Ram Investments of South Florida, Inc.
Sea Enterprise Adventures
6900 NW 77 Court
Miami, FL 33166

Facility ID No. 0251178

Miami-Dade County

Title V Air Operation Permit Renewal

Permit No. 0251178-003-AV

Permitting & Compliance Authority:
Miami-Dade County
Department of Environmental Resources Management
Air Quality Management Division
701 NW 1st Court
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Miami, Florida 33136

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Title V Air Operation Permit Renewal

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DRAFT PERMIT

PERMITTEE:
Ram Investments of South Florida, Inc.
6900 NW 77 Court
Miami, FL 33166

Permit No. 0251178-003-AV
Sea Enterprise Adventures
Facility Id No. 0251178
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The Sea Enterprise Adventures facility is located in Miami-Dade County at 6900 NW 77 Court, Miami, Florida. UTM Coordinates are: Zone 17, 567.09 East and 2857.70 North. Latitude is: 25/50/15 North; and, Longitude is: 80/19/26 West.

The Title V Air Operation Permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DRAFT
Renewal Application Due Date: DRAFT
Expiration Date: DRAFT

(Draft)

_____

H. Patrick Wong, Chief
Air Quality Management Division
Department of Environmental Resources Management
Miami-Dade County

HPW/aj

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

Ram Investments of South Florida, Inc. DBA Sea Enterprise Adventures is a fiberglass boat manufacturing facility. The boat manufacturing process begins with construction of a mold. This mold is used repeatedly in the boat manufacturing process, and a mold may have a lifespan of several years. A separate mold is required for different body shapes and lengths of boats. Because a mold is expensive to construct, boat manufacturers will have a finite number of model lengths or shapes. A boat consists of two pieces: the hull, which is the outer part of the boat, and the deck which is the part, on which the occupants of the boat stand. A mold is required for both the hull and the deck.

When a boat is constructed, the appropriate mold is coated with release agent (wax) such that, when the gelcoat/fiberglass layup process is completed, the hull (or deck) can be pulled out of the mold. Following application of the release agent, gelcoat is applied to the mold by spray gun. When the gelcoat has cured, fiberglass layup begins. The combination of the fiberglass mat and cured resin produces the lightweight, but structurally sound fiberglass resin hull and deck which is so favorable to the watercraft industry.

When the deck and hull are cured, they are pulled from their respective molds. Wood stringers and other structural components are placed in the hull, gasoline tanks and wiring is placed in the hull and foam is blown into the hull to provide buoyancy for the boat. The hull and the deck are assembled together. Other components, such as the center console, hatches, and other fiberglass resin parts are manufactured in the same manner as the deck and hull. These parts are then assembled to the boat. With the exception of placing labels on the boat and other cosmetic enhancements, the boat is basically completed.

Subsection B. Summary of Emissions Units.

E.U. ID No.	Brief Description
001	Fiberglass Boat Manufacturing Facility

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received December 3, 2010, this facility is a major source of hazardous air pollutants (HAP). The facility is not a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C.

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, General Provisions	001
40 CFR 63, Subpart VVVV – NESHAP for Boat Manufacturing	001
State Rule Citations – 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297	001
Local Rule – Chapter 24 – Code of Miami-Dade County	001

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. 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" means 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.
[Rule 62-296.320(2), 62-210.200(Definitions), F.A.C., and Permit No. 0251178-001-AC]

FW3. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C., and Permit No. 0251178-001-AC]

FW4. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW5. General Volatile Organic Compounds (VOC) Emissions or 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 or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.
[Rule 62-296.320(1), F.A.C., and Permit No. 0251178-001-AC]

FW6. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
b. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
c. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
d. Landscaping or planting of vegetation.
e. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.

f. Confining abrasive blasting where possible.
g. Enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c), F.A.C.; and Permit No. 0251178-001-AC]

Annual Reports and Fees
See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW7. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rule 62-213.205, F.A.C.]

FW10. Special Compliance Tests: When the DERM, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the DERM.
[Rule 62-297.310(7)(b) F.A.C.]

