TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Sea Ray Boats, Inc.
100 Sea Ray Drive
Flagler Beach, Florida 32136

Palm Coast Division
AIRS Facility ID No. 0350003
100 Sea Ray Drive
Flagler Beach, Florida 32136

PROJECT

Project No. 0350003-010-AC
Revisions to Specific Conditions 2, 3, and 12 of Permit No. 0350003-005-AC

COUNTY

Flagler, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Air Resources Section
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

March 5, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial activities. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

The applicant operates an existing fiberglass boat manufacturing facility (Standard Industrial Classification No. 3732). The UTM Coordinates are Zone 17, 485.49; N-3262.93; and, Latitude: 29° 29’ 45” North and Longitude: 81° 08’ 59”West. This site is an area that is in attainment (or designated as unclassifiable) for all pollutants subject to a National Ambient Air Quality Standard (NAAQA).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The project revises Specific Condition Nos. 2, 3, and 12 of previously issued Air Construction Permit No. 0350003-005-AC.

Processing Schedule

January 23, 2013: Received the application for a Title V Renewal, which included requests for changes to permit condition language that is also in underlying construction permit, No. 0350003-010-AC.

2. PSD APPLICABILITY

General PSD Applicability

The Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. A PSD applicability review is required in areas currently in attainment with the state and federal AAQS or areas otherwise designated as "unclassifiable". A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit: 5 tons per year or more of lead; 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD-major facility categories (fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants, and charcoal production plants.). Projects at existing or new major stationary sources are subject to PSD preconstruction review. In addition, proposed projects at existing minor sources are subject to PSD preconstruction review if potential emissions *from the proposed project* will exceed the PSD major stationary source thresholds.

Once a project becomes subject to PSD preconstruction review, each PSD pollutant is reviewed for PSD applicability based on emissions thresholds known as the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); Fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as nonmethane organic compounds (NMOC); and mercury (Hg). Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

The project is for the revision of Specific Condition Nos. 2, 3, and 12 of Construction Permit No. 0350003-005-AC. Due to the nature of this project, there are no increases in emissions expected; therefore, the project is not subject to PSD preconstruction review.

NSPS Applicability

The project does not affect previous NSPS Applicability determinations.

NESHAP Applicability

The project does not affect previous NESHAP Applicability determinations.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Rita Felton-Smith is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Northeast District Office, Air Resources Section, 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256, Phone: (904) 256-1700.