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STATE OF ILLINOIS
Pollution Control Board

ILLINOIS POLLUTION CONTROL BOARD
May 13, 2004

IN THE MATTER OF:)	
)	
PETITION OF CROWNLINE BOATS, INC.)	AS 04-01
FOR AN ADJUSTED STANDARD FROM 35)	(Adjusted Standard)
ILL. ADM. CODE 215.301)	

CROWNLINE BOATS, INC. POST HEARING RESPONSE

On April 23, 2004, a hearing in this matter was held at the City Hall in West Frankfort, Illinois. At the conclusion of the hearing, the representative from the Illinois Pollution Control Board, Ms. Alisa Liu, requested Crownline Boats, Inc. ("Crownline") to provide three additional pieces of information. This pleading shall provide the additional information requested from Crownline at the hearing.

First, Miss Liu requested Crownline to provide definitions for the terms used in the monthly MACT compliance spreadsheets attached to the pleading Crownline entered into evidence at the hearing entitled "Responses of Crownline Boats, Inc. to Questions in Hearing Officer Order of April 6, 2004." As explained at the hearing, the terms used in the spreadsheets were taken from the federal rule entitled "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing", 40 CFR Part 63, Subpart VVVV (the "MACT Standard"). Attached at Exhibit A are pages 44233-44235 from the August 22, 2001, Federal Register when the MACT Standard was finalized, which sets forth the definitions of the terms used in Crownline's MACT compliance spreadsheets.

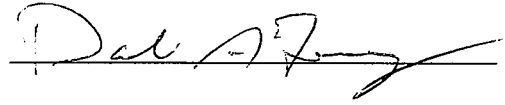
Second, at the hearing Crownline presented to the Court revised language for its proposed Adjusted Standard, which IEPA also expressed their support for at the hearing. Attached at Exhibit B is a copy of Crownline's revised Adjusted Standard language.

Third, in its pleading "Responses of Crownline Boats, Inc. to Questions in Hearing Officer's Order of April 6, 2004", Crownline stated that its emissions of Hazardous Air Pollutants ("HAPs") prior to complying with the MACT standard were approximately 204 tons per year. Crownline also estimated that it had reduced its HAP emissions by approximately 50 tons per year (a reduction of approximately 25%) by complying with the MACT Standard. (See responses to questions 2(b) and 7(a)). At the hearing, Miss Liu asked if Crownline could provide additional information regarding the 50 ton/25% reduction in HAPs. Attached hereto and labeled as Exhibits C and D are two spreadsheets showing 12-month rolling total air emissions. Exhibit C identifies that as of December 2003, Crownline's 12-month rolling HAP emissions were 153.91 tons. This amount represents Crownline's estimated actual emissions on a 12-month rolling average as of December 2003 while being in compliance with the MACT Standard. Exhibit D is an estimate of what Crownline's emissions would have been if it made the exact same number of boats and boat models as in Exhibit C, but was not complying with the MACT Standard. Exhibit D identifies that Crownline's 12-month rolling HAP emissions would have been approximately 204.18 tons per year if it had not been complying with the MACT Standard.

The above information should satisfy the requests made of Crownline at the April 23, 2004 hearing.

BRYAN CAVE, LLP

By:

A handwritten signature in black ink, appearing to read "Dale A. Guariglia", is written over a horizontal line.

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CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing response were mailed, first class, on May 13, 2004, to each of following persons: Carol Sudman, Hearing Officer, Illinois Pollution Control Board, 1021 North Grand Avenue East, P.O. Box 19274, Springfield, IL 62794-9274; Dorothy M. Gunn, Illinois Pollution Control Board, James R. Thompson Center, 100 W. Randolph Street, Suite 11-500, Chicago, IL 60601, and Charles Matoesian, Assistant Counsel, IEPA, 1021 North Grand Avenue East, P. O. Box 19276, Springfield, IL 62794-9276.

