating condition listed in Part II, section A.18 of their FOP. Note that Duffy currently has no permitted combustion source.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed renewal as described is not expected to violate Rule 408. Duffy meets this requirement by complying with operating condition listed in Part II, section A.19 of their FOP.

Rule 409 – *Combustion Contaminants*. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO₂) at standard conditions averaged over a minimum of 25 consecutive minutes. Duffy meets this requirement by complying with operating condition listed in Part II, section A.20 of their FOP. Note that Duffy currently has no permitted combustion source.

Rule 430 – *Breakdown Provisions*. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. Duffy meets this requirement by complying with operating condition listed in Part II, section A.21 of their FOP.

Rule 441 – *Research Operations*. This rule allows for exemption from requirements for experiment or research operations upon APCO approval. Duffy is not operating under any exemptions pursuant to Rule 441

Rule 442 – *Usage of Solvents*. This rule reduces VOC emissions from VOC containing materials or equipment that is not subject to any other rule in Regulation XI. Duffy meets this requirement by complying with operating condition listed in Part II, section A.24 of their FOP.

Rule 444 – *Open Outdoor Fires*. This rule governs the emissions from Open Outdoor Fires. Duffy is expected to meet the requirements of this rule pursuant to Part II, section A.25.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 60. Currently there are no NSPSs applicable to Duffy.

Rule 1104 – *Organic Solvent Degreasing Operations*. This rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. Duffy meets this requirement by complying with operating condition listed in Part II, section A.26 of their FOP.

Rule 1113 – *Architectural Coatings*. This rule limits the quantity of VOC in Architectural Coatings. Duffy meets the requirements of this rule by complying with operating condition listed in Part II, section A.27 of their FOP.

Rule 1114 – *Wood Products Coatings*. This rule limits the quantity of VOC in Wood Coatings. Duffy meets the requirements of this rule by complying with operating condition listed in Part II, section A.28 of their FOP.

Rule 1115 – *Metal Parts and Products Coatings*. This rule limits the emission of VOC from coatings associated with Metal Parts and Products. Duffy meets the requirements of this rule by complying with operating condition listed in Part II, section A.29 of their FOP.

Rule 1162 – *Polyester Resin Operations*. This rule limits the emission of VOC (and HAPS by nature of the HAPs present in resins) from Polyester Resin Operations, organic Solvent cleaning, and the storage and disposal of Solvents and waste Solvent materials associated with such operations. Duffy meets the requirements by complying with operating condition listed in Part II, sections A.30 and Part III. Part II of the FOP was written to include the sections of the rule that specifically pertains to this facility's operations (for example the facility does not use closed molding nor do they have a VOC control device installed; therefore, section (C)(1)(b)(and (c) were not written into the permit.)

Rule 1168 – *Adhesive and Sealant Applications*. This rule limits VOC (and HAP) from the application of Adhesives, Adhesive Primers, Sealants, Sealant Primers, or any other Primers. Duffy is expected to comply with the requirements of this rule pursuant to Part II, section A.31

Regulation X – *Emission Standards for Additional Specific Air Contaminants*. Pursuant to Regulation X, Duffy is required to comply with all applicable ATCMs, MACTs and NESHAPS. There are currently no ATCMs that apply to the Duffy facility. The specific MACTs/NESHAPS applicable to Duffy are listed under the Federal Requirements below.

Regulation XII – *Federal Operating Permits*. This regulation contains requirements for sources which must have a FOP. Duffy currently has a FOP and is expected to comply with all applicable rules and regulations.

Rule 1201 – *Federal Operating Permit Definitions*. Duffy is defined as a federal Major Facility pursuant to this rule as they have a Potential to Emit in excess of 10 tons per year of a single HAP (major for styrene).

Rule 1203 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. Duffy complies with this rule per Part II, sections B and C, and Part IV and V of their FOP.

Rule 1205 – *Modifications of Federal Operating Permits*. This action to Duffy’s FOP does not constitute a modification; therefore, this rule is not subject to this action.

Rule 1206 – *Reopening, Reissuance and Termination of Federal Operating Permits*. This action to Duffy’s FOP does not constitute a Reopening, Reissuance or Termination of Federal Operating Permits; therefore, this rule is not subject to this action.

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. Duffy has and/or will properly notice(d) their renewal pursuant to this rule. Please see the cover page for noticing dates and the appendix for noticing details.

Rule 1208 – *Certification*. Duffy included a Certification of Responsible Official as required with the submitted application for the Renewal.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. Duffy is not a Major GHG Facility pursuant to Rule 1211 and has no requirements pertaining to this regulation.

Regulation XIII – *New Source Review*. This regulation sets forth requirements for the preconstruction review of all new or modified facilities. Duffy is not a new facility nor is it currently a modified facility; therefore, this regulation does not apply.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. This rule controls the emission of toxic air contaminants from existing source. This permit action does not trigger the applicability of Rule 1520. Duffy is required to report as part of the District’s inventory and Hot Spot programs on an annual basis. Duffy’s facility-wide prioritization score for Emission Year 2020 classifies their facility as “Low Priority”.

Regulation XVII – *Prevention of Significant Deterioration*

Please take notice that this regulation is not currently used within the MDAQMD because the USEPA has not delegated authority for the PSD Program to the MDAQMD at this time. That said, this permitting action (FOP renewal) does not trigger PSD as this facility is not a new or existing Major PSD Facility.

Federal Regulations

40 CFR 63, Subpart A – *NESHAP General Provisions*. Duffy complies with this regulation per Part II, Section A, Condition 33.

