Blazer Boats, Inc.
Blazer Boats Inc. Manufacturing Facility
Facility ID No.: 0330264
Escambia County

Construction Permit - Title V Source
Permit No.: 0330264-001-AC

Permitting and Compliance Authority:
Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

[electronic file name: 0330264-001-ac.doc]

Construction Permit - Title V Source
Permit No.: 0330264-001-AC

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Permittee:
Blazer Boats, Inc.

Permit No.: 0330264-001-AC
Facility ID No.: 0330264
SIC Nos.: 3732
Project: Fiberglass Boat Manufacturing Facility

This permit is for the construction of a manufacturing facility located at.Ellyson Industrial Park, 3300 Bill Metzger Lane in Pensacola, Escambia County; UTM Coordinates: Zone 16, 482.59 km East and 3375.87 km North; Latitude: 30° 31.442' North and Longitude: 87° 11.685' West.

STATEMENT OF BASIS: This Title V air construction 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 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix TV-3, Title V General Conditions

Effective Date: March 27, 2000
Expiration Date: March 27, 2005

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Ed K. Middleswart, P.E.
Air Program Administrator

EKM/trc

Section I. Facility Information.

Subsection A. Facility Description.

The building of the Blazer Boats, Inc., manufacturing facility consists of the construction of a new 57,000 square foot building at an undeveloped site. The building site is positioned inside of the Ellyson Industrial Park. The facility includes two gelcoat booths, a fiberglass shop, a wood working shop, a grinding area, and a rigging area. Boats built at this facility range from 16 to 21 feet in length.

Activities at this facility consist of the application of gelcoat to molds with airless spray guns. Chop guns are then used to apply styrene resin and glass fiber to molds to build up appropriate material thickness. The formed shells are removed from molds and cleaned in the grinding shop. Interior wood boat components are manufactured in the woodworking shop. Boat assembly is completed in the rigging area.

Each gelcoat booth is equipped with one exhaust system that will discharge through a stack 10 feet above the building roof. The exhaust system inlets are equipped with particulate filters to aid in the removal of fugitive gelcoat particles. The fiberglass shop is equipped with three exhaust stacks and the inlets are equipped with particulate filters. Portable vacuum systems are used to contain dust generated in the grinding and wood working shops. Particulate filters are installed on all building exhaust fans.

The equipment used to apply resin is cleaned using a solvent. Styrene and other VOCs are emitted uncontrolled. The majority of the styrene and other VOC emissions exit the building through the gelcoat booths and fiberglass shop exhausts. The wood working shop makes molds and wood and/or foam structural boat members.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities. These include general facility cleanup and maintenance, mold fabrication and maintenance, product final assembly and miscellaneous activities pursuant to operating and maintaining a manufacturing facility and offices.

Based on permittee information, the facility has the potential to emit 10 TPY of styrene and 1 TPY of other miscellaneous VOCs, if operated continuously at a maximum rate. Styrene is defined as a HAP in Rule 62-210.200, F.A.C. There is no source-specific emission limit applicable to this facility. A letter from Cornerstone Engineering, Inc., dated February 18, 2000, requests a 15 TPY limit for styrene emissions. As this will support expected production growth through the life of the permit, 15 TPY of styrene emissions is established as the facility's current capacity.

Blazer Boats, Inc., is a company currently building boats using the same process described in this document. Because Blazer Boats, Inc., is relocating an existing process, it does not trigger the need for a case-by-case MACT determination.

This construction permit is issued under the provisions of Chapters 62-4, 62-210, and 62-213.

Based on the initial construction permit application received December 14, 1999, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

Unregulated Emissions Units and/or Activities
001 Fiberglass Boat Manufacturing Facility

The above emissions unit is composed of the following activities:

Resin spray lay-up
Gelcoat Spray-on
Resin hand lay-up, roll-on
Drilling, sanding and sawing of boat hulls
Mold Release
Solvent consumption
Adhesive consumption

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Statement of Basis
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

These documents are on file with permitting authority:
Florida Department of Environmental Protection Memorandum received January 25, 2000
Blazer Boats, Inc., Permit Application received December 14, 1999
Cornerstone Engineering, Inc., letter received February 22, 2000

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-3, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not 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.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a. As required by rule, inspection, or change in process the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
b. The owner or operator shall report to the Department of Community Affairs (DCA) within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the USEPA/Chemical Safety Hazard Investigation Board or the National Response Center under Section 112(r)(6).
c. The owner or operator shall submit the required annual registration fee to the DCA on or before June 21, 1999 and on April 1 annually thereafter, in accordance with Part IV, Chapter 252, F.S. and Rule 9G-21, F.A.C.

5. Not federally enforceable. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), F.A.C.]

6. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

7. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: maintaining all filters in a serviceable condition and performing proper general housekeeping.
[Rule 62-296.320(4)(c)2., F.A.C

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364, Fax: 850/595-8096

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155, Fax: 404/562-9164

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
001	Fiberglass Boat Manufacturing Facility

Emission Limitations and Standards

A.1. Visible Emissions. Visible emissions shall be less than 20% opacity.
[Rule 62-210.300(3)(c) 1.f.,F.A.C.]

A.2. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Test Methods and Procedures

A.3. Visible Emissions. A **v**isible emissions test is required in order to provide reasonable assurance that the emissions unit can comply with the standards of the Department. The test shall be conducted within 45 days of the completion of construction. The test shall be conducted on a gelcoat booth stack while a boat is being constructed (gelcoat is being applied). The visible emissions tests shall be conducted in accordance with EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. The Department shall be notified at least 15 days prior to testing to allow witnessing.
[Rules 62-210.300(3)(c) 1.i, and 62-297.401(9), F.A.C.]

A.4. Capacity. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.
[Rules 62-297.310(2) and 62-4.070, F.A.C.]

Recordkeeping and Reporting Requirements

A.5. Special Compliance Tests. When the Department, 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 Department rule or in a permit issued pursuant to those rules is being violated, it may 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 Department.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

A.6. VOC and HAP emissions shall be tracked on logs commencing from the date of issuance of this permit with monthly materials usage and emissions calculations based on the VOC and HAP content (wt %) of the materials used. As a minimum, the logs shall include:

- Identification of the raw materials (solvents, coatings) used,
- Quantity, and composition of the materials used identifying total VOC content, total HAP content, and individual HAP content for each material used.
- VOC, HAPs, and individual HAP emissions based on materials usage.

Monthly summaries and rolling twelve-month averages shall be certified and signed by responsible company representative to be accurate and truthful calculated representations of actual emissions. Monthly summaries and rolling twelve-month averages of emissions shall be kept and maintained for Department inspection for at least five years. Permittee shall install, use, and maintain appropriate systems to gather data necessary to track VOC and HAP emissions.
[Rule 62-296.320]

A.7. Except as provided in Rule 62-213.420(1)(a)4., F.A.C., a facility that commences operation as a Title V source after October 25, 1995, or that otherwise becomes subject to the permitting requirements of Chapter 62-213, F.A.C., after October 25, 1995, must file an application for an operation permit under this Chapter ninety days before expiration of the source's construction permit, but no later than 180 days after commencing operation, unless a different application due date is provided at Rule 62-204.800, F.A.C.
[Rule 62-213.420(1)(a)2, F.A.C.]