Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T.
Vinyard Jr.
Secretary

PERMITTEE:

Seabring Marine Industries, Inc.
1579 SW 18th Street
Williston, Florida 32696

Air Permit Number: 0750082-014-AC
Expiration Date: June 30, 2015
Issue Date: June 25, 2012
Fiberglass Boat Manufacturing Facility
ARMS ID.: 0750082
Project: New Coating Booth

This is the final air construction permit, which authorizes the construction of a new coating booth used in the production of fiberglass boats. Spray coating will be the primary activity conducted in the booth. Other ancillary operations may be conducted in the booth which may include but are not limited to repair work, lamination, sanding and grinding, assembly and other related activities. The proposed work will be conducted at the Seabring Marine Industries, Inc. site located at Williston Airport Industrial Park, off Highway 41, Williston, Levy County, Florida (Standard Industrial Classification No. 3732). The facility is located in Levy County at Williston Airport Industrial Park, off Highway 41, Williston, Levy County, Florida. The UTM coordinates are Zone 17, 356.9 km East, and 3249.2 km North, Latitude/Longitude: 29° 21' 55.6" N; 82° 28' 27.5" W. As noted in the final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the

Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Khalid Al-Nahdy

Khalid A. Al-Nahdy, P.E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on June 25, 2012 to the persons listed below:

Mr. Rusty Fiegel, Seabring Marine Industries, Inc. rusty.fiegel@montereyboats.com
Mr. Robert Pita, Seabring Marine Industries, Inc. (robert.pita@montereyboats.com)
Mr. John B. Koogler, Ph.D., P.E., Koogler and Associates, Inc. jkoogler@kooglerassociates.com
Mr. Pradeep Raval, Koogler and Associates, Inc. praval@kooglerassociates.com

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.

Shane Maghen June 25, 2012
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

FACILITY DESCRIPTION

Seabring Marine Industries, Inc. is a fiberglass boat manufacturing facility. This fiberglass boat operation generates emissions from laying up fiberglass, woodworking, materials storage and handling, and coating operations (painting). Emission Points are identified as follows: EP1 – gel coat booth stack, EP2 and EP3 - two (2) small parts grinding booth stacks, EP4 – woodworking area dust collector stack and EP5 – parts cutting and grinding area cyclone stack. There are numerous horizontal building exhaust fans in the plant.

Pollutants: Fugitive Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs). Primary HAPs are styrene, methyl methacrylate, and xylene.

The existing facility consists of the following emissions unit(s).

Facility ID No. 0750082

ID No.	Emission Unit Description
001	Fiberglass Boat Manufacturing Facility -- Monterey Boats Lamination Department is the start of the manufacturing process and this area is the primary source of VOC and HAP emissions. The process is an open mold process. The initial step starts with a fiberglass mold that has been treated with a release agent to allow the finished laminated part to be pulled or removed from the mold. The first step in the lamination process is the spray application of a gel coat to the mold which is the exterior finish once the part is pulled from the mold. The gel coat cures for a period. Next, a vinyl ester barrier coat is sprayed and allowed to cure. After that, chop strand fiberglass and resin are applied to form a skin coat. All air bubbles are rolled out (removed) and the material is allowed to cure. Next, certain models get a print block material sprayed on. After the print block cures additional lamination is performed, which varies based on the boat model being produced. The final laminating is performed when the flooring or bracing is installed. One the bracing is cured all the cavities are filled with urethane foam and the installation holes are covered with fiberglass laminate. The next step involves painting the inside of the hulls and decks. Once cured the laminated part is pulled from the mold and placed on a fixture that helps the part retain the molded shape. Various adhesives, solvents and lubricants are then used to finish the interior and during parts assembly. Engines are attached and tested. A final product inspection is conducted before covering up the boat with plastic film in preparation for delivery. There are other areas throughout the plant that use solvents/cleaners/coatings, etc. that emit VOCs and HAPs but those quantities are negligible when compared to the emissions from the lamination process. A workshop area has cutting and grinding tools that are used to cut various boards, as needed. The particulate matter emissions from this operation are vented to a cyclone.

