TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

JRL Ventures Incorporated/Marine Concepts

Facility ID No. 0810236

PROJECT

Project No. 0810236-003-AC
Application for Minor Air Construction Permit
Project Name: Increase VOC and HAPs Emissions Limits

COUNTY

Manatee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-0926

September 3, 2014

Prepared by Danny Stubbs

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:

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.

II. Project Description:

A. Applicant:

Mr. Matt Chambers, President
JRL Ventures, Incorporated
6805 15th Street East
Sarasota, Florida 34243

B. Professional Engineer:

Mr. Tom T. John, P.E.
Tom T. John, Professional Engineer, Inc.
6250 Cape Hatteras Way #2
St. Petersburg, Florida 33702

C. Project Location:

The facility is located in Manatee County at 6805 15th Street East in Sarasota, Florida.

D. Project Summary:

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

E. Application Information:

Application Received on: June 5, 2014
Additional Information Requested on: July 2, 2014
Additional Information Received on: September 3, 2014
Application Complete on: September 3, 2014

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to 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	facility operations are 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	facility 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 not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	this is a new source, therefore not subject to PM RACT rule
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

Subject to:	Y/N	Comments
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)	Y	EU No. 001 is subject to 40 CFR 63, Subpart VVVV. *Note: This activity is exempt from 40 CFR 63, Subpart GGGGG. 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 the site remediation only cleans up acetone, which is not a HAP.*
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	facility is a Title V source based on the individual HAP and total HAP emissions
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required. Compliance is demonstrated via recordkeeping.

IV. Summary of Emissions

EU No. 001 Description: Fiberglass products, forms, molds, and plugs manufacturing.

Pollutant	**EU No.**	**Potential Emissions** (tpy)	**Allowable Emissions (**tpy)
VOC	001	48.0	48.0
Total HAP	001	48.0	48.0
Individual HAP (Styrene)	001	19.8	N/A
VE Limitation			
VE	001		<20% (Rule 62-296.320(4)(b), 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, Florida Statutes and Section 62-4.070, Florida Administrative Code, 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).