



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Joel V. Moss
Vice President
Sea Hunt Boats Manufacturing Company
2348 Shop Road
Columbia, South Carolina 29201

Dear Joel Moss:

On January 26, 2023, the U.S. Environmental Protection Agency Region 4 Air Enforcement Branch conducted a partial compliance inspection at the Sea Hunt Boats Manufacturing Company located in Columbia, South Carolina. Enclosed is a copy of the final report generated by the U.S. Environmental Protection Agency's Region 4, South Air Enforcement Section.

Should you have any questions regarding this inspection report, please contact me at (404) 562-9172, or by email at Porter.Sharron@epa.gov

Sincerely,

SHARRON
PORTER
Sharron Porter
Environmental Engineer
South Air Enforcement Section

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SHARRON PORTER
Date: 2023.03.21
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Enclosures (1)

ENCLOSURE A
FINAL INSPECTION REPORT

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Final Inspection Report**

I. GENERAL INFORMATION

Facility Name: Sea Hunt Boats Manufacturing Company

Location (Address): 2348 Shop Road
Columbia, South Carolina 29201

Inspection Date: January 26, 2023

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

PROGRAMMATIC ID: SC00019000234

PERMIT NUMBER: Permit #GTV-0740-0037

EPA Region 4 Investigator(s)/Inspector(s):
Sharron Porter, Environmental Engineer
Steve Rieck, Environmental Scientist
Roselyn Hughes-Fairley, Environmental Engineer

State/Local Investigator(s)/Inspector(s):
Joe Law, Compliance Specialist, South Carolina Department of Health and
Environmental Control (SCDHEC)

Person(s) Contacted at Facility (Name and Title):
1. Joel V. Moss, Vice President
2. Michael G. Roberts, CFO
3. Ron Joyner, Lamination Manager

Report Prepared by: Sharron Porter

FACILITY INFORMATION
A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Boat manufacturer
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Permit # GTV-0740-0037
3. Air permit issuance date.	March 5, 2020
4. Air permit expiration date.	March 31, 2025
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	Hazardous Air Pollutants (HAPs)
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	40 C.F.R. Part 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Release of HAPs during coating and resin application.
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	N/A

B. Process Description

Sea Hunt Boats Manufacturing is a fiberglass boat manufacturing facility. The facility's boat manufacturing operations include mold staging/preparation, gelcoat application, lay-up, demold/pull-out, cut, trimming, grinding, and final assembly. The initial stages of the process include cleaning, sealing and waxing molds. The mold is then transferred to

another area of the facility where the gel coat, chopped strand mat (fiberglass), and resin are added to the molds with a spray gun. These materials cure and harden into the various components of the boat. Following the curing process, the components are removed from the mold. Components are cut or trimmed, sent to the grinding booth and on to be completed in the final production line assembly line area. Sea Hunt Boat Manufacturing operates one ten-hour shift per day, 5 days a week. There are 285 employees. Sea Hunt Boat Manufacturing has not made any major modifications or expansions to the process in the last eighteen to twenty-four months.

II. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	The EPA Region 4 inspection team and SCDHEC inspector arrived at the facility on January 26, 2023, at 8:43 AM EST.
2. Credentials presented to facility personnel (include name and title).	Y	Upon arrival, EPA inspectors presented credentials to Joel Moss, Ron Joyner and Mike Roberts.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	The team held an opening conference with Joel Moss, Ron Joyner and Mike Roberts to discuss the purpose of the inspection. The Team stated the inspection would consist of an opening conference, physical walk thru, records review and closing conference.
4. Discussed safety issues.	Y	The team discussed appropriate personal protective equipment prior to going to process areas.
5. Discussed which records to be reviewed.	N	The team reviewed documents related to compliance with Subpart VVVV. A list of documents reviewed can be found in Item 10 of this report.

