Title V Air Operation Permit Renewal
Permit No. 0251178-003-AV

APPLICANT

The applicant for this project is Ram Investments of South Florida, Inc. dba Sea Enterprise Adventures. The applicant's responsible official and mailing address are: Mr. Ralph Torres, Vice President, Ram Investments of South Florida, Inc., 6900 NW 77 Court, Miami, FL 33166.

FACILITY DESCRIPTION

The applicant operates the Sea Enterprise Adventures facility, which is located at 6900 NW 77 Court, Miami, FL 33166.

Summary of 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.

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

PROJECT DESCRIPTION

The purpose of this permitting project is for a Title V permit renewal for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received December 3, 2010.

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

NESHAP: The facility does operate a unit 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: Since this facility has no control equipment, Compliance Assurance Monitoring (CAM) does not apply. 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. Based on the 2009 Annual Operating Report (AOR), the facility continues to operate as a Major Source of Air Pollution.

These documents are on file with the permitting authority:
Application for a Title V Air Operation Permit Renewal received December 3, 2010.

Specific changes were made to the previous air operation permit (No. 0251178-002-AV) and are in the DRAFT Title V Air Operation Permit Renewal as described below.

Items numbered 1-7 below represent the changes to the previous Title V Air Operation Permit. Underline text indicates additions.

1. Changes in Section II – Facility Wide Conditions. The following conditions were updated to reflect changes in the air permitting format by FDEP since the last permitting action:

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.]

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]

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.]

2. Changes in Section II – Facility Wide Conditions. The following conditions were deleted to reflect changes in the air permitting format by FDEP since the last permitting action:

3. Changes in Section II – Facility Wide Conditions. The following conditions were added into this section for reasonable assurance:

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.]

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.]

4. Changes in Section III – Subsection A, Emissions Unit Specific Conditions. The NESHAP applicability footnote was deleted from the emissions unit description since it is addressed by permit condition A.1.

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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]

5. Changes in Section III – Subsection A, Emissions Unit Specific Conditions. The following applicable Specific Conditions have been added or modified in this permit for reasonable assurance:

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.]

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) and 62-210.200(PTE), F.A.C.; Air Construction 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.]

6. Changes in Section III – Subsection A, Emissions Unit Specific Conditions. The incorporation of additional Specific Conditions required that many specific conditions following **A.1.** from Emissions unit 001 be renumbered, and permit cited appropriately. Other minor changes include numbering updates.

7. All referenced notes in parentheses (eg. See Condition A.3 etc.) were removed to avoid confusion.

PROJECT REVIEW

The subject of this permit is the issuance of Title V Air Operation Permit Renewal No. 0251178-003-AV for the Sea Enterprise Adventures facility, located at 6900 NW 77 Court, Miami, Florida.

CONCLUSION

This project is for Title V air operation permit renewal No. 0251178-003-AV. 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.