Chris*Craft Corporation
Chris*Craft Boats – Plant 1

Facility ID No. 0810077
Manatee County

Title V Air Operation Permit Renewal

Permit No. 0810077-012-AV
Renewal of Title V Air Operation Permit No. 0810077-011-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 470-5700
Fax: (813) 470-5996

Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Chris*Craft Corporation
8161 15th Street East
Sarasota, Florida 34243

Permit No. 0810077-012-AV
Chris*Craft Boats – Plant 1
Facility ID No. 0810077
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 existing Chris*Craft Boats – Plant 1 is located in Manatee County at 8161 15th Street East, Sarasota, Florida. UTM Coordinates are: Zone 17, 347.19 East and 3031.21 North. Latitude is: 27°23'45" North and Longitude: 82°32'44" 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: Date, 200x
Renewal Application Due Date: Exp. Date -225, 20xx
Expiration Date: Eff. Date + 5 years, 20xx

Draft/Proposed

Kelley M. Boatwright
District Air Program Administrator
Southwest District

KMB/qn/admin

Subsection A. Facility Description.

The facility's manufacturing operations are primarily conducted in the Lamination Building and Assembly Building as further described below:

LAMINATION BUILDING

TOOLING/MOLD MAINTENANCE – In the process referred to as tooling/mold maintenance, new product designs are built, new molds are produced, and existing molds are repaired. Tooling supports the manufacturing operation, but is not a production operation in that the items produced are not sold or incorporated directly into finished products. Wood is used to create the "plug" or form for the mold. A mold is created by placing special tooling gelcoat and resin on the plug.

Gelcoat and resin raw materials for tooling must perform differently from those used for the finished product; for example, the molds must be more durable for repeated use in the manufacture of many parts, and the surface of the molds must allow the parts to separate easily from the mold. Therefore, such non-production resins typically contain larger quantities of styrene and/or other hazardous air pollutants (HAPs) than production resins. Emissions from the gelcoat and resin are exhausted through stacks GC1 to GC3 (gelcoat) and LB1 to LB8 (resins).

After the gel coat application, a barrier coat is applied within the lamination building. The barrier coat is intended to improve resistance to osmotic blistering and prevent fiberglass pattern "print thru". Emissions from the application of the barrier coat, which is considered a type of resin, are exhausted in the same manner as the bulk resin emissions, which are discussed below.

MOLD CARE – In mold care, which is located in the southeast corner of the building, molds are prepared for use in the production of parts. Typically, this process includes cleaning the mold and applying mold release agents such as waxes and polishes to encourage proper removal of the part from the mold and to help prevent the gelcoat and resin laminates from adhering to or damaging the mold. HAP and VOC emissions are exhausted through vents MC1 to MC4 located on the southern half of the east wall of the building.

LAMINATION – The lamination process includes gelcoat and resin lay-up and foam placement.

Gelcoat lay-up is conducted inside the gelcoat booth at the northeast corner of the lamination building. Emissions from the booth are exhausted through three 37 ft. high stacks designated as GC1 to GC3. Each stack exhausts at a design rate of 35,000 ACFM and each stack has a filter to control emissions of unconfined particulate matter. Gelcoat forms the outer surface of the part and gives the product it glossy finish. Gelcoat is a type of resin that is impregnated with color. The resin, mixed with fiberglass reinforcement material, forms the structure of the product. First, one or more layers of gelcoat is applied to the surface of the mold, and the material is allowed to cure. Spray guns are used to apply gelcoat.

Then, layers of resin lay-up (not gelcoat), chopped glass, and woven fiberglass mat are applied on top of this layer of gelcoat and again allowed to cure. Chopper guns cut fiberglass and spray both the chopped glass and resin into the mold. The raw material that makes up both gelcoat and resin is liquid initially and chemically cross-links or polymerizes after addition of an initiator or catalyst. These resin materials harden as the part cures. Emissions from the resin are exhausted through eight 48 ft. high stacks designated as LB1 to LB8. Each stack exhausts at a minimum of 14,960 ACFM and each stack has a filter to control emissions of unconfined particulate matter. Once the laminate cures, the part is separated from the mold. There are different molds for different parts, for example, boat decks and hulls.