40 CFR 63, Subpart M – *NESHAP for Asbestos*. Duffy complies with this regulation per Part II, Section C, Condition 21.

40 CFR 63, Subpart VVVV – *NESHAP for Boat Manufacturing*. Duffy is subject to this subpart as they are a boat manufacturing facility that build fiberglass boats and are a major source of HAP. Duffy is required to comply with the provisions of this regulation through both the incorporated by reference requirement of their FOP under Part II, section A, Condition 33; as well as, several specific conditions throughout Part II, Sections B and C, and Part III.

40 CFR 63, Subpart WWWW – *NESHAP for Reinforced Plastic Composites*. Duffy is not subject to this subpart, as this facility does NOT engage in reinforced plastic composite production or repairs other than that pertaining to boats, and pursuant to 63.5787(b) is subject to 40 CFR 63, Subpart VVVV.

40 CFR 64, *Compliance Assurance Monitoring*. The Compliance Assurance Monitoring (CAM) rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a Major Facility that is required to obtain Title V, Part 70 or 71 permit and it meets all of the following criteria. “PSEU” means an emissions unit considered separately with respect to each regulated air pollutant.

The PSEU must:

- a. Be subject to an emission limitation or standard [40 CFR 64]; AND,
- b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
- c. Have the **potential pre-control** emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

As part of its normal business operations, Duffy emits VOC, HAPs, and Particulate Matter (PM) from each PSEU. All PSEUs share the facility Potential to Emit (PTE) for all pollutants; therefore, for purposes of CAM, each PSEU is considered to have a potential to emit equivalent to the facility PTE.

The Major Source Thresholds for this portion of the District are listed in the table below. Facility VOC emissions are capped by permit condition not to exceed 20 tons per year, therefore; Duffy does not qualify as a major source of VOC (threshold is 25 tpy), nor does it have a control device for VOC; therefore, CAM does NOT apply. PM emissions are controlled by dry filter; however,

uncontrolled PM emissions are minimal (less than the more stringent offset threshold of 15 tpy) and do not exceed the 100 tpy major source threshold; therefore, CAM does not apply for PM.

Pollutant	Major Source Threshold (tons per year)
NO _x	25
VOC	25
CO	100
PM ₁₀	100
SO _x	100
Single HAP	10
Combination of HAP	25

F. CONCLUSIONS AND RECOMMENDATION:

The District has reviewed the application for the renewal of Duffy Boats' Federal Operating Permit. The District has determined that the renewal is in compliance with all applicable District, state, and federal rules and regulations as proposed when operated in the terms of the permit conditions given herein, and the attached revised FOP.

The proposed permit and corresponding statement of legal and factual basis i.e. Statement of Basis was released for public comment and publicly noticed pursuant to District Rule 1207 (please see Appendix A for the public noticing details). Additionally, these documents will be submitted to USEPA and CARB pursuant District Rule 1205 for a forty-five (45) day review period. Please refer to the cover page of this document for the noticing dates.

G. PUBLIC COMMENT AND NOTIFICATIONS

1. Public Comment

This preliminary determination will be publicly noticed in accordance with District Rule 1207. Please see Appendix A of this document for noticing details.

2. Notifications

This preliminary determination will be submitted to USEPA and CARB pursuant to District Rule 1205 for a forty-five (45) day review period.

Director, Office of Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

APPENDIX A

Public Notice

Noticing Methods include the following, per District Rule 1207 (A)(1)(a):

- Scheduled to be published in newspapers of general circulation - Riverside Press Enterprise (Riverside County) and the Daily Press (San Bernardino County) on Friday [insert date].
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in Appendix A).
- Posted on the MDAQMD Website at the following link:
<https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting>

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**NOTICE OF TITLE V PERMIT RENEWAL-
PRELIMINARY DETERMINATION**



NOTICE OF TITLE V PERMIT RENEWAL

NOTICE IS HEREBY GIVEN THAT Duffy Electric Boat Company, located at 17130 & 17260 Muskrat Avenue, in Adelanto, California has submitted an application to renew their Federal Operating Permit 121502114. Duffy Boats manufactures fiberglass composite boats. Duffy Boats is defined as a federal Major Facility pursuant to District Rule 1201 as they have a Potential to Emit (PTE) greater than 10 tons per year of a single Hazardous Air Pollutant (HAP). Duffy Boats is a Major Toxic source of emissions [District Rule 1201(S)(1)(c)] and a minor emission source of all criteria pollutants.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed renewal of the Federal Operating Permit. If you submit written comments, you may also request a public hearing on the proposed issuance of the Federal Operating Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on **DATE tentative November 15, 2021**, to the MDAQMD, Attention: Roseana Brasington, at the address listed below.

PETITION FOR REVIEW: Federal Operating Permits are also subject to review and approval by the United States Environmental Protection Agency (USEPA). If the USEPA finds no objection to the proposed permit renewal, the final permit will be issued. In the event of public objection to the issuance of a specific permit, a Title V petition may be submitted to the USEPA Administrator electronically through the Central Data Exchange at: <https://cdx.epa.gov/>. In order to file a Title V petition, issues must be raised with reasonable specificity during the public comment period, and filed within 60 days of the close of the USEPA review period.

AVAILABILITY OF DOCUMENTS: The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, CA 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: <https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry>. Please contact Roseana Brasington, Air Quality Engineer, at the address, above, or (760) 245-1661, extension 5706, or rbrasington@mdaqmd.ca.gov, for additional questions pertaining to this action and/or corresponding documents.

Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661

SHERI HAGGARD
Permit Engineering Manager
Mojave Desert Air Quality Management District
14306 Park Avenue, Victorville, CA 92392

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

BRAD POWERS, Executive Director

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City of
ADELANTO

Town of
APPA VALLEY

City of
DANFORTH

City of
DUTY

City of
HEWLETT

City of
MUSKAT

County of
DODGE

County of
SAN GABRIEL

City of
TWENTY NINE PALMS

City of
VICTORVILLE

Town of
VINCA VALLEY

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mchsi
951 E Skylark Ave
Ridgecrest, CA 93555

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Glendora, CA 91741

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Evolution Markets
27801 Golden Ridge Lane
San Juan Capistrano, CA 92675

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Metropolitan Water District
700 N Alameda Street, 8th Floor, Rm 106
Los Angeles, CA 90012

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12351 Rancho Road
Adelanto, CA 92301

Mr. Anoop Sukumaran
Environmental Engineer, Searles Valley
P.O. Box 367
Trona, CA 93592-0367

Director, Air Division (Attn: AIR-3)
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San Francisco, CA 94105

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Los Angeles, CA 90012

Ms. Janet Laurain
Adams Broadwell Joseph & Cardozo
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South San Francisco, CA 94080-7037

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Barstow, CA 92311

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Victorville, CA 92394

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Riverside, CA 92507

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Chairman, Gabriel Band of Mission Indians -
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Principal, Air Sciences, Ramboll Environ
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Pico Rivera, CA 90660

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Blythe, CA 92225

Chief, San Gabriel Band of Mission Indians
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Division Chief, San Bernardino County EHS
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San Bernardino, CA 92415-0160

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Environmental Contact, Metropolitan Water
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Los Angeles, CA 90054

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Apple Valley, CA 92307

Mr. Tom Lucas
Drew Carriage
5540 Brooks Street
Montclair, CA 91763

Mr. Carlos Gaeta
Southern California Gas Company
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Victorville, CA 92394-1007

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EH&S Manager, Northwest Pipe Co.
12351 Rancho Road
Adelanto, CA 92301

APPENDIX B

Application

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION INSTRUCTIONS

Introduction:

Mojave Desert Air Quality Management District (MDAQMD) Rule 1202 requires Title V permit holders to submit an application for renewal of the Title V permit no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date of the permit. A complete renewal application will consist of the following forms and documents, together with appropriate supplemental information, as described in these instructions:

1. A General Facility Information form and all required attachments.
2. An Application Certification form
 - The Application Certification Form is used to certify that the facility is currently operating and will continue to operate in compliance with all applicable requirements of the Title V permit and applicable rules and regulations.
 - If the facility is not operating in compliance with current requirements, the facility must submit a compliance plan using the Title V Non-Compliant Operations Report
 - The Application Certification form is also used to certify that the facility has reviewed the current Title V permit for errors.
 - If the facility finds any errors in the current Title V permit, or if there are any necessary additions or new requirements that have become applicable since the previous Title V permit was issued, a redlined copy of the permit must be attached to the permit renewal application, along with any necessary permit application/modification forms.
3. A Title V Non-Compliant Operations report, if applicable
4. A Title V List of Exempt Equipment, pursuant to Rule 219
5. A Title V Potential Emissions Report for criteria pollutants, HAPs, and greenhouse gases.
6. A Compliance Assurance Monitoring (CAM) Applicability Determination form, along with CAM Plans for all emission units at the facility for which CAM Plans are required.
7. A Permit Shield Request, if applicable.
8. An Alternative Operating Scenarios form, if applicable.


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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – GENERAL FACILITY INFORMATION

1. FACILITY ID: <u>02114 & 02953</u>	FACILITY SIC CODE: <u>3732-Boat Building & Repairing</u>
TITLE V PERMIT NUMBER: <u>121502114</u>	PERMIT EXPIRATION DATE: <u>June 8, 2020</u>
2. COMPANY NAME: <u>Duffy Electric Boat Company</u>	
3. COMPANY MAILING ADDRESS:	
STREET/P.O. BOX: <u>17260 Muskrat Ave.</u>	
CITY: <u>Adelanto</u>	STATE: <u>California</u> 9-DIGIT ZIP CODE: <u>92301-2279</u>
4. FACILITY NAME: <u>Duffy Electric Boat Company</u>	
5. FACILITY MAILING ADDRESS:	
STREET/P.O. BOX: <u>17260 Muskrat Ave.</u>	
CITY: <u>Adelanto</u>	STATE: <u>California</u> 9-DIGIT ZIP CODE: <u>92301-2279</u>
6. RESPONSIBLE OFFICIAL (AS DEFINED IN 40 CFR 70.2 AND MDAQMD RULE 1201)	
NAME: <u>Marshall Duffield</u>	TITLE: <u>Owner</u> PHONE NUMBER <u>(760)246-1211</u>
7. TITLE V PERMIT CONTACT PERSON	
NAME: <u>Alfonso Figueroa</u>	TITLE: <u>Safety & Compliance</u> PHONE NUMBER <u>(760)246-1211</u>
8. TYPE OF ORGANIZATION:	
<input type="checkbox"/> CORPORATION <input checked="" type="checkbox"/> SOLE OWNERSHIP <input type="checkbox"/> GOVERNMENT <input type="checkbox"/> PARTNERSHIP <input type="checkbox"/> UTILITY	
9. CAM (COMPLIANCE ASSURANCE MONITORING) PLANS	
Are you required to submit a CAM plan for any emissions unit at this facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, submit a CAM plan for each emissions unit as an attachment to the application. See attached CAM plan instructions for more detail.	