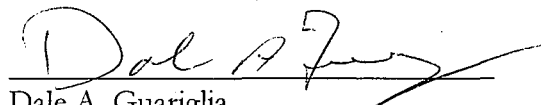

Dale A. Guariglia

Exhibit A

(d) This subpart does not apply to aluminum coating operations on aluminum boats intended for commercial or military (nonrecreational) use, antifoulant coatings, assembly adhesives, fiberglass hull and deck coatings, research and development activities, mold sealing and release agents, mold stripping and cleaning solvents, and wood coatings as defined in § 63.5779. This subpart does not apply to materials contained in handheld aerosol cans.

§ 63.5686 How do I demonstrate that my facility is not a major source?

You can demonstrate that your facility is not a major source by using the procedures in either paragraph (a) or (b) of this section.

(a) *Emission option.* You must demonstrate that your facility does not emit, and does not have the potential to emit as defined in § 63.2, considering federally enforceable permit limits, 9.1 megagrams (10 tons) or more per year of a single HAP or 22.7 megagrams (25 tons) or more per year of a combination of HAP. To calculate your facility's potential to emit, you must include emissions from the boat manufacturing facility and all other sources that are collocated and under common ownership or control with the boat manufacturing facility.

(b) *Material consumption option.* This option can be used if you manufacture either fiberglass boats or aluminum recreational boats at your facility. You must meet the criteria in paragraph (b)(1), (2), or (3) of this section and comply with the requirements in paragraph (c) of this section. If you initially rely on the limits and criteria specified in paragraph (b)(1), (2), or (3) of this section to become an area source, but then exceed the relevant limit (without first obtaining and complying with other limits that keep your potential to emit HAP below major source levels), your facility will then become a major source, and you must comply with all applicable provisions of this subpart beginning on the compliance date specified in § 63.5695. Nothing in this paragraph is intended to preclude you from limiting your facility's potential to emit through other federally enforceable mechanisms available through your permitting authority.

(1) If your facility is primarily a fiberglass boat manufacturing facility, you must demonstrate that you consume less than 45.4 megagrams per rolling 12-month period of all combined polyester- and vinyl-ester-based resins and gel coats (including tooling and production resins and gel coats, and clear gel coats),

and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from aluminum recreational boat manufacturing or other source categories) originate from the fiberglass boat manufacturing materials.

(2) If your facility is primarily an aluminum recreational boat manufacturing facility, you must demonstrate that it consumes less than 18.2 megagrams per rolling 12-month period of all combined surface coatings, aluminum wipedown solvents, application gun cleaning solvents, and carpet and fabric adhesives; and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from fiberglass boat manufacturing or other source categories) originate from the aluminum recreational boat manufacturing materials.

(3) If your facility is a fiberglass boat or an aluminum recreational boat manufacturing facility, you must demonstrate that the boat manufacturing materials consumed per rolling 12-month period contain a total of less than 4.6 megagrams of any single HAP and less than 11.4 megagrams of all combined HAP, and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from other source categories) originate from these boat manufacturing materials.

(c) If you use the material consumption option described in paragraph (b) of this section to demonstrate that you are not a major source, you must comply with the requirements of paragraphs (c)(1) through (3) of this section.

(1) If your facility has HAP emissions that do not originate from boat manufacturing operations or materials described in paragraph (b), then you must keep any records necessary to demonstrate that the 90 percent criterion is met.

(2) A rolling 12-month period includes the previous 12 months of operation. You must maintain records of the total amount of materials described in paragraph (b) of this section used each month, and, if necessary, the HAP content of each material and the calculation of the total HAP consumed each month. Because records are needed for a 12-month period, you must keep records beginning no later than 12 months before the compliance date specified in § 63.5695. Records must be kept for 5 years after they are created.

(3) In determining whether the 90 percent criterion included in paragraph (b) of this section is met, you do not need to include materials used in

routine janitorial, building, or facility grounds maintenance; personal uses by employees or other persons; or products used for maintaining motor vehicles operated by the facility.

§ 63.5689 What parts of my facility are covered by this subpart?

The affected source (the portion of your boat manufacturing facility covered by this subpart) is the combination of all of the boat manufacturing operations listed in paragraphs (a) through (f) of this section.

(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(b) Closed molding resin operations.

(c) Resin and gel coat mixing operations.

(d) Resin and gel coat application equipment cleaning operations.

(e) Carpet and fabric adhesive operations.

(f) Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

§ 63.5692 How do I know if my boat manufacturing facility is a new source or an existing source?

