Catalina Yachts
Morgan Division

Facility ID No. 1030223
Pinellas County

Title V Air Operation Permit Renewal

Permit No. 1030223-012-AV
(Renewal of Title V Air Operation Permit No. 1030223-011-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 470-5700
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Compliance Authority:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756

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Title V Air Operation Permit Renewal

Permit No. 1030223-012-AV

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Catalina Yachts, Morgan Division
7200 Bryan Dairy Road
Largo, Florida 33771

Permit No. 1030223-012-AV
Facility ID No. 1030223
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Catalina Yachts is located in Pinellas County at 7200 Bryan Dairy Road, Largo, Florida. UTM Coordinates are: Zone 17, 328.6 km East and 3083.6 km North. Latitude is: 27^0 51' 56" North; and, Longitude is: 82^0 44' 27" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: Date, 200x
Renewal Application Due Date: Exp. Date -225, 20xx
Expiration Date: Eff. Date + 5 years, 20xx

(Draft/Proposed)

_____
Kelley M. Boatwright
Permitting & Waste Cleanup Program Administrator
Southwest District

KMB/sg/admin

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility consists of a fiberglass boat manufacturing facility subject to the requirements of 40 CFR 63, Subpart VVVV-National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. The facility consists of seven main buildings which include the Tooling Building, the Glass Building (Fiberglass Lamination Building), the Grinding Building, the Intermediate Assembly and Final Assembly Buildings, the Varnishing Building and the Storage Building.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fiberglass Boat Manufacturing
002	Wood Shop

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received April 7, 2014, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Regulations	
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart VVVV- National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing	001
State Regulations	
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices - The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. **Not federally Enforceable -** Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means 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 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following:

a. Each building's fans and/or ventilation systems shall be operating whenever usage of materials containing VOC/OS's occurs and shall remain operating for at least 1 hour after the usage has been completed.
b. All materials containing VOC/OS's shall be stored in closed original containers and/or in small automatic closing safety cans.
c. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.
d. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of materials containing VOC/OS's.
e. Work practice controls shall include limiting the amount of clean-up solvents issued to employees and employees shall use gloves whenever handling resins.
f. Immediately attend to all spills of materials containing VOC/OS's as appropriate.

[Rule 62.296.320(1)(a), F.A.C.].

FW4. General Visible Emissions - No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter - No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including 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 emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. The north wall of the grinding building shall contain a filter with the exhaust fan.

b. Frequent cleanings and sweeping of floors, equipment, and finished products.

c. Supervisory inspections during operation(s) to ensure that all activities are being conducted in a manner to minimize emissions.

d. Application of water to paved and unpaved areas accommodating vehicular traffic, as necessary.

e. Enclosure or covering of activities or equipment where necessary.

As an indicator that adequate control measures are being employed, visible emissions from exhaust fans, doors, and vents should not exceed five percent (5%) opacity. If this level is exceeded, it shall not be considered a violation in and of itself, but may allow the Department to require additional controls or work practices.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1030223-010-AC]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (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 Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{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.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www.epa.gov/osweroe1/content/rmp/index.htm. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

***IMPORTANT NOTES TO PERMITTEE*:**

Permit Renewal - see Appendix TV, Condition No. TV18.

(Note - Renewal application is due 225 days prior to expiration date of this permit.)

Title V Semi-Annual Monitoring Reports - see Appendix RR, Condition No. RR4.

Subsection A. Emissions Unit No. 001 – Fiberglass Boat Manufacturing Facility

The specific conditions in this section apply to the following emissions unit (EUs):