SUBSECTION A. Emissions Unit 001

The specific conditions in this section apply to the following emissions unit:

E.U. ID No.	Brief Description
001	Fiberglass Boat Manufacturing Facility Operations: • Polymer releasing material applied to mold • Gelcoat sprayed on the mold to create a smooth outer surface • Fiberglass cloth with resin is applied to gelcoat • Core and putty are vacuum-applied to separate glass layers • Second layer of fiberglass cloth with resin is applied. • Manufacturing and Lamination Areas equipped with six (6) exhaust fans as follows: - Six (6) Dayton Model 3C412 fans, 3 HP each, with a volumetric flow rate of 12, 220 CFM - Fan Blade diameter is 30” - Exhaust stack height is 30 ft.

GENERAL

A.1. Rule Applicability: The permittee shall comply with the terms and conditions of 40 CFR 63 Subpart VVVV and the General Provisions of Subpart A since the facility meets both of the criteria listed below:
(a) The permittee is the owner or operator of a boat manufacturing facility that builds fiberglass boats.
(b) The permittee’s boat manufacturing facility is a major source of HAP.
[40 CFR 63.5683, and Permit No. 0251178-001-AC]

A.2. Facility Operations Covered by 40 CFR 63 Subpart VVVV: The affected source (the parts of the permittee’s boat manufacturing facility covered by 40 CFR 63 Subpart VVVV) is the combination of all of the boat manufacturing operations listed below:
(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
(b) Closed molding resin operations.
(c) Resin and gel coat mixing operations.
(d) Resin and gel coat application equipment cleaning operations.
(e) Carpet and fabric adhesive operations.
[40 CFR 63.5689, and Permit No. 0251178-001-AC]

A.3. Compliance Date: The permittee shall comply with all the applicable standards of 40 CFR 63 Subpart VVVV and 40 CFR 63 Subpart A.
[40 CFR 63.5692, 63.5695, 63.5773, and Permit No. 0251178-001-AC]

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.]

Essential Potential to Emit (PTE) Parameters

Permitted Capacity.

A.5. Hours of Operation: The referenced emission unit(s) may operate 24 hours/day, 7 days/week for 52 weeks/year resulting in a total of 8,760 hours in any consecutive 12-month period.
[Rules 62-4.160(2) & 62-210.200 (PTE) F.A.C., and Permit No. 0251178-001-AC]

Control Technology

A.6. Options for complying with the open molding emissions limit**:** The permittee shall use one or more of the options listed in items (a) through (c) of this condition to meet the emissions limit in 40 CFR 63.5698 for the resins and gel coats used in open molding operations at the facility.

(a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.*
1. The permittee shall demonstrate that emissions from the open molding resin and gel coat operations that the permittee averages meet the emission limit in 40 CFR 63.5698 using the procedures described in 40 CFR 63.5710.
Compliance with this option is based on a 12-month rolling average.
2. Those operations and materials not included in the emissions average must comply with either item (b) or (c) of this condition.

(b) *Compliant materials option.* The permittee shall demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to Appendix 1. Compliance with this option is based on a 12-month rolling average.

(c) *Add-on control option*. The permittee shall use an enclosure and add-on control device, and demonstrate that the resulting emissions meet the emission limit in 40 CFR 63.5698. Compliance with this option is based on control device performance testing and control device monitoring.

[40 CFR 63.5701, and Permit No. 0251178-001-AC]

Emission Limitations and Standards

A.7. Visible Emissions: The permittee shall not cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the opacity of which is equal to or greater than 20%.
[Rule 62-296.320(4)(b) F.A.C., and Permit No. 0251178-001-AC]

A.8. Emissions Limit for Open Molding Resin and Gel Coat Operations:

(a) The permittee shall limit organic HAP emissions from the five open molding operations listed in items (a)(1) through (5) of this condition to the emission limit specified in item (b) of this condition. Operations listed in item (d) are exempt from this limit.
(1) Production resin.
(2) Pigmented gel coat.
(3) Clear gel coat.
(4) Tooling resin.
(5) Tooling gel coat.

(b) The permittee shall limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this condition, based on a 12-month rolling average.

$$\text{HAP Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \qquad \text{(Eq. 1)}$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

M_R = mass of production resin used in the past 12 months, excluding any materials exempt under item (d) of this condition, megagrams.

M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under item (d) of this condition, megagrams.

M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under item (d) of this condition, megagrams.

M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under item (d) of this condition, megagrams.

