FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

DRAFT PERMIT

PERMITTEE

JRL Ventures, Incorporated
6805 15th Street East
Sarasota, Florida 34243

Authorized Representative:
Mr. Matt Chambers, President

Air Permit No. 0810236-003-AC
Permit Expires: 06/30/2015
JRL Ventures, Incorporated/Marine Concepts
Minor Air Construction Permit
Increase VOC and HAPs Emissions Limits

This is the final air construction permit to increase the facility's volatile organic compound (VOC) and hazardous air pollutants (HAPs) allowable emissions at JRL Ventures, Incorporated. The proposed work will be conducted at the JRL Ventures, Incorporated/Marine Concepts facility (Standard Industrial Classification No. 3732). The facility is located in Manatee County at 6805 15th Street East in Sarasota, Florida. The UTM coordinates are Zone 17, 349.5 km East, and 3034.1 km North. As noted in the Final Determination provided with this final permit, no changes or 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

Due to 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 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 Hillsborough County, Florida
DRAFT

_____ _____

Kelley M. Boatwright Effective Date
Permitting & Waste Clean Up Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) 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 the date indicated below to the persons listed below.

Matt Chambers, President, JRL Ventures, Inc., (mchambers@marineconcepts.com)

Tom T. John, P.E., Tom T. John, Professional Engineer, Inc., (tjengr@msn.com)

Danielle D. Henry, SWD Compliance Assurance Program Manager, (danielle.d.henry@dep.state.fl.us)

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.

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

JRL Ventures, Inc. manufactures finished laminated products for marine and other fiberglass manufacturing industries. The dominant products produced are forms, plugs, and molds principally used in the manufacturing of fiberglass boats. The facility consists of two main structures; the westernmost building manufactures plugs and molds and the easternmost building performs lamination, gel coating, grinding, and other related activities.

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

Facility ID No. 0810236	
EU ID No.	**Emissions Unit Description**
001	Fiberglass Products, Forms, Molds, and Plugs Manufacturing

Project Description and Affected Emissions Units

This project will increase the facility's VOC and total HAPs allowable emissions. Allowable emissions will increase from 24 to 48 tons/year for volatile organic compounds (VOC) and from 24 to 48 tons/year for total hazardous air pollutants (HAPs). This increase in allowable emissions will reclassify the facility from a non-Title V to a Title V source.

This project will modify the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Fiberglass Products, Forms, Molds, and Plugs Manufacturing

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Sources/Activities

- Site remediation activities per Rule 62-210.300(3)(b)1., F.A.C. (Generic Emissions Unit or Activity Exemption). These activities are also exempt from 40 CFR 63, Subpart GGGGG – National Emission Standards for Hazardous Air Pollutants: Site Remediation per 40 CFR 63.7881(b)(1).

  Note: The facility is using an air stripper to remove acetone from ground water; however, under 40 CFR 63.7881(b)(1), the facility's site remediation is not subject to this subpart because it only cleans up acetone, which is not a HAP.

- Three (3) milling machines with particulate matter emissions controlled by a dust collector. Uncontrolled emissions are exempt per Rule 62-210.300(3)(b)1., F.A.C. (Generic Emissions Unit or Activity Exemption).
- Solvent recovery unit per Rule 62-210.300(3)(b)1., F.A.C. (Generic Emissions Unit or Activity Exemption).

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).

- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Construction Permit No. 0810236-001-AC. Also reference current Operation Permit 0810236-002-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Permitting & Waste Cleanup Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

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; and

d. Appendix D. Common Testing Requirements.

e. Appendix E. 40 CFR 63, Subpart A

f. Appendix F. 40 CFR 63, Subpart VVVV

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 - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Annual Emissions Fee Form and Fee - This facility will become subject to Title V Annual Emissions Fees, in accordance with Rule 62-213.205, F.A.C., on the day EU No. 001 resumes operation after modification. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download 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.
[Rule 62-213.205, F.A.C.]

