

STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0010077-009-AV

APPLICANT

The applicant for this project is Hunter-Marlow, LLC. The applicant's responsible official and mailing address are: Mr. John Peterson, Responsible Official, Hunter -Marlow, LLC, 14700 Northwest US Highway 441, Alachua, Florida 32615.

FACILITY DESCRIPTION

The applicant operates the Alachua Facility, which is an existing fiberglass boat manufacturing facility. The Alachua facility is located in Alachua County at 14700 Northwest US Highway 441, Alachua, Alachua Co., Florida.

Process operations include the fabrication of boat decks, hulls and fiberglass reinforced plastic parts, the grinding and sanding of rough surfaces, the coating of hulls with antifouling paint, and the assembly of the decks and hulls to form the completed boats.

This facility consists of:

EP1- Exhaust stacks E1-E4 & E9-E16

EP2- Stack ML1

EP3 & EP4- Stacks W1 & W2

EP5- Wall and ceiling vents, M1-M3.

Fiberglass boat manufacturing operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows:

Emissions Point EP1 identifies the 12 exhaust stacks of the ventilation/exhaust system for the deck and hull building. Each stack contains 2 polyester fiber non-woven filters and 12 box filters. The polyester filters are changed on a weekly basis while the box filters are changed depending upon the pressure drop across the filter. Stacks E1-E4 and E9-E12 are located in the Hull Room and Stacks E13-E16 are located in the Deck Room.

Emission Point EP2 identifies the exhaust stack for the mill lamination vent where various adhesives are applied to the wood components of the boats.

Emissions Point EP3 & EP4 identifies the (2) particulate matter control devices used to collect the generated dust in the woodworking mill. Each device consists of a cyclone and baghouse in series. Lumber that is milled in this building is used to pre-fabricate the boat interiors. This process utilizes various kinds of adhesives, varnishes, caulks, putty and filler, cleanup solvents and other minor VOC containing products.

Emissions Point EP5 identifies the wall and ceiling vents through which fugitive VOC and HAP emissions resulting from the use of raw materials in the R & D Building, the Assembly Room, and the Finishing Room are emitted. In addition, the facility operates a spray room equipped with paint arrestor filters to control overspray as well as a drying room. The spray room has four (4) exhaust fans, while the drying room has one.

Also included in this permit are insignificant emissions units and/or activities.

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PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility. This project also transfers the permit to a new owner, Marlow-Hunter, LLC, 14700 Northwest US Highway 441, Alachua, Florida 32615.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received August 20, 2012

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

PROJECT REVIEW

The renewal has been reformatted in accordance with the new Title V format effective in 2010, including new applicable appendices.

CONCLUSION

This project renews Title V air operation permit No. 0010077-008-AV, which was issued on November 5, 2007. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.