(a) A boat manufacturing facility is a new source if it meets the criteria in paragraphs (a)(1) through (3) of this section.

(1) You commence construction of the affected source after July 14, 2000.

(2) It is a major source.

(3) It is a completely new boat manufacturing affected source where no other boat manufacturing affected source existed prior to the construction of the new source.

(b) For the purposes of this subpart, an existing source is any source that is not a new source.

§ 63.5695 When must I comply with this subpart?

You must comply with the standards in this subpart by the compliance dates specified in Table 1 to this subpart.

Standards for Open Molding Resin and Gel Coat Operations

§ 63.5698 What emission limit must I meet for open molding resin and gel coat operations?

(a) You must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.

(1) Production resin.

- (2) Pigmented gel coat.
 (3) Clear gel coat.
 (4) Tooling resin.

- (5) Tooling gel coat.
 (b) You must limit organic HAP emissions from open molding

operations to the limit specified by equation 1 of this section, based on a 12-month rolling average.

$$\text{HAP Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad (\text{Eq. 1})$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

M_R = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

(c) The open molding emission limit is the same for both new and existing sources.

(d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations

showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinyl ester resin used for skin coats. This exemption does not apply to blends of vinyl ester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinyl ester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

§ 63.5701 What are my options for complying with the open molding emission limit?

You must use one or more of the options listed in paragraphs (a) through (c) of this section to meet the emission limit in § 63.5698 for the resins and gel coats used in open molding operations at your facility.

(a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.*

(1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in § 63.5698 using the procedures described in § 63.5710. Compliance with this option is based on a 12-month rolling average.

(2) Those operations and materials not included in the emissions average must comply with either paragraph (b) or (c) of this section.

(b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to this subpart. Compliance with this option is based on a 12-month rolling average.

(c) *Add-on control option.* Use an enclosure and add-on control device, and demonstrate that the resulting emissions meet the emission limit in § 63.5698. Compliance with this option is based on control device performance testing and control device monitoring.

§ 63.5704 What are the general requirements for complying with the open molding emission limit?

(a) *Emissions averaging option.* For those open molding operations and materials complying using the emissions averaging option, you must

demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section.

(1) Use the methods specified in § 63.5758 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in § 63.5710 to show that the organic HAP emissions do not exceed the limit specified in § 63.5698.

(3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Amount of material used per month.

(iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in § 63.5710.

(4) Prepare and submit the implementation plan described in § 63.5707 to the Administrator and keep it up to date.

(5) Submit semiannual compliance reports to the Administrator as specified in § 63.5764.

(b) *Compliant materials option.* For each open molding operation complying using the compliant materials option, you must demonstrate compliance by performing the steps in paragraphs (b)(1) through (4) of this section.

(1) Use the methods specified in § 63.5758 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in § 63.5713 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 to this subpart.

(3) Keep records as specified in paragraphs (b)(3)(i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.

(iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in § 63.5713.

(4) Submit semiannual compliance reports to the Administrator as specified in § 63.5764.

(c) *Add-on control option.* If you are using an add-on control device, you must demonstrate compliance by performing the steps in paragraphs (c)(1) through (5) of this section.

(1) Conduct a performance test of the control device as specified in §§ 63.5719 and 63.5722 to demonstrate initial compliance.

(2) Use the performance test results to determine control device parameters to monitor after the performance test as specified in § 63.5725.

(3) Comply with the operating limits specified in § 63.5715 and the control device and emission capture system monitoring requirements specified in § 63.5725 to demonstrate continuous compliance.

(4) Keep the records specified in § 63.5767.

(5) Submit to the Administrator the notifications and reports specified in §§ 63.5761 and 63.5764.

§ 63.5707 What is an implementation plan for open molding operations and when do I need to prepare one?

(a) You must prepare an implementation plan for all open molding operations for which you comply by using the emissions averaging option described in § 63.5704(a).

(b) The implementation plan must describe the steps you will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, your implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section.

(1) A description of each operation included in the average.

(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.

(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in § 63.5698.

(c) You must submit the implementation plan to the Administrator with the notification of

compliance status specified in § 63.5761.