Activity	Yes No NA	Comments
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	The team discussed the boat manufacturing process, from raw materials to finished product. All process areas of the facility were observed.
7. Discussed facility policy regarding photographs or video (if applicable).	N/A	The team did not bring video or photograph equipment.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	
9. Discussed CBI.	Y	The team indicated that any material claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		

Activity	Yes No NA	Comments
10. The types of records reviewed, and the time period reviewed.	Y	The inspection team reviewed the records listed below on site during the inspection: Records reviewed during the inspection: 1. Title V Air Quality Permit 2. Title V Annual Compliance Certification (April 1, 2021 – March 31, 2022) dated April 19, 2022 3. 2020 Emissions Inventory Report 4. Visual Inspection Report for January 19, 2023. 5. Opacity Inspections July 14, 2022 6. 2022 Weekly Dry Filter Manufacturing Log dated December 5, 12, 19, 2022 7. Title V Semi Annual Report (April 1, 2022 – September 30, 2022) dated October 24, 2022 8. Initial Notification and Notification of Compliance Status Report dated October 15, 2007. 9. Boat Manufacturing NESHAP Implementation Plan dated October 2007 10. On-site Implementation Log, Calendar Year 2022. This report included the number of gel coat guns in use/available and the number of resin guns in use/available. 11. VOC/HAP Emission Reports 12 month rolling average (September, October, November 2022), dated December 2022.
Facility Walk-Through Observations		

11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	Inspection of process areas began at 9:28 am. The inspection team started at the Warehouse. Sea Hunt Boat Manufacturing raw materials consist of gelcoat, resin, fiberglass, putty, and catalyst. These materials are housed in a climate-controlled warehouse. There are eight different colors of gelcoats. The facility receives resin in bulk and has 2 resin tanks on site. Their suppliers are Ineos and Alpha Owens Corning. The inspection team viewed the Gel Coat and Fiberglass Application operations. The Resin Operations were observed next. Fiberglass and resins were applied by spray gun. Chopped fiberglass string cut into small one inch to one inch and a half pieces were sprayed onto the mold. The boat stays in the mold about three days. Once the parts were separated from the mold, the Team moved to the cutting and grinding room. The boats were completed in the final assembly area where we observed a deck and hull being put together and carpeting application. Final quality assurance and inspection of the boat is done during the final assembly. From start to finish, on average it takes about 5-7 days to finish a boat, 6 days for a small boat (21 feet) and 7 days for a large boat (25 feet) Sea Hunt Boat Manufacturing demonstrates compliance with the CAA by emissions averaging. The facility accounts for coating used at the facility through the “as purchased process”. Sea Hunt Boats Manufacturing purchases 100% of products used at the facility through Composites One Company. Material Safety Data Sheets are on file for products distributed. The amount of material used is tracked to maintain compliance with the emissions averaging option in Subpart VVVV.
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Activity	Yes No NA	Comments
		No issues of concern were observed during the process area inspection.
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	The facility operates a fabric filter control device to control particulate matter and improve indoor air quality. No issues were noted with the control device.

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N	No visible emissions were observed during the inspection.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	N	

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N	The infrared camera was not used at this facility.

Activity	Yes No NA	Comments
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	A TVA was not used at the facility.
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	A PID was not used at the facility.
Closing Meeting		
28. Conducted a closing meeting.	Y	The R4 inspector conducted a closing meeting on January 26, 2023, at 11:30 AM EST with Joel Moss and Ron Joyner.

Activity	Yes No NA	Comments
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	N/A	
31. Discussed observations.	Y	The inspection team thanked facility staff for their time. The team discussed the facility walkthrough.
32. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe.
33. Date and time inspection concluded.		The inspection concluded on January 26, 2023, at 11:30 AM EST.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature:

SHARRON PORTER

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PORTER
Date: 2023.03.21 15:43:46 -04'00'

EPA Supervisor Signature & Title:

TODD GROENDYKE

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Chief, South Air Enforcement Section