Stamas Yacht, Inc.

Facility ID No. 1030226
Pinellas County

Title V Air Operation Permit Renewal

Permit No. 1030226-008-AV
Renewal of Title V Air Operation Permit No. 1030226-007-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 (PCAQD)

509 East Avenue South, Suite 138
Clearwater, FL 33756

Telephone: (727) 464-4422
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Title V Air Operation Permit Renewal

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Stamas Yacht, Inc.
300 Pampas Avenue
Tarpon Springs, Florida 34689

Permit No. 1030226-008-AV
Stamas Yacht, Inc.
Facility ID No. 1030226
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 Stamas Yacht, Inc is located in Pinellas County at 300 Pampas Avenue, Tarpon Springs, Florida. UTM Coordinates are: Zone 17, 326.9 East and 3115.3 North. Latitude is: 28°09'07" North and Longitude: 82°45'48" 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
District Air Program Administrator
Southwest District

KMB/qn/admin

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The fiberglass boat manufacturing facility consists of a Mold Storage Building, Wood Mill & Lumber Storage Building, Prototype & Development Building, Fiberglass Lamination Building, and an Assembly Building with Storage Room as shown in Attachment 1submitted with the renewal application dated October 17, 2013. Volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions from the facility are generated from the gelcoat application, resin application, and other miscellaneous VOC/HAP based adhesives, putties, mold care, paints/solvents, cleanup and related materials used in the manufacture of fiberglass boats.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the application dated June 24, 2008, and a letter dated February 19, 1996, from the permittee, particulate emissions from the Wood Mill & Lumber Storage Building are considered "trivial".

Based on the Title V Air Operation Permit Renewal application dated October 17, 2013, this facility is a major source of HAPs.

This facility is subject to the requirements of 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fiberglass Boat Manufacturing Facility

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received 08/07/2013, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No.
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
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	001

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.; Pinellas County Code, Section 58-178]

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 operation requirements:

a. The exhaust fans associated with the Fiberglass Lamination Building shall be operating whenever usage of materials containing VOC/OS occurs and shall remain operating for at least 1 hour after the usage has been completed. Additionally, doors and windows shall be closed, whenever feasible, to ensure that VOC/OS emissions are captured and discharged through the exhaust with adequate dispersion.

b. When determining the VOC emission and Styrene emission rates, the percent of solids in the recovered solvents and hazardous waste, shall be documented and subtracted from the amount of recovered solvents and hazardous waste, if applicable.

c. All materials containing VOC/OS shall be stored in closed containers and/or in small automatic closing safety cans.

d. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.

e. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive VOC/OS emissions and spills of materials containing VOC/OS.

f. Work practice controls, when practicable, shall include limiting the amount of clean-up solvents issued to employees and employees shall use gloves whenever handling resins.

g. Immediately attend to all spills of materials containing VOC/OS as appropriate.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; and Construction Permit 1030226-001-AC]

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. Application of water to paved and unpaved areas accommodating vehicular traffic, if a visible particulate plume is observed to extend more than 15 feet from the point of origin.

b. Using enclosures and/or wind screens as necessary.

c. Vacuuming and/or sweeping of the heavy sanding/grinding areas as necessary.

d. The buildings shall be kept reasonably clean and the dust controlled to reasonable levels by vacuuming and/or sweeping as necessary.

As an indicator that adequate control measures are being employed, visible emissions from exhaust fans, doors, and vents should not exceed 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.
[Rules 62-4.070(3) and 62-296.320(4)(c)2., F.A.C.]

Annual Reports and Fees
See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report - The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. *(See also Appendix RR, Condition No. RR5.)*
[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee - The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download 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. *(See also Appendix RR, Condition No. RR6.)*
[Rule 62-213.205, F.A.C.]

FW8. 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. *(See also Appendix RR, Condition No. RR7.)*
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. 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 to: 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 (EU):

EU ID No.	Brief Description
-001	Fiberglass Boat Manufacturing Facility: The styrene/VOC emissions are primarily from the resin and gelcoat applications used in the boat building operations. The facility also used gelcoats, resins, paints, thinners and solvents in maintenance activities. Fugitive emissions of VOC include those resulting from the use of cleaners and solvents. This emissions unit is regulated under NESHAP; 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C. The material usage as proposed by the facility is shown here for information only:

Material	Quantity
a. Resin	500,000 pounds
b. Gelcoat	100,000 pounds
c. Other materials containing VOCs	90,000 pounds
d. 766 E 8265 Surf Neo Gel0Kote (or equivalent) (= approx. 2.5 tons/yr. of titanium dioxide emissions)	50.0 tons
e. Cadox M-50 Red (or equivalent) (= less than 0.6692 tons/yr of MEKP emissions)	10,000 pounds
f. 353 Vinylux Primewash Base (or equivalent) (= approx. 0.00075 tons/yr. of Chromate emissions)	10 gallons
g. AL200 Fiberglass Primer Aluminum (or equivalent) (= approx. 0.203 tons/yr. of Methylene Chloride emissions)	50 gallons

{Permitting Note: The material usages shown above are indicators of compliance with emissions limits but are not in themselves enforceable conditions.)

<u>Essential Potential to Emit (PTE) Parameters</u>

A.1. <u>Hours of Operation</u> - This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 1030226-009-AC]

Emission Limitations and Standards

A.2. Styrene and Volatile Organic Compound (VOC) Emissions Limitation – The following Styrene and VOC emissions rates shall not exceed the following:

Pollutant	Tons per any consecutive 12-month period
Styrene	24.9
Total VOC, which also includes HAPs (e.g., Styrene) that are a VOC and VOCs from catalyst, putty, painting, fillers, cleanup, etc.	49.9

[Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit 1030226-009-AC]

Recordkeeping and Reporting Requirements

A.3. Recordkeeping Requirements - In order to demonstrate compliance with Specific Condition Nos. A.2., the permittee shall maintain monthly logs. The monthly logs shall be based on the monthly purchase of all VOC/Styrene containing materials (Resin, Gelcoat, Putties, Fillers, etc.) provided that all materials used at this facility are purchased. At a minimum, the logs shall record the following:

a. the total quantity, in lbs. of each material purchased that contains VOCs;

b. the total quantity, in lbs. of all materials purchased that contain VOCs for each category as shown in material usage information in the emissions unit description a, b. and c, along with a cumulative consecutive 12 month total for each of the 3 categories;

c. the total quantity of each material purchased as shown in material usage information in the emissions unit description d,e,f, and g. in the associated units shown along with a cumulative 12 consecutive month total for each of the 4 categories;

d. the percentage (%) by weight of VOCs along with the (%) by weight of styrene for each material/product purchased that contains VOCs and HAPs;

e. the method of application (where applicable) for each material purchased (see Table below); and

f. the total quantity, in tons, for each emission category (Styrene & Total VOC) as shown in Condition No. A.2., along with a cumulative 12 consecutive month total for each category.

Each log, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle.

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

Supporting documentation (MSDS sheets, purchase orders, etc.) shall be kept for each material which includes sufficient information to determine VOC emissions and Styrene emissions.

The VOC and styrene 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. The monthly records shall have the facility's name, emission unit number (001), and be completed by the end of the following month. The logs/records shall be kept at the facility for a minimum of 5 years.

[Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.; Construction Permit No. 1030226-009-AC]

A.4. Emissions Calculation Requirements - Emissions of Styrene, Methyl methacrylate (MMA), and other volatile organic compounds (VOC) shall be determined as follows until notified by the Department. Note, Styrene and MMA are each considered 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
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

% 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
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. MDI emissions, which are only emitted when using foam, shall be determined by the following equation:

Emissions (tons) = Tons of Foam Used x 0.0001337

4. Other VOC emissions shall be determined by the following equation for each material. These values shall be used in conjunction with the above Styrene, MMA, and MDI emissions to determine total VOC:

$$\text{Emissions(tons)} = \text{Mvoc} \times 1.00 \times \text{Cvoc}$$

where:

Mvoc = amount of VOC containing material used (in tons)
Cvoc = VOC content (percent/100)

[Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.; Construction Permit No. 1030226-009-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 applicable provisions for this facility are listed in Attachment A - Applicability Table for 40 CFR 63 Subpart VVVV and Subpart A. 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. The complete MACT standard is in the attached Appendix 40 CFR 63, Subpart VVVV, which is a part of this permit.
[Rule 62-204.800, F.A.C.; 40 CFR 63, Subparts A and VVVV; Construction Permit No. 1030226-009-AC]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

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 Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing [for Open Molding Resin and Gel Coat Operations using Emissions Averaging Option and/or Compliant Materials Option]

Appendix RR, Facility-wide Reporting Requirements

Appendix TR, Facility-wide Testing Requirements

Appendix TV, Title V General Conditions

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis

Table H, Permit History