Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF FINAL PERMIT

Mr. Mark Pratt, General Manager
Lauderdale Marine Center
2001 S.W. 20th Street
Fort Lauderdale, Florida 33315

VIA ELECTRONIC MAIL
E-MAIL RECEIPT REQUESTED

Dear Mr. Pratt:

Enclosed is operation permit number 0112710-003-AO to operate an air pollution source pursuant to Section 403.087 of the Florida Statutes, Broward County's Specific Operating Agreement with the Florida Department of Environmental Protection, and Broward County Code Chapter 27 Article IV which adopts Florida Administrative Code (FAC) 62-4, 62-296 and 62-297.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 62-103 and 28-5.201, FAC, and must be filed (received) in the Office of the Broward County Attorney at 115 South Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes and Chapter 27. This permit is final and effective on the date filed with the Clerk of the PPRAQD unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the PPRAQD. When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Broward County, Florida
POLLUTION PREVENTION, REMEDIATION AND
AIR QUALITY DIVISION

Lorenzo Fernandez 2/7/14

Lorenzo Fernandez, P.E., Manager
Environmental Assessment, Remediation and Air Quality
Pollution Prevention, Remediation and Air Quality Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Permit was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with e-mail receipt requested before the close of business on 2/10/14 to the persons listed below.

Lee Hoefert, P.E., SFDEP, Air Section, Lee.Hoefert@dep.state.fl.us

Mark Pratt, Lauderdale Marine Center, pratt@lauderdalemarinecenter.com

Susan Engle, ESI, via e-mail

Stephanie Brooks, P. E., Brooks and Associates, via e-mail

Siobhan Duff, ESI, via e-mail

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) 2/10/14 (Date)

Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF AIR POLLUTION PERMIT

ISSUED TO:

PERMITTEE:

Authorized Representative:
Mr. Mark Pratt, General Manager
Lauderdale Marine Center
2001 S.W. 20th Street
Fort Lauderdale, Florida 33315

AIRS ID NO: 0112710
Permit Number: 0112710-003-AO
Issue Date: February 7, 2014
Expiration Date: October 7, 2018

Facility Name: Lauderdale Marine Center is located at 2001 S.W. 20th Street, Fort Lauderdale, Broward County, Florida.

Project Description: Operation permit to renew the federally enforceable state operation permit 0112710-001AF following the issuance of the construction permit 0112710-002-AC that was requested to increase the volatile organic compounds (VOCs) emissions limit from 24 tons/year to 40 tons/year. The total hazardous air pollutants (HAPs) and individual HAP emissions limits remain unchanged. Also, the two existing emissions units were combined into one emissions unit to ease the tracking products used; and to simplify the emission calculations. SIC Code: 3732. NAICS: 336612.

Lat/Long: 26°5' 46.32" N / 80°09'55.97" **UTM:** Zone 17; 583.4 Km. E; 2886.6 Km. N

Statement of Basis: This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQD) and made a part hereof.

This permit is organized by the following sections.
1. Facility Description
2. General Conditions
3. Facility-wide Conditions
4. Emissions Unit Specific Conditions

Executed in Broward County, Florida

Lorenzo Fernandez 2/7/14
Lorenzo Fernandez, P.E., Manager
Environmental Assessment, Remediation and Air Quality
Broward County Pollution Prevention, Remediation and Air Quality Division

1. FACILITY DESCRIPTION

The facility is a boat yard. It provides full service vessel repair and maintenance. The service includes boat engine maintenance and tuning which are exempt from air permitting requirements. The surface coating operation is conducted in nineteen (19) designated, covered paint sheds, twenty –two (22) service bays and in the three (3) working yards. The surface coating, conducted in the service bays, is limited to light touch- up and finishing work as the bays are too small to accommodate large vessels. The working yard can accommodate up to eighty –nine (89) vessels of various sizes at one time. The painting, that takes place in the service bays, is applied by roller or HVLP spray system. The boats, that are located in the working yard, are completely enclosed in a shrink wrap enclosure during the surface coating operation. The enclosure is also fitted with a portable filtration system that employs high capacity industrial exhaust fans, large cross-section sheet metal filter banks and a flexible ducting. The filter banks are placed within the vessel enclosure and covered with filter media. The filter banks are then connected to the exhaust fan, located outside the enclosure, by lengths of suction ducting. The facility also conducts fiberglass repair activities. Boat manufacturing is not allowed. The volatile organic compounds (VOCs) and hazardous air pollutant (HAPs) emissions resulting from this operation are unconfined (fugitive) in nature.