EU ID No.	Brief Description
-001	Fiberglass Boat Manufacturing Facility - The facility consists of seven main buildings which include the Tooling Building, the Glass Building (Fiberglass Lamination Building), the Grinding Building, the Intermediate Assembly Building, the Final Assembly Building, the Varnishing Building, and the Storage Building for old and/or obsolete parts and other laminated components. The activities conducted in each of the seven buildings are described below: 1) Tooling Building Molds for fiberglass reinforced boat and other related components are usually constructed in the tooling building. Once the molds have been completed, they are transferred to the Glass Building (Fiberglass Lamination Building). 2) Glass Building (Fiberglass Lamination Building) In this building, a wax or other release agent is applied to the surface of the molds and the molds are then sprayed with a (typically pigmented) styrene based gelcoat. Approximately 90% of the fiberglass resin used at the facility is utilized in the glass building. The glass building is equipped with 22 exhaust fans. 3) Grinding Building The hardened fiberglass hull and deck parts are transferred to this building after curing and removal from their molds. The excess material ("flashing") is trimmed from the part, typically with a hand held air driven cut off tool. Imperfections in the deck and hull surfaces are removed by grinding the surface and reapplying gelcoat and/or resin. The north wall of the grinding building has a 60" exhaust fan which is equipped with a filter to control particulate matter generated from the activities occurring in the building. 4) Intermediate and Final Assembly Buildings In the final assembly building, the interior component of the boats are installed, the power equipment is installed, the wood structures and trim are installed, painting is performed as required, rigging is in place, wiring is in place, small parts and components are added and the decks and hulls are connected using bonding agents including bonding putties and adhesives. The final assembly building is equipped with 9 exhaust fans. The wood shop is located inside the intermediate assembly building. The wood shop is where the wooden parts, including cabinets, table tops, louvered doors, receptacle plates, exterior trim/rail etc. of the boats are manufactured. Each major piece of stationary equipment with the potential to generate particulates is ducted through one of two cyclones which each exhausts to a central baghouse. The central baghouse is located outside the intermediate assembly building and has 3 exhaust stacks. 5) Varnish Building In this building, wooden parts are varnished. Varnish and other coatings, including polyurethane and sealers, are applied in an enclosed booth in the building. The enclosed booth is equipped with incoming and existing air filters. Exiting air is discharged at a rate of 12,600 cfm through vertical stack, 2.5 feet in diameter terminating approximately 18 feet above ground level. The coated parts are transferred

	to an electrically heated drying booth, which is equipped with six blowers rated at 1500 cfm each to circulate the heated air over the parts to facilitate drying. The drying booth air exits through vertical stack, 0.83 feet in diameter terminating approximately 17 feet above ground level. 6) Storage Building This building is mainly used for the storage of old and/or obsolete parts and other laminated components.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 1030223-010-AC]

Emission Limitations and Standards

A.2. The permittee shall comply with the following:

a. Emissions of total HAP's shall not exceed 120 tons per any consecutive 12 month period.

b. Emissions of total volatile organic compounds (VOC's) which includes chemicals such as Styrene and Methyl Methacrylate, shall not exceed 120 tons per any consecutive 12 month period.

[Rules 62-4.160(2) and 62-210.200 (Definition "Potential to Emit"), F.A.C.; as requested by the permittee in the letter received on June 12, 2014.

Recordkeeping and Reporting Requirements

A.3. Recordkeeping Requirements – A **monthly** log based on the tracking of individual HAP's associated with monomer usage, total HAP's and/or VOC containing material used in association with manufacturing activities shall be kept for this facility to document compliance with the emission limitations of Condition No. A.2. At a minimum, the logs shall contain the following:

a. Facility Name, Date, and Emission Unit ID (1030223 001).

b. Identify and quantify each resin, coating, solvent, chemical, etc. used at the facility that contains HAP's and/or VOC's. At the permittee's option, "purchases" may be used where "usage" is specified, except when daily recordkeeping is required. If this option is utilized, no materials may be used which is not purchased and the material shall not be used in multiple application methods with different emission factors.

c. The total tons of each individual HAP (e.g., Styrene, MMA, etc.) emissions for the month.

d. The total HAP emissions for the month in tons.

e. The total VOC emissions for the month in tons.

f. The total HAP emissions, in tons, for the most recent consecutive 12 month period.

g. The total VOC emissions, in tons, for the most recent consecutive 12 month period.

General Recordkeeping Requirements

h. Record the method of application (where applicable) for each material used (see Table below).

i. Emissions of Styrene, Methyl Methacrylate (MMA), and other HAPs and VOCs shall be determined as follows until notified by the Department or the Pinellas County Air Quality Division. Note, Styrene and MMA are each considered both a VOC and a HAP.

1. Styrene emissions shall be determined using the following equation:

$$\text{Emissions (tons)} = \frac{\text{Ms} \times \text{EF}}{2000\ \text{lb/ton}}$$

where:

Ms = amount of styrene containing material used (in tons)
EF = emission factor (lb/ton) for styrene monomer content (from table below)

The applicable styrene emission factor shall be obtained (interpolated/extrapolated, if applicable) from the following table, in conjunction with the percent of available non-vapor suppressed (NVS) styrene monomer in the resin/gelcoat:

% Monomer	**Resin** Hand (Non-Spray) Layup**	**Resin** Mechanical Atomized Spray Layup**	**Resin Mechanical Nonatomized* Spray Layup**	**Gel Coat** Mechanical Atomized Spray Layup**	**Gelcoat Mechanical Nonatomized* Spray Layup**
18	39	51	39	138	67
19	41	54	41	148	70
20	43	58	43	158	79
21	45	61	45	168	88
22	48	64	47	178	97
23	50	68	49	189	106
24	52	71	51	200	115
25	55	75	54	211	124
26	57	78	56	221	133
27	59	82	58	233	142
28	62	86	60	244	151
29	64	90	62	256	160
30	67	94	64	269	169
31	69	97	66	281	178
32	71	102	68	295	187
33	74	105	71	308	196
34	77	112	74	322	205
35	80	118	77	336	214
36	83	127	80	354	223