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<p>10. ALTERNATE OPERATING SCENARIOS</p> <p>Does this application request alternative operating scenarios pursuant to Rule 1203(E)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, submit an Alternate Operating Scenarios form, as applicable.</p>
<p>11. RISK MANAGEMENT PLAN</p> <p>Has this facility been required to prepare a federal Risk Management Plan pursuant to Section 112(r) of the federal Clean Air Act and 40 CFR Part 68? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, has the federal Risk Management Plan been submitted to the implementing agency? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If a federal Risk Management Plan is required but has not been submitted to the implementing agency, provide a detailed explanation as an attachment to the application.</p>
<p>12. STRATOSPHERIC OZONE</p> <p>Does the facility conduct any activities that are regulated by the federal protection of stratospheric ozone requirements in 40 CFR Part 82? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>13. ACID RAIN</p> <p>Is this facility subject to the acid rain requirement in 40 CFR Part 72 through 40 CFR Part 78? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>14. MAJOR SOURCE STATUS</p> <p>Is this facility a major source of greenhouse gases, as defined in MDAQMD Rule 1211? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Is this facility a major source of any of the following pollutants:</p> <p><input checked="" type="checkbox"/> VOCs <input type="checkbox"/> Particulate Matter <input type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Sulfur Dioxides</p> <p><input type="checkbox"/> Lead <input checked="" type="checkbox"/> HAP</p>
<p>15. PERMIT SHIELDS</p> <p>Does the current Title V permit for this facility include any permit shields? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, is the basis for each permit shield still correct? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If the current Title V permit contains any permit shield for which the basis is no longer correct, provide a detailed explanation as an attachment to the application. If you are requesting an additional permit shield, complete the attached Permit Shield Request form.</p>
<p>16. CERTIFICATION BY RESPONSIBLE OFFICIAL</p> <p>Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete. I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:</p> <p>Signature: <u></u> Date: <u>June 1, 2020</u></p>

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – GENERAL FACILITY INFORMATION INSTRUCTIONS

The General Facility Information form requests general information identifying the stationary source. As indicated on the form and discussed in more detail below, an applicant is required to include supplemental information in addition to the form.

- Line 1. Please enter
- The MDAQMD Facility ID number
 - The Facility SIC code
 - The Title V Permit to Operate number
 - The Title V Permit expiration date
- Line 2. Enter the name of the company that owns the business
- Line 3. Enter the company mailing address
- Line 4. Enter the name of the facility
- Line 5. Enter the facility mailing address
- Line 6. Enter the name and title of the responsible official. The name of the person identified on this line must meet the qualifications of a “Responsible Official”, as defined in 40 CFR 70.2 and MDAQMD Rule 1201.

For a corporation, the responsible official shall be a president, secretary, treasurer, or vice president in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation. The responsible official may be a duly authorized representative rather than any of the above if the representative is responsible for the overall operation of one or more manufacturing, production or operating facilities which are applying for or subject to a permit; and:

1. The facility employs more than 250 persons or has gross annual sales or expenditures exceeding \$25 million in 1980 dollars; or
2. The delegation of the authority is approved in advance by the Executive Director.

For a partnership or sole proprietorship, the responsible official is a general partner or the sole proprietor, respectively.

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For a municipality, state, federal, or other public agency, the responsible official shall be either the principal executive officer or a ranking elected official. The principle executive officer, in the case of a federal agency, may be the executive officer having responsibility for a geographical unit.

For an Acid Rain Facility, the responsible official is a designated representative as defined in 40 CFR 72.20.

- Line 7. The name of the person identified on this line should be the appropriate contact for questions regarding the application.
- Line 8. Indicate the organizational structure of the facility
- Line 9. Complete a Compliance Assurance Monitoring Applicability Determination Form, and indicate whether you are required to submit a CAM plan for any emissions unit at the facility.
- Line 10. Please complete the Alternate Operating Scenario form, if applicable. Ensure that descriptions that contain sufficient emission information for the District to develop reasonable permit conditions for each alternative operating scenario anticipated at the facility.
- Line 11. Enter requested risk management plan information.
- Line 12. Enter requested information regarding the stratospheric ozone requirements.
- Line 13. Enter requested information regarding the acid rain requirements.
- Line 14. Enter requested information regarding the major source status of the facility.
- Line 15. Enter information indicating whether the current facility permit contains any Permit Shields. Indicate whether the basis for the permit shield is still correct. If you are requesting any additional permit shields, complete the attached Permit Shield Request form.
- Line 16. The name of the person’s signature provided on this line must meet the qualifications of a “Responsible Official”, as defined in 40 CFR 70.2 and MDAQMD Rule 1201. This definition is described in detail under Line 6. Please also specify the title of the Responsible Official at your facility.

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Revised: December 2012

Title V Renewal – 1202E2-A

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – APPLICATION CERTIFICATION

I. FACILITY INFORMATION

1. FACILITY NAME:	Duffy Electric Boat Company
2. FACILITY ID:	02114 & 02953
3. TITLE V PERMIT #:	121502114

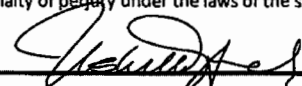
II. TITLE V PERMIT CERTIFICATION (Read each statement carefully and check one):

- The current Title V permit has been reviewed and it has been determined that equipment descriptions are correct, and all requirements are still applicable.
- The current Title V permit has been reviewed and errors have been found in equipment descriptions and/or permit requirements. A copy of the Title V permit is attached with redline changes. Permit application and/or modification forms are enclosed, as applicable.

III. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s), except for those requirements listed in the "Title V Non-Compliant Operations Report".
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis, except for those requirements listed in the "Title V Non-Compliant Operations Report".
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete. I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true.



Signature of Responsible Official

June 1, 2020

Date

Marshall Duffield

Name of Responsible Official (please print)

Owner

Title of Responsible Official (please print)

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL - APPLICATION CERTIFICATION INSTRUCTIONS

Complete a Title V Renewal - Application Certification Form by providing the following information:

I. Facility Information

- Line 1. Enter the name of the facility.
- Line 2. Enter the MDAQMD Facility ID number.
- Line 3. Enter the current Title V permit number.

II. Title V Permit Certification

Review the current Title V permit to operate to determine whether equipment descriptions are correct, and whether all requirements are still applicable to the equipment. If any errors are found, provide a redlined copy of the permit to operate, along with any applicable permit modification forms.

III. Compliance Certification

A compliance certification is a certification by the Responsible Official that each of the listed statements are true, accurate, and complete. The Responsible Official must check off that the statements that are true, sign and date, and print his/her name and title.

For a corporation, the responsible official shall be a president, secretary, treasurer, or vice president in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation. The responsible official may be a duly authorized representative rather than any of the above if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit; and

1. the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million in 1980 dollars; or
2. the District has approved a petition from the original responsible person to delegate authority.

For a public agency the responsible official shall be either the principal executive officer or the ranking elected official. The principal executive officer, in the case of a federal agency, may be the executive officer having responsibility for a geographical unit.

For a partnership or sole proprietorship, the responsible official is a general partner or the proprietor, respectively

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Revised: December 2012

Title V Renewal – 1202E2-B

Mojave Desert Air Quality Management District
TITLE V PERMIT RENEWAL APPLICATION – NON-COMPLIANT OPERATIONS (DEVIATIONS) REPORT
AND PART 70 COMPLIANCE SCHEDULE/PLAN AND QUALITY IMPROVEMENT PLAN - QIP

I. FACILITY INFORMATION

1. FACILITY NAME: Duffy Electric Boat Company	2. FACILITY ID 02114 & 02953	3. PERMIT NUMBER 121502114
--	---------------------------------	-------------------------------

II. NON-COMPLIANT OPERATIONS REPORT

4. Compliance status:			
a. <input checked="" type="checkbox"/> This facility has experienced non-compliant operations as described below but achieved compliance with the applicable requirements on <u>1/2020</u>			
b. <input type="checkbox"/> This facility continues to experience non-compliance with the applicable requirements as described below:			
5. PERMIT # OF EQUIPMENT	6. APPLICABLE REQUIREMENT (Rule or Permit Condition Number)	7. FEDERALLY ENFORCEABLE REQUIREMENT?	8. DESCRIPTION OF NON-COMPLIANT OPERATIONS (Attach additional sheets as needed)
	District Rule 1114	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Our facility was in violation of 1114. We were using non-compliant material for our wood coating operations. In compliance since January 2020.
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	

III. PART 70 COMPLIANCE SCHEDULE/PLAN AND QIP

9. DESCRIBE HOW COMPLIANCE WAS OR WILL BE ACHIEVED	10. COMPLIANCE SCHEDULE	
	DATE	REMEDIAL MEASURES AND MILESTONES
Our facility has stopped using all non-compliant material and switched to fully compliant material.	1/2020	

IV. PROGRESS REPORT SCHEDULE

11. CERTIFIED PROGRESS REPORTS WILL BE SUBMITTED ACCORDING TO THE FOLLOWING SCHEDULE: (CHECK a or b and complete c):			
a. <input checked="" type="checkbox"/> Semi-annually	b. <input type="checkbox"/> More frequently as specified	c. Submittal dates: 1) <u>2/28/20--</u> 2) <u>8/31/20--</u> 3) _____ 4) _____	

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Revised: December 2012

Title V Renewal – 1202E2-C

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL – NON COMPLIANT OPERATIONS REPORT INSTRUCTIONS

Complete a Non-Compliant Operations Report by providing the following information:

I. Facility Information

1. Enter the name of the facility.
2. Enter the MDAQMD Facility ID number.
3. Enter the current Title V permit number.

II. Non Compliant Operations Report

4. Check either a or b to indicate the non-compliant status of the operations.
5. Enter the permit # of the non-compliant equipment
6. Enter the rule or permit condition number of the applicable requirement
7. Check the appropriate box to indicate whether it is a federally enforceable requirement
8. Provide a description of the non-compliant operations

III. Part 70 Compliance Schedule/Plan and QIP

9. Provide a description of how compliance was or will be achieved
10. Provide a compliance schedule, complete with dates and milestones for non-compliant operations.

