Title V Air Operation Permit Revision
Permit No. 0090127-011-AV

APPLICANT

The applicant for this project is Vectorworks, Inc. The applicants' responsible official and mailing address are:

Mr. Jeffrey Gray, CEO and Managing Director
Vectorworks, Inc., Vectorworks Marine, LLC
805 Marina Road
Titusville, Florida 32796

FACILITY DESCRIPTION

The applicant operates Vectorworks Marine, LLC, which is located at 805 Marina Road, Titusville, Florida.

Vectorworks Marine, LLC manufactures Computer Numerical Control (CNC) plugs and conducts open and closed molding operations for boat manufacturing, fiberglass boats varying in size and purpose, and non-boat manufacturing related reinforced plastic composites. The facility consists of four main buildings: (1) Offices, (2) Machining and Office, (3) Infusion Molding and Large Lamination, and (4) Lamination and Assembly.

The primary activity in the Machining and Office Building is the machining of CNC plugs and open molding operations. The spray application of polyurethane foam and limited lamination using resins, putties, and fillers also take place in this building. Emissions in this building are channeled through a 2-ft diameter exhaust fan and exit an exhaust stack terminating 40-ft above ground level.

The Infusion Molding and Large Lamination Building is the site of lamination and gelcoating of large parts and molds. Infusion (closed) molding is the primary activity in this building. Emissions in this building are channeled through a 2-ft diameter exhaust fan and exit an exhaust stack terminating 40-ft above ground level.

The Lamination and Assembly Building is the site of lamination and gelcoating of smaller pieces and the assembly of boats. Infusion (closed) molding is the primary activity in this building. Emissions in this building are channeled through two (2) exhaust fans with filters to eliminate particulate emissions prior to exhaustion to the atmosphere.

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 incorporate the terms and conditions of major source air construction permit no. 0090127-012-AC.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued **[May 01, 2006]**
Application for a Title V Air Operation Permit Revision received **[February 28, 2008]**
Title V Air Operation Permit Revision issued **[September 08, 2008]**
Title V Air Operation Permit Renewal issued **[April 27, 2011]**
Application for a Major Source Air Construction Permit and a Title V Air Operation Permit Revision received **[September 08, 2011]**
Notice of Intent to Issue Air Permit issued **[November 10, 2011]**
Public Notice Published **[November 24, 2011]**

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 an emission unit (EU 001) that is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

- 40 CFR 63 Subpart VVVV (NESHAP: Boat Manufacturing); and
- 40 CFR 63 Subpart WWWW (NESHAP: Reinforced Plastic Composites Production).

(Note: The facility will demonstrate compliance with the MACT for both activities by use of the "averaging/point value" method.)

EU 002 (Adhesive Mixing/Packaging and Related Activities) is subject to 40 CFR 63 Subpart WWWW; however, the Emission Unit is not subject to any of the requirements in this subpart.

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 following were changes as part of this revision:

1) **Emission Unit 002-Adhesive Mixing/Packaging and Related Activities** was added as part of this revision; however, the facility-wide VOC/HAP emissions limitation will remain the same.

CONCLUSION

This project revises Title V air operation permit No. 0090127-010-AV, which was issued on April 27, 2011. 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.