Floatation foam and floor systems are fabricated and installed in the parts, and reinforcing wood is applied to parts as needed. Foam is used for floatation and strengthening of the part. The foam may be inserted in pre-made stringers or sprayed directly into the part with guns. Next, a layer of gelcoat may be applied on top of these items in portions of the interior of the part, if desired, for aesthetic qualities. Putty is used to glue various parts together. Emissions from these processes also exhaust through stacks LB1 to LB8.

On the north side of the lamination building is an additional small parts lamination area. The area is connected to the lamination building and emissions from this process are also vented through stacks LB1 to LB8.

On the south side (outside) of the building is a covered open work area, which is used for the pre-finishing of hulls and decks along with the occasional touch-up, clean-up, minor repair and buffing of finished boats. The area uses miscellaneous solvents in support of this activity and uses approximately 260 lbs./month of gelcoat/resin material.

CUTTING AND GRINDING AREA – Grinding is performed to smooth and trim the rough edges from the fiberglass part after it has been detached from the mold. Hand held cutting and grinding equipment and tools are used to perform this process.

The west end of the building is used solely for cutting/grinding. The unconfined particulate matter emissions from this activity are exhausted through vents LV1 to LV5. The airflow from each vent is first passed through a water bath before exhausting to the atmosphere.

ASSEMBLY BUILDING

WOOD/FIBERGLASS CUTTING AND SHAPING OPERATIONS

WOOD/FIBERGLASS CUTTING AND SHAPING OPERATIONS – Wood/Fiberglass cutting and shaping are performed in the Mill Shop (1st Floor) and Cabinet Shop (2nd Floor). Both shops use various tools to cut the stringers, floors, bulkheads, bracing, shelves, cabinets, etc.

ASSEMBLY/FINISHING – The final assembly and finishing of the fiberglass products are performed in this building. In addition, some non-fiberglass parts are fabricated, such as upholstered cushions and seats.

During the assembly process, manufactured fiberglass parts are put together with other parts, such as the upholstery, wiring, and engine. The finishing process includes the final touch ups to prepare the product for shipment such as patching, cleaning, polishing, and preparation for shipment.

Small tools are used for this finishing process, including hand tools, sander, buffers, test equipment, putty mixers, and hoists.

The raw materials used include adhesives, patching aids, cleaners, sealants, and layout fluids. Emissions from these materials are emitted through vents AV1 to AV8 located on the south wall.

Emissions from the West Adhesive Booth (second floor) exhaust through Stack LR1. The stack uses a filter to control emissions of unconfined particulate matter.

Emissions from the East Adhesive Booth (second floor) exhaust through Stacks LR2 and LR3. The stacks use a filter to control emissions of unconfined particulate matter.

GENERAL INFORMATION

VOC emissions and organic solvent emissions are controlled by work practice requirements, VOC & Styrene emission limitations, and the dispersion of emissions. Recordkeeping and reporting are used to document compliance with the emission limitations.

TEAKING OPERATIONS – The teaking operations involves the use of teak wood, which is special wood that withstands severe weather conditions. The teak wood is installed in the boat decks and is similar to a hardwood floor. The wood is brought to the site pre-cut but unstained. The wood is then sanded, mounted in the boat deck, and stained (using a wood finish/varnish). Epoxy systems, consisting of base resins and activators, are used to glue the wood to the boat deck. A teak caulk is used to seal the joints, etc. to ensure the waterproofing. The teaking operations take place on the east side of the Assembly Building and on the south & west sides of the Materials Storage Building. Emissions from the teaking operations are emitted fugitively.

All normal manufacturing operations are conducted indoors except for limited touch-up, repair and buffing activities, which can be performed outside in the covered open work area on the south side of the lamination building. Buildings are not normally totally enclosed during normal manufacturing and fabrication operations. Finished boats are routinely tested on the pond adjacent to the plant.