% Monomer	**Resin** Hand (Non-Spray) Layup**	**Resin** Mechanical Atomized Spray Layup**	**Resin Mechanical Nonatomized* Spray Layup**	**Gel Coat** Mechanical Atomized Spray Layup**	**Gelcoat Mechanical Nonatomized* Spray Layup**
37	86	136	83	371	232
38	90	146	86	390	241
39	92	156	89	408	250
40	95	166	93	427	259
41	98	176	96	446	268
42	100	187	99	466	278
43	112	192	102	477	287
44	117	202	105	495	296
45	122	212	108	513	305
46	127	221	111	532	314
47	133	232	115	551	323
48	138	242	118	571	332
49	143	252	121	590	341
50	148	263	124	609	350

* *Nonatomized* means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, and pressure fed resin rollers. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures.

** *The emission factors in these columns are based on a weighted average using the following assumptions:*

- *Using the Unified Emission Factors - 20% by weight of the facility's usage of resins and gelcoats are for reinforced plastic composites production for items such as hatches and doors, but not for hulls and decks.*

- *Using the National Marine Manufacturer Association's Factors – 80% by weight of the facility's usage of resins and gelcoats are for items such as decks and hulls.*

2. MMA emissions shall be determined by the following equations:

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

where:

Mmma = amount of MMA containing material used (in tons)
Cmma = MMA content (percent/100)

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

$$\text{Emissions (tons)} = Mvoc_{/HAP} \times Cvoc_{/HAP} \text{ x } EF$$

where:

$Mvoc_{/HAP}$ = amount of VOC/HAP-containing material used (in tons)
$Cvoc_{/HAP}$ = VOC/HAP content (percent/100)
EF = emission factor for the individual VOC/HAP-containing material

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

j. Each log, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle. Documentation of each chemical captured shall use for a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle).

k. When determining the VOC emissions and HAP emission rates, the percent of solids, in the recovered materials shall be documented and accounted for in the emission calculations, if applicable.

l. The monthly logs shall be completed by the end of the following month. Daily logs (if required) shall be completed within 3 business days. Supporting documentation (MSDS sheets, purchase orders, etc.) shall be kept for each material, which includes sufficient information to determine VOC emissions and HAP emissions.

m. The total HAP and total VOC emission summary, calculations, and records used to determine emissions shall be recorded in a permanent form suitable for inspection by the Department or PCAQD upon request.

n. The logs/records shall be kept at the facility for a minimum of 5 years and made available to the Department and PCAQD upon request.

[Rule 62-213.440(1)(b), F.A.C.; Construction Permit 1030223-010-AC]

Other Requirements

A.5. Federal Rule Requirements - In addition to the specific conditions listed above, this emissions unit is also subject to the applicable provisions of 40 CFR 63, Subparts A - General Provisions to 40 CFR 63 and VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing as adopted and incorporated by reference in Rule 62-204.800, F.A.C. The requirements listed below are based on the Title V permit renewal application received on April 7, 2014. When demonstrating compliance with 40 CFR 63, Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used, it must be used for a minimum of 12 consecutive months before switching to the other option.

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

Based on Federal Register dated 8/22/01, revised 12/8/01 to reflect 10/03/01 Federal Register revision.

What This Subpart Covers

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

Standards for Open Molding Resin and Gel Coat Operations

§63.5698 What emission limit must I meet for open molding resin and gel coat operations?
§63.5701 What are my options for complying with the open molding emission limit?
§63.5704 What are the general requirements for complying with the open molding emission limit?
§63.5707 What is an implementation plan for open molding operations and when do I need to prepare one?
§63.5710 How do I demonstrate compliance using emissions averaging?
§63.5713 How do I demonstrate compliance using compliant materials?
§63.5714 How do I demonstrate compliance if I use filled resins?

Demonstrating Compliance for Open Molding Operations Controlled by Add-on Control Devices

§63.5715 What operating limits must I meet?
Not applicable.
§63.5716 When must I conduct a performance test?
Not applicable.
§63.5719 How do I conduct a performance test?
Not applicable.
§63.5722 How do I use the performance test data to demonstrate initial compliance?
Not applicable.
§63.5725 What are the requirements for monitoring and demonstrating continuous compliance?
Not applicable.

Standards for Closed Molding Resin Operations

§63.5728 What standards must I meet for closed molding resin operations?

Standards for Resin and Gel Coat Mixing Operations

§63.5731 What standards must I meet for resin and gel coat mixing operations?