PROPOSED PROJECT

Project No. 014 is for the construction of a new coating booth used in the production of fiberglass boats. Spray coating will be the primary activity conducted in the booth. Other ancillary operations may be conducted in the booth which may include but are not limited to repair work, lamination, sanding and grinding, assembly and other related activities. The new booth will either be constructed in a new building at the site near the end of the primary boat manufacturing building or will be constructed in an existing building (currently used for storage) at the site (depending on economic conditions). Additional space will be provided by this construction thereby providing flexibility in the manufacturing process and relieving congestion in the current manufacturing areas. **There will not be any changes in permitted material usage or an increase in emissions from those previously allowed under Title V Air Operation permit No. 0750082-013-AV.** It is noted that the requirements of 40 CFR 63, Subpart VVVV- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing in lieu of the MACT determination[1] dated September 10, 1999, are also included in this permit.

[1] The facility ID was formerly 0750033, and the previous MACT determination was 0750033-002-AC, FL-MACT-006

This project will modify the following emissions unit.

Facility ID No. 0750082

ID No.	Emission Unit Description
001	Fiberglass Boat Manufacturing Facility -- Monterey Boats Lamination Department is the start of the manufacturing process and this area is the primary source of VOC and HAP emissions. The process is an open mold process. The initial step starts with a fiberglass mold that has been treated with a release agent to allow the finished laminated part to be pulled or removed from the mold. The first step in the lamination process is the spray application of a gel coat to the mold which is the exterior finish once the part is pulled from the mold. The gel coat cures for a period. Next, a vinyl ester barrier coat is sprayed and allowed to cure. After that, chop strand fiberglass and resin are applied to form a skin coat. All air bubbles are rolled out (removed) and the material is allowed to cure. Next, certain models get a print block material sprayed on. After the print block cures additional lamination is performed, which varies based on the boat model being produced. The final laminating is performed when the flooring or bracing is installed. One the bracing is cured all the cavities are filled with urethane foam and the installation holes are covered with fiberglass laminate. The next step involves painting the inside of the hulls and decks. Once cured the laminated part is pulled from the mold and placed on a fixture that helps the part retain the molded shape. Various adhesives, solvents and lubricants are then used to finish the interior and during parts assembly. Engines are attached and tested. A final product inspection is conducted before covering up the boat with plastic film in preparation for delivery.

	There are other areas throughout the plant that use solvents/cleaners/coatings, etc. that emit VOCs and HAPs but those quantities are negligible when compared to the emissions from the lamination process. A workshop area has cutting and grinding tools that are used to cut various boards, as needed. The particulate matter emissions from this operation are vented to a cyclone.

REGULATORY CLASSIFICATION

- This facility is subject to regulation under: 40 CFR 63, Subpart VVVV- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.
- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Air Resources Section, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office. The Permitting Authority's telephone number is (904) 256-1700.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office. The mailing address and phone number of the District Office is: 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256. The Compliance Authority's telephone number is (904) 256-1700.
3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions
   d. Appendix D. Common Testing Requirements
   e. NESHAP, 40 CFR Part 63, Subpart A, General Conditions
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1) (a), F.A.C.]
7. Source Obligation:
   a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification

otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Application for Title V Permit: This permit authorizes construction/modification of the permitted emission unit and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit revision at least 90 days prior to expiration of this permit; but no later than 180 days after start-up of the new coating booth. To apply for a Title V operation permit revision, the applicant shall submit the appropriate application form, required compliance test results (if any), and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting and Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Fiberglass Boat Manufacturing Facility -- Monterey Boats Lamination Department is the start of the manufacturing process and this area is the primary source of VOC and HAP emissions. The process is an open mold process. The initial step starts with a fiberglass mold that has been treated with a release agent to allow the finished laminated part to be pulled or removed from the mold. The first step in the lamination process is the spray application of a gel coat to the mold which is the exterior finish once the part is pulled from the mold. The gel coat cures for a period. Next, a vinyl ester barrier coat is sprayed and allowed to cure. After that, chop strand fiberglass and resin are applied to form a skin coat. All air bubbles are rolled out (removed) and the material is allowed to cure. Next, certain models get a print block material sprayed on. After the print block cures additional lamination is performed, which varies based on the boat model being produced. The final laminating is performed when the flooring or bracing is installed. One the bracing is cured all the cavities are filled with urethane foam and the installation holes are covered with fiberglass laminate. The next step involves painting the inside of the hulls and decks. Once cured the laminated part is pulled from the mold and placed on a fixture that helps the part retain the molded shape. Various adhesives, solvents and lubricants are then used to finish the interior and during parts assembly. Engines are attached and tested. A final product inspection is conducted before covering up the boat with plastic film in preparation for delivery. There are other areas throughout the plant that use solvents/cleaners/coatings, etc. that emit VOCs and HAPs but those quantities are negligible when compared to the emissions from the lamination process. A workshop area has cutting and grinding tools that are used to cut various boards, as needed. The particulate matter emissions from this operation are vented to a cyclone. Emission Points are identified as follows: EP1 – gel coat booth stack, EP2 and EP3 - two (2) small parts grinding booth stacks, EP4 – woodworking area dust collector stack and EP5 – parts cutting and grinding area cyclone stack. There are numerous horizontal building exhaust fans in the plant.

EQUIPMENT

1. **Project No. 014** is for the construction of a new coating booth used in the production of fiberglass boats. Spray coating will be the primary activity conducted in the booth. Other ancillary operations may be conducted in the booth which may include but are not limited to repair work, lamination, sanding and grinding, assembly and other related activities. The new booth will either be constructed in a new building at the site near the end of the primary boat manufacturing building or will be constructed in an existing building

(currently used for storage) at the site (depending on economic conditions). Additional space will be provided by this construction thereby providing flexibility in the manufacturing process and relieving congestion in the current manufacturing areas. **There will not be any changes in permitted material usage or an increase in emissions from those previously allowed under Title V Air Operation permit No. 0750082-013-AV.** It is noted that the requirements of 40 CFR 63, Subpart VVVV- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing in lieu of the MACT determination[1] dated September 10, 1999, are also included in this permit.

[Application No. 0750082-014-AC]

PERFORMANCE RESTRICTIONS

2. The I.D. No. and project name for this source shall be used on all correspondence.

3. Hours of Operation: The hours of operation **are not** restricted 24 H/D; 7 D/W; 52 W/Y (8760 H/Y).
[Rule 62-4.070(3) and Rule 62-210.200(PTE), F.A.C.]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

4. Permitted Capacity: The maximum operating rates are listed below and shall not be exceeded without prior Department approval.

POLLUTANT	LOCATION I.D.	EMISSION RATE TPY	F.A.C. RULE
Styrene (H163)	Emissions Unit 001	117 **NOTE (1)**	--- **NOTE (2)**
Volatile Organic Compounds **NOTE (3)**	Emissions Unit 001	228 **NOTE (1)**	--- **NOTE (2)**

NOTE (1) Styrene emissions are calculated as 11% of the available monomer for the resins; 48% of the available monomer for the pigmented and base gel coats; and, 51% of the available monomer for the tooling gel coats. The total styrene content of each material is calculated based on the maximum weight percent stated in the MSDS.
NOTE (2) Rule 62-210.200(203), F.A.C., Definitions - Potential To Emit (PTE)
NOTE (3) Emissions from all VOCs and styrene emissions combined.

5. Recordkeeping: Compliance shall be determined by recording the following data for each material used that contains VOC (including Styrene).

Quantity
• Gallons of Material Used (Plant usage logs shall be maintained)

Emissions Factors
• Density of Material in Pounds per Gallon (Manufacturer specification's data shall be maintained) • Pollutant Factor (Percentage by Weight)
Emissions
• Total Cumulative VOC and Styrene Emissions (Tons) • Total Cumulative Styrene Emissions (Tons)

Styrene emissions shall be determined using the same method as stated in Specific Condition 6 below.