9. Application for Title V Air Operation Permit - This permit authorizes modification of the permitted emissions unit and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit. To apply for a Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent month of records/logs specified in Specific Condition No. A.7.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

A. EU No. 001- Fiberglass Products, Forms, Molds and Plugs Manufacturing

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Fiberglass Products, Forms, Molds, and Plugs Manufacturing – This emissions unit manufactures finished laminated products for marine and other fiberglass manufacturing industries along with producing forms, plugs, and molds. The manufacturing processes occur in two main structures: a western building and an eastern building as further described below: Western Building This building is typically used to manufacture plugs and molds. Plugs manufactured may be constructed on either wood and/or rigid foam. For the wood plug method, a wooden structure is typically made from approximately ¾ inch thick plywood. This part is brought to the correct shape by one of the three (3) milling machines, and is erected on a wooden support base. A dust collector that vents inside the building is used to control particulate matter emissions from the milling machines. The structure is then planked with plywood sheets. For some small parts, epoxy glues may be used to bond the wood pieces prior to shaping on the milling machines. From either starting point, filler putty (e.g., bondo) is applied to the surface to fill any gaps in the wood surface; the surface is then sanded until "fair" (smooth), after which the entire plug is brushed with a styrene-based resin, followed by a spray-applied primer. The surfaces are dry sanded, another layer of primer is applied, and the plug is wet sanded. After wet sanding, the finished plug is inspected and readied for shipment to customers who will make their own mold from the plug to manufacture their products. In the foam method of plug manufacture, instead of planking with plywood, the base wood structure is covered with a spray applied "2 ½ lb density" or smaller two (2) part urethane foam. Smaller parts may be initially constructed of sheets of urethane foam. The foam surface is then rough cut into an approximate shape using the milling machines. The surface is then brushed with resin, then putty is used to fill any voids, and the surface is covered with spray/chopped resin and fiberglass. After curing, a high density foam is applied to the surface, and the part is milled in a final cut. Final plug detailing is then completed in the same manner as the wooden plug, with a hand applied resin coat, primer, sanding, and re-coating, etc. Finished molds may also be made from the plugs. Molds, which are the parts used by boat and laminated parts manufacturers to make their parts, are made from plugs. The plug is the original surface, from which molds, which have a shorter working life, will be made. To make the mold, the plug is spray coated with gelcoat, followed by hand laid resin/fiberglass or hand laid resin/fiberglass and filled resin. This process of hand and spray application continues until the desired mold wall thickness is reached, at which point the back of the mold is braced with steel bracing cut and welded to shape (or wood bracing laminated into the mold for smaller parts). The edges of the mold are trimmed, the part is removed from the plug, and wet sanded and buffed as needed prior to inspection and shrink wrapping for shipment. Waxing the plug with a mold release agent prior to applying the mold materials allows the mold to be easily removed from the plug for final polishing and inspection prior to shipping. Eastern Building This building is typically used to perform lamination, gelcoating, grinding, and other related activities. In the lamination process, a layer of catalyzed gelcoat is spray applied to the part mold, which has been prepared with a release agent to facilitate the removal of the cured part

	from the mold. The mold and gelcoat surfaces must be kept extremely clean to avoid cosmetic flaws in the exterior surface of the product. After the application of the gelcoat layer, the various layers of catalyzed resin and fiberglass are applied using non-atomized spray techniques. After curing, the hardened fiberglass products are removed from the mold and the excess material ("flashing") is trimmed, typically with a hand held air driven cut off tool, as necessary. Imperfections in the surfaces are removed by grinding the surface and re-applying gelcoat and/or resin as necessary. This activity is performed in the "grind booth". <u>Activities in both Buildings</u> The majority of the particulates generated from the fiberglass and wood/foam cutting, shaping, and sanding operations are expected to be too large to exit the area and are in general controlled by the use of portable "shop-vac" vacuum collectors where appropriate and normal "good housekeeping" procedures.

PERFORMANCE RESTRICTIONS

A.1. <u>Federal Regulatory Requirements</u> - This emission unit is subject to 40 CFR 63, Subpart A – National Emission Standards for Hazardous Air Pollutants General Provisions and 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, which is adopted by reference in Rule 62-204.800, F.A.C. The requirements listed below are based on the air construction permit application dated June 5, 2014. When demonstrating compliance with 40 CFR 63, Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used, it must be used for a minimum of 12 consecutive months before switching to the other option.

