

## STATEMENT OF BASIS

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Title V Air Operation Permit Renewal  
Permit No. 1270173-004-AV

### APPLICANT

The applicant for this project is Brunswick Commercial and Government Products. The applicant's responsible official and mailing address are:

Mr. John Ratto  
Director of Manufacturing Operations  
Brunswick Commercial and Government Products  
420 Megan Z Avenue  
Edgewater, Florida 32132  
jratto@whaler.com

### FACILITY DESCRIPTION

The applicant operates the Brunswick Commercial and Government Products, Edgewater facility, which is located at 420 Megan Z Avenue, Edgewater, Florida.

The facility is a commercial boat manufacturing facility including resin and gel coat operations. Processes include fiberglass lamination, grinding and trimming operations, support structure installation, foam injection and final assembly.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities (listed in Appendix I of the permit).

### 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

Initial Title V Air Operation Permit issued **June 9, 2004**  
Renewed Title V Air Operation Permit issued **June 29, 2009**  
Application for a Title V Air Operation Permit Renewal received **November 8, 2013**  
Notice of Intent to Issue Air Permit issued **January 7, 2014**  
Public Notice Published **January 13, 2014**

### 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 any emission units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

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

- 40 CFR 63, Subpart A, NESHAP General Provisions
- 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

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**

Changes that were made as part of this renewal are as follows:

- (1) Reformatting of Permit to reflect new Title V permit template**
- (2) Added applicable conditions of 40 CFR 63, Subpart VVVV to the Permit conditions**
- (3) Replacement of TV-6 with new Appendix TV**
- (4) Minor changes and additions to Appendix I-1, List of Insignificant Emissions Units and/or Activities**

### **CONCLUSION**

This project renews Title V air operation permit No. 0090051-018-AV, which was issued on December 2, 2008. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.