



Rick Scott  
Governor

John H. Armstrong, M.D.  
State Surgeon General

August 7, 2012

ELECTRONIC CORRESPONDENCE

[dw@marine-exhaust.com](mailto:dw@marine-exhaust.com)

Darrin Woods, Vice President  
Marine Exhaust Systems, Inc.  
3640 Fiscal Court  
Riviera Beach, FL 33404

**Re:** Intent to Issue - Draft Federally Enforceable State Operation Permit [FESOP] No. 0990692-003-AF  
**Project Description:** Initial FESOP for a facility that manufactures exhaust systems for marine industry.

**Dear Mr. Woods:**

One copy of the Federally Enforceable State Operation Permit (DRAFT PERMIT) for the Marine Exhaust Systems, Inc. located at 3680 Interstate Park Road South, Riviera Beach, Palm Beach County, Florida is enclosed. Also enclosed are the Health Department's Notice of Intent to Issue Permit (NOTICE OF INTENT), the Public Notice of Intent to Issue Permit (PUBLIC NOTICE), and the Technical Evaluation and Preliminary Determination.

The PUBLIC NOTICE must be published in the legal ad section of a local newspaper as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Laxmana Tallam, P.E., at the below letterhead address. If you have any other questions, please contact Mr. Tallam at 561-837-5978.

Sincerely,

For the Division Director  
Environmental Public Health

A handwritten signature in blue ink, appearing to read "James E. Stormer".

James E. Stormer, Q.E.P., Environmental Administrator  
Air & Waste Section

Enclosures:



Palm Beach County Health Department  
Division of Environmental Public Health-800 Clematis Street, P.O. Box 29, West Palm Beach, FL 33402-0029  
Phone: (561) 837-5900 Fax: (561)837-5295 – [www.pbchd.com](http://www.pbchd.com)



In the Matter of an  
Application for Air Permit by:

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

DRAFT PERMIT File No.: 0990692-003-AF  
Palm Beach County, Florida

*Authorized Representative:*

Darrin Woods, Vice President

**NOTICE OF INTENT TO ISSUE A FEDERALLY ENFORCEABLE STATE OPERATION PERMIT (FESOP)**

On April 27, 2012, Marine Exhaust Systems, Inc. (applicant) applied to the Palm Beach County Health Department for a Federally Enforceable State Operation Permit (FESOP) in accordance with Rule 62-210.300(2)(b) of the Florida Administrative Code (F.A.C.). The applicant's authorized representative and mailing address are: Darrin Woods, Vice President, 3640 Fiscal Court, Riviera Beach, FL 33404.

**Facility Location:** This facility is located at 3680 Interstate Park Road South, Riviera Beach, Palm Beach County.

**Facility Description:** 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. 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 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 Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 of the Florida Administrative Code (F.A.C.). However, in accordance with Section 403.182, F.S., DEP recognizes the Health Department as the approved local air pollution control program in Palm Beach County. As such, FDEP and the Palm Beach County Health Department have entered into a Specific Operating Agreement that authorizes the Health Department to issue or deny permits for this type of air pollution source located in Palm Beach County.*

**Permitting Authority:** Applications for federally enforceable state operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Palm Beach County Health Department is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 800 Clematis Street, West Palm Beach, Florida. The Permitting Authority's mailing address is: Air & Waste Section (4<sup>th</sup> Floor), 800 Clematis Street, West Palm Beach, Florida 33401. The Permitting Authority's telephone number is 561-837-5900.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue a federally enforceable state operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE" The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office at Air & Waste Section, Palm Beach County Health Department, 800 Clematis St., Post Office Box 29, West Palm Beach, Florida 33402-0029 (Telephone: (561) 837-5978; Fax: (561) 837-5295), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed 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 permitting authority's Legal Office, Attention: Chief Legal Officer, located at 800 Clematis Street in West Palm Beach, Florida, 33402 (Telephone: (561) 837-5900, Fax (561) 837-5295). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 (in a proceeding initiated by another party) 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 Permitting Authority'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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the

petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. 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 for this proceeding.