The emissions unit is as follows:

E.U. ID No.	Brief Description
003	Boat repair yard consisting of nineteen (19) designated, covered paint sheds and twenty- two (22) bays. The product application is performed with roller or HVLP spray system. Also, there are three (3) non-enclosed boat repair yard working areas for surface coating with roller or HVLP spray system. Surface coating, applied using the HVLP spray system, is contained with a shrink wrap enclosure which is equipped with a portable filtration system with high capacity industrial exhaust fans. There are no exhaust stacks for this operation.

2. GENERAL CONDITIONS

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The Permittee is placed on notice that the PPRAQD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160 (1), F.A.C.]

2. Permit Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the PPRAQD.
[Rule 62-4.160 (2), F.A.C.]

3. Disclaimer. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
[Rule 62-4.160 (3), F.A.C.]

4. Disclaimer. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160 (4), F.A.C.]

5. Liability. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and FDEP rule, unless specifically authorized by an order from the PPRAQD.
[Rule 62-4.160 (5), F.A.C.]

6. Operation and Maintenance. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by PPRAQD and FDEP rules.
[Rule 62-4.160 (6), F.A.C.]

7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
   (a) Have access to and copy any records that must be kept under conditions of the permit;
   (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or PPRAQD and FDEP rules.
   [Rule 62-4.160 (7), F.A.C.]

8. Notice of Noncompliance. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide PPRAQD with the following information:
   (a) A description of and cause of noncompliance; and
   (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPRAQD for penalties or for revocation of this permit.
   [Rule 62-4.160 (8), F.A.C.]

9. Reporting Noncompliance. The Permittee shall report any periods of noncompliance to the PPRAQD immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@broward.org. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.
[Rules 62-4.130 and 62-4.070(3), F.A.C.]

10. Evidence Materials. By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the PPRAQD, may be used by the PPRAQD as evidence in any enforcement proceeding arising under the Florida Statues or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
[Rule 62-4.160 (9), F.A.C.]

11. Rule Changes. The Permittee agrees to comply with changes in Florida Department of Environmental Protection rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or FDEP rules.
[Rule 62-4.160 (10), F.A.C.]

12. Permit Transfer. This permit is transferable only upon PPRAQD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the PPRAQD.
[Rule 62-4.160 (11), F.A.C.]

13. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.
[Rule 62-4.160 (12), F.A.C.]

14. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:

    (a) Upon request, the Permittee shall furnish all records and plans required under FDEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQD.
    (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by PPRAQD rule.
    (c) Records of monitoring information shall include:
        1. The date, exact place, and time of sampling or measurements;
        2. The person responsible for performing the sampling or measurements;
        3. The dates analyses were performed.
        4. The person responsible for performing the analyses;
        5. The analytical techniques or methods used;
        6. The results of such analyses.

        [Rule 62-4.160 (14), F.A.C.]

15. Information Submittal. When requested by the PPRAQD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the PPRAQD, such facts or information shall be corrected promptly.
[Rule 62-4.160 (15), F.A.C.]

16. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.
[Broward County Code, Sec. 27-173]

3. FACILITY-WIDE CONDITIONS

17. Objectionable Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

18. Volatile Organic Compound Emissions or Organic Solvent Emissions. No person shall 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 PPRAQD.
[Rule 62-296.320(1), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(f)]

19. General Visible Emissions. No person shall cause, let, permit, suffer or allow being discharged into the atmosphere any air pollutants from sources, the opacity of which is equal to or greater than 20 percent. If the presence of uncombined water is the only reason for failure to meet visible emission standards given in this section, such failure shall not be a violation of this prohibition.
[Rule 62-296.320(4) (b), F.A.C. and Broward County Code, Section 27-175(i). DEP Guidance, March 2000, DARM-PER 33].

20. Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Codes.
[Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(b)]

21. Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C and Broward County Code, Sec. 27-175(c)]

22. Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.