IV. Progress Report Schedule

11. Indicate schedule and dates of submittal for certified progress reports.

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Revised: December 2012

Title V Renewal – 1202E2-C

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – LIST OF EXEMPT EQUIPMENT

I. FACILITY INFORMATION

1. FACILITY NAME:	Duffy Electric Boat Company
2. FACILITY ID:	02114 & 02953
3. TITLE V PERMIT #:	121502114

II. SUMMARY OF EQUIPMENT EXEMPT FROM PERMIT REQUIREMENTS (INCLUDING PORTABLE)

4. EXEMPT EQUIPMENT DESCRIPTION	5. VENTING TO CONTROL (PERMIT #)	6. CONTROL DEVICE DESCRIPTION	7. BASIS FOR EXEMPTION (e.g. Rule 219(D)(2)(b))
N/A			

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – LIST OF EXEMPT EQUIPMENT INSTRUCTIONS

Introduction

Use the List of Exempt Equipment form for all Title 5 permit renewal applications. This form is designed to summarize all of the equipment at a facility that is exempt per MDAQMD Rule 219 from MDAQMD permit requirements (e.g., IC Engines \leq 50 BHP, Boilers $<$ 2 MMBTU/hr, etc.). This equipment can be listed according to category. However, if there is a specific device that is vented to control equipment, then the equipment must be listed separately. Trivial activities listed on the next page do not have to be listed on this form.

I. Facility Information

1. Enter the name of the facility.
2. Enter the MDAQMD Facility ID number.
3. Enter the current Title V permit number.

II. Summary of Equipment Exempt from Permit Requirements

4. Enter a description of the exempt equipment. Categories can be used (e.g., small boilers (75,000 BTU/hr – 2,000,000 BTU/hr)).
5. If the exempt equipment is connected to a control device, enter the control device permit number.
6. If the exempt equipment is connected to a control device, enter a description of the control device.
7. Provide the basis for exemption by referencing the appropriate section of Rule 219.

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Mojave Desert Air Quality Management District

TRIVIAL ACTIVITIES

- Combustion emissions from propulsion of mobile sources
- Air-conditioning units used for human comfort that do not have applicable requirements under Title VI of the Act.
- Ventilating units used for human comfort that do not exhaust air pollutant into the ambient air from any manufacturing/industrial or commercial process
- Non-commercial food preparation
- Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction
- Janitorial services and consumer use of janitorial products
- Internal combustion engines used for landscaping purposes
- Laundry activities, except for dry-cleaning and steam boilers
- Bathroom/toilet vent emissions
- Emergency (backup) electrical generators at residential locations
- Tobacco smoking rooms and areas
- Blacksmith forges
- Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. Asphalt batch plant owners/operators must still get a permit if otherwise required.
- Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
- Portable electrical generators <50 HP that can be moved by hand from one location to another. Moved by hand means it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance or device
- Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal, or plastic
- Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.
- Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as unpermitted equipment.
- Routine calibration and maintenance of laboratory equipment or other analytical instruments.
- Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis
- Hydraulic and hydrostatic testing equipment
- Environmental chambers not using HAP gases
- Shock chambers
- Humidity chambers

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- Solar simulators
- Fugitive emission related to movement of passenger vehicles, provided any required fugitive dust control plan or its equivalent is submitted
- Process water filtration systems and demineralizers
- Demineralized water tanks and demineralizer vents, air compressors and pneumatically operated equipment, including hand tools
- Batteries and battery charging stations, except at battery manufacturing plants
- Storage tanks, vessels and containers holding or storing liquid substances that will not emit any VOC or HAP
- Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized
- Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
- Drop hammers or hydraulic presses for forging or metalworking
- Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment
- Vents from continuous emissions monitors and other analyzers
- Natural gas pressure regulator vents, excluding venting at oil and gas production facilities
- Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation
- Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP
- CO2 lasers, used only on metals and other materials which do not emit HAP in the process
- Consumer use of paper trimmers/binders
- Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substance being processed in the ovens or autoclaves or the boilers delivering the steam
- Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants
- Laser trimmers using dust collection to prevent fugitive emissions
- Boiler water treatment operations, not including cooling towers
- Oxygen scavenging (de-aeration) of water
- Ozone generators
- Fire suppression systems
- Emergency road flares
- Steam vents and safety relief valves
- Steam leaks
- Steam cleaning operations
- Steam sterilizers

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL EMISSIONS REPORT, CRITERIA POLLUTANTS & HAPs

I. FACILITY INFORMATION

1. FACILITY NAME:	Duffy Electric Boat Company
2. FACILITY ID:	02114 & 02953
3. TITLE V PERMIT #:	121502114

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS							
		NOx (TPY)	VOC (TPY)	PM10 (TPY)	PM2.5 (TPY)	SOx (TPY)	CO (TPY)	Other: (TPY)	Other: (TPY)
S007654	Spray Booth								
S009850	Spray Booth								
P005246	GS Chopper Gun #1								
P005247	GS Chopper Gun #2								
P009257	GS Chopper Gun #3								
P005248	Spray Gun #1								
P009256	Spray Gun #2								

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL GREENHOUSE GAS EMISSIONS REPORT

I. FACILITY INFORMATION

1. FACILITY NAME:	Duffy Electric Boat Company
2. FACILITY ID:	02114 & 02953
3. TITLE V PERMIT #:	121502114

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS							
		CO ₂ (TPY)	N ₂ O (TPY)	CH ₄ (TPY)	HFCs (TPY)	PFCs (TPY)	SF ₆ (TPY)	Other: (TPY)	CO ₂ (e) (TPY)

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL – POTENTIAL EMISSIONS REPORT Criteria Pollutants, HAPs, and Greenhouse Gases

INSTRUCTIONS

Describe potential emissions of all regulated air pollutants emitted from each emissions source permitted by the District. Potential to emit is the maximum capacity of an emissions unit to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant shall be treated as part of its design only if the limitation, or the effect it would have on emissions, is incorporated into the applicable permit as a federally enforceable permit condition, or is contained in an EPA approved State Implementation Plan (SIP). Any physical or operational limitation includes pollution control equipment, restrictions on hours of operation, and restrictions on the type or amount of material combusted, stored, or processed.