M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under item (d) of this condition, megagrams.

(c) The open molding emission limit is the same for both new and existing sources.

(d) The materials specified in items (d)(1) through (3) of this condition are exempt from the open molding emission limit specified in item (b) of this condition.

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. The permittee shall keep a record of the resins for which this exemption is used.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. The permittee shall keep a record of the amount of gel coats used per month for which this exemption is used, and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis.

The permittee shall keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

[40 CFR 63.5698, and Permit No. 0251178-001-AC]

A.9. <u>Filled Resin Compliance Method</u>**:**

(a) If a filled production resin or filled tooling resin is used, the permittee shall demonstrate compliance for the filled material on an as-applied basis using equation 1 of this condition.

$$PV_F = PV_u \times \frac{(100 - \%Filler)}{100} \qquad \text{(Eq. 1)}$$

Where:

PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to Appendix 1.
% Filler = The weight-percent of filler in the as-applied filled resin system.

(b) If the filled resin is used as a production resin and the value of PV_F calculated by equation 1 of this condition does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
(c) If the filled resin is used as a tooling resin and the value of PV_F calculated by equation 1 of this condition does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
(d) If the permittee includes a filled resin in the emissions averaging procedure described in 40 CFR 63.5710, then the permittee shall use the value of PV_F calculated using equation 1 of this condition for the value of PV_i in equation 2 of 40 CFR 63.5710.
[40 CFR 63.5714, and Permit No. 0251178-001-AC]

A.10. Standards for resin and gel coat mixing operations:
(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
(b) The work practice standard in item (a) of this condition does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
(c) To demonstrate compliance with the work practice standard in item (a) of this condition, the permittee shall visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
(d) The permittee shall keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.
[40 CFR 63.5731, and Permit No. 0251178-001-AC]

A.11. Standards for resin and gel coat application equipment cleaning operations:
(a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
(b) The permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.
[40 CFR 63.5734, and Permit No. 0251178-001-AC]

A.12. Compliance demonstration with the resin and gel coat application equipment cleaning standards:
(a) The permittee shall determine and record the organic HAP content of the cleaning solvents subject to the standards specified in 40 CFR 63.5734 using the methods specified in 40 CFR 63.5758.
(b) If the permittee recycles cleaning solvents on site, documentation may be used from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as

originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in 40 CFR 63.5758 for demonstrating compliance with organic HAP content limits.

(c) At least once per month, the permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. The permittee shall keep records of the monthly inspections and any repairs made to the covers.

[40 CFR 63.5737, and Permit No. 0251178-001-AC]

A.13. Emission limit for carpet and fabric adhesive operations:

(a) Carpet and fabric adhesives shall contain no more than 5 percent organic HAP by weight.

(b) To demonstrate compliance with the emission limit in item (a) of this condition, the permittee shall determine and record the organic HAP content of the carpet and fabric adhesives using the methods in 40 CFR 63.5758.

[40 CFR 63.5740, and Permit No. 0251178-001-AC]

A.14. Organic HAP Content Determination: To determine the organic HAP content for each material used in the open molding resin and gel coat operations, carpet and fabric adhesive operations, the permittee shall use one of the options in items (1) through (6) listed below.

(1) *Method 311 (appendix A to 40 CFR part 63)*. The permittee shall use Method 311 for determining the mass fraction of organic HAP. The permittee shall use the procedures specified in items (1)(i) and (ii) of this condition when determining organic HAP content by Method 311.

(i) The permittee shall include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the permittee need not include it in the organic HAP total. The permittee shall express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point (for example, 0.1234).

(ii) The permittee shall calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).

(2) [R]

(3) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)*. The permittee may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

(4) *Alternative method*. The permittee may use an alternative test method for determining mass fraction of organic HAP if prior approval is obtained from the EPA administrator. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

(5) *Information from the supplier or manufacturer of the material*. The permittee may rely on information other than that generated by the test methods specified in items (1) through (4) of this condition, such as manufacturer's formulation data, according to items (5)(i) through (iii) of this condition.

(i) The permittee shall include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the permittee need not include it in the organic HAP total.

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee shall use the upper limit of the range for determining compliance. If a separate

measurement of the total organic HAP content using the methods specified in items (1) through (4) of this condition exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee shall use the measured organic HAP content to determine compliance.