Acetone, a non-VOC and non-HAP solvent, is used for cleaning in the Lamination Building and Assembly/Finishing Area within the Assembly Building. New, unused acetone is initially stored in the drum storage area until dispensed for use in the individual work areas. Used acetone is initially stored in the designated accumulation areas located within or immediately outside each building. The used acetone is subsequently either moved to the drum storage area and disposed off site, or recycled using an on-site acetone recycling still.

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

Title VI Activity – The air conditioning unit in the SW corner of the lamination building (50-ton unit) has two closed circuits, each having 47 lbs of refrigerant capacity.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fiberglass Boat Manufacturing
002	Wood & Fiberglass Cutting and Shaping Operations
003	Emergency Diesel Engine (Existing Stationary RICE)

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received 08/07/2013, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Regulations	
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing	001
40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	003
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

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. Not federally Enforceable - 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) and 62-210.200(Definitions), F.A.C.; Construction Permit 0810077-006-AC]

FW3. 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. The permittee shall comply with the following operation requirements:

A. The appropriate exhaust fans shall be operating whenever materials containing VOC's or OS's are being utilized and shall remain operating for at least 1 hour after the material usage has been completed.

B. All materials containing VOC's or OS's shall be stored in closed containers.

C. Recoverable clean-up solvents and miscellaneous VOC's and OS's used for clean-up of tools and equipment (does not apply to non-recoverable VOC and OS solvents used in conjunction with rags, etc.) shall be directed into containers that prevent evaporation into the atmosphere.

D. Work Practice controls shall include limiting the amount of clean-up solvents issued to employees. Employees shall use gloves, when practical, to reduce the need for clean-up solvents used for hand washing.

E. Immediately attend to all spills of materials that may emit VOC or OS emissions.

F. For each of the 11 exhaust stacks (LB1-LB8 & GC1-GC3), there shall be no device which either reduces the vertical momentum of the stack gas, or reduces the vertical dispersion of the stack gas.

G. The ventilation systems for this facility shall be operated and maintained in accordance with the manufacturer's instructions.

H. All equipment, pipes, hoses, lids, fittings, etc., shall be operated and maintained in such a manner as to minimize leaks, fugitive emissions and spills of materials. If applicable, this includes draining all VOC and OS containing fluids into closes containers during lengthy periods when materials are not in use.

[Rule 62-296.320(1), F.A.C. and Construction Permit No. 0810077-006-AC]

FW4. 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.]

FW5. 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. Maintenance of paved areas as needed.

b. Daily clean-up of work areas.

c. Regular mowing of grass and care of vegetation.

d. Limited access to plant property by unauthorized vehicles.

e. No visible emissions from the vents or doorways, or, if observed, that they are corrected within 24 hours.

[Rule 62-296.320(4)(c), F.A.C. and, proposed by applicant in Title V air operation permit application received 08/07/2013.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. 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. *(See also Appendix RR, Condition No. RR5.)*
[Rule 62-210.370(3), F.A.C.]

FW7. 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. *(See also Appendix RR, Condition No. RR6.)*
[Rule 62-213.205, 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. *(See also Appendix RR, Condition No. RR7.)*
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. 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]

***IMPORTANT NOTES TO PERMITTEE*:**

Permit Renewal - see Appendix TV, Condition No. TV18.
(Note - Renewal application is due 225 days prior to expiration date of this permit.)

Title V Semi-Annual Monitoring Reports - see Appendix RR, Condition No. RR4.