*Executed in West Palm Beach, Florida*  
PALM BEACH COUNTY HEALTH DEPARTMENT  
**For the Director of**  
**Division of Environmental Public Health**



James E. Stormer, Q.E.P., Environmental Administrator  
Air and Waste Section

**CERTIFICATE OF SERVICE**

The undersigned duly designated agency clerk hereby certifies that the DRAFT PERMIT, the NOTICE OF INTENT, the PUBLIC NOTICE, and the Technical Evaluation and Preliminary Determination were sent electronically (with received receipt) before the close of business on 8/7/2012 to the identified Authorized Representative.

In addition, the undersigned duly designated agency clerk hereby certifies that *copies* of these documents were sent electronically (with received receipt) on the same date to the person(s) listed:

Stephanie Brooks, P.E.	email	<a href="mailto:brookseng@aol.com">brookseng@aol.com</a>
Lennon Anderson, P.E., DEP/SED	email	<a href="mailto:Lennon.Anderson@dep.state.fl.us">Lennon.Anderson@dep.state.fl.us</a>
Ana Oquendo, EPA Region 4	email	<a href="mailto:quendo.ana@epa.gov">quendo.ana@epa.gov</a>

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), F.S., with the designated agency Clerk, receipt of which is hereby acknowledged.

Capmana Tallam

(Clerk)

8/7/2012

(Date)

**PUBLIC NOTICE OF INTENT TO ISSUE**  
**A FEDERALLY ENFORCEABLE STATE OPERATION PERMIT (FESOP)**

**PALM BEACH COUNTY HEALTH DEPARTMENT**

DRAFT PERMIT NO. 0990692-003-AF  
Marine Exhaust Systems, Inc.  
Palm Beach County, Florida

The Palm Beach County Health Department (Permitting Authority) gives notice of its intent to issue a Federally Enforceable State Operation Permit (FESOP) to Marine Exhaust Systems, Inc.. The applicant's authorized representative and mailing address are: Darrin Woods, Vice President, 3640 Fiscal Court, Riviera Beach, FL 33404.

**Facility Location:** This facility is located at 3680 Interstate Park Road South, Riviera Beach, Palm Beach County.

**Project Description:** 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. 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 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.

**Permitting Authority:** Applications for federally enforceable state operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Palm Beach County Health Department is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 800 Clematis Street, West Palm Beach, Florida. The Permitting Authority's mailing address is: Air & Waste Section (4<sup>th</sup> Floor), 800 Clematis Street, West Palm Beach, Florida 33401. The Permitting Authority's telephone number is 561-837-5900.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue a federally enforceable state operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed 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 permitting authority's Legal Office, Attention: Chief Legal Officer, located at 800 Clematis Street in West Palm Beach, Florida, 33402 (Telephone: (561) 837-5900, Fax (561) 837-5295). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 (in a proceeding initiated by another party) 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 Permitting Authority'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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. 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 for this proceeding.



Rick Scott  
Governor

John H. Armstrong, M.D.  
State Surgeon General

**AUGUST 7, 2012**  
**ELECTRONIC CORRESPONDENCE**  
**dw@marine-exhaust.com**

\*\*\* **DRAFT** \*\*\*

**FEDERALLY ENFORCEABLE STATE OPERATION PERMIT**

**ISSUED TO:**

**Permittee:**

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

<b>ARMS No.:</b>	0990692
<b>Permit No:</b>	0990692-003-AF
<b>Issued:</b>	<b>DRAFT</b>
<b>Expires:</b>	<b>DRAFT</b>

**Authorized Representative:**

Darrin Woods, Vice President

**LOCATED AT:**

**Location:** 3680 Interstate Park Road South, Riviera Beach, Palm Beach County, Florida, 33404  
Latitude 26° 46' 29.9"; Longitude 80° 5' 26.31"; UTM: Zone 17; 590.13 km E; 2961.83 km N  
Description: Manufacturer of marine exhaust components  
[SIC: 3714] Transportation Equipment -- Motor Vehicle Parts and Accessories

**STATEMENT OF BASIS:**

The Palm Beach County Health Department (Health Department) issues this permit under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4 through 62-297 the Florida Administrative Code (F.A.C.). The Florida Department of Environmental Protection (DEP) has permitting jurisdiction under Chapter 403.087, F.S. However, in accordance with Section 403.182, F.S., the DEP recognizes the Health Department as the approved local air pollution control program in Palm Beach County. As such, the DEP and the Health Department have entered into a Specific Operating Agreement that authorizes the Health Department to issue or deny permits for this type of air pollution source located in Palm Beach County. The above named permittee is authorized to operate the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Health Department.