(iii) If the organic HAP content is provided as a single value, the permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in items (1) through (4) of this condition is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee shall use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee shall use the measured organic HAP content to determine compliance.

(6) *Solvent blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP, which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the permittee may use the values for organic HAP content that are listed in Table 5 or 6 of Appendix 1. The permittee may use Table 6, Appendix 1 only if the solvent blends in the materials the permittee uses do not match any of the solvent blends in Table 5, Appendix 1 and the permittee knows only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6, Appendix 1, then the test results must be used for determining compliance.

[40 CFR 63.5758(a), and Permit No. 0251178-001-AC]

A.15. Notifications Submittal:

(a) The permittee shall submit all of the applicable notifications in Table 7 of Appendix 1 by the dates specified in the table. The notifications are described more fully in 40 CFR Part 63, Subpart A, General Provisions for boat manufacturing.

(b) The permittee shall submit changes to any information submitted in any notification, including the selected open molding emissions limit compliance option. The permittee shall submit any changes in writing to the DERM, at least 30 days prior to the initiation of such change(s).

(c) The permittee shall not switch from the selected open molding emissions limit compliance option in the middle of a 12-month averaging period, if the facility is complying with the MACT model point value averaging (emissions averaging) option.

[40 CFR 63.5761; Rule 62-4.070(3) F.A.C., and Permit No. 0251178-001-AC]

A.16. Compliance Option-Specific Conditions: In addition to the conditions listed above, based on the selected compliance option(s), the permittee shall also comply with the applicable open molding emissions limit option-specific conditions as follows:

(a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.* (1) Specific conditions A.17, A.18 and A.19.

(b) *Compliant materials option.* (1) Specific conditions A.20 and A.21.

(c) *Add-on control option*. (1) The permittee shall obtain an air construction permit from DERM prior to installing any add-on control.

[40 CFR 63 Subpart VVVV; Rule 62-4.070(3) F.A.C., and Permit No. 0251178-001-AC]

EMISSIONS AVERAGING OPTION

A.17. General Compliance Requirements: For those open molding operations and materials complying using the emissions averaging option, the permittee shall demonstrate compliance by performing the steps in items (1) through (5) listed below.

(1) The methods specified in 40 CFR 63.5758 shall be used to determine the organic HAP content of resins and gel coats.
(2) The calculations described in 40 CFR 63.5710 shall be completed to show that the organic HAP emissions do not exceed the limit specified in 40 CFR 63.5698.
(3) Records, as specified in items (3)(i) through (iv) and listed below, shall be kept for each resin and gel coat.
  (i) Hazardous air pollutant content.
  (ii) Amount of material used per month.
  (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
  (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in 40 CFR 63.5710.
(4) The implementation plan described in 40 CFR 63.5707 shall be prepared and submitted to the DERM, and be kept up to date.
(5) Semiannual compliance reports shall be submitted to the DERM as specified in 40 CFR 63.5764.
[40 CFR 63.5704(a), and Permit No. 0251178-001-AC]

A.18. Implementation Plan:
(a) The permittee shall prepare an implementation plan for all open molding operations for which compliance is demonstrated by using the emissions averaging option described in 40 CFR 63.5704(a).
(b) The implementation plan must describe the steps the permittee will take to bring the open molding operations covered by 40 CFR 63, Subpart VVVV, into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in items (b)(1) through (3) listed below.
  (1) A description of each operation included in the average.
  (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
  (3) Calculations showing that the operations covered by the plan will comply with the open molding emissions limit specified in 40 CFR 63.5698.
(c) The permittee shall submit the implementation plan to the DERM Air Quality Management Division with the notification of compliance status specified in 40 CFR 63.5761.
(d) The permittee shall keep the implementation plan on site and provide it to the DERM Air Quality Management Division upon request.
(e) The permittee shall submit any revised implementation plans with the next semiannual compliance report, specified in 40 CFR 63.5764.
[40 CFR 63.5707, and Permit No. 0251178-001-AC]

A.19. Compliance Method:
(a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in 40 CFR 63.5695, which is August 23, 2004.
(b) At the end of August 2005, the twelfth month after the compliance date, and at the end of every subsequent month, the permittee shall use equation 1 of this condition to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emissions limit in 40 CFR 63.5698 calculated for the same 12-month period. (Terms shall be included in equation 1 of 40 CFR 63.5698 and equation 1 of this condition for only those operations and materials included in the average.)