Subsection A. Emissions Unit No. 001 – Fiberglass Boat Manufacturing

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

EU ID No.	Brief Description
-001	Fiberglass Boat Manufacturing: The styrene/VOC emissions are primarily from the resin and gelcoat applications used in the boat building operations. The facility also used gelcoats, resins, paints, thinners and solvents in maintenance activities. Fugitive emissions of VOC include those resulting from the use of cleaners and solvents. This emissions unit is regulated under NESHAP; 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 0810077-006-AC]

A.2. Exhaust Stack Flow Rate - The exhaust stack flow rate for each of the 8 exhaust stacks (LB1 – LB8) on the south side of the Lamination Building shall not be less than 14,960 acfm.
[Construction Permit No. 0810077-006-AC]

A.3. Exhaust Stack Flow Rate - The exhaust stack flow rate for each of the 3 exhaust stacks (GC1 – GC3) on the east side of the Lamination Building used for ventilation of the Gelcoat Room shall not be less than 29,000 acfm.
[Construction Permit 0810077-006-AC]

Emission Limitations and Standards

(Permitting Note - The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

A.4. Styrene and Volatile Organic Compound (VOC) Emissions Limitation – The following maximum allowable Styrene and VOC emissions rates shall be verifiable on a monthly basis and shall not exceed the following:

	Maximum Allowable Emissions Rate	
Emission Category	lbs/hr (Monthly Average*	Tons Per Any Consecutive 12-Month Period
Styrene	78.2	175.0
Total VOC (includes Styrene)	N/A	235.6

* See Condition No. A.5.C.
[Rule 62-210.200 (PTE), F.A.C.; Construction Permit 0810077-006-AC]

Recordkeeping and Reporting Requirements

A.5. Recordkeeping - A log shall be established and maintained in order to document compliance with the limitations of Condition No. A.4. At a minimum, the Daily Logs and Monthly Logs shall record the following:

Daily Logs

A. Record the hours of operation, which will be used to calculate the allowable monthly average Styrene emission rate (lbs./hr.) of Condition No. A.4.

B. Record the date of all filter changes and its associated stack identification name, such as LB2, GC3, etc.

Monthly Logs (a "month" can also be defined as 13 – "4-week" periods per year, or a Department approved optional time period)

C. Calculate and record the emission rate (pounds per hour), based on a monthly average, for styrene as listed in Condition A.4.

D. Calculate and record the most recent consecutive 12-month period emission rate totals for Styrene and total VOC as listed in Condition No. A.4., in tons/year.

General Recordkeeping Requirements

E. Record the method of application (where applicable) for each material used (hand layup, spray layup, etc.).

F. Emissions of Styrene, Methyl methacrylate (MMA), Methylene Diphenyl Diisocyanate (MDI), and other volatile organic compounds (VOC) shall be determined as follows until notified by the Department. MDI emissions are generated only when using foam. Note, Styrene, MMA, and MDI are each considered a VOC and a HAP.

1. Styrene emissions shall be determined using the following equation:

$$\text{Emissions (tons)} = \frac{\text{Ms} \times \text{EF}}{2000 \text{ lb/ton}}$$

where:

Ms = amount of styrene containing material used (in tons)
EF = emission factor (lb/ton) for styrene monomer content (from table below)

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:

% Monomer	Resin** Hand (Non-Spray) Layup	Resin** Mechanical Atomized Spray Layup	Resin Mechanical Nonatomized* Spray Layup	Gel Coat** Mechanical Atomized Spray Layup	Gelcoat Mechanical Nonatomized* Spray Layup
18	39	51	39	138	67
19	41	54	41	148	70
20	43	58	43	158	79
21	45	61	45	168	88
22	48	64	47	178	97
23	50	68	49	189	106
24	52	71	51	200	115
25	55	75	54	211	124
26	57	78	56	221	133
27	59	82	58	233	142
28	62	86	60	244	151
29	64	90	62	256	160
30	67	94	64	269	169
31	69	97	66	281	178
32	71	102	68	295	187
33	74	105	71	308	196
34	77	112	74	322	205
35	80	118	77	336	214
36	83	127	80	354	223
37	86	136	83	371	232
38	90	146	86	390	241
39	92	156	89	408	250
40	95	166	93	427	259
41	98	176	96	446	268
42	100	187	99	466	278
43	112	192	102	477	287
44	117	202	105	495	296
45	122	212	108	513	305
46	127	221	111	532	314
47	133	232	115	551	323
48	138	242	118	571	332
49	143	252	121	590	341
50	148	263	124	609	350

* *Nonatomized* means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, and pressure fed resin rollers. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures.