**ISSUED BY:**

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

**DRAFT**

James E. Stormer, Q.E.P., Environmental Administrator  
Air & Waste Section  
Division of Environmental Public Health



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**SECTION II. FACILITY-WIDE CONDITIONS****PERMIT HISTORY**

April 27, 2012                      Received permit application

**PERMIT CONTENT**

Section I:    Summary Information

Section II:   Facility-Wide Specific Conditions

Section III:  Emissions Unit Specific Conditions

Section IV:  Appendices

*Appendix A:* General Permit Conditions

*Appendix B:* Citation Format

*Appendix C:* EF Table 1: Unified Emission Factors for Open Molding of Composites (Revised 10/13/2009)

**REGULATORY CLASSIFICATION**

Facility description: On April 27, 2012, Marine Exhaust Systems, Inc. applied to the Palm Beach County Health Department for a Federally Enforceable State Operating Permit (FESOP). Previously on March 28, 2012, the applicant submitted a permit application for a Title V permit. Later, the applicant withdrew the Title V permit application and chose to apply for a FESOP.

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' x 18' x 60') operating at 20,000 CFM of moving air, is 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, other two spray booths were installed. Spray booth (9' x 17' x 50') operating at 50,000 CFM of moving air, is installed for the resin gun applications. Three exhaust stacks discharge air pollutants from this booth at roof height. The third spray booth (9 x 17 x 60) is also installed for the resin gun applications, and operates at 60,000 CFM of moving air. 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.

**Regulatory Classification**

Title III:        The facility is not subject to the requirements the Title III of the Clean Air Act.

Title IV:        The facility will not operate any units subject to the acid rain provisions of the Clean Air Act.

Title V:        The facility is not subject to the requirements of the Title V of the Clean Air Act.

PSD:         The facility is classified as a PSD minor source of air pollution in accordance with Rule 62-212.400 F.A.C.

RACT:        The facility will not operate any units subject to the RACT.

NSPS:        The facility is not subject to the requirements of 40 CFR 60.

NESHAP:     The facility is not subject to the requirements of 40 CFR 63

## SECTION II. FACILITY-WIDE CONDITIONS

## THIS PERMIT ADDRESSES THE FOLLOWING EMISSIONS UNITS/ACTIVITIES:

EMISSIONS UNIT No.	EMISSIONS UNIT DESCRIPTION
001	Manufacture of marine exhaust systems using gel coats and resins

**1.0 ADMINISTRATIVE REQUIREMENTS**

- 1.1 Regulating Agencies: All applications, reports, tests, and notifications shall be submitted to the Air & Waste Section (4<sup>th</sup> floor) of the Palm Beach County Health Department (Health Department) at P.O. Box 29 (800 Clematis Street), West Palm Beach, Florida, 33402-0029. **[Specific Operating Agreement (SOA)]**
- 1.2 General Permit Conditions: The permittee shall be aware of, and operate under, the attached General Permit Conditions listed in **Appendix A** of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. **[Rule 62-4.160, F.A.C.]**
- 1.3 Citation Format: The format for citing applicable regulations is provided in **Appendix B** of this permit.
- 1.4 Application for Operation Permit: The permittee shall apply for a renewal of permit at least sixty (60) days **prior** to the expiration of this operation permit. The application shall include: the appropriate DEP form; the correct fee; all test reports required by this permit; and a summary of any changes or substitutions to equipment, processes, fuels, controls, etc., that vary from the original application.  
In accordance with the provisions of F.A.C. 62-210.350(1) and (4), an applicant shall publish a public notice of proposed agency action for any renewal application involving material changes from the existing permit and any application for permit revision. **[Rules 62-4.090 and 62-210.300(3)(b), F.A.C.]**
- 1.5 Applicable Regulations: This facility is subject to the following regulations: Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. Specifically, Rule 62-296.513, F.A.C. – ‘Reasonably Available Control Technology for Surface Coating Miscellaneous Metal Parts and Products.’ Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. **[Rule 62-210.300(1), F.A.C. and the SOA]**

**2.0 EMISSION LIMITING AND PERFORMANCE STANDARDS**

- 2.1 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.
- 2.2 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.]*

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**SECTION II. FACILITY-WIDE CONDITIONS**

2.3 **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 tons in any calendar year.**

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

(c) **Styrene -- in an amount greater than eight 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.]**

