AUGUST 14, 2017
ELECTRONIC CORRESPONDENCE
dw@marine-exhaust.com

FEDERALLY ENFORCEABLE STATE OPERATION PERMIT RENEWAL

PERMITTEE

Marine Exhaust Systems, Inc.
3640 Fiscal Court
Riviera Beach, FL 33404

Authorized Representative:
Darrin Woods, Vice President

Air Permit No. 0990692-004-AF
Permit Issued: **08/14/2017**
Permit Expires: **08/13/2022**
Renewal Date: **06/13/2022**
Air Operation Permit Renewal
for Permit No. 0990692-003-AF

Marine Exhaust Systems, Inc.
Palm Beach County, Florida

PROJECT

This is the **FINAL** air operation permit renewal, which authorizes the operation of Marine Exhaust Systems, Inc., which is a Manufacturer of marine exhaust components (Standard Industrial Classification No. 3714, NAICS Classification No. 336310). This project is a renewal to Permit No. 0990692-003-AF. There are no changes to the renewal permit. The facility is located in Palm Beach County at 3680 Interstate Park Road South, Riviera Beach, Palm Beach County, Florida, 33404. The UTM coordinates are, Zone 17; 590.13 km E; 2961.83 km N.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of 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.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Florida Department of Health Palm Beach County. The Permitting Authority's physical address is: 800 Clematis St., 4th Floor, West Palm Beach, Palm Beach County, Florida 33401. The Permitting Authority's mailing address is: 800 Clematis St., 4th Floor, West Palm Beach, Florida 33401. The Permitting Authority's telephone number is 561-837-5900.

Petitions. A person whose substantial interests are affected by the Department's permitting decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Palm Beach County Health Department Legal Office, located at 800 Clematis Street in West Palm Beach, Florida, 33401 (Telephone: (561) 671-4007, Fax (561) 837-5195). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information:
(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of how and when each petitioner received notice of the agency action or proposed action;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this Order (Permit) has the right to seek judicial review pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure with the Health Department at the address listed below 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 of Appeal must be filed within 30 days from the date this Order (Permit) is filed with the Clerk of the Health Department.

Executed in West Palm Beach, Florida
PALM BEACH COUNTY HEALTH DEPARTMENT

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Laxmana Tallam, P.E., Environmental Administrator
Air & Waste Section
Division of Environmental Public Health

If you have any questions, contact:
Paul Kalamaras, Engineering Specialist III
Air & Solid Waste Program
Palm Beach County Health Department
800 Clematis St., 4th Floor
West Palm Beach, Florida, 33401
Tel. (561) 837-5946

LT/JP/PK

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, (**with received receipt)** requested before the close of business on the date indicated below to the following persons.

Darrin Woods, Marine Exhaust Systems, Inc.	email	dw@marine-exhaust.com
Stephanie Brooks, P.E.	email	brookseng@aol.com
Ana Oquendo, EPA Region 4	email	oquendo.ana@epa.gov
Diane Pupa Southeast District Office, FDEP	email	Diane.Pupa@dep;state.fl.us
Jorge Patino, PE II, Supervisor, Air and Solid Waste Florida Department of Health Palm Beach County	email	Jorge.Patino@flhealth.gov
Jaime Morales, Environmental Engineer Florida Department of Health Palm Beach County	email	Jaime.Morales@flhealth.gov

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.

_____ _____

(Clerk) (Date)

PERMIT HISTORY

07/17/2017 Health Department received FESOP renewal application Pmt. (0990692-004-AF).

FACILITY DESCRIPTION

Facility Description: On June 3, 2010 Marine Exhaust was issued Air General Permit 0990692-001-AG. On April 27, 2012, Marine Exhaust Systems, Inc. applied to the Florida Department of Health Palm Beach County (Health Department) for a Federally Enforceable State Operating Permit (FESOP) No. 0990692-003-AF which was issued on September 17, 2012.

Marine Exhaust Systems, Inc. manufactures exhaust systems for the marine industry (yachts) based on diesel engine applications. The facility designs and fabricates various components, such as surge tubes, connection tubes, elbows, custom mufflers, underwater systems, and others. Resins and gel coats are used in manufacturing these components and the facility has three spray booths.