** *The emission factors in these columns are based on a weighted average using the following assumptions:*

- *Using the Unified Emission Factors - 20% by weight of the facility's usage of resins and gelcoats are for reinforced plastic composites production for items such as hatches and doors, but not for hulls and decks.*

- *Using the National Marine Manufacturer Association's Factors – 80% by weight of the facility's usage of resins and gelcoats are for items such as decks and hulls.*

2. MMA emissions shall be determined by the following equations:

$$\text{Emissions(tons)} = \text{Mmma} \times \text{Cmma} \times 0.75$$

where:
Mmma = amount of MMA containing material used (in tons)
Cmma = MMA content (percent/100)

3. MDI emissions, which are only emitted when using foam, shall be determined by the following equation:

Emissions (tons) = Tons of Foam Used x 0.0001337

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

$$\text{Emissions(tons)} = \text{Mvoc} \times 1.00 \times \text{Cvoc}$$

where:
Mvoc = amount of VOC containing material used (in tons)
Cvoc = VOC content (percent/100)

G. Each log, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle.

H. When determining the VOC emissions and Styrene emission rates (including the emissions from the insignificant activities), the percent of solids in the recovered materials shall be documented and accounted for in the emission calculations, if applicable.

I. The daily logs shall be completed by the end of the next business day and monthly logs shall be completed by the end of the following month. Supporting documentation (MSDS sheets, purchase orders, etc.) shall be kept for each material, which includes sufficient information to determine VOC emissions and Styrene emissions.

J. The logs/records shall be kept at the facility for a minimum of five (5) years and made available to the Department upon request.

The VOC and styrene emission summary, calculations, and records used to determine emissions shall be recorded in a permanent form suitable for inspection by the Department upon request.
[Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.]

Other Requirements

A.7. Reasonable Assurances - Changes to the air management systems of this facility (including air conditioning and other air handling equipment) may render the assumed VOC capture efficiencies ineffective. The Compliance Assurance Program of the Department's Southwest District Office shall be notified when a change is contemplated, or when any portion of an existing air management system is damaged in any manner. This notification shall include any potential impact on VOC emissions.
[Rule 62-4.070(3), F.A.C.; Construction Permit 0810077-006-AC]

A.8. Federal Rule Requirements - In addition to the specific conditions listed above, this emissions unit is/are also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart VVVV – National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing. Note, these requirements are for only Open Molding Resin and Gel Coat Operations using Emissions Averaging Option and/or Compliant Materials Option. Requirements relating to add-on-control devices have been deleted, since this emission unit does not utilize add-on-control devices. Additionally, when demonstrating compliance with 40 CFR 63, Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used, it must be used for a minimum of 12-consecutive months before switching to the other option.
[Rules 62-204.800 and 62-213.440, F.A.C.]

Subsection B. Emissions Unit No. 002 – Wood & Fiberglass Cutting and Shaping Operations

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

EU ID No.	Brief Description
-002	Wood & Fiberglass Cutting and Shaping Operations: Wood/Fiberglass cutting and shaping are performed in the Mill Shop (1st Floor) and Cabinet Shop (2nd Floor). Both shops use various tools to cut the stringers, floors, bulkheads, bracing, shelves, cabinets, etc. Tools such as the following are used: - CNC Accurouter Router - CNC Thermwood Router - Onsrud Table Router - Table Routers (2) - 12" Delta Table Saw - 10" Delta Table Saw - Band Saws (2) - Rockwell Belt and Radial Sander Unconfined particulate emissions from both shops are collected by a central dust collection system and controlled by a Murphey-Rodgers, Model MRSE-17-RAL baghouse. Fugitive particulate emissions from the Mill Shop are exhausted through vents MH1 to MH4. The baghouse and 4 vents are located on the east half of the north side of the building. This emission unit is not subject to CAM, since there is no applicable allowable mass emission limitation and uncontrolled emissions are expected to be less than 100 tons/yr.