Standards for Resin and Gel Coat Application Equipment Cleaning Operations

§63.5734 What standards must I meet for resin and gel coat application equipment cleaning operations?
§63.5737 How do I demonstrate compliance with the resin and gel coat application equipment cleaning standards?

Standards for Carpet and Fabric Adhesive Operations

§63.5740 What emission limit must I meet for carpet and fabric adhesive operations?

Standards for Aluminum Recreational Boat Surface Coating Operations

§63.5743 What standards must I meet for aluminum recreational boat surface coating operations?
Not applicable.

§63.5746 How do I demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings?
Not applicable.
§63.5749 How do I calculate the organic HAP content of aluminum wipedown solvents?
Not applicable.
§63.5752 How do I calculate the organic HAP content of aluminum recreational boat surface coatings?
Not applicable.
§63.5753 How do I calculate the combined organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings?
Not applicable.
§63.5755 How do I demonstrate compliance with the aluminum recreational boat surface coating spray gun cleaning work practice standards?
Not applicable.

Methods for Determining Hazardous Air Pollutant Content

§63.5758 How do I determine the organic HAP content of materials?

Notifications, Reports, and Records

§63.5761 What notifications must I submit and when?
§63.5764 What reports must I submit and when?
§63.5767 What records must I keep?
§63.5770 In what form and for how long must I keep my records?

Other Information You Need To Know

§63.5773 What parts of the General Provisions apply to me?
§63.5776 Who implements and enforces this subpart?

Definitions

§63.5779 What definitions apply to this subpart?

Table 1 to Subpart VVVV - Compliance Dates for New and Existing Boat Manufacturing Facilities

Table 2 to Subpart VVVV - Alternative HAP Content Requirements for Open Molding Resin and Gel Coat Operations

Table 3 to Subpart VVVV - MACT Model Point Value Formulas for Open Molding Operations

Table 4 to Subpart VVVV - Operating Limits If Using an Add-on Control Device for Open Molding Operations
Not applicable.

Table 5 to Subpart VVVV - Default Organic HAP Contents of Solvents and Solvent Blends

Table 6 to Subpart VVVV - Default Organic HAP Contents of Petroleum Solvent Groups

Table 7 to Subpart VVVV - Applicability and Timing of Notifications

Table 8 to Subpart VVVV - Applicability of General Provisions (40 CFR Part 63, Subpart A)

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

Subsection B. Emissions Unit No. 002 – Wood Shop

The specific conditions in this section apply to the following emissions units (EUs):

EU ID No.	Brief Description
-002	Wood Shop – The activities of this emissions unit are conducted in the wood shop which is located in the Intermediate Assembly Building. In the shop, wood is planed, ripped, sawed, sanded and fabricated into desired parts. Wooden parts, including cabinets, table tops, louver doors, receptacle plates, exterior trim/rails, etc. of the boat are manufactured in the shop. Each major piece of stationary equipment with a potential to generate particulate matter is ducted through one of two cyclones. Both cyclones exhaust to a central baghouse located outside the building. {Permitting Note(s): This emissions unit is regulated under: Rule 62-296.320(4)(b) and (c), F.A.C.; Compliance Assurance Monitoring (CAM) is not applicable since an allowable mass limitation is not applicable.}

Essential Potential to Emit (PTE) Parameters

B.1. Operational Limitations – The cyclone(s) and baghouse shall be in operation whenever the sawdust producing machines are operating.
[Construction Permit No. AC52-262880]

B.2. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Construction Permit No. AC52-262880]

Local Applicable Requirements (LARs)

B.3. The permittee shall comply with **Attachment D** which is the "Operation and Maintenance Plan" for the Wood Shop's emission control equipment (baghouse). The Operation and Maintenance (O&M) Plan documentation logs shall be maintained at the facility for a minimum of 5 years. At a minimum the O&M Plan shall include:

a. The operating parameters of the pollution control device.

b. Time table for routine maintenance of the pollution control device as specified by the manufacturer.

c. Time table for routine periodic observations of the pollution control device sufficient to ensure proper operation.

d. A list of the type and quantity of required spare parts for the pollution control device, which are stored on the premises.

e. A record log, which will indicate at a minimum:

1. When maintenance and observations were performed.
2. What maintenance and observations were performed.

3. Who performed said maintenance and observations.
4. Acceptable parameter ranges for each operational check.

[Pinellas County Code, Section 58-128]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

Appendix D, Operation and Maintenance Plan for Wood Shop's Dust Collector

Appendix I, List of Insignificant Emissions Units and/or Activities

Appendix NESHAP 40 CFR 63, Subpart A – General Provisions

Appendix NESHAP 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

Appendix RR, Facility-wide Reporting Requirements

Appendix TV, Title V General Conditions

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis

Table H, Permit History