Sea Ray Boats, Inc.
Cape Canaveral Plant

Facility ID No. 0090238
Brevard County

Title V Air Operation Permit

Permit No. 0090238-002-AV

Permitting Authority:

Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
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SECRETARY

PERMITTEE:
Sea Ray Boats, Inc.
350 Sea Ray Drive
Merritt Island, Florida 32953

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Cape Canaveral Plant
Facility ID No. 0090238
Title V Air Operation Permit

The purpose of this permit is to issue the Title V air operation permit for the above referenced facility. The Cape Canaveral Plant is located at 1200 Sea Ray Drive, Merritt Island, in Brevard County. UTM Coordinates are: Zone 17, 531.83 km East and 3142.3 km North. Latitude is: 28° 24' 24.2" North; and, Longitude is: 80° 40' 30.2" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: January 31, 2013
Renewal Application Due Date: June 20, 2017
Expiration Date: January 31, 2018

Executed in Tallahassee, Florida.

for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

JFK/es

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The Cape Canaveral Plant consists of a woodshop, wood coating, and curing operation. These operations are contained in buildings 102 and 103 on the leased property. Specifically, the facility consists of a woodworking shop with dust collection and control, an ultra-violet coating/curing line, an automatic spray booth, a manual spray booth, a hot water package boiler fired with natural gas, and stacking and laminar air ovens. Currently, the facility produces coated wood products for fiberglass boats. The facility proposes to expand this operation to also produce coated wood products for several other end users, such as surface coating for wood furniture, wood building products, and other miscellaneous wood products.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
-001	Coating and Curing Operations
-002	Woodworking Shop

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

Subsection C. Applicable Regulations.

The facility emits volatile organic compounds (VOC), some of which are regulated hazardous air pollutants (HAP). Based on the Title V air operation permit application received October 15, 2012, this facility is not a major source of HAP. However, based on EPA's "Once In Always In" policy, this facility is a major HAP source and will remain as such for the purposes of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) in Subpart VVVV of Title 40, Part 63, Code of Federal Regulations. Because the Cape Canaveral facility is not currently performing boat manufacturing related activities covered under the provisions of 40 CFR Part 63 Subpart VVVV, there are no applicable requirements at this time including but not limited to the monitoring, recordkeeping, work practices, HAP-content limits of boat building materials, written implementation plan and reporting requirements. Restrictions specified in Permit No. 0090238-001-AC maintain the facility as a synthetic minor HAP source for applicability determinations of any NESHAP categories in the future. A summary of applicable regulations is shown in the following table.

Regulation	EU No.
State Rule Citations	
Rule 62-4.070(3), F.A.C. Reasonable Assurance	001, 002
Rule 62-210.300, F.A.C., Permits Required	001, 002
Federal Rule Citations	
NESHAP Subpart A, General Provisions	Facility
NESHAP Subpart VVVV, Fiberglass Boat Manufacturing	Facility

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Paving and maintenance of roads, parking areas and yards.
b. Removal of particulate matter from work areas by vacuum or hand sweeping to prevent particulate matter from becoming airborne.
c. Landscaping or planting of vegetation.
d. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.

[Rule 62-296.320(4)(c), F.A.C.; and, proposed by applicant in Title V air operation permit renewal application received October 15, 2012.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

Subsection A. Emissions Unit 001

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

EU No.	Brief Description
-001	UV Coating and Curing Operations

The wood coating line will be used to apply stains and topcoats to the components fabricated in the woodshop. Components of the wood coating line include an automatic spray booth, a manual spray booth, and stacking and laminar air ovens. The 12 vertical stacks that are 38 feet above grade associated with the coating line are as follows:

Stack ID	Description	Diameter (feet)	Flow (acfm)	Exhaust Temperature (° F)
3	Roll Coat Application	0.83	10,000	90
4	Roll Coat UV Cure #1	0.67	3,000	150
5	Roll Coat UV Cure #2	0.67	3,000	150
6	Roll Coat UV Cure #3	0.67	3,000	150
7	Roll Coat UV Cure #4	0.67	3,000	150
9	Automatic Spray Booth	2.00	7,500	90
10	Stacking Oven	0.83	7,500	90
11	Laminar Air Oven	0.83	7,500	90
12	Spray Cure UV #1	0.67	3,000	150
13	Spray Cure UV #2	0.67	3,000	150
14	Spray Cure UV #3	0.67	3,000	150
15	Manual Spray Booth	3.50	30,000	90