Essential Potential to Emit (PTE) Parameters

B.1. Hours of Operation. The Mill Shop's/Cabinet Shop's wood and fiberglass cutting and shaping equipment is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.300(PTE), F.A.C.; Construction Permit 0810077-008-AC]

Emission Limitations and Standards

B.2. Visible Emissions (VE) Limitations - Visible emissions from the baghouse controlling the Mill Shop and Cabinet Shop shall not exceed 5% opacity.
[Rule 62-297.620(4), F.A.C.; Construction Permit AC41-189663]

Test Methods and Procedures

B.3. Compliance Test Methods - Required compliance tests shall be performed in accordance with the following reference method:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rule 62-297.401, F.A.C.]

B.4. Common Testing Requirements - Unless otherwise specified, compliance tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.
[Rule 62-297.310, F.A.C.]

B.5. Compliance Tests Prior To Renewal - Compliance tests shall be performed for VE once every 5 years. The tests shall occur during 8-12 months prior to the expiration date of this permit for obtaining a renewed operating permit to demonstrate compliance with the visible emission limits in Specific Condition B.2.
[Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Recordkeeping and Reporting Requirements

B.6. Reporting Schedule - The permittee shall keep adequate records of the operating hours of this emission unit in order to properly complete required Annual Operating Reports.
[Rules 62-210.370(3) and 62-213.440(1)(b), F.A.C.]

B.7. Other Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

Other Requirements

Reasonable Assurances

B.8. Reasonable Precautions - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. These precautions shall include the following:

A. Particulate emissions from the principle woodworking and fiberglass cutting, grinding, and sanding operations shall be controlled at the point of origin by pickup points from the baghouse. The baghouse shall be in service at all times that the above operations are being performed.

B. In order to ensure that the material collected in the baghouse is properly being handled and does not become a fugitive dust problem outside the assembly building, the permittee shall ensure the baghouse hopper is covered, except when transferring collected materials into the disposal container. After the collected material is placed in the disposal container, the material is transferred to a garbage compactor, which is totally enclosed.
[Rule 62-296.320(4)(c), F.A.C.; Construction AC41-189663]

B.9. Reasonable Indicator - As an indicator that the reasonable precautions in Condition No. B.8. are adequate, there shall be no visible emissions (5% opacity) from the following:

A. The Assembly Building's openings or vents;
B. The activity associated with emptying the baghouse's hopper to the disposal containers;
C. Handling of the disposal containers.

If this value is exceeded, it shall not be considered a violation in and of itself, but may be a violation of the reasonable precautions in Condition No. B.8.
[Rule 62-4.070(3), F.A.C.; Construction Permit AC41-189663]

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

EU No.	Brief Description
-003	Emergency Diesel Engine (Existing stationary RICE)

This emissions unit consists of the following Emergency Diesel Engine:

Description	Manufacturer	Model No.	Power (bhp)	Date of Construction
Emergency Fire Pump	Not Available	Not Available	192	1999

Federal Rule Requirements

C.1. 40 CFR 63, Subpart ZZZZ Requirements. The emergency diesel engine included in this emissions unit is subject to the applicable requirements contained in 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and 40 CFR 63, Subpart A - General Provisions. The applicable requirements for each engine (based on category and HP rating) are shown in Appendix NESHAP - 40 CFR 63, Subpart ZZZZ - Summary of Requirements.

*{**Permitting Note:** See "Appendix NESHAP-40 CFR 63, Subpart A" and "Appendix NESHAP-40 CFR 63, Subpart ZZZZ"}*

[Rule 62-4.070(3), F.A.C.; 40 CFR 63 Subpart A and 40 CFR 63 Subpart ZZZZ]

Essential Potential to Emit (PTE) Parameters

C.2. Hours of Operation. The permittee must operate this emissions unit according to the requirements in 40 CFR 63.6640(f)(1) through (3). In order for the engine to be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) through (3), is prohibited. If the engine is not operated according to the requirements in 40 CFR 63.6640(f)(1) through (3), the engine will not be considered an emergency engine under 40 CFR 63, Subpart ZZZZ and must meet all requirements for non-emergency engine.