2.4 **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.]**

2.5 **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.*

**3.0 OPERATION AND MAINTENANCE REQUIREMENTS**

3.1 **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.]**

**SECTION II. FACILITY-WIDE CONDITIONS****4.0 COMPLIANCE MONITORING REQUIREMENTS**

4.1 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.]**

**5.0 REPORTS AND RECORDKEEPING REQUIRED**

5.1 Annual Operating Report: The annual operating report shall be submitted to the Health Department by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to the Health Department. **[Rule 62-210.370(3), F.A.C.]**

**6.0 WASTE REQUIREMENTS**

6.1 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.]**

## SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

This portion of the permit addresses the following group of emissions unit:

EMISSION UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Manufacture of marine exhaust systems using gel coats and resins

### 1.0. EMISSION LIMITING STANDARDS

- 1.1 Facility-Wide Volatile Organic Compounds (VOCs) Limit: Permittee shall comply with the VOCs emission limit specified in [Facility – Wide Condition 2.3 \(Section II\)](#). 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]**
- 1.2 Facility Wide Hazardous Air Pollutants (HAPs) Limit. Permittee shall comply with the HAPs emission limit specified in [Facility – Wide Condition 2.3 \(Section II\)](#). 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]**
- 1.3. Facility-Wide Styrene Emissions Limit: Permittee shall comply with the Styrene emission limit specified in [Facility – Wide Condition 2.3 \(Section II\)](#). 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]**

### 2.0. OPERATING RESTRICTIONS

- 2.1 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.]**

### 3.0 MONITORING REQUIREMENTS

- 3.1 Emissions Estimation: The permittee shall maintain a current emissions inventory for the facility in order to ensure compliance with the emissions limits specified in [Facility-Wide Condition 2.3 \(Section II\)](#) 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.

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**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**

(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 4.3 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.

**4.0 Record Keeping Requirements****4.1 Monthly Emissions Reports: [Rule 62-297.310(7)(b), F.A.C.]**

The permittee shall maintain a monthly emissions report, on or before the 15<sup>th</sup> 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.

**4.2 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.

**4.3 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;

**5.0 Reporting Requirement:**

- 5.1 The permittee shall submit the emissions reports ([Specific Condition 4.1 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.}*

**PART IV**  
**LIST OF APPENDICES**

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<b>APPENDIX</b>	<b>DESCRIPTION</b>
A	General Permit Conditions [62-4.160]
B	Citation Format
C	EF Table 1: Unified Emission Factors for Open Molding of Composites (Revised 10/13/2009)

**APPENDIX B**  
**GENERAL CONDITIONS [F.A.C. 62-4.160]**

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval or any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

**APPENDIX B**  
**GENERAL CONDITIONS [F.A.C. 62-4.160]**

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The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (BACT), *not applicable*;
  - (b) Determination of Prevention of Significant Deterioration (PSD), *not applicable*; and
  - (c) Compliance with New Source Performance Standards, *applicable*.
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**APPENDIX B  
CITATION FORMAT**

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**ABBREVIATIONS AND ACRONYMS**

<b>°F</b>	Degrees Fahrenheit
<b>BACT</b>	Best Available Control Technology
<b>CFR</b>	Code of Federal Regulations
<b>DEP</b>	State of Florida, Department of Environmental Protection
<b>DARM</b>	Division of Air Resource Management
<b>EPA</b>	United States Environmental Protection Agency
<b>F.A.C.</b>	Florida Administrative Code
<b>F.S.</b>	Florida Statute
<b>ISO</b>	International Standards Organization ( <i>Refers to standard conditions of 288°K, 60% relative humidity, and 101.3 kPa.</i> )
<b>LAT.</b>	Latitude
<b>LONG.</b>	Longitude
<b>ORIS</b>	Office of Regulatory Information Systems
<b>SOA</b>	Specific Operating Agreement
<b>UTM</b>	Universal Transverse Mercator

**CITATIONS**

*The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, permit numbers, and identification numbers.*

Code of Federal Regulations:

<i>Example:</i>	<b>[40 CFR 60.334]</b>
<i>Where:</i>	40 - refers to Title 40
	CFR - refers to the Code of Federal Regulations
	60 - refers to Part 60
	60.334 refers to Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

<i>Example:</i>	<b>[Rule 62-213.205, F.A.C.]</b>
<i>Where:</i>	62 - refers to Title 62 of the Florida Administrative Code (F.A.C.)
	62-213 - refers to Chapter 62-213, F.A.C.
	62-213.205 - refers to Rule 62-213.205, F.A.C.

