FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
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PERMITTEE

Sea Ray Boats, Inc.
350 Sea Ray Drive
Merritt Island, Florida 32953

Authorized Representative:
Gary Zimmer, Vice President of Operations
Recreational Boat Group

Air Permit No. 0090238-001-AC
Permit Expires: December 31, 2013
Air Construction Permit
Cape Canaveral Plant
Woodshop, Coating, and Curing Operation

PROJECT

This is the final air construction permit, which authorizes construction of a woodshop with an ultra-violet wood coating and curing operation categorized under Standard Industrial Classification Nos. 2499 and 2599. The proposed operations of the Cape Canaveral Plant are contained in Buildings 102 and 103 on the leased property. The facility is located in Brevard County at 1200 Sea Ray Drive in Merritt Island, Florida. The UTM coordinates are Zone 17, 531.83 km East and 3142.3 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

STATEMENT OF BASIS

This air pollution construction 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.

Executed in Tallahassee, Florida
(Electronic Signature)

Office of Permitting and Compliance
Division of Air Resource Management
Department of Environmental Protection
Tallahassee, Florida

Jeffery F. Koerner
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CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with 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 following persons.

Mr. Randy Serfozo, Sea Ray Boats, Inc. (rserfozo@searay.com)
Mr. Gary Zimmer, Sea Ray Boats, Inc. (gary.zimmer@searay.com)
Mr. Randy Clunie, Sea Ray Boats, Inc. (randy.clunie@searay.com)
Mr. Kennard Kosky, P.E., Golder Associates Inc. (ken_kosky@golder.com)
Ms. Caroline Shine, Central District Office (caroline.shine@dep.state.fl.us)
Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Ms. Natasha Hazziez, US EPA Region 4 (hazziez.natasha@epa.gov)
Ms. Barbara Friday, DEP OPC: (barbara.friday@dep.state.fl.us)
Ms. Lynn Scearce, DEP OPC: (lynn.scearce@dep.state.fl.us)

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.
(Electronic Signature)

Lynn Scearce
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PROPOSED PROJECT

The Cape Canaveral Plant consists of a woodshop, wood coating, and curing operation. These operations are contained in buildings 102 and 103 on the leased property. Specifically, the facility consists of a woodworking shop with dust collection and control, an ultra-violet coating/curing line, an automatic spray booth, a manual spray booth, a hot water package boiler fired with natural gas, and stacking and laminar air ovens. Currently, the facility produces coated wood products for fiberglass boats. The facility proposes to expand this operation to also produce coated wood products for several other end users, such as surface coating for wood furniture, wood building products, and other miscellaneous wood products.

The facility emits volatile organic compounds (VOC), some of which are regulated hazardous air pollutants (HAP). Based on EPA's "Once In Always In" policy, this facility is a major HAP source and will remain as such for the purposes of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) in Subpart VVVV of Title 40, Part 63, Code of Federal Regulations. However, based on the application, none of the other potentially applicable NESHAP categories for major sources apply because the Cape Canaveral Plant has not conducted the type of work regulated by the provisions and, upon issuance of this permit, will be become an area source of HAP for any proposed new activities in the future. In addition, the application states that none of the potentially applicable NESHAP categories for area sources are applicable because the Cape Canaveral Plant has not conducted the type of work regulated by the provisions. Appropriate air permits must be obtained prior to conducting any work that will be regulated by a newly applicable NESHAP.

The facility consists of the following emissions units.

Facility ID No. 0090238

ID No.	Emission Unit Description
-001	Coating and Curing Operations
-002	Woodworking Shop

FACILITY REGULATORY CLASSIFICATION

- For purposes of NESHAP Subpart VVVV, this facility is a major source of hazardous air pollutants (HAP) based on EPA's "Once In Always In" policy and will remain as such. However, upon issuance of this final permit, the facility will become a synthetic minor HAP source for potentially applicable NESHAP categories in the future. Because the Cape Canaveral facility is not currently performing boat manufacturing related activities covered under the provisions of 40 CFR Part 63 Subpart VVVV, there are no applicable requirements at this time including but not limited to the monitoring, recordkeeping, work practices, HAP-content limits of boat building materials, written implementation plan and reporting requirements.

- Based on EPA's "Once In Always In" policy, the facility is a major HAP source for purposes of NESHAP Subpart VVVV. As such, a Title V air operation permit is required in accordance with Chapter 62-213, F.A.C.

- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The office mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Air Program at 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); and Appendix C (Common Conditions).

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: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Title V Air Operation Permit: Based on EPA's "Once In Always In" policy, the facility is a major HAP source for purposes of NESHAP Subpart VVVV. As such, a Title V air operation permit is required to operate the facility. A concurrent application for a Title V air operation permit is being processed as part of this project. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213.420, F.A.C.]

9. Annual Operating Report: By April 1st of each year, the permittee shall submit the "Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)" to the Compliance Authority. [Rule 62-210.370(3), F.A.C.]

A. UV Coating and Curing Operations

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
-001	Coating and Curing Operations consisting of a coating/curing line, an automatic spray booth, and a manual spray booth. This operation also includes the following unregulated activities: a hot water package boiler fired with natural gas (1.26 MMBtu/hour) and stacking and laminar air ovens.

PERFORMANCE RESTRICTIONS

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

EMISSIONS STANDARDS

2. Emissions Caps:

   a. *Hazardous Air Pollutants*: Emissions of all hazardous air pollutants from this emissions unit shall not exceed 9.0 tons during any consecutive 12 months, determined on a monthly basis.

   b. *Volatile Organic Compounds*: Emissions of all volatile organic compounds from this emissions unit shall not exceed 30.0 tons during any consecutive 12 months, determined on a monthly basis.

   [Application No. 0090238-001-AC; and Rules 62-210.200(193) (Definition of "Major Source of Air Pollution"), 62-210.300(2)(b), and 62-212.400(12), F.A.C.]

MONITORING REQUIREMENTS

3. Materials and Usage Records: On at least a monthly basis, the permittee shall track and record the use of materials (e.g., coatings, adhesives, solvents, etc.) that contain hazardous air pollutants and/or volatile organic compounds. For each such material, the permittee shall obtain records that identify the percentage of volatile organic compounds and the percentage of each hazardous air pollutant (e.g., vendor specification sheets, material safety data sheets (MSDS), EPA Method 24 analyses, EPA 450/3-84-019 analyses, or other similar records). [Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

4. Monthly Operations Log: The permittee shall prepare a monthly operations log detailing: the monthly use of all materials containing hazardous air pollutants and/or volatile organic compounds; the percentage of volatile organic compounds and the percentage of each hazardous air pollutant in the materials used; the monthly and 12-month rolling total emissions of volatile organic compounds, each hazardous air pollutant, and total hazardous air pollutants from this emissions unit. To demonstrate compliance with the emissions caps specified in this permit, emissions shall be calculated using the content of volatile organic compounds and hazardous air pollutants as identified in the records required for each material along with the actual material usage for the operating period. These monthly records shall be completed by the end of the following month. If an emissions cap is exceeded, the permittee shall report the exceedances to the Compliance Authority within one working day of making the determination. [Rule 62-4.070(3), F.A.C.]

B. Woodworking Shop

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
-002	Woodworking Shop with dust collection and filter system.

EQUIPMENT

1. Dust Collector: To control particulate matter emissions from the woodworking shop, the permittee shall install a dust collection system with a dust collector to achieve a design of 99.9% removal efficiency using a reverse air filter system using felt media. Compliance with this design specification shall be demonstrated by maintaining records of the performance specification sheets from the equipment vendor or other certification by an independent environmental consultant based on evaluation of the dust collector and filter. *{Permitting Note: Based on the installation of this required equipment, expected $PM/PM_{10}/PM_{2.5}$ emissions will not exceed 4.1 pounds per hour or 18 tons per year at full operation.}* [Application No. 0090238-001-AC]

PERFORMANCE RESTRICTIONS

2. Restricted Operation: The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

MAINTENANCE

3. Inspections: The operator shall periodically inspect the dust collector to ensure proper operation and control of the equipment. If there are visible emissions from the dust collector, the operator shall investigate and take corrective action. *{Permitting Note: It is not necessarily a violation to have visible emissions from the dust collector, but continued failure to take corrective action could be considered poor operation and circumvention of a control device.}* [Application No. 0090238-001-AC and Rule 62-4.070(3), F.A.C.]

RECORDS

4. Dust Collector Records: To demonstrate compliance with the specification for the design outlet dust loading from the dust collector, the operator shall maintain records of the performance specification sheets from the equipment vendor or other certification by an independent environmental consultant based on evaluation of the dust collector and filter. [Application No. 0090238-001-AC and Rule 62-4.070(3), F.A.C.]