One spray booth (9'H x 18'W x 60'L), operating at an air flow of 20,000 CFM, was installed in 2007 for the application of gel coat finishes to the products. Three exhaust stacks from this booth discharge air pollutants at the height of 6' above the roof.

In 2010, a second and third spray booths were installed. The second spray booth (9'H x 17'W x 50'L), operating at an air flow of 50,000 CFM, was installed for the resin gun applications. Three exhaust stacks discharge air pollutants from this booth at 6 feet above roof height. The third spray booth (9'H x 17'W x 60'L) was also installed for the resin gun applications, and operates at an air flow of 60,000 CFM. This booth has three stacks that discharge the air pollutants at roof height. The applicant requested the emission limits of eight tons of styrene per year, twenty tons of total hazardous air pollutants (HAPs) per year, and twenty tons of volatile organic compounds (VOCs) per year; so that the emissions from the facility do not exceed the Title III/V emission thresholds.

The applicant requested a federally enforceable, facility-wide operation permit which would limit potential pollutant emissions of the facility below Title V applicability thresholds.

The source is classified as a synthetic minor (for HAPs) source of air pollution. This permit is a Federally Enforceable State Operation Permit (FESOP) issued in accordance with the requirements of Rule 62-210.300(2)(b), F.A.C.

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

EU No.	Emission Unit Description
001	**Manufacture of marine exhaust systems using gel coats and resins**

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
State Rule Citations	
Rule 62-210.300(2)(b), F.A.C., Permits Required for FESOP	EU001
Rule 62-212.400, Classification as a PSD minor source for HAPS	EU001

FACILITY REGULATORY CLASSIFICATION

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **does not** operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility **is not** 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

{Permit Note: Marine Exhaust Systems, Inc. operated under an Air General Permit from 06/03/2010 to 09/16/2012.}

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All applications, reports, tests, and notifications shall be submitted to the Air and Waste Section of the Florida Department of Health Palm Beach County (Health Department) at P.O. Box 29 (800 Clematis Street, 4th Floor), West Palm Beach, Florida, 33402-0029, and phone number (561) 837-5900. **[Specific Operating Agreement – SOA]**

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Health Palm Beach County (Health Department) at P.O. Box 29 (800 Clematis Street, 4th Floor), West Palm Beach, Florida, 33402-0029, and phone number (561) 837-5900.

3. Appendices: The following Appendices are attached as a part of this permit: **Appendix A** (Citation Formats and Glossary of Common Terms); **Appendix B** (General Conditions) and **Appendix C** (EF Table 1: Unified Emission Factors for Open Molding of Composites (Revised 10/13/2009). *{Permitting Note: Appendix D (Permit History) is also included for informational purposes only.}*

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: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. **[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]**

7. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. **[Rule 62-4.090, F.A.C.]**

8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (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 (DEP) District Office or Florida Department of Health Palm Beach County (Health Department). All synthetic non-Title V sources or all facilities with the potential to emit 10 tons/year or more of volatile organic compounds (VOC) or 25 tons/year or more of nitrogen oxides (NO_X) and located in an ozone nonattainment area or ozone air quality maintenance area shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C**.** **[Rule 62-210.370(3), F.A.C.]**

   {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.}

EMISSION LIMITING AND PERFORMANCE STANDARDS

9. General VOC Standards: The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents without applying known and existing vapor emission control devices or systems. This includes: **[Rule 62-296.320(1), F.A.C.]**

   (a) Regular inspection and maintenance of piping, valves, flanges, tanks, and containers used for storage and transfer of organic liquids in order to minimize fugitive VOC emissions.

(b) When not in use, directing solvent-containing materials to containers that prevent evaporation.

10. Objectionable Odors: The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320(2), F.A.C.]**

Note: An objectionable odor is defined as 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 62-210.200, F.A.C.]

11. **Facility-Wide Emission Cap: The permittee shall not cause, suffer, allow or permit the discharge of facility-wide emissions as specified below.**

(a) Volatile organic compounds (VOCs) — including hazardous air pollutants (HAPs) — in an amount greater than twenty (20) tons in any calendar year.