Facility Identification (ID) Number:

<i>Example:</i>	Facility ID No.: 099-0001
<i>Where:</i>	099 3 digit number indicates that the facility is located in Palm Beach County
	0221 4 digit number assigned by state database identifies specific facility

New Permit Numbers:

<i>Example:</i>	099-2222-001-AC or 099-2222-001-AV
<i>Where:</i>	AC - identifies permit as an Air Construction Permit
	AV - identifies permit as a Title V Major Source Air Operation Permit
	099 - 3 digit number indicates that the facility is located in Palm Beach County

**APPENDIX B  
CITATION FORMAT**

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- 2222 - 4 digit number assigned by state database identifies specific facility
- 001 - 3 digit sequential number assigned by the state database identifies specific permit project

Old Permit Numbers:

*Example:* AC50-123456 or AO50-123456

- Where:*
- AC - identifies permit as an Air Construction Permit
  - AO - identifies permit as an Air Operation Permit
  - 123456 - 6 digit number assigned by state database identifies specific permit

Other Permit Numbers:

*Example:* PSD-FL-185 or PA95-01

- Where:*
- PSD-FL refers to a Prevention of Significant Deterioration Permit issued by the Florida DEP
  - PA refers to a Power Plant Siting Act Permit

**APPENDIX C**  
**EF TABLE 1: UNIFIED EMISSION FACTORS FOR OPEN MOLDING OF COMPOSITES (REVISED 10/13/2009)**

**EF Table 1: Unified Emission Factors for Open Molding of Composites**

Revised and Approved: 10/13/2009

Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed		33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 <sup>(2)</sup>
Styrene content in resin/gelcoat, % <sup>(1)</sup>	<33 <sup>(2)</sup>	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 <sup>(2)</sup>
Manual	0.126 x %styrene x 2000	83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180	(0.286 x %styrene) - 0.0529) x 2000
Manual w/ Vapor Suppressed Resin VSR <sup>(8)</sup>	Manual emission factor [listed above] x (1 - (0.50 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized	0.169 x %styrene x 2000	111	120	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354	((0.714 x %styrene) - 0.18) x 2000
Mechanical Atomized with VSR <sup>(9)</sup>	Mechanical Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized Controlled Spray <sup>(4)</sup>	0.130 x %styrene x 2000	86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273	0.77 x ((0.714 x %styrene) - 0.18) x 2000
Mechanical Controlled Spray with VSR	Mechanical Atomized Controlled Spray emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Non-Atomized	0.107 x %styrene x 2000	71	74	77	80	83	86	89	92	95	98	102	105	108	111	115	118	121	124	((0.157 x %styrene) - 0.0165) x 2000
Mechanical Non-Atomized with VSR <sup>(8)</sup>	Mechanical Non-Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Non-Atomized application of resins that contain Methyl Styrene monomer <sup>(10)</sup>																				
<b>Mechanical Non-Atomized Styrene monomer emission Factor (listed above) x .55</b>																				
Mechanical Non-Atomized Filled DCPD resins <sup>(11)</sup>	0.144 x % styrene x 2000	95	98	101	104	108	111	114	117	120	124	127	130	133	136	140	143	146	149	((0.1603 x % styrene) - 0.0055) x 2000
Filament application	0.184 x %styrene x 2000	122	127	133	139	144	149	155	160	166	171	177	182	188	193	199	204	210	216	((0.2746 x %styrene) - 0.0298) x 2000
Filament application with VSR <sup>(8)</sup>	0.120 x %styrene x 2000	79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	138	140	0.65 x ((0.2746 x %styrene) - 0.0298) x 2000
Gelcoat Application	0.445 x %styrene x 2000	294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646	((1.03646 x %styrene) - 0.195) x 2000
Gelcoat Controlled Spray Application <sup>(4)</sup>	0.325 x %styrene x 2000	215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472	0.73 x ((1.03646 x %styrene) - 0.195) x 2000
Gelcoat Non-Atomized Application <sup>(8)</sup>	SEE Note 9 below	198	205	214	223	232	241	250	259	268	278	287	296	305	314	323	332	341	350	((0.4506 x %styrene) - 0.0505) x 2000
Lesser Atomized Gelcoat Application <sup>(12)</sup>	for < 30 - 0.323 x % styrene x 2000	229	241	252	264	276	287	299	311	322	334	346	357	369	381	392	404	416	428	((0.5842 x % styrene) - 0.07825) x 2000
Covered-Cure after Roll-Out	Non-VSR process emission factor [listed above] x (0.60 for Manual <or> 0.65 for Mechanical)																			
Covered-Cure without Roll-Out	Non-VSR process emission factor [listed above] x (0.50 for Manual <or> 0.55 for Mechanical)																			

**Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed**

Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	≥20
MMA content in gelcoat, % <sup>(6)</sup>	15	30	34	38	42	46	50	54	58	62	66	70	74	78	82	86	90	94	98	102	≥20
Gel coat application <sup>(7)</sup>		30	31	32	194	208	217														0.75 x %MMA x 2000

- Notes
- Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders, fillers, glass,....etc.
  - Formulas for materials with styrene content < 33% are based on the emission rate at 33% (constant emission factor expressed as percent of available styrene), and for styrene content > 50% on the emission rate based on the extrapolated factor equations; these are not based on test data but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.
  - The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the *CFA Vapor Suppressant Effectiveness Test*.
  - SEE the *CFA Controlled Spray Handbook* for a detailed description of the controlled spray procedures.
  - The effect of vapor suppressants on emissions from filament winding operations is based on the *Dow Filament Winding Emissions Study*.
  - Including MMA monomer content as supplied, plus any extra MMA monomer added by the molder, but before addition of other additives such as powders, fillers, glass,....etc.
  - Based on gelcoat data from *MMA Emission Study*.
  - SEE the July 17, 2001 EECs report *Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites* for a detailed description of the non-atomized gelcoat testing.
  - Use the equation ((0.4506 x %styrene) - 0.0505) x 2000 for gelcoats with styrene contents between 19% and 32% by wt.; use the equation 0.185 x %styrene x 2000 for gelcoats with less than 19% styrene content by wt.
  - Refer to Section 3.0, Instructions and Examples for the Emission Factor table, 3.2 Calculation of the methyl styrene factor
  - Use this factor for the non-atomized application of DCPD or DCPD-blend resin, when filled to 30% or more by weight
  - Table from 30% TO 32% styrene content :

**TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION**

**DRAFT**

Federally Enforceable State Air Operating Permit (FESOP) No. 0990692-003-AF

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

Palm Beach County, Florida

Permitting & Compliance Authority:

Palm Beach County Health Department  
Division of Environmental Public Health  
Air & Waste Section  
800 Clematis Street (P.O. Box 29)  
West Palm Beach, FL 33402-0029

August 3, 2012

**1.0 APPLICATION INFORMATION**1.1 Applicant Name and Address

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

Authorized Representative  
Darrin Woods, Vice President

1.2 Application Review

03/28/2012 Applicant submitted the Title V permit application (0990692-002-AV)  
04/10/2012 Applicant withdrawn the Title V permit application  
04/27/2012 Applicant submitted the permit application for a FESOP (0990692-003-AF)  
05/09/2012 Request for Information (RFI) issued  
05/09/2012 Correct application fee received  
06/25/2012 Response to the RFI received

**2.0 FACILITY INFORMATION**2.1 Facility Location

3680 Interstate Park Road South, Riviera Beach, Palm Beach County, Florida, 33404

Latitude 26° 46' 29.9"; Longitude 80° 5' 26.31"; UTM: Zone 17; 590.13 km E; 2961.83 km N

2.2 Standard Industrial Classification Code (SIC # 3714)

Major Group Number	37	Transportation Equipment
Group Number	371	Motor Vehicles And Motor Vehicle Equipment
Industry Number	3714	Motor Vehicle Parts and Accessories

2.3 Facility Category

Based on the specific conditions in the draft permit and the limitations on the emissions of Hazardous air pollutants (Haps) and Volatile Organic Compounds (VOCs), this facility is classified as a synthetic non-Title V source of air pollution.

