Yellowfin Yachts, Inc.

Facility ID No. 0810211
Manatee County

Title V Air Operation Permit Renewal

Permit No. 0810211-006-AV
(Renewal of Title V Air Operation Permit No. 0810211-004-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air and Solid Waste Permitting, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 470-5700
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Compliance Authority:

State of Florida
Department of Environmental Protection
Compliance Assurance Program, Southwest District

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Title V Air Operation Permit Renewal

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Yellowfin Yachts, Inc.
2059 58th Ave Circle East
Bradenton, Florida 34203

Permit No. 0810211-006-AV
Facility ID No. 0810211

Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Yellowfin Yachts, Inc. is located in Manatee County at 2059 58th Ave Cir East, Bradenton, Florida. UTM Coordinates are: Zone 17, 349.80 km East and 3034.37 km North; Latitude: 27°25'27" North and Longitude: 82°32'23" West.

The Title V air operation 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, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: Date, 200x
Renewal Application Due Date: Exp. Date -225, 20xx
Expiration Date: Eff. Date + 5 years, 20xx

(Draft/Proposed)

_____

Kelley M. Boatwright
Permitting & Waste Cleanup Program Administrator
Southwest District

SM/act/admin

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility consists of a Title V fiberglass boat manufacturing facility subject to the requirements of 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

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.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fiberglass Boat Manufacturing Facility

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received July 24, 2014, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Regulations	
40 CFR 63, Subpart A, General Provisions	001
40 CFR 63, Subpart VVVV, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing	001
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices - The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. **Not federally Enforceable -** Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General 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 or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following:

a. All resin activities shall be conducted inside the buildings.

b. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of solvent materials.

c. All solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

[Rule 62-296.320(1), F.A.C.; Construction Permit 0810211-003-AC]

FW4. General Visible Emissions - No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter - No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. cutting, shaping, grinding, and sanding operations performed by hand tools and tabletop equipment shall, in general, be controlled by portable "shop-vac" vacuum collectors

b. normal "good housekeeping" procedures

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 0810211-003-AC]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www.epa.gov/osweroe1/content/rmp/index.htm. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

***IMPORTANT NOTES TO PERMITTEE*:**

Permit Renewal - see Appendix TV, Condition No. TV18.
(Note - Renewal application is due 225 days prior to expiration date of this permit.)

The specific conditions in this section apply to the following emissions unit (EU):

EU ID No.	Brief Description
001	Fiberglass Boat Manufacturing Facility - The facility manufactures fiberglass reinforced recreational boats and other related articles in a range of sizes and styles. It is subject to the requirements of 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 0810211-003-AC]

Emission Limitations and Standards

A.2. Volatile Organic Compounds (VOCs) Limitation - Emissions of volatile organic compounds (VOCs) shall not exceed 48.5 tons per any consecutive 12-month period. Styrene and Methyl Methacrylate (MMA) are each defined as a VOC and a hazardous air pollutant.
[Requested by permittee in letter dated October 10, 2008; Construction Permit 0810211-003-AC]

A.3. Emission Calculation Requirements - Emissions of Styrene, Methyl Methacrylate (MMA), and other volatile organic compounds (VOCs) shall be determined as follows until notified by the Department.

1. Styrene emissions shall be determined using the following equation:

$$\text{Emissions (tons)} = \frac{\text{Ms} \times \text{EF}}{2000\ \text{lb/ton}}$$

where:
Ms = amount of styrene containing material used (in tons)
EF = emission factor (lb/ton) for styrene monomer content (from table below)

The applicable styrene emission factor shall be obtained (interpolated/extrapolated, if applicable) from the following table, in conjunction with the percent of available non-vapor suppressed (NVS) styrene monomer in the resin/gelcoat:

% Monomer	Resin** Hand (Non-Spray) Layup	Resin** Mechanical Atomized Spray Layup	Resin Mechanical Nonatomized* Spray Layup	Gel Coat** Mechanical Atomized Spray Layup	Gelcoat Mechanical Nonatomized* Spray Layup
18	39	51	39	138	67
19	41	54	41	148	70
20	43	58	43	158	79
21	45	61	45	168	88

% Monomer	**Resin** Hand (Non-Spray) Layup**	**Resin** Mechanical Atomized Spray Layup**	**Resin Mechanical Nonatomized* Spray Layup**	**Gel Coat** Mechanical Atomized Spray Layup**	**Gelcoat Mechanical Nonatomized* Spray Layup**
22	48	64	47	178	97
23	50	68	49	189	106
24	52	71	51	200	115
25	55	75	54	211	124
26	57	78	56	221	133
27	59	82	58	233	142
28	62	86	60	244	151
29	64	90	62	256	160
30	67	94	64	269	169
31	69	97	66	281	178
32	71	102	68	295	187
33	74	105	71	308	196
34	77	112	74	322	205
35	80	118	77	336	214
36	83	127	80	354	223
37	86	136	83	371	232
38	90	146	86	390	241
39	92	156	89	408	250
40	95	166	93	427	259
41	98	176	96	446	268
42	100	187	99	466	278
43	112	192	102	477	287
44	117	202	105	495	296
45	122	212	108	513	305
46	127	221	111	532	314
47	133	232	115	551	323
48	138	242	118	571	332
49	143	252	121	590	341
50	148	263	124	609	350

* *Nonatomized* means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, and pressure fed resin rollers. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures.

