



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

SENT VIA ELECTRONIC MAIL

Randy Sheppard
Environmental Health and Safety Director
Mastercraft Boat Company
100 Cherokee Cove Drive
Vonore, Tennessee 37885
Randy.sheppard@mastercraft.com

Dear Randy Sheppard:

Enclosed is a copy of the final report generated by the U.S. Environmental Protection Agency's Region 4, South Air Enforcement Section, for the inspection conducted at the Mastercraft Boat Company, located in Venore, Tennessee on April 20, 2023.

If you have any questions, please contact me at (404) 562-9134, or by email at taylor.kevin@epa.gov.

Sincerely,

Taylor, Kevin Digitally signed by Taylor,
Kevin
Date: 2023.06.06 09:28:47
-04'00'

Kevin Taylor
Environmental Engineer
South Air Enforcement Section

Enclosure

ENCLOSURE A
INSPECTION REPORT

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

I. GENERAL INFORMATION

Facility Name: Mastercraft Boat Company (Mastercraft)
Location (Address): 100 Cherokee Cove Drive
Vonore, Tennessee 37885

Inspection Date: April 20, 2023

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

ICIS-Air Number: TN0000004712300107

EPA Investigator(s)/Inspector(s):

1. Kevin Taylor, Environmental Engineer, EPA Region 4
2. Sharron Porter, Environmental Engineer, EPA Region 4
3. Steve Rieck, Environmental Scientist, EPA Region 4

State/Local Investigator(s)/Inspector(s):

1. Jeff Kent, Environmental Scientist
Tennessee Division of Air Pollution Control

Person(s) Contacted at Facility (Name and Title):

1. Randy Sheppard, Environmental Health and Safety Director
2. Lucrecia Denson, Environmental Health and Safety Assistant
3. Ken McAllister, Environmental Health and Safety Assistant
4. Steven Dunn, Scepter Engineering (Conference call)

Report Prepared by: Kevin Taylor

II. 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.).	Title V Operating Permit No. 572538
3. Air permit issuance date.	07/16/2018
4. Air permit expiration date.	07/15/2023
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	Hazardous Air Pollutants (HAPs) Volatile Organic Compounds (VOCs)
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 40 CFR 63, Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products"
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	HAPS in coatings and resins are emitted during application.
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Fabric filters are used in the spraying areas for particulate control.

B. Process Description (provide narrative or attach description provided by the company or excerpts from the permit)

Fiberglass Boat Manufacturing Operations:- Gelcoat, Lamination, Adhesive Spraying and Grinding Operations (NESHAP Subpart VVVV) with Exhaust Filters as Control.

III. INSPECTION ACTIVITIES

Activity	Yes	Comment
	No	

	NA	
Opening Meeting		
1. Date and time entered the facility.	Yes	The EPA inspectors entered the facility on April 20, 2023, at 11:00 am (EDT).
2. Credentials presented to facility personnel (include name and title).	Yes	Upon arrival, the EPA inspectors presented their EPA credentials to the facility personnel.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Yes	The EPA inspectors held an opening conference with Randy Sheppard, Lucretia Denson and Ken McAllister, representing Mastercraft, Steven Dunn, the Mastercraft environmental contractor and Jeff Kent with TDEC. The purpose and objectives of the inspection were explained during the opening conference. The EPA inspectors pointed out that they were conducting a partial compliance evaluation that was targeting compliance with 40 CFR 63, Subpart VVVV, "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (MACT VVVV)." Participants of the opening conference that were physically present filled out an attendance sheet with contact information.
4. Discussed safety issues.	Yes	The EPA inspectors discussed with the facility the personal safety equipment needed to conduct the inspection and any emergency procedures for the facility.
5. Discussed which records to be reviewed.	Yes	The EPA inspectors identified records to be reviewed for the evaluation. Those records included a listing of coatings and resins used in the process with associated safety data sheets, the initial notification report for MACT VVVV, the most current Notification of Compliance Status Report, coating and resin usage information, semi-annual reports, and annual compliance certifications and dry