6. <u>Recordkeeping-Styrene</u>. Styrene emissions shall be determined using the following equations:

Emissions, in tons = Amount of material x styrene monomer content (percent/100)
x emission factor (percent/100, from the table below)
x ton/2000 pounds

Application Method	NVS Monomer 35%	NVS Monomer 38%	NVS Monomer 42%	NVS Monomer 45%	NVS Monomer 50%
Resin Non-Spray Lay-up	11%	11%	12%	12%	13%
Tooling/Pigmented Based Gel coats	48%	51%	54%	56%	---

The applicable emission factor shall be interpolated from the above table, in conjunction with the percent of available non-vapor suppressed (NVS) monomer in the resin/gel coat.

[FINAL Title V Permit No. 0750082-014-AC]

7. <u>Reporting:</u> A report of the data required by Condition 5. above shall be submitted to the Northeast District Office on a semi-annual basis. These reports shall be postmarked no later than the 60th day following the end of the reporting period defined below:

REPORTING PERIOD	REPORT DUE DATE
January – June	September 1
July – December	March 1

The annual operating report for that calendar year may be submitted in lieu of the July-December semi-annual report.
[Rule 62-4.070(3), F.A.C.]

8. Volatile Organic Compounds (VOC) or Organic Solvents (OS): 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. The permittee shall continue to use the operational practices listed below:

1. All solvents and raw material are stored and handled in appropriate containers equipped with tight fitting lids.
2. Good housekeeping and training personnel in their respective task(s) at the facility.
3. A lamination area exhaust stack fan shall be run at all times, including nights and weekends (with the exception of when plant operations are to be ceased for one week or greater), in order to prevent the build-up of odor causing pollutants. The Department may require the running of additional fan(s), if deemed necessary.
4. The gel coat area exhaust stack fans shall be run during all gel coat activities.

[Rule 62-296.320(1), F.A.C.]

9. Reasonable precautions: Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, as necessary, the application of dust suppressants, the paving and maintenance of roads, parking areas and yards, the use of hoods, fans, filters, and similar equipment to contain, capture and or/vent particulate matter.
[Rule 62-296.320(4)(c)2., F.A.C.]

10. Revision(s): Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

Subpart VVVV Requirements:

Resin and Gel Coat Application Equipment Cleaning Operations:

11. Resin and Gel Coat Application Equipment Cleaning: For the routine flushing of resin and gel coat application equipment (e.g., spray guns, flow coaters, brushes, rollers, and squeegees), the permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. No organic HAP content limit applies when removing cured resin or cured gel coat from application equipment.
[40 CFR 63.5734(a)]

12. Organic HAP-containing Solvent Storage: The permittee shall store organic HAP-containing solvents used for removing cured resin or cured gel coat[1] in containers with covers. The covers shall have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater

than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or cured gel coat are exempt from the requirements of 40 CFR Part 63, Subpart T.

[1]*Cured resin or cured gel coat means resin or gel coat that has changed from a liquid to a solid.*
[40 CFR 63.5734(b)]

Carpet and Fabric Adhesive Operations

13. Carpet and Fabric Adhesives Organic HAP Content: The permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.
[40 CFR 63.5740(a)]

Resin and gel coat mixing operations:

14. Resin and Gel Coat Mixing Containers: All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
[40 CFR 63.5731(a)]

15. Resin and Gel Coat Mixing Container Work Practice Exemption: The work practice standard in the Specific Condition directly above does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
[40 CFR 63.5731(b)]

TOTAL ORGANIC HAP EMISSION LIMITS AND STANDARDS

16. Total Organic HAP Emissions. Total Organic HAP Emissions from the following open molding operations shall be limited as stated in **Specific Condition No. 17**:

Production resin
Pigmented gel coat
Clear gel coat
Tooling resin
Tooling gel coat

[40 CFR 63.5698(a)]

17. Total Organic HAP Emissions: Total Organic HAP Emissions shall be limited to the limit specified by the following equation, based on a 12-month rolling average:

HAP Limit = $[46(M_R) + 159(M_{PG}) + 291(M_{CG}) + (54(M_{TR}) + 214(M_{TG})]$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

M_R = **mass of production resin** used in the past 12 months, excluding any materials exempt under Specific Condition No. 18 megagrams.