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

Based on Federal Register version dated 8/22/2001 and revision dated 10/3/2001

What This Subpart Covers

§63.5680 What is the purpose of this subpart?
§63.5683 Does this subpart apply to me?
§63.5686 How do I demonstrate that my facility is not a major source? ***{Not applicable}***
§63.5689 What parts of my facility are covered by this subpart?
§63.5692 How do I know if my boat manufacturing facility is a new source or an existing source?
§63.5695 When must I comply with this subpart?

Standards for Open Molding Resin and Gel Coat Operations

§63.5698 What emission limit must I meet for open molding resin and gel coat operations?
§63.5701 What are my options for complying with the open molding emission limit?
§63.5704 What are the general requirements for complying with the open molding emission limit?
§63.5707 What is an implementation plan for open molding operations and when do I need to prepare one?
§63.5710 How do I demonstrate compliance using emissions averaging?

§63.5713 How do I demonstrate compliance using compliant materials?
§63.5714 How do I demonstrate compliance if I use filled resins?

Demonstrating Compliance for Open Molding Operations Controlled by Add-on Control Devices
§63.5715 - §63.5725 ***{Not applicable}***
Standards for Closed Molding Resin Operations
§63.5728 What standards must I meet for closed molding resin operations?
Standards for Resin and Gel Coat Mixing Operations
§63.5731 What standards must I meet for resin and gel coat mixing operations?
Standards for Resin and Gel Coat Application Equipment Cleaning Operations
§63.5734 What standards must I meet for resin and gel coat application equipment cleaning operations?
§63.5737 How do I demonstrate compliance with the resin and gel coat application equipment cleaning standards?
Standards for Carpet and Fabric Adhesive Operations
§63.5740 ***{Not applicable}***
Standards for Aluminum Recreational Boat Surface Coating Operations
§63.5743 - §63.5755 ***{Not applicable}***
Methods for Determining Hazardous Air Pollutant Content
§63.5758 How do I determine the organic HAP content of materials?
Notifications, Reports, and Records
§63.5761 What notifications must I submit and when?
§63.5764 What reports must I submit and when?
§63.5767 What records must I keep?
§63.5770 In what form and for how long must I keep my records?
Other Information You Need To Know
§63.5773 What parts of the General Provisions apply to me?
§63.5776 Who implements and enforces this subpart?
Definitions
§63.5779 What definitions apply to this subpart?
Tables to Subpart VVVV
Table 1 - Compliance Dates for New and Existing Boat Manufacturing Facilities
Table 2 - Alternative HAP Content Requirements for Open Molding Resin and Gel Coat Operations
Table 3 - MACT Model Point Value Formulas for Open Molding Operations
Table 4 - Operating Limits If Using an Add-on Control Device for Open Molding Operations
{Not applicable}
Table 5 - Default Organic HAP Contents of Solvents and Solvent Blends
Table 6 - Default Organic HAP Contents of Petroleum Solvent Groups
Table 7 - Applicability and Timing of Notifications
Table 8 - Applicability of General Provisions (40 CFR Part 63, Subpart A)

[Rule 62-204.800, F.A.C.; 40 CFR 63, Subparts A and VVVV]

A.2. Restricted Operation – The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

A.3. Unconfined Emissions of Particulate Matter - All reasonable precautions shall be taken to prevent and control the generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. (See Appendix C, Condition No. 9). These provisions are applicable to any source, including but not limited to, industrial related activities such as loading, unloading, storing and handling of materials. These provisions shall also include the following:

a. The use of a dust collector is to control particulate matter emissions from the three (3) milling machines.

b. Exercise good housekeeping procedures as necessary. (e.g., such as cleaning and sweeping of floors and work surfaces along with the use of "shop-vac" vacuum collectors.)

[Rule 62-296.320(4)(c), F.A.C.]

