FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Endeavour Catamaran Corporation
3703 131st Avenue North
Clearwater, FL 33762

Authorized Representative:
Mr. Robert Vincent, President

Air Permit No. 1030380-006-AO
Permit Expires: 11/19/2019
Minor Air Operation Permit
Project: Air Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 1030380-005-AO for a fiberglass boat manufacturing operation (Standard Industrial Classification No. 3732). The facility is located in Pinellas County at 3703 131st Avenue North in Clearwater, Florida. The UTM coordinates are Zone 17, 334.26 km East, and 3086.37 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

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. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this final permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. 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, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 interests will be affected by the agency determination; (c) A statement of when and how each 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 indicate; (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 final 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 is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

for

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

November 19, 2014
Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Robert Vincent, President, Endeavour Catamaran Corporation (endeavourcats@aol.com)

Mr. Tom John, P.E., Tom John, P.E., Incorporated (tjengr@msn.com)

Mr. Sherrill Culliver, PCAQD (sculliver@pinellascounty.org)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Rhonda Hughes
(Clerk)

11/19/2014
(Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is an existing fiberglass boat manufacturing facility. The existing facility consists of the following emission unit (EU).

Facility ID No. 1030380	
EU ID No.	**Emissions Unit Description**
001	Fiberglass Boat Manufacturing Facility

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Sources/Activities

- Fiberglass boat repair activities
  [Rule 62-210.300(3)(b)1, F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant(s) volatile organic compounds (VOCs) and styrene.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030380-005-AO

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air and Solid Waste Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756
Telephone: 727-464-4422

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority. [Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to the Compliance Authority no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent two months of records/logs specified in Specific Condition No(s). A.7.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

SECTION 3. EMISSIONS UNIT AND SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Fiberglass Boat Manufacturing Facility

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	For the operation of a catamaran boat manufacturing facility consisting of two buildings. Fugitive emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPS) result from the use and application of resin and gelcoat at various stages of the boat manufacturing process and other associated products. These emissions are from open doorways and overhead loading doors with assistance, as needed, from portable floor fans and ventilation fans. The buildings do not have a stack, chimney, or other similar ventilation system. Unconfined particulate emissions are generated from activities such as sanding, cutting, and grinding.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation – The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

EMISSIONS STANDARDS

A.2. VOC and Styrene Emission Limitations – In order to establish the facility as a non-Title V source of VOC and HAP emissions, the following emission limits shall apply facility-wide and based on such, the facility is considered a synthetic non-Title V source.

a. Total VOC emissions (including Styrene) shall not exceed 15 tons in any consecutive 12-month period.

b. Total Styrene emissions shall not exceed 8 tons in any consecutive 12-month period.[1]

Note 1 – Based on the processes involved in manufacturing polyester resin catamaran boats, Styrene is considered the highest possible individual hazardous air pollutant (HAP) that can be emitted. Thus, the VOC and Styrene emission limitations will ensure that no individual HAP emission or total of all HAP emissions will exceed Title V permitting thresholds.
[Rule 62-210.200 (definition of Potential to Emit), F.A.C.; Construction Permit 1030380-002-AC]

A.3. 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 is 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 (Objectionable Odor) and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

A.4. Volatile Organic Compounds (VOC)/ 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following:

a. All resin activities shall be conducted inside the buildings.

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

c. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

d. Tightly cover or close all VOC and/or solvent containers when they are not in use.

e. Prevent excessive air turbulence across exposed VOCs.

f. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1030380-002-AC]

A.5. Unconfined Particulate Matter Emission Requirements – All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.310(3), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include:

a. Periodic sweeping of shop areas including the use of "shop-vac" style vacuum units and the use of good housekeeping procedures throughout the manufacturing process.

b. Large pieces of equipment in the wood shop may be controlled by a bag type collector, which re-circulates the air back into the building.

In order to provide reasonable assurance that the above measures are being implemented and that they are effective in controlling unconfined emissions of particulate matter, visible emissions from any building opening or vent should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but an indication that additional controls may be required.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1030380-002-AC]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.6. Emissions Calculation Requirements – Emissions of Styrene, Methyl Methacrylate (MMA), and other volatile organic compounds (VOCs) shall be determined for as follows until notified by the Permitting Authority or the Compliance Authority. Note, Styrene and MMA are each considered a VOC and a HAP.

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

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

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
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 equation:

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

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

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

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

where:
M_{voc} = amount of VOC containing material used (in tons)
C_{voc} = VOC content (percent/100)

[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit) F.A.C.]

A.7. Emission Recordkeeping Requirements – In order to document compliance with the VOC/HAP limitations of Specific Condition No. A.2., the permittee shall maintain a monthly log based on the tracking of all Styrene and/or VOC containing material used in association with manufacturing activities. The logs shall be retained on file at the facility for at least three years and, at a minimum, contain the following:

a. Facility name, Facility ID No. (1030380), and Emission Unit No. (001);

b. Date (month/year);

c. Identity and quantity of each resin, coating, solvent, chemical, etc., used at the facility that contains Styrene and/or VOC, per application method. Usage logs of materials, other than gelcoats and resins, may be based upon an inventory at the beginning of the month, receipt of material during the month, an inventory of the material at the end of the month. At the permittee's option, monthly usage of these materials may be based on "purchases", provided no materials are used which are not purchased.

Whether the logs are based on inventories or purchased, the applicable material shall not be used in multiple application methods with different emission factors.

d. Application method and appropriate emission factor, used to determine Styrene and/or VOC emissions;

e. The total tons of Styrene emissions for the month;

f. The total tons of VOC (including Styrene) emissions for the month;

g. The total tons of Styrene emissions for the most recent consecutive 12-month period, and;

h. The total tons of VOC (including Styrene) emissions for the most recent consecutive 12 month period.

Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus collected for disposal or recycle). Supporting documentation such as Styrene/VOC content, Styrene/VOC emission factors used, MSDS sheets, waste disposal records, purchase orders, "As Supplied" data sheets, etc., shall be kept for each chemical and associated products, which includes sufficient information to determine emissions. The monthly logs shall be completed by the end of the following month. These records shall be available to the Permitting Authority and the Compliance Authority upon request.

[Rules 62-4.070(3); Construction Permit 1030380-002-AC]