(b) Hazardous air pollutants (HAPs) – in an amount greater than twenty (20) tons in any 12 consecutive month periods.

(c) Styrene -- in an amount greater than eight (8) tons in any 12 consecutive month periods.

[Permittee's request to escape Title III and Title V of the Clean Air Act, Rule 62-210.300(2)(b), F.A.C.]
{Permit Note: The actual Facility-Wide Total HAPS and VOC emissions from 2012 to 2016 have been consistently less than 2 and 3 tons respectively per year}

12. General Visible Emissions Standard: Unless otherwise specified by permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from new, or existing emissions units, the opacity of which is equal to or greater than 20 percent. **[Rule 62-296.320(4)(b), F.A.C.]**

13. Unconfined Emissions of Particulate Matter: The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, 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 emission. Reasonable precautions shall include the following: **[Rule 62-296.320(4)(c), F.A.C.]**

(a) Paving and maintenance of roads, parking areas and yards.
(b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
(c) Application of asphalt, water, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
(d) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
(e) Landscaping or planting of vegetation.
(f) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
(g) Confining abrasive blasting where possible.
(h) Enclosure or covering of conveyor systems.
(i) Particulate matter over-spray shall be controlled by the filter pads of the spray booths.

Permitting Note: Facilities that cause frequent, valid complaints will be required by the Health department to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular source, the Health department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

OPERATION AND MAINTENANCE REQUIREMENTS

14. Circumvention: The permittee shall not circumvent air pollution control equipment/methods or allow the emission of air pollutants without the equipment/methods operating properly. **[Rule 62-210.650, F.A.C.]**

COMPLIANCE AND MONITORING REQUIREMENTS

15. Duration: All records and reports required by this permit shall be kept for at least five years from the date the information is recorded. **[Rule 62-4.070(3), F.A.C.]**

WASTE REQUIREMENTS

16. Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid, and hazardous wastes in accordance with all applicable Federal, State, and Local regulations. This air pollution permit does not preclude the permittee from securing any other types of required permits, licenses, or certifications. **[Rule 62-4.070(3), F.A.C.]**

A. Marine Exhaust Systems using Gel Coats and Resins

This section of the permit addresses the following emission unit.

EU No.	Emission Unit Description
001	**Manufacture of marine exhaust systems using gel coats and resins**

EMISSIONS STANDARDS

Emissions Standards:

1. Facility-Wide Volatile Organic Compounds (VOCs) Limit: Permittee shall comply with the VOCs emission limit specified in **Section II, Condition 11.** In order to ensure compliance with the VOC emissions limit, the permittee shall adjust the operations of this facility based on the information required in the monthly Log. **[Permittee's request to escape Title V regulations]**
2. Facility Wide Hazardous Air Pollutants (HAPs) Limit. Permittee shall comply with the HAPs emission limit specified in **Section II, Condition 11.** In order to ensure compliance with the HAPs emissions limit, the permittee shall adjust the operations of this facility based on the information required in the monthly Log. **[Permittee's request to escape Title V regulations]**
3. Facility-Wide Styrene Emissions Limit: Permittee shall comply with the Styrene emission limit specified in **Section II, Condition 11.** In order to ensure compliance with the Styrene emissions limit, the permittee shall adjust the operations of this facility based on
the information required in the monthly Log. **[Permittee's request to escape Title V Regulations]**

   {Permit Note: The actual Facility-Wide Total HAPS and VOC emissions from 2012 to 2016 have been consistently less than 2 and 3 tons respectively per year}

OPERATING RESTRICTIONS

4. *Paint spray booths:* The permittee shall maintain and operate the spray booths according to the manufacturer's specifications. The permit shall maintain the in-line filters of the spray booths according to the manufacturer's specifications. **[Rule 62-4.070(3), F.A.C.]**

MONITORING REQUIREMENTS

6. Emissions Estimation: The permittee shall maintain a current emissions inventory for the facility in order to ensure compliance with the emissions limits specified in **Section II, Condition 11.** of this permit. As a minimum, the emissions inventory shall be reviewed and updated monthly, as needed. The emissions inventory shall include the following:

   (a) *Materials Inventory:* The source shall develop and maintain an inventory of raw materials (i.e., resins, gel coats, catalysts, activators, solvents, and other products that contain VOCs or HAPs) used at the facility. At a minimum, the emissions inventory shall be reviewed and updated monthly, as needed. The inventory shall contain, at a minimum, the raw material name, the density (lb/gal), the total VOC content (lb/gal), the individual and total HAP contents (lb/gal), and the identified HAPs. The materials inventory shall be supported by Material Safety Data Sheets supplied by the manufacturer.