M_{PG} = **mass of pigmented gel coat** used in the past 12 months, excluding any materials exempt under Specific Condition No. 18 megagrams.

M_{CG} = **mass of clear gel coat** used in the past 12 months, excluding any materials exempt under Specific Condition No. 18 megagrams.

M_{TR} = **mass of tooling resin** used in the past 12 months, excluding any materials exempt under **Specific Condition No. 18** megagrams.

M_{TG} = **mass of tooling gel coat** used in the past 12 months, excluding any materials exempt under **Specific Condition No. 18** megagrams.

[40 CFR 63.5698(b)]

18. The following materials are exempt from the open molding emission limit specified in Specific Condition 17 above:

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for

this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.
[40 CFR 63.5698(d)]

Compliance Methods:

19. The permittee shall use one or more of the following options, (a) through (b), to meet the emission limit in the Specific Condition 17. above:

(a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.*

(1) Demonstrate that emissions from the open molding resin and gel coat operations that are averaged meet the emission limit in **Specific Condition No. 17**. using the procedures described in **Specific Condition Nos. 46 through 50**. Compliance with this option is based on a 12-month rolling average.

(2) Those operations and materials not included in the emissions average must comply with (b) of this section.

(b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2. Compliance with this option is based on a 12-month rolling average.
[40 CFR 63.5701]

20. The Permittee shall meet the requirements of **Specific Condition 40 through 54**, if using the Emissions Averaging Option to meet the emission limit in **Specific Condition No. 17.**

21. The Permittee shall meet the requirements of **Specific Conditions Nos. 55 through 59**, if using the Compliant Materials Option to meet the emission limit in **Specific Condition No. 17.**

22. **<u>Organic HAP Content of Cleaning Solvents Determination</u>:** The Permittee shall determine and record the organic HAP content of the cleaning solvents subject to the requirements of **Specific Condition Nos. 11 and 12** using the methods stated in **Specific Condition No. 24.**
[40 CFR 63.5737(a)]

23. **<u>Onsite Recycled Cleaning Solvents</u>:** For those cleaning solvents recycled onsite, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions **in Specific Condition No. 24** for demonstrating compliance with organic HAP content limits.
[40 CFR 63.5737(b)]

24. <u>Organic HAP content Determination Method:</u> The permittee shall use one of the following options, (1) through (6) to determine the organic HAP content for each material used in open molding resin and gel coat operations or carpet and fabric adhesive operations.

(1) *Method 311 (appendix A to 40 CFR part 63)*. The permittee may use Method 311 for determining the mass fraction of organic HAP. The procedures specified in (1)(i) and (ii) shall be used when determining organic HAP content by Method 311.

(i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).

(ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).

(3) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)*. The permittee may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

(4) *Alternative method*. The permittee may use an alternative test method for determining mass fraction of organic HAP if prior approval is obtained by the Administrator. The procedures in § 63.7(f) shall be followed in order to submit an alternative test method for approval.

(5) *Information from the supplier or manufacturer of the material*. The permittee may rely on information other than that generated by the test methods specified in paragraphs (1) through (4) above, such as manufacturer's formulation data, according to paragraphs (5)(i) through (iii) below.

(i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (1) through (4) above exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then use the measured organic HAP content to determine compliance.

(iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP

content using the methods specified in paragraphs (1) through (4) above is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then use the measured organic HAP content to determine compliance.

(6) *Solvent blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP, which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the values for organic HAP content that are listed in Table 5 or 6 may be used. Table 6 may be used only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 and only whether the blend is either aliphatic or aromatic is known. However, if test results indicate higher values than those listed in Table 5 or 6, then the test results must be used for determining compliance.

