STATEMENT OF BASIS

Sea Ray Boats, Incorporated
Merritt Island Complex

Title V Air Operation Permit Revision
Permit No. 0090093-016-AV

APPLICANT

The applicant for this project is Sea Ray Boats, Incorporated. The applicant's responsible official and mailing address are:

Mr. Randy Serfozo, General Manager
Sea Ray Boats, Incorporated, Merritt Island Complex
350 Sea Ray Drive
Merritt Island, Florida 32953-4185

FACILITY DESCRIPTION

The applicant operates the Merritt Island Complex, which includes the Product Development and Engineering (P.D.E.) Plant and the Sykes Creek Plant. The complex is located at 200 and 350 Sea Ray Drive, Merritt Island, Florida.

The fiberglass boat production consists of the following processes:

- mold maintenance
- gelcoat application
- gelcoat holding
- lamination (resin, fiberglass, man-made synthetics, and wood application)
- lamination holding
- parts extraction from molds
- parts cutting and grinding
- parts inspection and repair
- wood shop
- upholstery
- assembly
- test, final finish, inspection, and delivery
- repairs to existing boats
- bottom painting

The pollution control device for the P.D.E. Plant Small Parts/Wood Shop consists of a Torit Dust Collector, model 30-15.

The pollution control device for the P.D.E. Plant Cutting/Grinding Booth (Fabric Enclosure) consists of three Industrial Maid Air Cleaners or equal dust control device. Each of these three banks of air filters consist of pre-filters, pleated filters, and bags filters in series.

The pollution control devices for the Sykes Creek Plant Wood Shop consist of a Joe Hills Custom System (JHC), a dust collection and clean air recirculation system.

The pollution control device for the grinding operations at the Sykes Creek Plant consists of a portable Dust Collector, model DC5000 or a JBI Incorporated, or equal, permanent dust control device.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility to remove the Cape Canaveral Plant from the Merritt Island Complex currently operating under Title V Permit No. 0090093-015-AV.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision and Application for Concurrent Air Construction/PSD Permit Revision was received on October 15, 2012.
Draft/Proposed Title V Air Operation Permit Renewal posted onto web site on December 5, 2012.
Public Notice published on December 7, 2012.
Notification to U.S. EPA Region 4 of Publication of Public Notice on December 10, 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 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.

- Facility is subject to 40 CFR 63, Subpart VVVV, Boat Manufacturing, and will comply with the subpart and maintain records of material usage to demonstrate compliance.

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

Permit Nos. 0090238-001-Ac and 0090238-002-AV establish the Cape Canaveral Plant as a separate facility from the Merritt Island Complex. The purpose of this permitting project is to revise existing Title V Permit No. 0090093-015-AV for the Merritt Island Complex to remove all references to the Cape Canaveral Plant.

The following permit sections are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight. Changes to the permit made as part of this revision are shown below:

1. Section I, Subsection A is changed, as follows:

Subsection A. Facility Description.

Sea Ray Boats, Inc. owns and operates a boat manufacturing and repair complex. This complex consists of two ~~three~~ plants: (1) Product Development and Engineering (P.D.E.) Plant, and (2) Sykes Creek Plant~~, and (3) Cape Canaveral Plant which consists of only Buildings 102 and 103 of the 1200 Sea Ray Drive location~~. The Product Development and Engineering Plant and the Sykes Creek Plant are located on contiguous property at 200 and 350 Sea Ray Drive, respectively. ~~The Cape Canaveral Plant is located at 1200 Sea Ray Drive.~~ The following buildings are located within the Merritt Island Complex:

Facility Description	Sea Ray Plant
1. P.D.E. Offices and Fabrication	P.D.E. Plant
2. Compressor, Testing & Transformer	
3. Materials Storage Building	
4. Cutting/Grinding Booth	
5. Fuel Tank and Containment	
6. Resin Storage Building	
7. Fiberglass Boat Repairs	
8. Lamination Building	Sykes Creek Plant
9. Fabrication, Warehouse & Offices	
10. Bottom Paint Building	
11. Assembly Building & Offices	
12. Security Building	
13. Fuel Tanks and Containment	
14. Resin Storage Building	
15. Marina Facility	
16. Fiberglass Boat Repairs	
~~17. Wood Shop/UV Wood Coating and Curing~~	~~Cape Canaveral Plant, which consists of only Buildings 102 and 103 of the 1200 Sea Ray Drive location~~

2. Section III, Subsection A description is changed, as follows:

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
-001	The fiberglass boat production consists of the following processes: – mold maintenance – gelcoat application – gelcoat holding – lamination (resin, fiberglass, man-made synthetics, and wood application) – lamination holding – parts extraction from molds – parts cutting and grinding – parts inspection and repair – wood shop – upholstery – assembly – bottom painting ~~– UV coating/staining~~ – test, final finish, inspection, and delivery – repairs to existing boats The pollution control device for the P.D.E. Plant Small Parts/Wood Shop consists of a Torit Dust Collector, model 30-15. The pollution control device for the P.D.E. Plant Cutting/Grinding Booth (Fabric Enclosure)

	consists of three Industrial Maid Air Cleaners or equal dust control device. Each of these three banks of air filters consist of pre-filters, pleated filters, and bags filters in series. The pollution control devices for the Sykes Creek Plant Wood Shop consist of a Joe Hills Custom System (JHC), a dust collection and clean air recirculation system. The pollution control device for the grinding operations at the Sykes Creek Plant consists of a portable Dust Collector, model DC5000 or a JBI Incorporated, or equal, permanent dust control device. ~~The pollution control device for the Cape Canaveral Plant Wood Shop consists of a Joe Hill Custom System (JHC) dust collection system.~~ ~~Building 103 at the Cape Canaveral Plant is used for storage.~~

CONCLUSION

This project revises Title V air operation permit No. 0090093-015-AV. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.