Title V Air Operation Permit Renewal
Permit No. 1030224-011-AV

APPLICANT

The applicant for this project is Traditional Watercraft, Inc., d/b/a Island Packet Yachts. The applicant's responsible official and mailing address are: Mr. Kevin Pastor, V.P., Manufacturing, 1979 Wild Acres Road, Largo, FL 33771.

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 has 2 sites: 1) 1979 Wild Acres Road and 2) 2080 Wild Acres Road. Both sites are in Largo, Pinellas County.

The site at 1979 Wild Acres Road consists of two (2) main buildings (glass building and tooling/mold storage building) and an enclosure between these two (2) buildings. The main lamination activities and curing are conducted in the glass building. Inside the glass building is a cutting/grinding booth. Small parts lamination, grinding and trimming are conducted in the enclosure between the glass building and tooling/mold storage building.

After a fiberglass reinforced boat and other related components are designed, molds for the fiberglass components are built. After applying a wax to the surface of the molds, they are sprayed with a (typically pigmented) styrene based gelcoat in the gelcoat spray booth located in the northeast corner of the glass building. When the gelcoat has sufficiently solidified, fiberglass material is placed in the mold and polyester resin is applied to the glass with hand-held, flow through pressure fed rollers. The resin is catalyzed at a point just before it reaches the handle of the roller. The required thickness of fiberglass and resin are built up using this method. After curing the hardened fiberglass hull and deck parts are removed from the mold and put on a cradle. On some of the parts with large, flat horizontal surfaces, non-structural thickness is built up by using putty applied by hand or by nonatomized applicator.

Closed molding techniques are used for some parts fabrication. In this procedure the gelcoat is applied to the surface of the mold in a traditional "open molding" method; fiberglass cloth or mat is then laid over the gelcoated surface and a second "half" of the mold is placed over the fiberglass. The edges are sealed except for a point where the resin is introduced. A vacuum is pulled on the part for several hours to verify the seal integrity. Catalyst is introduced into the resin drums and/or pails and thoroughly mixed prior to infusion into the part. The vacuum draws the catalyzed resin into the part until it appears at the exit hose at which point the flow will be terminated. Vacuum will continue to be applied overnight. After curing over night the part is removed from the mold. Closed molding operations meet the criteria for insignificant activity specified in Rule 62 -213.430(6)(b), F.A.C.

Excess material is trimmed from the parts in the grinding booth which is equipped with a dust collection system. Additional, lesser amounts of grinding may be performed in the main building or glass shop. All of these areas are equipped with dust filters. No particulates are discharged outside the building from the grinding booth. These grinding and trimming activities are considered exempt.

The site at 2080 Wild Acres Road consists of Assembly Building No. 4 (south) and Assembly Building No. 5 (north), and a separate building (west) with a wood mill (shop).

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit No. 1030224-009-AV issued **07/27/2009**
Application for a Title V Air Operation Permit Renewal received **12/10/2013**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility is subject to the applicable federal National Emission Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63, Subpart A (General Provisions), Subpart VVVV (Boat Manufacturing - for Open Molding Resin and Gel Coat Operations using Emissions Averaging Option and/or Compliant Materials Option), and Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the emissions units at the facility.

ZZZZ: The facility does have Reciprocating Internal Combustion Engines (RICE).

PROJECT REVIEW

The permit was reformatted according to the current permitting template. To reduce the overall emissions of Hazardous Air Pollutant (HAP) species, in particular styrene, Island Packet is employing resin closed molding techniques for some parts fabrication. The applicant has determined that the use of approximately 45 gallons per year of topcoat paint, catalyst and reducers will result in less than 200 lbs/year of VOC emissions, and the Department has agreed that the emissions from the closed molding process would be considered insignificant.

CONCLUSION

This project renews Title V Air Operation Permit No. 1030224-009-AV, which was issued on 7/27/2009. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.