[40 CFR 63.5758(a)]

25. <u>Carpet and Fabric Adhesives Organic HAP Content Methods</u>: The permittee shall determine and record the organic HAP content of the carpet and fabric adhesives using the methods in Specific Condition No. 24. to demonstrate compliance with the emission limit in **Specific Condition No. 13.**
[40 CFR 63.5740(b)]

<u>Inspections:</u>

26. <u>Resin and Gel Coat Mixing Container Inspection:</u> To demonstrate compliance with the work practice standard in **Specific Condition No. 14**, the permittee shall visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
[40 CFR 63.5731(c)]

27. <u>Organic HAP-Containing Solvents Containers:</u> The permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps no less than once per month. The permittee shall keep records of the monthly inspections and any repairs made to the covers.
[40 CFR 63.5737(c)]

<u>Recordkeeping Requirements:</u>

28. <u>Resin and Gel Coat Mixing Container Recordkeeping</u>: The permittee shall keep records of which mixing containers are subject **Specific Condition Nos. 14 and 15**. The permittee shall maintain records of the results of the inspections, including a description of any repairs or corrective actions taken.
[40 CFR 63.5731(d)]

29. Records: The permittee shall maintain the records stated below:

(1) A copy of each notification and report that is submitted to comply with 40 CFR 63 Subpart VVVV.

(2) All documentation supporting any notification or report that is submitted.

(3) For facilities not controlled by an add-on control device: The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the permittee shall also record the amounts of each applied by atomized and nonatomized methods.

[40 CFR 63.5767]

30. Records – Form: The permittee shall maintain records that are readily available and in a form so that they can be easily inspected and reviewed. The records may be on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
[40 CFR. 63.5770(a) and (d)]

31. Records –Duration: The permittee shall maintain each record for a period of 5 years following the date that each record is generated. The record shall be maintained onsite for at least 2 years after the date that the record is generated and may be maintained offsite for the remaining 3 years.
[40 CFR 63.5770(b) and (c)]

Notification Requirements:

32. The permittee shall submit all applicable notifications in Table 7 to the Administrator and the Northeast District Office by the dates specified in the table. The notifications are described more fully in 40 CFR Part 63, Subpart A, General Provisions, referenced in Table 8.
[40 CFR 63.5761(a)]

33. If any information submitted in any notification is changed, the permittee shall submit the changes in writing to the Administrator within 15 calendar days after the change.
[40 CFR 63.5761(b)]

Reporting Requirements:

34. The permittee shall submit the applicable reports stated in **Specific Condition Nos. 35-39 by the dates in 36. through 38.**[1]

[1] Unless a different schedule for submission of reports has been approved by the Administrator pursuant to 40 CFR 63.10(a).
[40 CFR 63.5764(a)]

35. <u>First Compliance Report Period -Organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions:</u> The first compliance report must cover the period beginning 12 months after the issuance of this construction permit and ending on June 30th. **Note**: Previously submitted. First Compliance Report complete.
[40 CFR 63.5764(b)(1)]

36. <u>First Compliance Report Submittal Date</u>: The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance-reporting period stated in Specific Condition 35. **Note**: Previously submitted. First Compliance Report complete.
[40 CFR 63.5764(b)(2)]

37. <u>Subsequent Compliance Report Periods:</u> Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or July 1 through December 31. Activities authorized by Air Construction permit No. 0750082-014-AC shall be included in the semiannual reporting periods.
[40 CFR 63.5764(b)(3)]

38. <u>Subsequent Compliance Report Submittal Dates:</u> Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period. Activities authorized by Air Construction permit No. 0750082-014-AC shall be included in the semiannual reporting periods.
[40 CFR 63.5764(b)(4)]

39. The compliance report shall include the information specified below in (1) through (7) of this section.

(1) Company name and address.
(2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
(3) The date of the report and the beginning and ending dates of the reporting period.
(4) A description of any changes in the manufacturing process since the last compliance report.
(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
(6) If during the reporting period compliance was reached with the emission limits and work practice standards, a statement shall be included to that effect.
(7) If during the reporting period a deviation from an emission limit or work practice standard occurred, the information listed in (7)(i) through (iv) of this section shall be included in the semiannual compliance report.
    (i) A description of the operation involved in the deviation.
    (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.

