STATEMENT OF BASIS

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

Air Construction Permit
Permit No.: 0330264-001-AC

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.

The building of the Fiberglass Boat 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.

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 a 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.

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).

Environmental Impact

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions TPY	Allowable Emissions TPY
HAP - Styrene	Cornerstone Engineering, Inc. letter dated February 18, 2000	10	15
PM	62-296.320(4)(b)	<1	N/A
PM10	62-296.320(4)(b)	<1	N/A
Other VOCs	62-210.200	1	N/A
Objectionable Odors	62-296.320(2)	N/A	None allowed off plant property.
VE	62-296.320(4)(b)	N/A	Not more than 20 opacity

Compliance History

This is a new facility with no history.

Fee Summary

The construction permit application fee was $1000.00 for a subtype 1E for sources 5 TPY but less than 25 TPY.