



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**  
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RICK SCOTT  
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LT. GOVERNOR

CLIFFORD D. WILSON III  
INTERIM SECRETARY

## **FINAL PERMIT**

### **PERMITTEE**

Tampa Yacht Manufacturing, LLC  
4350 62<sup>nd</sup> Avenue North  
Pinellas Park, Florida 33781

Air Permit No. 1030534-003-AO  
Permit Expires: 12/17/2019  
Minor Air Operation Permit  
Project: Air Operation Permit Renewal

Authorized Representative:  
Mr. Robert Stevens, CEO/Manager

This is the final permit to renew existing Air Operation Permit No. 1030534-002-AO for operation of a fiberglass boat manufacturing facility (Standard Industrial Classification No. 3732). The facility is located in Pinellas County at 4350 62<sup>nd</sup> Avenue North in Pinellas Park, Florida. The UTM coordinates are Zone 17, 333.2 km East and 3079.2 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](mailto: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

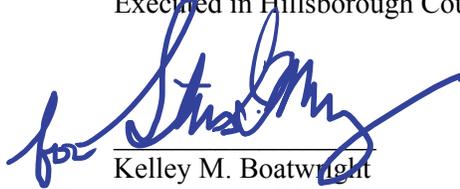
statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including 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



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

12/17/2014  
Effective Date

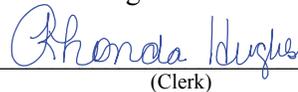
**CERTIFICATE OF SERVICE**

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 Stevens, Tampa Yacht Manufacturing, LLC, ([robert.stevens@tampa-yacht.com](mailto:robert.stevens@tampa-yacht.com))
- Mr. Tom T. John, P.E. Incorporated, ([tjengr@msn.com](mailto:tjengr@msn.com))
- Mr. Sherrill Culliver, Pinellas County Air Quality Division ([sculliver@pinellascounty.org](mailto: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.



(Clerk)

12/17/2014  
(Date)

**SECTION 1. GENERAL INFORMATION (FINAL)**

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**FACILITY AND PROJECT DESCRIPTION**

**Existing Facility**

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

Facility ID No. 1030534	
<b>EU ID No.</b>	<b>Emissions Unit Description</b>
001	Fiberglass Boat Manufacturing

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

**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 pollutants volatile organic compounds (VOC) and styrene (individual and total HAP).

**PERMIT HISTORY/AFFECTED PERMITS**

This permit replaces Operation Permit No. 1030534-002-AO.

## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

### A. EU No 001. – Fiberglass Boat Manufacturing

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  
E-mail: [SWD\\_Air\\_Permitting@dep.state.fl.us](mailto:SWD_Air_Permitting@dep.state.fl.us)

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;
  - d. Appendix D. Common Testing Requirements; and
  - e. Appendix E. Unified Emission Factors for Open Molding of Composites
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

### SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

#### A. EU No 001. – Fiberglass Boat Manufacturing

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 Pinellas County Air Quality Division (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 month of records/logs specified in Specific Condition No. 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. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)**

**A. EU No 001. – Fiberglass Boat Manufacturing**

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

<b>EU ID No.</b>	<b>Emissions Unit Description</b>
001	<p data-bbox="337 338 716 371"><u>Fiberglass Boat Manufacturing:</u></p> <p data-bbox="337 405 1450 737">For the operation of a fiberglass boat manufacturing facility consisting of one building. The facility manufactures fiberglass boats, molds, and other fiberglass articles. Styrene-containing resin and gelcoat are used in the manufacturing process. Acetone, which is not considered a VOC, is used as the predominant cleanup solvent. Fugitive emissions of volatile organic compounds (VOC) 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 dispersed from the building through four wall mounted exhaust fans on the northern wall. Unconfined particulate emissions are generated from activities such as sanding, cutting, and grinding of fiberglass and wood. The following is a summary of the manufacturing steps and the associated pollutants.</p> <p data-bbox="337 783 1179 816">(a) <u>Hull, Deck, and Small Parts Resin Application to Forms and Molds</u> In the manufacture of hulls and decks, a HAP-based gelcoat is applied predominantly by spray methods to the hull and deck forms and molds in the glass shop and is allowed to cure. HAP-based resins and fiberglass (for structural support) are then applied using non-atomized spray guns. Additional lamination layers of fiberglass are applied to the surface until the required thickness is achieved. The primary VOC/HAP species emitted from the fiberglass lamination operation is styrene, which forms the base for the resins and gelcoats used in the process. Some gelcoat materials replace 3% to 5% of the styrene content with methyl methacrylate (MMA).</p> <p data-bbox="386 1115 1463 1283">The manufacture of “small parts,” which includes hatches, covers, consoles, and parts other than hulls or decks, is similar to the manufacture of hulls and decks, but with correspondingly smaller molds. Small parts manufacture and “mold care” are typically conducted in or near the lamination area. HAPs and VOC are also emitted during this manufacturing step.</p> <p data-bbox="386 1318 1446 1381">Emissions generated by the gelcoat and resin application and curing are dispersed through the four wall mounted exhaust fans located on the northern wall.</p> <p data-bbox="337 1419 849 1453">(b) <u>Hull and Deck Trimming and Grinding</u> After curing, the hardened fiberglass hull and deck parts are removed from the mold and the excess material (“flashing”) is typically cut away and trimmed, typically with a handheld, air-driven cut-off tool, as necessary. Imperfections in the surfaces are removed by grinding the surface and re-applying gelcoat and/or resin. Particulate matter generated from these activities are generally managed using a portable “Shop Vac” vacuum collector and through good housekeeping practices that include cleaning surfaces and sweeping floors.</p> <p data-bbox="337 1686 732 1719">(c) <u>Mold Preparation and Repair</u> The molds used in the manufacturing process are cleaned using solvents-based materials, inspected after use, and then prepared (in the “mold care” process) for return and reuse in the lamination stage of the manufacturing process. Scratches and other imperfections observed on mold surfaces are repaired, if necessary, typically with resin or gelcoat tooling.</p>

## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

### A. EU No 001. – Fiberglass Boat Manufacturing

	<p>In some situations, new molds are manufactured using production or other resins and tooling materials.</p> <p>(d) <u>Component Assembly</u> Hulls, decks, small parts, and other components are assembled in the “Assembly” building using adhesives, foams, solvents, and coatings that may either be water-based or may contain miscellaneous solvents. Tubing, fittings, rigging, and motors are added as appropriate and the complete unit is prepared for inspection prior to delivery. Small quantities of HAPs and VOC are emitted during this manufacturing step.</p>
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#### 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.** Volatile Organic Compound (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:

- a. total combined emissions of all VOCs (including styrene) shall not exceed 24 tons in any consecutive 12-month period; and
- b. total styrene emissions shall not exceed 9.5 tons in any consecutive 12-month period.

*Permitting Note: Based on the processes involved in manufacturing fiberglass 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 No. 1030534-001-AC]

- A.3.** 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 materials containing VOC/OS shall be stored in closed containers and/or in small automatic closing safety cans.
- b. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.
- c. 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.
- d. Immediately attend to all spills of materials containing VOC/OS, as appropriate.

## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

### A. EU No 001. – Fiberglass Boat Manufacturing

[Rules 62-4.070(3) and 62-296.320(1), F.A.C.; Construction Permit No. 1030534-001-AC]

- A.4.** 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.  
[Rules 62-210.200 (Definition of “Objectionable Odor”) and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

- 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 62-296.320, 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 industrially related activities such as loading, unloading, storing, or handling. Reasonable precautions to prevent emissions of unconfined particulate matter from trimming and other similar activities shall include: cutting, shaping, and sanding operations performed by hand tools and tabletop equipment shall, in general, be controlled by portable “shop-vac” vacuum collectors and normal “good housekeeping” procedures.

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 the facility should not exceed five percent (5%) opacity. If this value is exceeded, it will not be considered a violation in and of itself, but may be a violation of the precautions stated above and serve as justification to the Department that to require additional controls or work practices.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit No. 1030534-001-AC]

### RECORDKEEPING AND REPORTING REQUIREMENTS

- A.6.** Emission Calculations - In order to document compliance with Specific Condition No. A.2., the permittee shall calculate emissions based on the following methodology:

Material Usage Rate (lbs) x Species Concentration (% by weight)\* x Emission Factor (lbs emitted/lbs applied)\* = Species Emission Rate (lbs)

\* Styrene and methyl methacrylate (MMA) emission factors shall be determined in accordance with the attached Unified Emission Factors (UEF) for Open Molding of Composites table dated July 23, 2001. Emission factors for any other VOC or HAP shall be 1.0 unless lower emission factors are approved by the Department in writing.

[Rules 62-4.070(3), F.A.C.]

- A.7.** Monthly VOC and HAP Recordkeeping - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition No. A.2. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, “purchases” may be used instead of “usage” in determining VOC/HAP emissions, provided that no materials are used which are not purchased and the material is not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:

- a. facility name, facility ID No., emission unit ID No., and description (i.e., Tampa Yacht Manufacturing, 1030534, E.U. No. 001, Fiberglass Boat Manufacturing);
- b. month, year, and method used for records (usage or purchase);

### SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

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#### A. EU No 001. – Fiberglass Boat Manufacturing

- c. monthly total quantity in gallons of each material (resin, gelcoat, solvent, etc.) that contains styrene, HAPs, and/or VOC;
- d. percentage by weight of each individual HAP (including styrene) and VOC for each material identified in c., above;
- e. appropriate emission factor(s), and method(s) of application (i.e., mechanical non-atomized) used to determine emissions in accordance with Specific Condition A.6.;
- f. monthly total of styrene, other individual HAP, total HAP and VOC emissions (tons/month) based on c., d., and e. above; and
- g. consecutive 12-month rolling total of styrene, other individual HAP, total HAP and VOC emissions (tons/consecutive 12-month period) based on f. above.

The monthly logs shall be completed by the 15th of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department and the PCAQD upon request. Supporting documentation [Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs), purchase orders, emission factors, etc.] shall be kept for each VOC and HAP containing material.

[Rule 62-4.070(3), F.A.C.]