FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

PERMITTEE

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

Authorized Representative:

Mr. Dan Goddard, Vice President, General Manager

Air Permit No. 0350003-010-AC
Permit Expires:
Issue Date:
Palm Coast Division
AIRS ID No. 0350003

Project: SC #12 Revision

This is the final air construction permit revises Specific Condition Nos. 2, 3, and 12 of previously issued Air Construction Permit No. 0350003-005-AC. The existing facility, Palm Coast Division, is a fiberglass boat manufacturing facility (Standard Industrial Classification No. 3732). The existing facility is located in Flagler County at 100 Sea Ray Drive, Flagler Beach. The UTM Coordinates are Zone 17, 485.49; N-3262.93; and, Latitude: 29° 29' 45" North and Longitude: 81° 08' 59"West.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

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.

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.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

DRAFT

Executed in Jacksonville, Florida

Draft

_____

Khalid AlNahdy, P. E. Date
District Air Program Administrator

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) 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 _____ to the persons listed below.

Mr. Dan Goddard: dgoddard@searay.com
Mr. Randy Clunie: Randy.Clunie@searay.com
Mr. Craig Wall: Craig.Wall@searay.com
Mr. Scott A. McCann P.E., Golder Associates, Inc: Scott_McCann@GOLDER.com
Ms. Natasha Hazziez, U.S. EPA Region 4: Hazziez.natasha@epa.gov
Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov
Ms. Barbara Friday, DEP DARM: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

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.

Draft

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

This facility is fiberglass boat manufacturing facility involving Lamination, Fabrication and Assembly processes.

Existing Facility

The existing facility consists of the following emissions unit.

Facility ID No. 0350003	
ID No.	**Emission Unit Description**
001	Boat manufacturing facility with resin and gel coat operations and carpet and fabric adhesive operations.

FACILITY REGULATORY CLASSIFICATION

- 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(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Air Resources Section, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office. The Permitting Authority's telephone number is (904) 256-1700.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office. The mailing address and phone number of the District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is (904) 256-1700.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions

   d. Appendix D. Common Testing Requirements

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. Source Obligation:

a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	The fiberglass boat production consists of the following processes: – mold maintenance – gelcoat application – gelcoat holding – lamination (resin, fiberglass, man-made synthetics, and wood application) – lamination holding – parts extraction from molds – parts cutting and grinding – parts inspection and repair – wood shop – upholstery – assembly – test, final finish, inspection, and delivery

This permit revises conditions outlined in construction permit No. 0350003-005-AC as follows:

1. Specific Condition No. 2. is revised from:

2. The permittee shall remove the existing twelve (12) Strobic Air Exhaust Fans (E1-E11 and E53) located in the Lamination Building. The permittee shall install twelve (12) new exhaust duct at the former Strobic Air Exhaust fan locations and connect them together such that the combined exhaust will be transported to an 8-foot exit diameter, 5-foot exhaust stack with a design air flow rate of 300,000 acfm.

   [Consent Order No. 02-0699]

To:

2. The permittee shall remove the existing twelve (12) Strobic Air Exhaust Fans (E1-E11 and E53) located in the Lamination Building. The permittee shall install twelve (12) new exhaust duct at the former Strobic Air Exhaust fan locations and connect them together such that the combined exhaust will be transported to an 8-foot exit diameter, 75-foot exhaust stack with an air flow rate of approximately 300,000 acfm.

   [Consent Order No. 02-0699]

2. Specific Condition No. 3. is revised from:

3. Volatile Organic Compounds. Total VOC emissions (including styrene) shall not exceed 249 tons per any consecutive 12-month period.

[Requested Emissions Cap in Air Construction permit application received February 25, 2003]

To:

3. Facility-Wide Volatile Organic Compounds (VOC) Emissions. The maximum facility-wide total VOC emissions, including hazardous air pollutants (HAPs), shall not exceed 249 tons per any consecutive 12-month period.

[Requested Emissions Cap in Air Construction permit application received February 25, 2003; Rules 62-4.070(3), and 62-210.200(PTE), F.A.C.]

3. Specific Condition No. 12. is revised from:

12. Recordkeeping-Emission Calculation Equations.

a. Styrene emissions shall be determined using the following equations:

Emissions, in tons = Amount of material used (in pounds)

x styrene monomer content (percent/100)

x emission factor for styrene monomer content (from table below)

x ton/2000 pounds

The applicable styrene emission factor** shall be obtained (interpolated/extrapolated, if applicable) from the following table, in conjunction with the percent of available non-vapor suppressed (NVS) styrene monomer in the resin/gelcoat:

Application Method	NVS Monomer 35%	NVS Monomer 38%	NVS Monomer 42%
Resin Non-Spray Lay-up	11%	11%	12%
Tooling/Pigmented/ Based Gelcoats NOTE(1)	44%	47%	51%
Resin Closed Molding	1.5%	1.5%	1.5%

NOTE(1) Modified Emission Factor (MEF)- determined from the FL Interim Emission Factor minus the portion of the total monomer containing Methyl Methacrylate.

$$MEF = \text{FL Interim EF} \times \frac{[\%\ \text{Total Monomer} - 3\%\ \text{MMA*}]}{[\%\ \text{Total Monomer}]}$$

**Assumes percent of MMA in Gelcoat is an average of 3%.*

b. MMA emissions shall be determined by the following equations:
Emissions, in tons = Amount of material used (in pounds)

x MMA content (percent/100)

x 0.75**

x ton/2000 pounds

c. Other VOC emissions shall be determined by the following equation for each material. These values shall be used in conjunction with the above Styrene and MMA emissions to determine total VOC:

Emissions, in tons = Amount of material used (in pounds)

x other VOC content (percent/100)

x 1.00

x ton/2000 pounds

** Should more accurate emission factors be developed in the future, the permittee will submit this information for consideration by the Department prior to implementation.

[Construction Permit Application received February 25, 2003]

To:

12. <u>VOC Emissions Calculations</u>. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). The emissions calculation methods are:

- Styrene, Methyl Methacrylate, and Methyl styrene (aka vinyl toluene/ Methyl Toluene) emissions from open mold applications of resin, gelcoat, putty, gunk, and gelpatch shall be determined by use of "United Emissions Factors (UEF) for Open Molding of Composites (Revised October 13, 2009 UEF Table 1)" per method of open mold application.

- Closed Molding use 1.5% emissions factor for all VOC content components = styrene + methyl methacrylate + other organic HAPs + other VOCs

- Cold Press Closed Molding use 3% emissions factor for all VOC content components = styrene + methyl methacrylate + other organic HAPs + other VOCs

- Methyl Methacrylate two-part adhesives use 75% emissions factor for methyl methacrylate emissions

- Emissions of MDI, other isocyanate ingredients, and polyols (polyglycol) from foams produce negligible emissions and are not required to be included in the VOC calculations.

- Organic peroxides and dimethyl phthalate produce negligible emissions and are not required to be included in the VOC calculations.

- Other, non-styrene, non-MMA, non-HAP VOC emissions shall be determined by material VOC content, the assumption that all of the VOC is emitted, and material usage.

Supporting documentation (chemical usage tracking logs, MSD sheets, Safety Data Sheet, supplier-provided Regulatory Data Sheets or equivalent, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) are methods used to determine VOC, HAP, and other emissions. These records shall be kept for each chemical and associated product which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. The log and documents shall be kept at the facility for at least five years and made available to the Department.

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]