		filter logs. To make the process more efficient, Mastercraft was given the option of sending the information electronically following the inspection.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Yes	The EPA inspectors discussed the overall inspection plan, which was primarily focused on observing the entire boat manufacturing process, from start to finish, with an emphasis on areas where the application of the coatings and resins take place.
7. Discussed facility policy regarding photographs or video (if applicable).	No	N/A
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	No	N/A
9. Discussed CBI.	Yes	The EPA inspectors requested that anything that the facility considers to be CBI be identified. The facility would also have an opportunity to review the EPA inspection report for CBI content prior to finalizing it. Any information identified as CBI would be treated in accordance with regulations.
Records Reviewed at the Facility		
10. The types of records reviewed and the time period reviewed.	Yes	The following records were to be electronically emailed to Kevin Taylor as a follow up to the inspection: Semi-annual reports for 2021 & 2022 Listing of coatings and resins used since January 2022. Safety Data Sheets for all coatings used since January 2022. Monthly coating/resin usage and emissions records since January 2022.

		Annual compliance certification report for 2022. Dry filter logs Notification of Compliance Status Report (latest)
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.	N/A	The walk-through inspection started at approximately 11:49 am. Mastercraft produces 5 – 6 models of boats that range from 19ft to 26 ft in length. The first area observed was the mold prep area where the boat moldings are cleaned, waxed, and taped. After being prepped, a gel coat is applied to the mold. The gel coat is set up in 55 gal drums and there are 17 gel coat booths that are used in the gel coat process. The gel coat booths are controlled by fabric filters. The fabric filters are changed out every month. Acetone is used to flush the gel coat lines and nozzles to change colors. From gel coat, the molding goes to lamination. There are three rows for lamination that are dedicated to the processing of the hull, the deck, and the boat liner. In the lamination process, a skin coat of fiberglass is sprayed on or laid down in sheets and secured to the mold with resin. Following the lamination process, the structures are sent to the hole cut and the grinding and trimming areas in preparation for the final assembly of the hull, lining and deck. It should be noted that the gel coatings are stored in 55-gallon drums and the resins are stored in storage tanks. The storage rooms are climate controlled.
12. The type of process parametric monitoring observed and the	N/A	

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.		
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	
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).	Y	The equipment used for air pollution control are fabric filters employed for the control of particulates. The logs for the fabric filter change outs were provided by the facility.

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.		
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	

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).	No	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	No	There were no emissions which were visible to the naked eye.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	No	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	

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/A	
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	
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	
Closing Meeting		

28. Conducted a closing meeting.	Yes	The EPA inspectors conducted a closing meeting on April 20, 2023, at approximately 12:54 pm EDT with Randy Sheppard, Lucrecia Denson and Ken McAllister, representing Mastercraft, Steven Dunn, the Mastercraft environmental contractor and Jeff Kent with TDEC. The close out meeting was conducted at the facility's main office.
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	No	Although the CBI procedures were explained in the opening meeting and at the start of the inspection. A CBI declaration was not made at the time of the inspection. The facility was advised that an inspection report would be sent to them for a CBI review following the inspection.
31. Discussed observations.	Yes	The EPA inspectors discussed the observations made during the inspection and stated that, although no concerns were noted at the time, a review of the records received still had to be conducted following the onsite portion of the inspection.
32. Discussed next steps, if applicable?	Yes	The EPA inspectors stated that an inspection report would be the next step in the process which would cover observations made during the day of the inspection.
33. Date and time inspection concluded.	Yes	The inspection concluded on April 20, 2023, at approximately 1:15 pm EDT.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature: Taylor, Kevin Digitally signed by Taylor, Kevin
Date: 2023.06.06 09:29:28 -04'00'

EPA Supervisor Signature & Title Groendyke, Todd Digitally signed by
Groendyke, Todd
Date: 2023.06.06 09:41:38
-04'00'

Date Report Finalized: _____