Title V Air Operation Permit Renewal
Permit No. 1130163-005-AV

APPLICANT

The applicant for this project is Fabbro Marine Group. The applicant's responsible official and mailing address are: Mr. Christopher Fabbro, President, Fabbro Marine Group, 5552 Industrial Boulevard, Milton, Florida 32583.

FACILITY DESCRIPTION

The applicant operates the Santa Rosa Facility, which is located at 5552 Industrial Boulevard, at the Santa Rosa Industrial Park in Milton, Santa Rosa County.

This facility consists of fiberglass boat manufacturing and associated activities. Boat-building activities are conducted inside two joined building and consist of a fiberglass lay-up area and rigging area.

The manufacturing process starts in the lay-up area with the application of a gel coat layer to the mold, and is followed by building up styrene based resins and chopped glass fiber and fiberglass mats to the required thickness for the particular structure (hull, liner, etc). After curing, the parts are removed from the molds, trimmed and finished.

The fiberglass lay-up area includes the lamination area where the hulls and decks are fabricated and gel coat is applied to the hulls and decks. The equipment used to apply resin and gel coat is cleaned using acetone in both the lamination and gel coat areas. The acetone is filtered on site and reused. Ventilation is provided by eight exhaust fan/stacks in the lamination and machining areas. Styrene (which is the major HAP pollutant emitted) from the resin and gel coat application along with other VOCs, are emitted uncontrolled. PM from overspray is controlled by filters on the stack intakes. The majority of the VOC emissions are expected from the lay-up area stacks.

Boats are moved from the lay-up area to the rigging area for final assembly and are outfitted with hardware, controls and motors as required by clients. Some minor touch-up fiberglass repair may be done in the rigging area as needed. Carpet and adhesive operations and aluminum recreational boat surface coating operations are not performed at this facility.

Cutting, shaping and sanding of the fiberglass hulls, decks and parts are done in a sanding booth in the grinding area, which is separated with a canvas entrance screen. Fugitive particulate emissions from these operations, primarily polystyrene and glass fiber dust are controlled by an exhaust fan and box filter. Molds and foam structural members are made in the woodworking shop.

This emission unit is subject to 40 CFR 63 Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. The permittee elected to demonstrate compliance with the emission limits by averaging emissions with the applicable MACT model point value equations and appropriate record keeping.

This permit also includes miscellaneous insignificant activities. These include general facility cleanup and maintenance, mold fabrication and maintenance, product final assembly and miscellaneous activities pursuant to operating and maintaining a manufacturing facility and offices.

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Based on the Title V Air Operation Permit Renewal application received February 20, 2013, this facility is a major source of hazardous air pollutants (HAPs).

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility. . During this renewal the VE testing frequency is reduced from annually; to once every 5 years (prior to permit renewal). Previous VE test results from 1999 – 2012 revealed opacity readings of 0.0%.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued October 7, 2008
Application for a Title V Air Operation Permit Renewal received February 20, 2013
Notice of Intent to Issue Air Permit issued April 11, 2013
Public Notice Published May 7, 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 stationary source of air pollution in accordance with Rule 62-212.400, F.A.C.

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

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

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 units at the facility.

PROJECT REVIEW

This Title V permit renewal used the revised permit template with updated formatting, replaced Appendix TV-6 with the new Appendix TV and streamlined the EU sections by moving common conditions to the new appendices.

During this renewal the VE testing frequency is removed. The previous 5% visible emissions limit was changed in this permit to 20% per the general facility-wide VE standard because there was no rule-based emissions-unit specific requirement. Previous VE test results from 1999 – 2012 revealed opacity readings of 0.0 %

CONCLUSION

This project renews Title V air operation permit No. 1130163-004-AV, which was issued on October 7, 2008. . 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.