HAP emissions = $[(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})+(PV_{TR})(M_{TR})+(PV_{TG})(M_{TG})]$ (Eq. 1)
Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.
PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.
M_R = Mass of production resin used in the past 12 months, megagrams.
PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.
M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.
PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.
M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.
PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.
M_{TR} = Mass of tooling resin used in the past 12 months, megagrams.
PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.
M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams.

(c) At the end of every month, the permittee shall use equation 2 of this condition to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^{n} \left(M_i \, PV_i \right)}{\sum_{i=1}^{n} \left(M_i \right)} \qquad \text{(Eq. 2)}$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, PV_{TR}, and PV_{TG}) included in the average, kilograms of HAP per megagram of material applied.
M_i = mass of resin or gel coat i used within an operation in the past 12 months, megagrams.
n = number of different open molding resins and gel coats used within an operation in the past 12 months.
PV_i = the MACT model point value for resin or gel coat i used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

(d) The permittee shall use the equations in Table 3 of Appendix 1 to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.
(e) If the organic HAP emissions, as calculated in item (b) of this condition, are less than the organic HAP limit calculated in 40 CFR 63.5698(b) for the same 12-month period, then the permittee is in

compliance with the emissions limit in 40 CFR 63.5698, for those operations and materials included in the average.

[40 CFR 63.5710, and Permit No. 0251178-001-AC]

COMPLIANT MATERIALS OPTION

A.20. General Compliance Requirements: For each open molding operation complying using the compliant materials option, the permittee shall demonstrate compliance by performing the steps in items (1) through (4) listed below.

(1) The methods specified in 40 CFR 63.5758 shall be used to determine the organic HAP content of resins and gel coats.

(2) The calculations described in 40 CFR 63.5713 shall be completed to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 of Appendix 1.

(3) Records, as specified in items (3)(i) through (iv) and listed below, shall be kept for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.

(iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in 40 CFR 63.5713.

(4) Semiannual compliance reports shall be submitted to the DERM Air Quality Management Division as specified in 40 CFR 63.5764.

[40 CFR 63.5704(b), and Permit No. 0251178-001-AC]

A.21. Compliance Method:

(a) Compliance using the organic HAP content requirements listed in Table 2 of Appendix 1 is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on August 23, 2004. If the permittee is using filled material (production resin or tooling resin), the permittee shall comply according to the procedure described in 40 CFR 63.5714.

(b) At the end of August 2005, the twelfth month after the compliance date, and at the end of every subsequent month, the permittee shall review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2 of Appendix 1, then the permittee is in compliance with the emissions limit specified in 40 CFR 63.5698, for that 12-month period for that operation. In addition, the permittee do not need to complete the weighted-average organic HAP content calculation contained in item (c) of this condition for that operation.

(c) At the end of every month, the permittee shall use equation 1 of this condition to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\text{Weighted-Average HAP Content (\%)} = \frac{\sum_{i=1}^{n} \left(M_i \, HAP_i \right)}{\sum_{i=1}^{n} \left(M_i \right)} \qquad \text{(Eq. 1)}$$

Where:

M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. The permittee shall use the methods in 40 CFR 63.5758 to determine organic HAP content.

n = number of different open molding resins or gel coats used in the past 12 months in an operation.

(d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 of Appendix 1, then the permittee is in compliance with the emissions limit specified in 40 CFR 63.5698.

[40 CFR 63.5713, and Permit No. 0251178-001-AC]

Excess Emissions

A.22. 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., and Permit No. 0251178-001-AC]

A.23. 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., and Permit No. 0251178-001-AC]

A.24. 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., and Permit No. 0251178-001-AC]

Recordkeeping and Reporting Requirements

A.25. Report Submittal:

(a) The permittee shall submit the applicable reports specified in items (b) through (e) of this condition. To the extent possible, the permittee shall organize each report according to the operations covered by 40 CFR 63, Subpart VVVV, and the compliance procedure followed for that operation.