I. Facility Information

1. Enter the name of the facility.
2. Enter the MDAQMD Facility ID number.
3. Enter the current Title V permit number.

II. Potential Annual Emissions

4. List all new and existing emission units either by MDAQMD application or permit number. When the emission unit is new and has not yet been assigned an application number, leave this column blank.
5. Provide a brief equipment description of the emission unit.
6. Potential Annual Emissions: Report potential emissions of pollutants. Quantify emissions from permitted sources, in tons per year, for pollutants for which:
 - 1) A facility is a major source. Fugitive emissions need only be included with reported emissions for source categories listed in 40 CFR Part 70.2(2); or
 - 2) Emissions data are required to show the applicability of, or compliance with, a requirement. Fugitive emissions must be included in the reported emissions.

When quantification is not required by one of the above two criteria, merely check the box in the column associated with all the pollutants emitted from a permitted source (e.g. for a boiler check the boxes in the columns for NO_x, CO, SO_x, VOC, and write in 'HAPS' in the column titled 'Other' and check that box, too).

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING INSTRUCTIONS FOR DETERMINING APPLICABILITY

Introduction

With the exception of emission units that are municipally-owned backup utility power units, as described by 40 CFR Part 64, Section 64.1(b)(2)¹, the CAM rule is applicable to each emission unit (existing and new construction) at a Title V facility that meets ALL of the following criteria²:

1. The emission unit is subject to an emission limitation or standard³;
2. The emission unit uses a control device to achieve compliance with a federally enforceable emission limitation or standard; and,
3. The emission unit has a pre-control potential to emit (PTE) that exceeds or is equivalent to any of Title V major source thresholds shown in the following table:

Pollutant	PTE Emission Threshold ⁴ (tons per year)
VOC	25
NOx	25
1 HAP ⁵	10
2+ HAPs	25
Any other air pollutant	100

¹ The facility must attach the documentation required by 40 CFR Part 64, Section 64.2(b)(2) to demonstrate that the backup utility power unit only operates during periods of peak demand or emergency situations; and has actual emissions, averaged over the last three calendar years of operation, less than 50% of the major source emission thresholds.

² Additional information about the CAM rule can be found on EPA's website at <http://www.epa.gov/ttnemc01/cam.html>

³ Only emission limitations and standards from an "applicable requirement" for emission units with control devices are subject to the CAM rule. Only emission limitations and standards from an "applicable requirement" for emission units with control devices are subject to the CAM rule. Emission limitation or standard is defined in 40 CFR 64.1 and includes emission limitations, emission standards, capture efficiencies, destruction efficiencies, work practices, and process or control device parameters. Applicable requirement has the same meaning as in 40 CFR part 70 and, generally, includes federally enforceable requirements from MDAQMD and State rules that are approved into the California State Implementation Plan (SIP), New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants, and New Source Review permits. Certain emission limits or standards may be exempt from the CAM rule under 40 CFR 64.2(b).

⁴ The PTE emission threshold is based on MDAQMD Rule 1201 definition of a "Major Source Facility" (Amended 09/26/05). Please be advised that the threshold values are subject to change based on rule amendments.

⁵ Hazardous Air Pollutant

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Mojave Desert Air Quality Management District

**TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING
APPLICABILITY DETERMINATION FORM**

I. FACILITY INFORMATION

1. FACILITY NAME: Duffy Electric Boat Company
2. FACILITY ID: 02114 & 02953
3. TITLE V PERMIT #: 121502114

II. CAM STATUS SUMMARY FOR EMISSION UNITS

4. Based on the criteria in the instructions (check one and attach additional pages as necessary):

a. There are no emission units with control devices at this Title V facility.

b. There are emission units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM plan is attached for each affected emissions unit.

5. EMISSION UNIT {APPLICATION OR PERMIT #}	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? {ENTER YES OR NO. IF YES, STATE THE REASON FOR EXEMPTION}	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			

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TITLE V PERMIT RENEWAL – CAM APPLICABILITY DETERMINATION FORM INSTRUCTIONS

I. Facility Information

1. Enter the name of the facility.
2. Enter the MDAQMD Facility ID number.
3. Enter the current Title V permit number.

II. CAM Status Summary for Emission Units

4. Check box (a) or (b) to indicate whether there are emission units with control devices that are subject to the CAM rule. For more detailed information regarding CAM rule applicability, refer to 40 CFR Part 64, Section 64.1. Note that only one CAM plan is required for a control device that is common to more than one emissions unit, or if an emissions unit is controlled by more than one control device similar in design and operation. If the control devices are not similar in design and operation, one plan is required for each control device.
5. List all new and existing emission units either by MDAQMD application or permit number. When the emission unit is new and has not yet been assigned an application number, leave this column blank.
6. Provide a brief equipment description of the emission unit by indicating the equipment type, make, and model and serial numbers as appropriate.
7. List each pollutant that is subject to an emission limitation or standard, as defined in 40 CFR 64.1.
8. Provide the uncontrolled emissions potential to emit for the pollutant.
9. State whether the uncontrolled potential emissions exceed the major source threshold and use a control device (yes/no).
10. State whether each emission limitation or standard is exempt from CAM. If it is exempt, provide a reason.
11. State whether a CAM plan is required.

