Title V Air Operation Permit
Permit No. 0090238-002-AV

APPLICANT

The applicant for this project is Sea Ray Boats, Inc. The applicant's responsible official and mailing address are: Mr. Gary Zimmer, Vice President of Operations, Recreational Boat Group, Cape Canaveral Plant, 350 Sea Ray Drive, Merritt Island, Florida 32953. The existing facility is located in Brevard County at 1200 Sea Ray Drive in Merritt Island, Florida. The UTM coordinates are Zone 17, 531.83 km East and 3142.3 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS).

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, a 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.

The facility consists of the following emissions units.

Facility ID No. 0090238

ID No.	Emission Unit Description
-001	Coating and Curing Operations
-002	Woodworking Shop

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 Brushes	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

From the coating and curing operation, the facility emits volatile organic compounds (VOC), some of which are regulated hazardous air pollutants (HAP). The facility emits particulate matter from the woodshop dust collector. There are currently no state unit specific requirements applicable to the woodshop or coating and curing operations. The small gas-fired package boiler is exempt from permitting under the categorical and conditional exemptions because it meets all of the requirements of Rule 62-210.300(3)(a)33., F.A.C. for fossil fuel steam

generators, hot water generators, and other external combustion heating units with a heat input capacity less than 10 million Btu per hour. The woodshop and coating and curing operations are subject to Rule 62-210.300, F.A.C., Permits Required.

The woodshop is required to install and operate a dust collection and control system to achieve a design of 99.9% removal efficiency using a reverse air filter system using felt media based on the vendor specifications. Compliance with this design specification will be demonstrated by maintaining 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. The operator is required to 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 will investigate and take corrective action. 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. No initial or periodic visible emissions compliance tests (EPA Method 9) are required.

HAP and VOC emissions from the coating and curing operations will be limited to 9.0 and 30.0 tons during any consecutive 12 months, respectively. Compliance will be determined on a monthly basis from records of the monthly material use (e.g., coatings, adhesives, solvents, etc.) and records of the HAP and VOC material contents.

PROJECT DESCRIPTION

On October 15, 2015, the applicant submitted a concurrent application for an air construction permit with this application for a Title V air operation permit. Based on a recent market survey and industry feedback, the applicant proposes to expand operations to include coated wood products marketed to other end users such as surface coating for wood furniture, wood building products, and other miscellaneous wood products. Specifically, the application requests authorization of the Cape Canaveral Plant as a separate facility from the Merritt Island Complex's fiberglass boat building facility. The application also requests specific emissions limits to establish the Cape Canaveral Plant as a synthetic minor source of VOC and HAP emissions.

Facility History

Sea Ray conducts operations in three facilities on Merritt Island: the Sykes Creek facility, a Project Development and Engineering (PD&E) facility, and the Cape Canaveral facility. The Cape Canaveral Plant is approximately 1.2 miles away from the Sykes Creek and PD&E facilities, which are owned by Sea Ray. Sea Ray used to own the Cape Canaveral facility, but has since sold the property and leases two warehouses back from the buyer. Sea Ray once owned a fourth facility, the Merritt Island facility, contiguously located to Sykes Creek and PD&E. Sea Ray sold Merritt Island facility property in 2011 and the property is no longer being used to manufacture boats.

In 1999, Sea Ray developed the Cape Canaveral facility property with the intention of manufacturing boats. Sea Ray applied for a permit for the Cape Canaveral facility and the Cape Canaveral facility was deemed to be a single facility for PSD purposes with the Sykes Creek, Merritt Island and PD&E facilities. The Department found the facilities were under common control, shared the same SIC code and were adjacent. As provided in their application, Sea Ray did not complete construction under the permit and did not conduct boat manufacturing operations at the Cape Canaveral facility.

In 2004, Sea Ray applied for and received a permit to conduct boat repair operations at the Cape Canaveral facility, which was subject to NESHAP Subpart VVVV. Sea Ray repaired boats at the Cape Canaveral facility until 2009. In 2006, Sea Ray applied for and received a permit to conduct wood coating operations at the Cape Canaveral facility. Wood coating operations are conducted to this day.

In Permit No. 0090238-001-AC, the Department determined that the Cape Canaveral Plant is a separate facility from the Sykes Creek and PD&E facility.

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

NESHAP: 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. However, based on the application, none of the other potentially applicable NESHAP categories for major sources apply because the Cape Canaveral Plant has not conducted the type of work regulated by the provisions and, upon issuance of this permit, will become an area source of HAP for any proposed new activities in the future. In addition, the application states that none of the potentially applicable NESHAP categories for area sources are applicable because the Cape Canaveral Plant has not conducted the type of work regulated by the provisions. Appropriate air permits must be obtained prior to conducting any work that will be regulated by a newly applicable NESHAP. 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.

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

GHG: The facility is not identified as a major source of green house gas (GHG) pollutants.

CONCLUSION

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.