### 3.0 PROJECT DESCRIPTION

This facility consists of the following emissions unit:

EMISSIONS UNIT No.	EMISSIONS UNIT DESCRIPTION
001	Manufacture of marine exhaust systems using gel coats and resins

On April 27, 2012, Marine Exhaust Systems, Inc. applied to the Palm Beach County Health Department for a Federally Enforceable State Operating Permit (FESOP). Previously on March 28, 2012, the applicant submitted a permit application for a Title V permit. Later, the applicant withdrew the Title V permit application and chose to apply for a FESOP.

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' x 18' x 60') operating at 20,000 CFM of moving air, is 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, other two spray booths were installed. Spray booth (9' x 17' x 50') operating at 50,000 CFM of moving air, is installed for the resin gun applications. Three exhaust stacks discharge air pollutants from this booth at roof height. The third spray booth (9 x 17 x 60) is also installed for the resin gun applications, and operates at 60,000 CFM of moving air. 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 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.

### 4.0 RULE APPLICABILITY

The proposed project is subject to preconstruction review under the applicable provisions of Chapter 403, Florida Statutes, and Chapters 62-209 through 62-297 of the Florida Administrative Code (F.A.C.). This facility is located in Palm Beach County; an area designated as "maintenance" for the pollutant ozone and attainment for all other criteria pollutants in accordance with the chapter 62-204 F.A.C.

The proposed project is exempt from review under Rule 62-212.400 F.A.C., Prevention of Significant Deterioration (PSD), because this source is considered a minor facility for the purpose of PSD regulations (potential to emit less than 250 tons per year of pollutant).

The proposed facility shall comply with all applicable provisions of the Florida Administrative Code and, specifically, the following chapters and rules:

<b>Chapter 62-4, F.A.C</b>	-	<b>Permits.</b>
Rule 62-4.160, F.A.C.	-	General Permit Conditions
<b>Chapter 62-210, F.A.C.</b>	-	<b>Stationary Sources – General Requirements</b>
Rule 62-210.300, F.A.C.	-	Permits Required.
Rule 62-210.350, F.A.C.	-	Public Notice and Comment.
Rule 62-210.370, F.A.C.	-	Reports.
Rule 62-210.650, F.A.C.	-	Circumvention.
Rule 62-210.700, F.A.C.	-	Excess Emissions.
Rule 62-210.900, F.A.C.	-	Forms and Instructions.
<b>Chapter 62-212, F.A.C.</b>	-	<b>Stationary Sources – Preconstruction Review</b>
Rule 62-212.300, F.A.C.	-	General Preconstruction
<b>Chapter 62-296, F.A.C.</b>	-	<b>Stationary Sources – Emission Standards</b>
Rule 62-296.320, F.A.C.	-	General Pollutant Emission Limiting Standards.
<b>Chapter 62-297, F.A.C.</b>	-	<b>Stationary Sources - Emissions Monitoring</b>
Rule 62-297.310, F.A.C	-	General Test Requirements.

#### 4.1 Regulatory Classification

<u>Title III:</u>	The facility is not subject to the requirements the Title III of the Clean Air Act.
<u>Title IV:</u>	The facility will not operate any units subject to the acid rain provisions of the Clean Air Act.
<u>Title V:</u>	The facility is not subject to the requirements of the Title V of the Clean Air Act.
<u>PSD:</u>	The facility is classified as a PSD minor source of air pollution in accordance with Rule 62-212.400 F.A.C.
<u>RACT:</u>	The facility will not operate any units subject to the RACT.
<u>NSPS:</u>	The facility is not subject to the requirements of 40 CFR 60.
<u>NESHAP:</u>	The facility is not subject to the requirements of 40 CFR 63

#### 5.0 Title V Applicability Determination

Facility keeps track of the materials (gel coats, resins, and others) on monthly basis. Based on the HAP content and VOC content of these materials, the emissions of individual HAP, total HAPs, and VOCs are estimated. The emissions factors styrene and MMA are calculated using 'the Unified Emission Factors for Open Molding of Composites (Revised 10/13/2009 or current)' sheet.

The applicant is required to submit the annual operating report (AOR) on an annual basis. The current actual emissions of total HAPs and the VOCs are ~ 2 tons per year.

#### 6.0 CONCLUSION

Based on the information provided by the applicant, the PBCHD has a reasonable assurance that the proposed project, as described in this evaluation, and subject to the conditions in the proposed draft permit, will not cause or contribute to a violation of any air quality standard or any other technical provision of Chapter 62-4 through 62-297 of the Florida Administrative Code.