(b) Unless the DERM Air Quality Management Division has approved a different schedule for submission of reports under 63.10(a), the permittee shall submit each report by the dates in items (b)(1) through (5) of this condition.
   (1) If the source is not controlled by an add-on control device (i.e., the source is complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the the startup date, and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the startup date. If the source is controlled by an add-on control device, the first compliance report must cover the period beginning on the startup date and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the startup date.
   (2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in item (b)(1) of this condition.
   (3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
   (4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
   (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in items (b)(1) through (4) of this condition.

(c) The compliance report must include the information specified in items (c)(1) through (7) of this condition.
   (1) Company name and address.
   (2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
   (3) The date of the report and the beginning and ending dates of the reporting period.
   (4) A description of any changes in the manufacturing process since the last compliance report.
   (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which the permittee is demonstrating compliance. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
   (6) If the permittee was in compliance with the emission limits and work practice standards during the reporting period, the permittee shall include a statement to that effect.
   (7) If the permittee deviated from an emission limit or work practice standard during the reporting period, the permittee shall also include the information listed in items (c)(7)(i) through (iv) of this condition in the semiannual compliance report.
      (i) A description of the operation involved in the deviation.
      (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
      (iii) A description of any corrective action the permittee took to minimize the deviation and actions the permittee has taken to prevent it from happening again.
      (iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

(d) If the facility has an add-on control device, the permittee shall submit semiannual compliance reports and quarterly excess emission reports as specified in 40 CFR 63.10(e). The contents of the reports are specified in 40 CFR 63.10(e).

(e) If the facility has an add-on control device, the permittee shall complete a startup, shutdown, and malfunction plan as specified in 40 CFR 63.6(e), and the permittee shall submit the startup, shutdown, and malfunction reports specified in 40 CFR 63.10(e)(5).

[40 CFR 63.5764, and Permit No. 0251178-001-AC]

A.26. Additional Recordkeeping: The permittee shall keep the records specified below in addition to records specified in individual conditions of this permit.

(a) The permittee shall keep a copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart VVVV.

(b) The permittee shall keep all documentation supporting any notification or report that was submitted.

(c) If the facility is not controlled by an add-on control device (i.e., the permittee is complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the permittee shall keep the records specified below:

(1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the permittee shall also record the amounts of each applied by atomized and nonatomized methods.

(2) [R]

(3) [R]

(d) If the facility has an add-on control device, the permittee shall keep the records specified in 40 CFR 63.10(b) relative to control device startup, shut down, and malfunction events; control device performance tests; and continuous monitoring system performance evaluations.

[40 CFR 63.5767, and Permit No. 0251178-001-AC]

A.27. Format/Length of Recordkeeping:

(a) Records must be readily available and in a form so they can be easily inspected and reviewed.

(b) The permittee shall keep each record for 5 years following the date that each record is generated.

(c) The permittee shall keep each record on site for at least 2 years after the date that each record is generated. The permittee can keep the records offsite for the remaining 3 years.

(d) The permittee can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

[40 CFR 63.5770, and Permit No. 0251178-001-AC]

A.28. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

A.29. VOC Content and Emissions: The permittee shall determine the VOC content 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 VOC content for each material containing or emitting VOCs.

b. The material usage rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s).

c. The total monthly VOC emissions rates for each material, calculated from the monthly material usage rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month.

d. A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3) F.A.C., and Permit No. 0251178-001-AC]

A.30. Monitoring Data and Supporting Documentation: Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept, which includes sufficient information to determine compliance. The log and documents shall be kept for at least 5 years and made available to the Department of Environmental Resources Management (DERM). Monthly logs shall be completed within 10 calendar days of the following month.
[Rules 62-4.070(3) & 62-213.440(1)(b)2.b. F.A.C.]

A.31. Record of Recycling: The owner or operator shall keep a log with the following information: the amount of chemicals manifested to recyclers, the manufacturer, or the dump.
[Rule 62-4.070(3) F.A.C., and Permit No. 0251178-001-AC]

The Following Appendices are Enforceable Parts of This Permit

Appendix 1, Tables 1 – 7 of 40 CFR 63 Subpart VVVV
Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart VVVV – NESHAP for boat manufacturing.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History.
Table A, Monthly VOC, HAP Emissions Log
Table FD, Open Molding Compliance Options Flow Diagram