(d) You must keep the implementation plan on site and provide it to the Administrator when asked.

(e) If you revise the implementation plan, you must submit the revised plan with your next semiannual compliance report specified in § 63.5764.

§ 63.5710 How do I demonstrate compliance using emissions averaging?

(a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in § 63.5695.

(b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in § 63.5698 calculated for the same 12-month period. (Include terms in equation 1 of § 63.5698 and equation 1 of this section for only those operations and materials included in the average.)

$$\text{HAP emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})] \quad (\text{Eq. 1})$$

Where:

HAP emissions= Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

M_R = Mass of production resin used in the past 12 months, megagrams.

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.

PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.

PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

M_{TR} = Mass of tooling resin used in the past 12 months, megagrams.

PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams.

(c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eq. 2})$$

Where:

PV_{OP} =weighted-average MACT model point value for each open molding operation (PV_R , PV_{PG} , PV_{CG} , PV_{TR} , and PV_{TG}) included in the average, kilograms of HAP per megagram of material applied.

M_i =mass of resin or gel coat i used within an operation in the past 12 months, megagrams.

n =number of different open molding resins and gel coats used within an operation in the past 12 months. PV_i =the MACT model point value for resin or gel coat i used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

(d) You must use the equations in Table 3 to this subpart to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.

(e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in § 63.5698(b) for the same 12-month period, then you are in compliance with the emission limit in § 63.5698 for those operations and materials included in the average.

§ 63.5713 How do I demonstrate compliance using compliant materials?

(a) Compliance using the organic HAP content requirements listed in Table 2 to this subpart is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in § 63.5695.

Exhibit B

CROWNLINE BOATS, INC.

REVISED ADJUSTED STANDARD LANGUAGE

As an alternative to compliance with the 8 lb/hr Rule found at 35 IAC § 215.301, this adjusted standard allows Crownline to limit its discharge of organic material into the atmosphere from its boat manufacturing operations by operating in full compliance with the National Emission Standard for Hazardous Air Pollutants for New and Existing Boat Manufacturing Facilities, set forth at 40 CFR §63 Subpart VVVV, as may be amended in the future, and with the following conditions:

a. Crownline shall continue to investigate boat production methods with a reduced VOM content and, where practicable, shall substitute current coatings with lower VOM content coatings as long as such substitution does not result in a net increase in VOM emissions. Crownline shall be required to do any reasonable test of new technologically or economically reasonable production methods or materials applicable to the open-mold fiberglass boat manufacturing industry which may reduce VOM emissions at Crownline's facility which the Illinois EPA Bureau of Air specifically requests in writing that they do. An annual report summarizing the activities and results of these investigatory efforts shall be prepared by Crownline and submitted to the Illinois EPA Bureau of Air, Compliance and Enforcement Section.

b. The relief granted in this proceeding shall be limited to the emission activities at the Crownline West Frankfort facility as of the date of this filing

c. Nothing in this adjusted standard shall relieve Crownline of its duty to operate in full compliance with the Clean Air Act, its CAAPP, the Illinois Environmental Protection Act and other applicable regulations not otherwise discussed herein.