   (b) *Emission Factor Inventory:* The permittee shall maintain a current emission factor inventory for determining monthly emissions of VOCs, styrene and total HAPs. Emission factors for styrene, and Methyl Methacrylate shall be estimated using the "Unified Emission Factors for Open Molding of Composites (ver 10/13/2009 or current)" – **Appendix C**, and the HAP content of the material. Facility shall obtain approval from the Health Department to use an alternate source to estimate the emission factors for styrene and Methyl Methacrylate.

   (c) Determining Hazardous Air Pollutant Content: The permittee may rely on information such as manufacturer's formulation data. If the HAP content is provided by the material supplier or manufacturer as a range, then the permittee shall use the upper limit of the range for determining compliance.

(d) *Emissions Inventory:* The permittee shall develop and implement a monthly emission monitoring system in conjunction with the Subsections (a), (b) and (c) of this specific condition and the operating records **(Specific Condition 9. of this section)** requirements. As a minimum, the compliance monitoring system shall include calculations of 12-month rolling total emissions of individual HAP, and total HAPs, and calendar year emissions of VOCs.

RECORD KEEPING REQUIREMENTS

7. Monthly Emissions Reports: **[Rule 62-210.370(2), F.A.C.]**

The permittee shall maintain a monthly emissions report, on or before the 15th of each month, to summarize facility-wide emissions of VOC, individual HAP, and total HAPs. The report shall include, at a minimum, the monthly emissions and the calendar year total emissions for VOC, previous 12-month rolling total emissions of individual HAP and total HAPs. The report shall also include any updates to the emissions factors used to calculate emissions and the effective date of the emission factor usage.

8. Record Maintenance **[Rule 62-4.070(3), F.A.C.]**

(a) Facility records must be readily available and in a form so they can be easily inspected and reviewed.
(b) The permittee shall keep each record for 5 years following the date that each record is generated.
(c) The permittee shall keep each record on site for at least 2 years after the date that each record is generated. The permittee can keep the records offsite for the remaining 3 years.
(d) The permittee may keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

9. Operating Records: **[Rule 62-4.070(3), F.A.C.]**

The permittee shall maintain the following records for at least five (5) years:

(a) Monthly receipts of all the resins and gel coats received (in pounds) during the month at the site and the reported styrene, other HAPs, and total HAP content (% weight) of each;
(b) Monthly records of all the resins gel coats remained at the end of the month (in pounds) at the site;
(c) Monthly receipts of all the styrene-containing solvent(s) received (in pounds) during the month at the site and the reported styrene, other HAPs, and total HAP content (% weight) of each;
(d) Monthly records of all the styrene-containing solvent(s) remained at the end of the month (in pounds) at the site;
(e) The date and amount of all materials received on site which are not tracked under (a) or (c) but that contain volatile organic compounds (VOCs) and/or hazardous air pollutants (HAPs). The permittee shall keep track of individual HAPs, and total HAP content (% weight) of each of these materials;

REPORTING REQUIREMENTS

10. The permittee shall submit the emissions reports **(Specific Condition 7. of this section)**, to the Health Department on a quarterly basis. The permittee shall submit these quarterly reports for one year (four quarters) after the final permit is issued. The first quarterly report covers period of the calendar quarter during which the final permit is issued. The quarterly report shall be submitted within 30 days after the end of the calendar quarter, the time period covered by the report.

{Permitting Note: The permittee may elect to use an electronic recordkeeping system in the format of either a spreadsheet or database provided records can be generated when requested by the Health Department.}