** *The emission factors in these columns are based on a weighted average using the following assumptions:*

- *Using the Unified Emission Factors - 20% by weight of the facility's usage of resins and gelcoats are for reinforced plastic composites production for items such as hatches and doors, but not for hulls and decks.*

- *Using the National Marine Manufacturer Association's Factors – 80% by weight of the facility's usage of resins and gelcoats are for items such as decks and hulls.*

2. MMA emissions shall be determined by the following equation:

$$\text{Emissions (tons)} = \text{Mmma} \times \text{Cmma} \times 0.75$$

where:
Mmma = amount of MMA containing material used (in tons)
Cmma = MMA content (percent/100)

3. Other VOC emissions shall be determined by the following equation for each material. These values shall be used in conjunction with the above Styrene and MMA emissions to determine total VOC emissions:

Emissions (tons) = M_{voc} x 1.00* x C_{voc}

where:
M_{voc} = amount of VOC containing material used (in tons)
C_{voc} = VOC content (percent/100)
* The following "Emission Factors" may be used for the chemicals listed below.

Chemical	Emission Factor
Di-isocyanates, when used as a catalyst for foam production	0.00021
Dimethyl Phthalate, when used with resins/gelcoats	0.001
Methyl Ethyl Ketone Peroxide, when used with resins/gelcoats	0.001

[Rule 62-4.070(3), F.A.C.; Construction Permit 0810211-003-AC]

Recordkeeping and Reporting Requirements

A.4. A monthly log based on the tracking of all VOC containing material used in association with manufacturing activities shall be kept for this facility to document compliance with the emission limitation of Specific Condition No. A.2. Note, if any month results in total VOC emissions being greater than 43.6 ton for the most recent consecutive 12-month period, the logs required below shall then be kept daily. The daily logs shall include a cumulative total to demonstrate compliance with Specific Condition No. A.2. The logs shall be retained on file at the facility for at least 5 years. At a minimum, the logs shall contain the following:

a. Facility Name, Date, and Emission Unit ID (0810211 001).

b. Identify and quantify each resin, coating, solvent, chemical, etc. "used" at the facility that contains VOCs, per application method. Usage logs of materials other than gelcoats and resins may be based on the beginning and ending inventories, deliveries, shipments, etc. Additionally, when daily records for materials other than gelcoats and resin are not required to be kept, monthly

usage of these materials may be based upon purchases, provided no materials are used which are not purchased.

c. Show the appropriate emission factor(s), per application method(s), used to determine Styrene, MMA, and/or VOC emissions.

d. The total tons of VOC (including Styrene and MMA) emissions for the month.

e. The total tons of VOC (including Styrene and MMA) emissions for the most recent consecutive 12-month period.

Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The percent of solids in the recovered materials shall be documented and accounted for in the emission calculations, if applicable. Supporting documentation such as Styrene/VOC content, Styrene/VOC emission factors used, MSDS sheets, purchase orders, "As Supplied" data sheets, etc. shall be kept for each chemical and associated products, which includes sufficient information to determine emissions. The monthly logs shall be completed by the end of the 15th day of the following month. Daily logs (if required) shall be completed within 3 business days. These records shall be available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit 0810211-003-AC]

Source Commitments

A.5. Recordkeeping, reporting, and demonstrating compliance associated with Title 40, Code of Federal Regulations (CFR), Part 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, regarding the emission limitations for open molding of resin and gelcoat operations in 40 CFR 63.5698, shall "only" use the maximum achievable control technology (MACT) model point value averaging (emissions averaging) option pursuant to 40 CFR 63.5701(a) and 40 CFR 63.5710.
[Rule 62-204.800(11), F.A.C.; 40 CFR 63.5698, 40 CFR 63.5701(a), and 40 CFR 63.5710; Construction Permit 0810211-003-AC]

Other Requirements

A.6. Federal Rule Requirements - In addition to the specific conditions listed above, this emissions unit is also subject to the applicable provisions of 40 CFR 63, Subparts A - General Provisions to 40 CFR 63 and VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing as adopted and incorporated by reference in Rule 62-204.800, F.A.C. The requirements listed below are based on the Title V permit renewal application received on July 24, 2014. Note, as requested by the permittee, these are requirements for the Open Molding Resin and Gel Coat Operations using the emissions averaging option. Requirements relating to using compliant resin and gelcoat materials and add-on-control devices have been deleted, since this emission unit does not utilize these compliant materials and add-on-control devices.

40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing - Applicable Provision Requirements

Based on Federal Register dated 8/22/01, revised 12/8/01 to reflect 10/03/01 Federal Register revision.

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[Rule 62-204.800(11), F.A.C.; Construction Permit 0810211-003-AC]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

Appendix I, List of Insignificant Emissions Units and/or Activities

Appendix NESHAP 40 CFR 63, Subpart A – General Provisions

Appendix NESHAP 40 CFR 63, Subpart VVVV National Emission Standards for Boat Manufacturing

Appendix RR, Facility-wide Reporting Requirements

Appendix TV, Title V General Conditions

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis

Table H, Permit History