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – PERMIT SHIELD REQUEST

I. FACILITY/APPLICATION INFORMATION

1. FACILITY NAME: Duffy Electric Boat Company
2. FACILITY ID: 02114 & 02953
3. TITLE V PERMIT #: 121502114
4. IDENTIFY EXISTING EQUIPMENT FOR WHICH A PERMIT SHIELD IS REQUESTED: PERMIT #: <u>S007654</u> EQUIPMENT DESCRIPTION: <u>Spray Booth, wood coatings</u>
5. ARE MULTIPLE PERMIT SHIELD APPLICATIONS FOR SIMILAR EQUIPMENT AS THE EQUIPMENT DESCRIBED ABOVE BEING SUBMITTED AT THE SAME TIME? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, provide the number of multiple units: <u>7</u>

II. PERMIT SHIELD INFORMATION

6. REGULATORY REQUIREMENTS FOR WHICH A PERMIT SHIELD IS SOUGHT Rule 1162 — Polyester Resin Operations, 8/28/2017
7. REASON(S) FOR REQUESTING A PERMIT SHIELD: Our facility falls under Rule 1162 — Polyester Resin Operations Requesting Permit Shield for the following permits: S007654 — used for wood coating operations S009850 — used for gel coat operations P005246 — used to apply resin & fiberglass P005247 — used to apply resin & fiberglass P009257 — used to apply resin & fiberglass P005248 — used to spray gel coat P009256 — used to spray gel coat
8. ESTIMATED TIME THAT THE PERMIT SHIELD SHOULD LAST (CHECK ONE): a. <input checked="" type="checkbox"/> For the life of the permit b. <input type="checkbox"/> Other (Specify): _____

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Title V Renewal – 1202E2-G

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL – PERMIT SHIELD REQUEST INSTRUCTIONS

General Instructions

A Title V facility has the option to use this form to request that their Title V permit contain a permit shield. A Title V permit with a permit shield will identify rules that do not apply, and state that compliance with all conditions on the permit will be considered as compliance with all regulatory requirements in effect as of the date of the permit issuance. A requirement identified in the permit as non-applicable is not enforceable by EPA, MDAQMD, or citizens. However, if a requirement is erroneously omitted from the permit, a permit shield will not protect a facility from enforcement action.

I. Facility/Application Information

1. Enter the name of the facility.
2. Enter the MDAQMD Facility ID number.
3. Enter the current Title V permit number.
4. Enter the permit # and description of the equipment
5. Enter information if you are requesting permit shields for multiple pieces of similar equipment

II. Permit Shield Information

6. In the space provided, describe the regulatory requirement for which the facility is requesting a shield, and cite the rule reference and date of the rule version.
7. Explain the reason(s) for requesting a permit shield for each regulatory requirement.
8. Check the appropriate box to indicate the duration or length of time over which the permit shield should last.

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Title V Renewal – 1202E2-G

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – ALTERNATE OPERATING SCENARIOS

I. FACILITY/APPLICATION INFORMATION

1. FACILITY NAME: Duffy Electric Boat Company
2. FACILITY ID: 02114 & 02953
3. TITLE V PERMIT #: 121502114
4. THIS APPLICATION IS FOR: (check one) <input type="checkbox"/> An alternative operating scenario <input type="checkbox"/> Emissions trading under a facility emissions limit

II. DETAILED SUMMARY

5. PROVIDE A DETAILED SUMMARY OF PROPOSED ALTERNATE OPERATING SCENARIOS OR EMISSIONS TRADING, AS DISCUSSED IN THE INSTRUCTIONS. N/A
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Title V Renewal – 1202E2-H

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL – ALTERNATE OPERATING SCENARIOS INSTRUCTIONS

Introduction

The provisions for operational flexibility for federally enforceable permit conditions are contained in Rule 1203(E). To qualify under the provisions, the operational change may not constitute a “modification” as defined under any provision of Title I of the Federal Clean Air Act, or exceed the emissions currently allowed under the permit. Any operational change that requires and authority to construct will still need to go through that process. Two types of operational flexibility will be allowed:

A. Alternate Operating Scenarios

The first type of operational flexibility is the use of alternative operating scenarios that are allowed for in the permit to operate. The owner/operator of the stationary source has the burden of identifying and applying for the scenarios in the application. The District must make a determination that the scenarios will not violate any applicable District, state, or federal requirement, and then allow for the scenarios in the issued permit.

B. Emissions Trading Under a Facility Emissions Limit

The second type of operational flexibility allows for changes in operation of a facility that were not anticipated in the permit to operate. A change under this provision must meet several qualifying conditions. The change must not result in any exceedance of any applicable emission limit, emission standard, or performance standard. Procedurally, the owner/operator must give the District at least a 12-day written notice before making the change. The owner/operator must also provide the District certain information about the change, and must not make the change if a written denial from the District is received during the 12-day notice period. The change must not be a modification as defined in Rule 1203(E) or in Title I of the CAA, and must not violate any applicable federal requirements.

Form Instructions

I. **Facility/Application Information**

1. Enter the name of the facility.
2. Enter the MDAQMD Facility ID number.
3. Enter the current Title V permit number.
4. Check a box to indicate whether the application is for an Alternate Operating Scenario, or Emissions Trading Under a Facility Emissions Limit (see definitions A and B, above)

II. **Detailed Summary**

5. In the space provided, provide a detailed summary of proposed Alternate Operating Scenarios or Emissions Trading, as discussed in A and B above.

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