TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Jupiter Marine International, Inc.
1103 112th Avenue East
Palmetto, Florida 34221

Jupiter Marine – Palmetto Plant

Facility ID No. 0810212

PROJECT

Project No. 0810212-005-AC
Application for Minor Air Construction Permit
Modification to a Facility Expansion Project

COUNTY

Manatee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

March 27, 2013

Prepared by Tammy McWade

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. Facility Description:

Jupiter Marine International, Inc. operates a fiberglass boat manufacturing plant (EU 001), which consists of laminating, gelcoating, painting, and trimming operations. Ventilation is provided by four exhaust stacks, large garage doors and miscellaneous fans/vents throughout the facility.

The facility consists of fugitive emissions of particulate matter (PM), volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from all building openings. To control emissions of PM, the exhaust stacks are equipped with fabric filters on the stack intake vents adjacent to the gelcoat area. HAPs, VOC and styrene emissions are controlled by material usage limitations and work practice requirements. Recordkeeping and reporting are used to document compliance with emission limitations.

II. Project Description:

A. Applicant:

Carl Herndon, President
Jupiter Marine International, Inc.
1103 12th Avenue East
Palmetto, Florida 34221

B. Professional Engineer:

Veronica N. Sgro, P.E.
Koogler and Associates, Inc.
4014 Northwest 13th Street
Gainesville, Florida 32609

C. Project Location:

Jupiter Marine International, Inc.
1103 12th Avenue East
Palmetto, Florida 34221

D. Project Summary:

On March 4, 2008, Jupiter Marine International, Inc. was issued Air Construction Permit No. 0810212-002-AC for an expansion in the physical size of the existing facility and an increase in the production rate. Based on the information provided in the original application emissions of VOC, HAPs and styrene would increase and the existing facility would become a Title V major source. However, the facility's expansion project only consisted of the construction of a spray booth and covered area between the two buildings, which did not cause emissions of VOC, HAPs or styrene to meet or exceed the Title V permitting threshold. Therefore, the applicant is requesting a modification to Air Construction Permit No. 0810212-002-AC to remove the post expansion and Title V permitting requirements from the permit.

E. Application Information:

Air Construction Application Received on: 12/20/2012
Additional Information Requested on: 12/20/2012
Additional Information Received on: 3/18/2013
Application Complete: 3/18/2013

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, F.S. and Chapters 62-204 through 62-297, F.A.C., as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	not exempt from general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	painting operations could be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	painting operations are a source of VOC and odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Manatee County is an attainment area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	there is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS–40 CFR 63)	N	there is no applicable source category

Subject to:	Y/N	Comments
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source for VOC, total HAP and styrene emissions
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	no emissions testing is required

IV. Summary of Emissions: Emission Unit (EU) 001 – Fiberglass Boat Manufacturing Facility

Pollutant	Existing Potential Emissions[2] (TPY)	Increase in Potential Emissions[3] (TPY)	Potential Emissions after Project[4] (TPY)	Emission Limits (TPY)
VOC	15.66	0.48	16.14	24.9
Total HAP	10.03	0.19	10.22	24.9
Styrene	6.53	0	6.53	9.9
VE[5]	5% Opacity	---	---	5% Opacity

Notes:

1. Tons per year (TPY).
2. Existing potential emissions were calculated based on the consecutive 2-year average reported prior to the spray booth being installed in the annual operating report for each pollutant during 2006 and 2007.
3. Increases in potential emissions were calculated based on the average annual pollutant emissions produced from the spray booth for the consecutive years 2008 through 2012.
4. Potential emissions after project are the existing potential emissions plus the spray booth potential emissions.
5. Fugitive emissions opacity indicator that additional controls or work practices may be required.

As shown in the above table, total project emissions will not exceed the Title V threshold emissions rates; therefore, the project is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, F.S. and Section 62-4.070, F.A.C., the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).