(iii) A description of any corrective action taken to minimize the deviation and the actions taken to prevent it from happening again.

(iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

[40 CFR 63.5764(c)]

Emissions Averaging Compliance Option:

Conditions 40 through 54 shall become effective should the permittee use the Emissions Averaging Option to meet the emission limit in Specific Condition No. 17.
[Rule 62-4.070(3), F.A.C.]

40. **Emissions Averaging Option:** If using the Emissions Averaging Option to meet the emission limit **in Specific Condition No. 17,** the permittee shall demonstrate compliance by performing the following steps (1) through (5) of this section:

(1) Use the methods specified in **Specific Condition No. 24** to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in **Specific Condition Nos. 46. – 50** to show that the organic HAP emissions do not exceed the limit in **Specific Condition No. .17**.

(3) Keep records as specified below in (3)(i) through (iv) for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Amount of material used per month.

(iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in Specific Condition Nos. 47 through 51

(4) Prepare and submit the implementation plan described in **Specific Condition Nos. 41 through 45** to the Administrator and keep it up to date.

(5) Submit semiannual compliance reports to the Administrator as stated in specific condition No. 34.

[40 CFR 63.5704(a)]

RECORDKEEPING AND REPORTING REQUIREMENTS

41. **Implementation Plan:** If using the emissions averaging option to meet the emission limit in **Specific Condition No. 17**, the permittee must prepare an implementation plan.
[40 CFR 63.5707(a)]

42. **Implementation Plan Requirements:** The implementation plan stated in **Specific Condition No. 41**. shall describe the steps that will be taken in order to bring the open molding operations stated in Specific Condition No. 16 into compliance with 40 CFR 63 Subpart VVVV. For each operation included in the emissions average, the implementation plan must include the elements listed below in (1) through (3) of this section.

(1) A description of each operation included in the average.

(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.

(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit stated in **Specific Condition No. 17**

[40 CFR 63.5704(b)]

43. <u>Implementation Plan Submittal</u>: The permittee shall submit the implementation plan to the Administrator with the notification of compliance status stated in **Specific Condition Nos. 32 and 33**.
[40 CFR 63.5704(c)]

44. The permittee shall keep the implementation plan on site and provide it to the Administrator when asked.
[40 CFR 63.5704(d)]

45. Should the implementation plan be revised, the permittee shall submit the revised plan with the next semiannual compliance report stated in **Specific Condition No. 37**.
[40 CFR 63.5704(e)]

46. <u>Recordkeeping:</u> Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the date of issuance of this construction permit.
[40 CFR 63.5710(a)]

47. <u>Recordkeeping</u>: At the end of the twelfth month after your compliance date and at the end of every subsequent month, use the following equation to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in **Specific Condition No. 17** calculated for the same 12-month period. (Include terms in the equation in **Specific Condition No. 17**. and the following equation for only those operations and materials included in the average.)

HAP emissions = $[(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})+(PV_{TR})(M_{TR})+(PV_{TG})(M_{TG})]$

Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

M_R = Mass of production resin used in the past 12 months, megagrams.

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.

PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.

PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

M_{TR} = Mass of tooling resin used in the past 12 months, megagrams.

PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams.

[40 CFR 63.5710(b)]

48. <u>Recordkeeping</u>: At the end of every month, use the following equation to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\Gamma_{i=1}^{n} (M_i \, PV_i)}{\Gamma_{i=1}^{n} (M_i)}$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, PV_{TR}, and PV_{TG}) included in the average, kilograms of HAP per megagram of material applied.

M_i = mass of resin or gel coat i used within an operation in the past 12 months, megagrams.

n = number of different open molding resins and gel coats used within an operation in the past 12 months.