For the engine listed in this emissions unit:

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) Operation of emergency stationary RICE for any combination of the purposes specified in 40 CFR 63.6640(f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year is allowed. Any operation for non-emergency situations as allowed by 40 CFR 63.6640(f)(3) of this section counts as part of the 100 hours per calendar year allowed by 40 CFR 63.6640(f)(2).

(i) - Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for

maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) - Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) - Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in 40 CFR 63.6640(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[Rule 62-210.200 (Potential to Emit), F.A.C., 40 CFR 63.6640(f)]

General Requirements for Existing Engines ≤ 500HP

C.3. Work or Management Practice Standards. The permittee shall comply with the requirements listed in the following table for each engine.

For each…	You must meet the following requirements except during periods of startup…	During periods of Startup you must …
1. Emergency stationary CI RICE and black start stationary CI RICE [1]	a. Change oil and filter every 500 hours of operation or annually, whichever comes first.[2] b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.[3]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.[3]

[1] *If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of 40 CFR 63, Subpart ZZZZ, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in 40 CFR 63.6620 and Table 4 to this subpart.*

[2] *Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) or (j) in order to extend the specified oil change requirement in the table above (i.e., applicable requirements from Table 2c of 40 CFR 63, Subpart ZZZZ).*

[3] *Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.*

[40 CFR 63.6602 and 40 CFR 63, Table 2c]

Monitoring of Operations for Existing Engines ≤ 500HP

C.4. General Maintenance. The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
[40 CFR 63.6625(e)]

C.5. Hour Meter. A non-resettable hour meter must be installed if one is not already installed.
[40 CFR 63.6625(f)]

C.6. Time Spent at Idle. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in 40 CFR 63, Subpart ZZZZ, Table 2c (i.e., Specific Condition No. K.3) to this subpart apply.
[40 CFR 63.6625(h)]

C.7. Optional Oil Analysis Program. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63, Subpart ZZZZ, Tables 2c (i.e., Specific Condition No. K.3). The oil analysis program must be performed in accordance with the requirements of 40 CFR 63.6335(i).
[40 CFR 63.6625(i)]

Compliance for Existing Engines ≤ 500HP

C.8. Continuous Compliance. Each unit must be in compliance with the applicable Work or Management Practice Standards of Specific Condition No. K.3. at all times.
[40 CFR 63.6605(a)]

C.9. Operation and Maintenance of Equipment. At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
[40 CFR 63.6605(b)]

C.10. The permittee must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Specific Condition No. K.3. that apply to you according to methods specified in 40 CFR 63, Subpart ZZZZ, Table 6.
[40 CFR 63.6640(a)]

C.11. The permittee must also report each instance in which the applicable requirements in 40 CFR 63, Subpart ZZZZ, Table 8 were not met.
[40 CFR 63.6640(e)]

Recordkeeping and Reporting Requirements for Existing Engines ≤ 500HP

C.12. Maintenance Plan Records. You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.
[40 CFR 63.6655(e)]

C.13. Hours or Operation Records. If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the nonresettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in 40 CFR 63.6640(f)(2)(ii) or (iii) or 40 CFR 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(1) An existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to nonemergency engines.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

[40 CFR 63.6655(f)]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

Appendix I, List of Insignificant Emissions Units and/or Activities

Appendix NESHAP 40 CFR 63, Subpart A – General Provisions

Appendix NESHAP 40 CFR 63, Subpart VVVV - National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing [for Open Molding Resin and Gel Coat Operations using Emissions Averaging Option and/or Compliant Materials Option]

Appendix NESHAP 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Appendix RR, Facility-wide Reporting Requirements

Appendix TR, Facility-wide Testing Requirements

Appendix TV, Title V General Conditions

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis

Table H, Permit History

Table 1, Summary of Air Pollutant Standards and Terms

Table 2, Compliance Requirements