A.4. Reasonable Precautions to Prevent VOC and Organic Solvent (OS) Emissions - The permittee shall not store, pump, handle process, load, unload, or use in any process or installation, VOC or OS's without applying know and existing vapor emission control devices or systems deemed necessary by the Department. Reasonable precautions and/or controls shall include the following:

a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated and maintained in such a manner as to minimize leaks, fugitive emission, and spills of paints and solvent materials that contain VOC and/or OS's.

b. All solvents from solvent washings that contain VOC and/or OS's shall be directed into containers that prevent evaporation into the atmosphere.

c. All resin/gelcoat activities shall be conducted inside the eastern and western buildings.

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

EMISSIONS STANDARDS

A.5. Total HAPs Emissions Limitation - Total emissions of HAPs shall not exceed 48.0 tons per any consecutive 12-month period.
[Rule 62-210.200(definition of Potential to Emit), F.A.C.; Permit application dated June 5, 2014]

A.6. Total VOC Emission Limitation - Total emissions of VOC (including styrene) shall not exceed 48.0 tons per any consecutive 12-month period.
[Rule 62-210.200(definition of Potential to Emit), F.A.C.; Permit application date June 5, 2014]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.7. HAP and VOC Recordkeeping: - The permittee shall keep monthly logs to document compliance with the Total HAPs, and Total VOC limitations in Specific Condition Nos. A.5. and A.6. Usage of materials may be based on inventory at the beginning of the month, receipt of material during the month, and inventory of the materials at the end of the month, provided that the materials are not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:

a. facility name, facility ID No., EU ID No. with description (i.e., JRL Ventures, Inc., 0810236, E.U. 001 - Fiberglass Products, Forms, Mold, and Plugs Manufacturing);

b. month, year, and method used for records (usage or inventory);

c. identify and quantify each resin, coating, solvent, etc. used at the facility that contains Styrene, MMA, and/or other HAPs and VOC;

d. appropriate emission factor(s), and method(s) of application (e.g., mechanical atomized, gelcoat controlled spray application) used to determine styrene, MMA and/or other HAPs and VOC emissions;

e. monthly total of styrene emissions (tons/month);

f. monthly total of VOC (including styrene) emissions (tons/month);

g. monthly total of Total HAP emissions (tons/month);

h. most recent 12 consecutive month period total of styrene emissions (tons/12 consecutive month period) based on (e.) above;

i. most recent 12 consecutive month period total of VOC (including styrene) emissions (tons/12 consecutive month period) based on (f.) above; and

j. most recent 12 consecutive month period total of Total HAP emissions (tons/12 consecutive month period) based on (g.) above.

(*Permitting Note: See Specific Condition No. A.8. for emissions calculations requirements.)*

The monthly logs shall be completed by the end of the following month. These records shall be maintained at the facility for at least five (5) years and made available to the Department upon request. Supporting documentation such as styrene/VOC /HAP content, styrene/VOC/HAP emission factors used, MSDS sheets, purchase orders, "As Supplied" data sheets, etc. shall be kept for each product which includes sufficient information to determine emissions.

[Rule 62-4.070(3), F.A.C.]

A.8. Emissions Calculation Requirements – Emissions of Styrene, Methyl methacrylate (MMA), and other volatile organic compounds (VOC) shall be determined for open molding activities as follows until notified by the Department. Note, Styrene and MMA are each considered a VOC and a HAP.

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:

A. EU No. 001- Fiberglass Products, Forms, Molds and Plugs Manufacturing

% 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
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 equations:

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

where:

Mmma = amount of MMA containing material used (in tons)

Cmma = MMA content (percent/100)

3. VOC and HAP emissions for all other materials shall be determined by the following equation for each material. These values shall be used in conjunction with other emissions values in this specific condition to determine total VOC/HAP emissions:

$$\text{Emissions (tons)} = \text{Mvoc}_{/\text{HAP}} \times \text{Cvoc}_{/\text{HAP}} \text{ x EF}$$

where:

$\text{Mvoc}_{/\text{HAP}}$ = amount of VOC/HAP-containing material used (in tons)

$\text{Cvoc}_{/\text{HAP}}$ = VOC/HAP content (percent/100)

EF = emission factor for the individual VOC/HAP-containing material

Note: Emissions factor shall be 1.0 except for certain reactive species (e.g. isocyanates, peroxides, and phthalates). Emissions factors other than 1.0 must be approved by the Department.

[Rule 62-4.070(3), F.A.C.]