Title V Air Operation Permit Renewal
Permit No. 0810211-006-AV

APPLICANT

The applicant for this project is Yellowfin Yachts. The applicant's responsible official and mailing address are: Wylie Nagler, President, Yellowfin Yachts, Inc., 2059 58th Ave Cir East, Bradenton, Florida.34203.

FACILITY DESCRIPTION

The applicant operates the boat manufacturing facility, which is located at 2059 58th Ave Cir East, Bradenton.

This facility consists of a fiberglass boat manufacturing facility, which is identified as the only emission unit at the facility - Emission Unit No. ID 001.

General Description: The facility manufactures fiberglass reinforced recreational boats and other related articles in a range of sizes and styles. The facility consists of five (5) manufacturing buildings designated with the following addresses:

- 6593 19th Street East, Sarasota
- 6515 19th Street East, Sarasota
- 6603 19th Street East, Sarasota
- 6607 19th Street East, Sarasota
- 6611 19th Street East, Sarasota
- 2059 58th Ave. Circle East, Bradenton

Hazardous air pollutant (HAP) based gelcoat is applied, predominantly by spray methods, to hull and deck forms and molds in the building at 6603 19th Street East and is allowed to cure. HAP based resin and fiberglass (for structural support) is then hand applied using non-atomized spray and hand methods to gelcoat surfaces.

After curing, the hardened fiberglass hull and deck parts are removed and the excess material trimmed as necessary to remove the excess "flashing". Imperfections in the surfaces are removed by grinding the surface and re-applying gelcoat and /or resin. These procedures are done in the buildings at 6515 19th Street East and 6607 19th Street East.

The manufacture of small parts, such as hatches, covers, consoles and parts other than the hulls or decks, is a similar process with correspondingly smaller molds. After removal of the components from the molds, the molds are cleaned, inspected and prepared for return to lamination in the "mold care" step, using solvent based materials. Scratches and other imperfections observed on the mold surface are repaired, if necessary, typically with resin or gelcoat tooling. In some situations, for example, a damaged mold or a new product line, new molds will have to be manufactured using production or other resins and tooling. Small parts and mold manufacture are typically conducted in or near the lamination area, but may be located farther away as the situation warrants. These procedures are also done in the buildings at 6515 19th Street East and 6607 19th Street East.

The hulls, decks, small parts, and other components are assembled using adhesives, foams, solvents, and coatings, either water based or volatile organic compound containing miscellaneous solvents in the "assembly area" of the building located at 6603th 19th Street East. Tubing, fittings, rigging, and motors are added as appropriate, and the completed unit is stored prior to delivery.

Woodworking, trimming, cutting, shaping, grinding, and sanding activities also occur at this facility. Particulate emissions from these activities, hand tools, and limited tabletop equipment are in general controlled by portable

"shop-vac" vacuum collectors and normal "good housekeeping" procedures. These procedures are done in the building at 6593 19th Street East.

Small boat manufacturing operations for Models 17, 21 and 24 using closed molded techniques are conducted in the building at 2059 58th Ave. Circle East, Bradenton.

The facility is subject to the General Pollution Emission Limiting Standards of Rules 62-296.320 (1), (2), and (4), F.A.C. along with the requirements of 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing using the emissions averaging option.

CAM is not applicable at this facility, since it has no control devices.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Combined Air Operation and Construction Permit Nos. 0810211-003-AC and 0810211-004-AV issued 02/26/2008
Title V Air Operation Permit Administrative Correction No. 0810211-005AV issued 08/06/2012
Application for a Title V Air Operation Permit Renewal received July 24, 2014
Additional Information Request dated 08/18/2014
Additional Information Response received 09/19/2014
Notice of Intent to Issue Air Permit issued **[Month day, year]** ***(To be determined)***
Public Notice Published **[Month day, year]** ***(To be determined)***

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operates emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63. Emission Unit 001 is subject to 40 CFR 63, Subpart VVVV National Emission Standards for Boat Manufacturing

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

PROJECT REVIEW

The Title V permit renewal was reformatted from the old format to the current Title V template format. Appendix TV-6 was replaced with the new appendices TV and RR. The permit was also updated to reflect address changes made as part of an administrative correction (i.e., Project No. 08110211-005-AV).

CONCLUSION

This project renews Title V Air Operation Permit No. 0810211-004-AV, which was issued on 02/26/2008. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.