23. Unconfined Emissions of Particulate Matter. The permittee shall take reasonable precautions to control emissions of fugitive particulate matter. Reasonable precautions may include but shall not be limited to the following:
    a) Paving and maintenance of roads, parking areas and yards;
    b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing;
    c) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the source to prevent reentrainment, and from buildings or work areas to prevent particulate matter from becoming airborne;
    d) Landscaping or planting of vegetation
    e) Use of hoods, fans, filters and similar equipment to contain, capture and/or vent particulate matter;
    f) Enclosure or covering of conveyor systems
    g) Sanders and grinders equipped with vacuum collection systems

    [Rule 62-296.320(4) (c) F.A.C.; Broward County Code Section 27-177(b)]

24. Special Compliance Tests. When PPRAQD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a PPRAQD rule or in a permit issued pursuant to those rules is

being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the PPRAQD.
[Rule 62-297.310(7) (b), F.A.C.]

25. Annual Operation Report (AOR). The AOR shall be submitted to the PPRAQD by April 1 of the following year. If the permittee elects to use FDEP's electronic annual operation report software (EAOR), the report must be submitted directly to FDEP and there is no requirement to submit a copy to PPRAQD.
[Rule 62-210.370(3), F.A.C.]
{Permitting Note. Information on the EAOR submittal is available at http://www.dep.state.fl.us/air/emission/eaor/default.htm}

26. Operating Permit Renewal. Sixty days before the expiration date of this operation permit, the permittee shall apply for a renewal of permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[Rule 62-4.090 F.A.C.]
{Permitting Note: The permittee may also elect to submit the application electronically using the Electronic Permit Submittal and Processing system (EPSAP) via the http://www.dep.state.fl.us/air/emission/epsap/default.htm website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.

4. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. This section addresses the following emissions units.

E.U. ID No.	Description of Emissions Unit
003	Boat repair yard consisting of nineteen (19) designated, covered paint sheds and twenty- two (22) bays. The product application is performed with roller or HVLP spray system. Also, there are three (3) non-enclosed boat repair yard working areas for surface coating with roller or HVLP spray system. Surface coating, applied using the HVLP spray system, is contained with a shrink wrap enclosure which is equipped with a portable filtration system with high capacity industrial exhaust fans. There are no exhaust stacks for this operation.

Emission Limiting Standards

27. Facility-Wide VOC, Total HAP and Individual HAP Emissions. In order to avoid major source (Title V) applicable standards, the volatile organic compounds (VOCs) emissions shall be less than 40 tons in any consecutive twelve month period, the individual hazardous air pollutant (HAP) emissions shall be less than 9 tons in any consecutive twelve month period and the total HAP emissions shall be less than 24 tons in any consecutive twelve month period.
[Rule 62-4.070(3) F.A.C., Rule 62-213.4220(3(c) 1, FESOP application submitted October 7, 2008, construction permit application received October 1, 2013]

Recordkeeping and Reporting Requirements

28. VOC Content: The owner or operator shall determine the VOC content of all solvent based materials, coatings, and solvents used, and shall monitor the usage of such materials at the referenced emission unit by recording and maintaining the following information:

    a. The VOC content for each material containing or emitting VOC.
    b. The material utilization rate on a monthly basis, for all materials containing or emitting VOC used at the referenced emission unit.
    c. The total monthly VOC emission rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 20 days after the end of that month.
    d. A rolling consecutive 12-month total emission rate for VOC, calculated from the monthly totals for the previous twelve calendar months.
    e. Maintain Material Safety Data Sheets (MSDS) for all volatile materials utilized.

    [Rule 62-4.070(3), F.A.C.]

29. Total and Individual HAP Content: The owner or operator shall determine the total and individual HAP contents of all solvent based materials, coatings, and solvents used, and shall monitor the usage of such materials at the referenced emission unit by recording and maintaining the following information:

    a. The individual and total HAP contents for each material containing or emitting HAPs.
    b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emission unit.
    c. The individual and total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
    d. A rolling consecutive 12-month total emission rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.
    e. Maintain Material Safety Data Sheets (MSDS) for all volatile materials utilized.

    [Rule 62-4.070(3), F.A.C.]

30. The permittee shall maintain the records required by this permit for a period of five (5) years from the date the records were created and be made available for PPRAQD staff review, if necessary.
    [Rule 62-4.070(3), F.A.C.]

31. The permittee shall notify PPRAQD of any change in products and submit new material safety data sheets (MSDS) for approval prior to use.
    [Rule 62-4.070(3), F.A.C.]