Florida Department of
Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

Vectorworks, Inc.
805 Marina Road
Titusville, Florida 32796

Authorized Representative:
Mr. Jeffrey Gray, CEO and Managing Director

Air Permit No. 0090127-012-AC
Permit Expires: 03/30/2012
Site Name: Vectorworks Marine, LLC
Major Source Air Construction Permit
Project Name: Adhesive Mixing/Packaging

This is the final air construction permit, which authorizes construction and installation of adhesive mixing/packaging equipment and related activities equipment. The proposed work will be conducted at the Vectorworks Marine, LLC (Standard Industrial Classification No. 3732). The facility is located in Brevard County at 805 Marina Road in Titusville, Florida. The UTM coordinates are Zone 17, 518.19 km East, and 3166.22 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

December 12, 2011

Caroline D. Shine
District Air Program Administrator
Central District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, 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 December 12, 2011 to the persons listed below.

Mr. Jeffrey Gray, Vectorworks Marine, LLC: (**grayj@vectorworksmarine.com)**
Mr. Kurtis A. Hopf, P.E., Vectorworks Marine, LLC: (**khopf@vectorworksmarine.com)**
Mr. Thomas Mulligan, P.E., Geotechnical and Environmental Consultants, Inc.: (**tjmulligan@g-e-c.com)**

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, F.S., with the designated Department clerk, receipt of which is hereby acknowledged.

December 12, 2011

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Vectorworks Marine, LLC

Vectorworks Marine, LLC manufactures Computer Numerical Control (CNC) plugs and conducts open and closed molding operations for boat manufacturing, fiberglass boats varying in size and purpose, and non-boat manufacturing related reinforced plastic composites. The facility consists of four main buildings: (1) Offices, (2) Machining and Office, (3) Infusion Molding and Large Lamination, and (4) Lamination and Assembly.

The existing facility consists of the following emissions units.

Facility ID No. 0090127	
ID No.	Emission Unit Description
001	Lamination/Gelcoating Operations

Project Description and Proposed Emission Unit

This project will add Adhesive Mixing/Packaging as an additional emissions unit and the facility-wide VOC/HAP emissions limitation will remain the same.

This project will add the following emissions unit.

Facility ID No. 0090127	
ID No.	Emission Unit Description
002	**Adhesive Mixing/Packaging and Related Activities**

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 a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- **Emission Unit 001** is subject to 40 CFR Part 63 Subpart A–General Provisions, 40 CFR Part 63 Subpart VVVV–Boat Manufacturing, and 40 CFR Part 63 Subpart WWWW–Reinforced Plastic Composites Production. Emissions Unit No. 002 is also subject to 40 CFR 63 Subpart WWWW–Reinforced Plastic Composites Production; however, Emission Unit No. 002 **is excluded from any requirements in this subpart.**

PERMIT HISTORY/AFFECTED PERMITS

Modifies Permit No. 0090127-010-AV; Concurrent processing with Title V Air Operation Permit Revision No. 0090127-011-AV

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Air Resource Management Section. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767 Telephone: 407-897-2931

   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 the Central District Air Resource Management Section (see above mailing address and phone number).

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. Application for Title V Air Operation Permit Revision: This permit authorizes construction or modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions unit(s). **The Title V air operation permit revision application has already been submitted to the Permitting Authority in concurrence with this project on September 08, 2011**. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

A. EU No. 002-Adhesive Mixing/Packaging and Related Activities

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	Adhesive Mixing/Packaging and Related Activities These activities are not considered lamination or gelcoating activities but they will take place in a separate subsection of the Lamination and Assembly Building. This activity is not expected to produce particulate. Adhesive components will be placed into closed mixers having capacities ranging from 100 to 500 gallons. After mixing, the mixing pot is then raised above a 55-gallon drum or a dispenser cartridge and a cylinder forces the mixture out of the pot in controlled volumes. Emissions are routed to the atmosphere through a 2-ft. diameter, approximately 10,000 cubic ft. per minute stack. VOC/HAP emissions will mainly originate from the mixing and packaging activities. Additional emissions of VOCs will originate from the cleaning of mixing and packaging equipment.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation. This emission unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.2. Visible Emissions. Visible emissions shall not exceed 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]

A.3. VOC/HAP Emissions. The maximum **facility-wide** VOC/HAP emissions shall not exceed the following:

Pollutant	Emissions (tons per any consecutive 12-months period)
Total VOC	Less than 50.0
Combined HAP	Less than 50.0
Single HAP	Less than 50.0

Recordkeeping and Reporting Requirements

A.4. Monthly Recordkeeping Requirements. In order to demonstrate compliance with Specific Condition No. **A.3.**, the permittee shall maintain a monthly log at the facility for a period of at

least 5 years from the date the data is recorded and made available to the Department upon request. The log shall contain the following:

a. Facility Name, Facility ID No. (i.e., 0090127);

b. Month and year of record;

c. The consecutive 12-month totals of Total VOC emissions, combined HAP emissions, and single HAP emissions, in tons;

d. The consecutive 12-month totals of the usage of adhesive(s), in tons;

e. The total for each month of the usage of adhesive(s); in tons;

f. The VOC/HAP content of adhesive(s).

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12 months total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total. Facilities or emission units that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months total can be maintained each month.
[Rules 62-4.070(3) and 62-213.440, F.A.C.]

A.5. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.4.** above, must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of **a template of sample calculations** and available for review on site by the Department. [Rule 62-4.070(3), F.A.C.]

Other Requirements

A.6. Federal Rule Requirements. In addition to the specific conditions listed above, Emissions Unit No. 002 is also subject to 40 CFR 63 Subpart WWWW–Reinforced Plastic Composites Production; however, Emission Unit No. 002 **is excluded from any requirements in this subpart.**

[Rule 62-204.800(11)(b)79., F.A.C.; and §63.5790(b), **§63.5790(c),** and §63.5787 of 40 CFR 63 Subpart WWWW]

{Permitting Note: **Repair or production materials that do not contain resin or gel coat** (§63.5790(c)) are excluded from any requirements of the subpart. Additionally, the EU 002 operations are not associated with the manufacture of reinforced plastic composite parts.}