PV_i = the MACT model point value for resin or gel coat i used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

[40 CFR 63.5710(c)]

49. <u>Recordkeeping</u>: The permittee shall use the equations in Table 3 to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.
[40 CFR 63.5710(d)]

50. <u>Recordkeeping</u>: If the organic HAP emissions, as calculated in Specific Condition No. 47, are less than the organic HAP limit calculated in Specific Condition No. 17. for the same 12-month period, then you are in compliance with the emission limit in Specific Condition No. 17. for those operations and materials included in the average.
[40 CFR 63.5710(e)]

Filled Resins:

51. **Filled Resin Usage:** If including a filled resin in the emissions averaging procedure described in **Specific Condition No. 40**, then use the value of PVF calculated using the equation in **Specific Condition 52**. for the value of PV i in the equation in Specific Condition No. 48.
[40 CFR 63.5714(d)]

52. **Filled Resin Usage:** When using either a filled production resin or filled tooling resin, the permittee must demonstrate compliance for the filled material on an as-applied basis using the following equation:

$$PV_F = PV_u \times \frac{(100 - \%Filler)}{100}$$

Where:

PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3.

% Filler = The weight-percent of filler in the as applied filled resin system.
[40 CFR 63.5714(a)]

53. **Filled Resin as a Production Resin Compliance Determination:** If the filled resin is used as a production resin and the value of PV_F calculated by the equation in **Specific Condition No. 52**. does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
[40 CFR 63.5714(b)]

54. **Filled Resin as a Tooling Resin Compliance Determination:** If the filled resin is used as a tooling resin and the value of PV_F calculated by the equation in **Specific Condition No. 52** does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
[40 CFR 63.5714(c)]

Compliant Materials Compliance Option

Conditions 55 through 59 shall become effective should the permittee use the Compliant Materials Option to meet the emission limit in Specific Condition No. 17.

55. **Compliant Materials Option.** If using the Compliant Materials Option to meet the emission limit in Specific Condition No. 17 the permittee shall demonstrate compliance by performing the following steps (1) through (4) of this section:

(1) Use the methods specified in Specific Condition No. 24 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in Specific Condition No. 58 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2.

(3) Keep records as specified below in (3)(i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.

(iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in **Specific Condition No. 58.**

(4) Submit semiannual compliance reports to the Administrator as specified in **Specific Condition No. 34.**

[40 CFR 63.5704(b)]

56. **Recordkeeping:** Compliance using the organic HAP content requirements listed in Table 2 is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on issuance date of this construction permit. If using filled material (production resin or tooling resin), the permittee shall comply according to the procedure described in **Specific Condition No. 51. –54**.
[40 CFR 63.5713(a)]

57. **Recordkeeping:** At the end of the twelfth month after the issuance date of this construction permit, and at the end of every subsequent month, the permittee shall review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2, then in the facility has reached compliance with the emission limit stated in Spec**ific Condition No. 17** for that 12-month period for that operation. In addition, the permittee is not required to complete the weighted-average organic HAP content calculation contained in **Specific Condition No. 58** for that operation.
[40 CFR 63.5713(b)]

58. **Recordkeeping**: At the end of every month, the permittee shall use the following equation to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\text{Weighted-Average HAP Content (\%)} = \frac{\sum_{i=1}^{n} (M_i \, HAP_i)}{\sum_{i=1}^{n} (M_i)}$$

Where:

M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods **in Specific Condition No. 24** to determine organic HAP content.

n = number of different open molding resins or gel coats used in the past 12 months in an operation.

[40 CFR 63.5713(c)]

59. <u>Recordkeeping</u>: If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2, then the facility has reached compliance with the emission limit stated in **Specific Condition No. 17**.

60. A completed **<u>Application for Air Permit –Title V Source</u> (Revision)** [DEP Form No. 62-210.900(1), F.A.C.] shall be submitted to the Department at least 90 days prior to the expiration date of this construction permit but no later than 180 days after the emissions unit commences operation or commences operation as modified. To properly apply for an operation permit, the permittee shall submit the appropriate application form.
[Rules 62-4.055, 62-4.220, F.A.C., and 62.213.420(1)(a)4]