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0090238-001-AC]

Emission Limitations and Standards

A.2. Emissions Caps:

a. *Hazardous Air Pollutants*: Emissions of all hazardous air pollutants from this emissions unit shall not exceed 9.0 tons during any consecutive 12 months, determined on a monthly basis.

b. *Volatile Organic Compounds*: Emissions of all volatile organic compounds from this emissions unit shall not exceed 30.0 tons during any consecutive 12 months, determined on a monthly basis.

[Permit No. 0090238-001-AC; and Rules 62-210.200(193) (Definition of "Major Source of Air Pollution"), 62-210.300(2)(b), and 62-212.400(12), F.A.C.]

Monitoring of Operations

A.3. Materials and Usage Records: On at least a monthly basis, the permittee shall track and record the use of materials (e.g., coatings, adhesives, solvents, etc.) that contain hazardous air pollutants and/or volatile organic compounds. For each such material, the permittee shall obtain records that identify the percentage of volatile organic compounds and the percentage of each hazardous air pollutant (e.g., vendor specification sheets, material safety data sheets (MSDS), EPA Method 24 analyses, EPA 450/3-84-019 analyses, or other similar records). [Permit No. 0090238-001-AC]

Recordkeeping and Reporting Requirements

A.4. Monthly Operations Log: The permittee shall prepare a monthly operations log detailing: the monthly use of all materials containing hazardous air pollutants and/or volatile organic compounds; the percentage of volatile organic compounds and the percentage of each hazardous air pollutant in the materials used; the monthly and 12-month rolling total emissions of volatile organic compounds, each hazardous air pollutant, and total hazardous air pollutants from this emissions unit. To demonstrate compliance with the emissions caps specified in this permit, emissions shall be calculated using the content of volatile organic compounds and hazardous air pollutants as identified in the records required for each material along with the actual material usage for the operating period. These monthly records shall be completed by the end of the following month. If an emissions cap is exceeded, the permittee shall report the exceedances to the Compliance Authority within one working day of making the determination. [Permit No. 0090238-001-AC]

A.5. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

Subsection B. Emissions Unit 002

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

EU No.	Brief Description
-002	Woodworking Shop

The activities in the wood shop include saws, routers, sanders, etc. and the particulate emissions generated by these operations are controlled by a Joe Hill Custom dust collector system equipped with a Ligna-Con Dust Collection Unit Model 14.5-500-12 filter or equivalent dust collector with a vertical stack exhaust that is 38 feet above grade and 1.83 feet in diameter with an exhaust flow of 50,000 acfm at 90º F.

Equipment

B. 1. Dust Collector: To control particulate matter emissions from the woodworking shop, the permittee shall maintain a dust collection system with a dust collector to achieve a design of 99.9% removal efficiency using a reverse air filter system using felt media. Compliance with this design specification shall be demonstrated by maintaining records of the performance specification sheets from the equipment vendor or maintaining record of evaluation of the dust collector design by an independent environmental consultant. *{Permitting Note: Based on the installation of this required equipment, expected PM/PM_{10}/$PM_{2.5}$ emissions will not exceed 4.1 pounds per hour or 18 tons per year at full operation.}* [Application No. 0090238-001-AC]

Essential Potential to Emit (PTE) Parameters

B. 2. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0090238-001-AC]

MAINTENANCE

B. 3. Inspections: The operator shall periodically inspect the dust collector to ensure proper operation and control of the equipment. If there are visible emissions from the dust collector, the operator shall investigate and take corrective action. *{Permitting Note: It is not necessarily a violation to have visible emissions from the dust collector, but continued failure to take corrective action could be considered poor operation and circumvention of a control device.}* [Permit No. 0090238-001-AC]

RECORDS

B. 4. Dust Collector Records: To demonstrate compliance with the specification for the design outlet dust loading from the dust collector, the operator shall maintain records of the performance specification sheets from the equipment vendor or other certification by an independent environmental consultant based on evaluation of the dust collector and filter. [Permit No. 0090238-001-AC]

Recordkeeping and Reporting Requirements

B. 5. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.