Title V Air Operation Permit Renewal
Permit No. 0251152-006-AV

APPLICANT

The applicant for this project is Cigarette Racing Team, LLC. The applicant's responsible official and mailing address are: Skip Braver, CEO, Cigarette Racing Team, LLC. 4355 NW 128 Street, Miami, FL 33054.

FACILITY DESCRIPTION

The applicant operates the Cigarette Racing Team, LLC. facility, which is located at 4355 NW 128 Street, Miami, FL 33054.

This facility consists of the following emissions units:

EU No.	Brief Description
Regulated Emissions Units	
001	**Fiberglass Boat Manufacturing** ▪ Fiberglass lamination with spray and hand application of gelcoat and resin; ▪ Boat mold maintenance & repair; ▪ Deck and hull assembly and rigging; ▪ Carpet & upholstery installation; ▪ Miscellaneous cutting, sanding, gluing, carpentry, and finishing activities.
002	**Two (2) Paint Spray Booths and One (1) Mixing Room** ▪ One (1) Monarch Vehicle Paint Spray Booth of dimensions 70' L x 18'-6'' H x 22' W. Booth is fully enclosed and equipped with low temperature ($T<180^0F$) fabric filters ▪ One (1) H & S Open Face Paint Spray Booth of dimensions 20' x 8'. Booth is equipped with low temperature ($T<180^0F$) fabric filters ▪ One (1) Mixing Room of dimensions 10' W x 12' L x 7' H These are custom made booths and have no model numbers. In addition to painting operations, the two (2) paint spray booths are also used for graphics and detailing operations, and applicable boat lay-up operations.

Cigarette Racing Team, LLC. is a fiberglass boat manufacturing facility. Boats decks and hulls are fabricated by fiberglass lamination using hand and spray application of gelcoat and resin. Process operations include assembly of the deck and hulls, carpentry, carpet installation, spray painting, and various rigging activities. On average, the Cigarette Racing Team, LLC. facility produces 30 boats per year. The facility makes 7 – 8 different models with an average size of 45 ft long and 10 ft wide.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V Air Operation Permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received July 7, 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 source of air pollution for Prevention of Significant Deterioration (PSD) in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

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

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 this facility. The CAM rule requires owners and operators to monitor the operation and maintenance of their control equipment so that they can evaluate the performance of their control devices and report whether or not their facilities meet established emission standards. The MACT standards implemented in the permit will address and insure that the facility will be in compliance with Hazardous Air Pollutants (HAPs) emissions standards.

PROJECT REVIEW

Specific changes were made to the previous Title V Air Operation Permit No. 0251152-005-AV, and are in this PROPOSED Title V Air Operation Permit Renewal. Such changes include FDEP reformatting of the entire permit document, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc. For example, some of the recordkeeping, and testing requirements that were previously listed under TV-6, (i.e. administrative permit corrections, deviation reports, etc.) and the Facility-Wide Conditions, and Specific Conditions under the previous Title V permit (i.e. certification by responsible official, testing, submittal of monitoring reports, statement of compliance, etc.) are now listed under the new Appendix RR – Facility-Wide Reporting Requirements, and Appendix TR – Facility-Wide Testing Requirements.

Additionally, recent organizational changes have occurred within the Miami-Dade County Government and the Department of Environmental Resources Management (DERM) was merged with two (2) other departments. The consolidated name is now the Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management. As a result, all references to DERM in the permit have been changed to RER.

Items numbered 1 – 5 below represent the changes to the previous Title V Air Operation Permit. Underline text indicates additions. ~~Strikethrough indicates text removed.~~

1. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Unit 001 & 002 – Fiberglass Boat Manufacturing/Spray Booths with Mixing Room. The Specific Conditions pertaining to 40 CFR 63, Subpart VVVV – National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing are rearranged in this renewal Title V Permit renewal according to the compliance options, similar to other boat manufacturing facilities. As a result, the Specific Condition Nos. have been re-numbered accordingly.

2. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Unit 001 & 002 – Fiberglass Boat Manufacturing/Spray Booths with Mixing Room. Specific Condition A.4. has been added to ensure that the facility obtain an air construction permit prior to installing any add on control device as follows:

A.4. Permit Requirement: Pursuant to Rule 62-210.300(1), F.A.C., the permittee shall apply for and obtain an Air Construction Permit prior to the installation of any control device to control emissions from boat manufacturing operations.
[Rule 62-210.300(1), F.A.C.]

3. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Unit 001 & 002 – Fiberglass Boat Manufacturing/Spray Booths with Mixing Room. All references to Appendix 1 in the permit has been removed and replaced with 40 CFR 63 Subpart VVVV since the complete Subpart VVVV is now included as Appendix NESHAP, 40 CFR 63 Subpart VVVV. In addition, all referenced notes in parentheses (eg. See A.7, etc.) were removed.

4. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Unit 001 & 002 – Fiberglass Boat Manufacturing/Spray Booths with Mixing Room. To keep with the FDEP reformatting of the entire permit document, the following specific conditions addressing excess emissions have been added:

A.21. Excess Emissions Allowed: Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

A.22. Excess Emissions Allowed: Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

A.23. Excess Emissions Prohibited: Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

5. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Unit 001 & 002 – Fiberglass Boat Manufacturing/Spray Booths with Mixing Room. The following Specific Condition addressing Individual & Total HAP Content and Emissions has been modified as follows:

A.29. Individual & Total HAP Content and Emissions: The permittee shall determine the individual and total HAP contents of all materials, including solvents, and shall monitor the usage of such materials at the referenced emissions unit(s), by recording and maintaining the following information:

a. The individual and total HAP contents for each material containing or emitting HAPs.
b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emission unit(s).
c. The individual and total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.

d. A rolling consecutive 12-month total emission rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3) F.A.C., Permit Nos. 0251152-001 & 003-AC]

CONCLUSION

This project renews Title V air operation permit No. 0251152-005-AV, which was issued on February 22, 2010. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.