Exhibit C

Crownline Boats, Inc. Monthly Emissions Summary 12-Month Rolling Total

	Dec-03	Nov-03	Oct-03	Sep-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Mar-03	Feb-03	Jan-03	Dec-02
Monthly													
VOM (tons)	6.10	11.80	16.38	19.42	17.44	15.29	17.87	21.97	20.03	19.24	17.73	16.80	13.39
HAP (tons)	5.45	10.84	12.96	16.00	14.03	12.29	15.42	18.36	15.84	17.42	15.30	14.59	11.77
12-Month Rolling Total													
VOM (tons)	183.27	193.97	210.88	211.69	205.76	210.18	208.86	209.29	207.27	204.28	199.21	195.68	191.10
HAP (tons)	153.91	163.05	176.91	179.11	174.90	180.03	179.54	179.90	178.43	177.55	172.36	169.65	165.66
Boats Made													
Monthly	238	271	435	388	409	354	390	473	374	375	355	361	278
12-Month Rolling Total	4062.00	4185.00	4505.00	4338.00	4204.00	4118.00	4087.00	4097.00	4076.00	4022.00	3952.00	3866.00	3752.00
	Dec-03	Nov-03	Oct-03	Sep-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Mar-03	Feb-03	Jan-03	Dec-02
Monthly													
Styrene (tons)	4.55	8.01	9.62	10.63	10.65	8.87	10.99	14.41	11.52	13.38	11.39	10.37	9.50
MMA (tons)	0.79	2.51	2.17	3.16	2.77	2.16	3.25	2.75	3.25	2.98	2.72	2.57	1.62
12-Month Rolling Total													
Styrene (tons)	114.02	119.84	130.41	132.80	130.73	135.44	135.61	124.62	110.21	98.69	85.31	73.92	63.55
MMA (tons)	28.51	30.29	31.71	31.56	30.11	30.42	30.02	26.77	24.02	20.77	17.79	15.07	12.50
	Dec-03	Nov-03	Oct-03	Sep-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Mar-03	Feb-03	Jan-03	Dec-02
Monthly													
Toluene (tons)	0.05	0.23	0.83	1.88	0.26	0.85	0.83	0.87	0.67	0.76	0.78	1.27	0.44
Hexane (tons)	0	0	0	0	0	0.01	0	0.01	0.00	0.02	0.00	0.00	0.00
12-Month Rolling Total													
Toluene (tons)	8.01	9.23	10.50	10.46	9.80	9.95	9.82	8.99	8.12	7.45	6.69	5.91	4.64
Hexane (tons)	0.04	0.04	0.05	0.05	0.05	0.05	0.04	0.04	0.03	0.03	0.01	0.01	0.01

	Dec-03	Nov-03	Oct-03	Sep-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Mar-03	Feb-03	Jan-03	Dec-02
Monthly													
DMP (tons)	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.01	0.02	0.01	0.00
DBP (tons)	0	0	0.16	0.15	0.08	0.24	0.15	0.12	0.18	0.09	0.23	0.08	0.05

12-Month Rolling Total

DMP (tons)	0.13	0.13	0.13	0.13	0.13	0.13	0.14	0.13	0.12	0.10	0.09	0.07	0.06
DBP (tons)	1.40	1.48	1.69	1.65	1.60	1.64	1.48	1.33	1.21	1.03	0.94	0.71	0.63

	Dec-03	Nov-03	Oct-03	Sep-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Mar-03	Feb-03	Jan-03	Dec-02
Monthly													
Xylene (tons)	0.01	0.01	0.09	0.07	0.16	0.05	0.11	0.05	0.05	0.11	0.04	0.10	0.09
MEK (tons)	0.04	0.08	0.07	0.07	0.09	0.09	0.06	0.13	0.14	0.07	0.12	0.18	0.07

12-Month Rolling Total

Xylene (tons)	0.75	0.84	1.01	0.98	0.98	0.92	0.94	0.83	0.78	0.73	0.62	0.58	0.48
MEK (tons)	0.96	1.10	1.30	1.35	1.38	1.35	1.36	1.30	1.17	1.03	0.96	0.84	0.66

	Dec-03	Nov-03	Oct-03	Sep-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Mar-03	Feb-03	Jan-03	Dec-02
Monthly													
Cumene (tons)	0	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.10	0.00
Other (tons)	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

12-Month Rolling Total

Nov-02	Oct-02	Sep-02	Aug-02	Jul-02	Jun-02	May-02	Apr-02	Mar-02	Feb-02	Jan-02
15.32	17.19	13.49	21.86	13.97	18.30	19.95	17.04	14.17	14.20	12.22
12.93	15.16	11.79	19.16	11.80	15.78	16.89	14.96	12.23	12.59	10.60

313	268	254	323	323	400	452	320	305	269	247
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Nov-02	Oct-02	Sep-02	Aug-02	Jul-02
9.08	12.01	8.56	15.36	9.04
2.31	2.02	1.71	3.08	1.76

Nov-02	Oct-02	Sep-02	Aug-02	Jul-02
1.06	0.79	1.22	0.41	0.72
0.01	0.00	0.00	0.00	0.00

Nov-02	Oct-02	Sep-02	Aug-02	Jul-02
0.01	0.01	0.01	0.01	0.02
0.16	0.12	0.10	0.12	0.08

