TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Falcon Marine LLC
9008 Marlin Street
Cape Canaveral, FL 32920

Falcon Marine LLC

Facility ID No. 0090248

PROJECT

Project No. 0090248-001-AC
Application for an Air Construction Permit
Project Name: Air Construction Permit

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Programs
Central District Office
Orlando, Florida 32803-3767
DEP_CD@dep.state.fl.us

September 29, 2014

Prepared by Jeff Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210, and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Harley C. McDonald, Managing Member
Falcon Marine LLC
9008 Marlin Street
Cape Canaveral, FL 32920
hmcdonald@falconmarineusa.com

B. Application Contact:

Mr. Harley C. McDonald, Managing Member
Falcon Marine LLC
9008 Marlin Street
Cape Canaveral, FL 32920
hmcdonald@falconmarineusa.com

C. Project Location:
5225 S. Washington Avenue
Titusville, FL 32780

D. Project Summary:
This is the initial air construction permit for a fiberglass boat manufacturing facility. Facility operations will result in VOC and HAP emissions, with the predominant HAP being styrene. Another HAP that will be used at the facility is methyl methacrylate (MMA).

E. Application Information:

Application Received (including processing fee) on: 08/21/2014
Request for Additional Information (RAI No. 1) sent on: 09/08/2014
Teleconference to discuss RAI No. 1: 09/11/2014
Reply to Request for Additional Information (RAI No. 1) received on: 09/15/2014
Application determined to be complete on: 09/22/2014

II. PSD Applicability for Project

The Potential to Emit for VOCs (Volatile Organic Compounds) is 3.19 tons per year, which is less than 250 tons per year; therefore, no additional PSD Applicability Evaluation is necessary. For more information, see Section IV. Summary of Emissions of this document.

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, and Chapters 62-204 through 62-297, F.A.C., as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	The Potential to Emit for VOCs is 3.19 tons per year, which is less than 250 tons per year.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	The facility is a potential source of unconfined particulate matter emissions. Visible emissions are limited to less than 20 percent opacity.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	The facility is a source of VOCs and odors. Potential to emit for VOCs is 3.19 tons per year.
Rule 62-296.400, F.A.C. – Stationary Source Emission Standards	N	There is no applicable source category.

Subject to:	Y/N	Comments
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone
Rule 62-204.800(8), F.A.C. - Standards of Performance for New Stationary Sources (NSPS – 40 CFR 60)	N	No applicable categories
Rule 62-204.800(10), F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	Y	The facility is subject to 40 CFR 61, Subpart M – Asbestos.
Rule 62-204.800(11), F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	The facility is not subject to 40 CFR 63, Subpart VVVV – Boat Manufacturing and 40 CFR 63, Subpart WWWW – Reinforced Plastic Composites because these NESHAPs apply only to major sources of HAPs (Hazardous Air Pollutants).
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	The Potential to Emit for VOCs is 3.19 tons per year.
Rule 62-297.310, F.A.C. – General Compliance Test Requirements	N	No requirements for compliance testing.

IV. Summary of Emissions

VOCs and HAPs:

Pollutant	EU No. and brief description	Potential Emissions (tons/year)	Major Source Thresholds (tons/year)
Total Volatile Organic Compounds (VOCs)	EU 001 Fiberglass Boat Manufacturing*	3.19	100
Total Hazardous Air Pollutants (HAPs)	EU 001 Fiberglass Boat Manufacturing*	2.51	25
Individual Hazardous Air Pollutant (HAP)	EU 001 Fiberglass Boat Manufacturing*	1.75	10

* Based on Attachment 5 of the RAI Response. The calculations shown in Attachment 5 use the worst-case product in each category, meaning that the product with the highest HAP or VOC content is used in each of the application methods. The quantities used are projected quantities.

V. Discussion

The paint spray booth is being permitted for workload associated with the permitted boat manufacturing. It is not for expansion of painting activities as a separate manufacturing activity. The booth will increase the quality of the paint work and eliminate interference

from other activities taking place in the southern building that may affect the quality of the paint finish.

VI. Federal NSPS and/or NESHAP Provisions

The facility is not subject to any NSPS Provisions.

The facility is subject to 40 CFR 61, Subpart M – Asbestos.

The facility is not subject to 40 CFR 63, Subpart VVVV – Boat Manufacturing, or 40 CFR 63, Subpart WWWW – Reinforced Plastic Composites, because these NESHAP regulations apply only to major sources of HAPs (Hazardous Air Pollutants).

VII. Conclusions

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VIII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and adopted federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, by e-mail at jeff.rustin@dep.state.fl.us or by phone at 407-897-4100.