Nov-02	Oct-02	Sep-02	Aug-02	Jul-02
0.09	0.06	0.07	0.10	0.07
0.21	0.12	0.10	0.06	0.10

Nov-02	Oct-02	Sep-02	Aug-02	Jul-02
0.01	0.01	0.01	0.01	0.00
0.00	0.00	0.00	0.00	0.00

Exhibit D

Crownline Boats, Inc.
Monthly Emissions Summary
If Crownline Was Not Complying with MACT¹
12-Month Rolling Total

	Dec-03	Nov-03	Oct-03	Sep-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Mar-03	Feb-03	Jan-03	Dec-02
Monthly													
VOM (tons)	10.11	17.33	23.53	27.07	23.95	18.69	20.42	25.79	23.27	23.77	20.18	19.25	13.39
HAP (tons)	9.45	16.38	20.11	23.65	20.53	15.94	19.22	23.08	19.21	20.45	16.16	15.63	11.77
12-Month Rolling Total													
VOM (tons)	234.11	243.25	254.63	248.29	234.71	232.62	227.90	225.78	219.94	213.71	204.11	198.13	191.10
HAP (tons)	204.18	210.36	218.68	213.73	201.87	200.50	196.36	192.92	186.73	182.48	174.26	170.69	165.66
Boats Made													
Monthly	238	271	435	388	409	354	390	473	374	375	355	361	278
12-Month Rolling Total	4062.00	4185.00	4505.00	4338.00	4204.00	4118.00	4087.00	4097.00	4076.00	4022.00	3952.00	3866.00	3752.00
Monthly													
Styrene (tons)	8.56	13.54	16.77	18.29	17.25	12.21	14.26	18.58	14.36	15.89	12.21	11.37	9.50
MMA (tons)	0.79	2.51	2.17	3.16	2.67	2.47	3.79	3.30	3.78	3.49	2.76	2.62	1.62
12-Month Rolling Total													
Styrene (tons)	161.92	164.73	169.77	165.01	155.28	153.39	150.22	135.96	117.38	103.02	87.13	74.92	63.55
MMA (tons)	30.89	32.72	34.14	33.99	32.54	32.95	32.24	28.45	25.15	21.37	17.88	15.12	12.50
Monthly													
Toluene (tons)	0.05	0.23	0.83	1.88	0.26	0.85	0.83	0.87	0.67	0.76	0.78	1.27	0.44
Hexane (tons)	0	0	0	0	0	0.01	0	0.01	0.00	0.02	0.00	0.00	0.00
12-Month Rolling Total													
Toluene (tons)	8.01	9.23	10.50	10.46	9.80	9.95	9.82	8.99	8.12	7.45	6.69	5.91	4.64
Hexane (tons)	0.04	0.04	0.05	0.05	0.05	0.05	0.04	0.04	0.03	0.03	0.01	0.01	0.01

¹This chart was prepared to estimate what Crownline's air emissions would have been if it made the same number and models of boats as it did in the months shown, but Crownline was not complying with 40 CFR Part 63, Subpart VVVV (the "MACT").

Nov-02 Oct-02 Sep-02 Aug-02 Jul-02

15.32 17.19 13.49 21.86 13.97

12.93 15.16 11.79 19.16 11.80

313 268 254 323 323

Nov-02 Oct-02 Sep-02 Aug-02 Jul-02

9.08 12.01 8.56 15.36 9.04

2.31 2.02 1.71 3.08 1.76

Nov-02 Oct-02 Sep-02 Aug-02 Jul-02

1.06 0.79 1.22 0.41 0.72

0.01 0.00 0.00 0.00 0.00

Nov-02	Oct-02	Sep-02	Aug-02	Jul-02
0.01	0.01	0.01	0.01	0.02
0.16	0.12	0.10	0.12	0.08

Nov-02	Oct-02	Sep-02	Aug-02	Jul-02
0.09	0.06	0.07	0.10	0.07
0.21	0.12	0.10	0.06	0.10

Nov-02	Oct-02	Sep-02	Aug-02	Jul-02
0.01	0.01	0.01	0.01	0.00
0.00	0.00	0.00	0.00	0.00