FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

DRAFT PERMIT

PERMITTEE

Century Boats
40047 County Road 54 East
Zephyrhills, FL 33540

Authorized Representative:
Mr. Bryan Lucius, President

Air Permit No. 1010518-001-AC
Permit Expires: xx/xx/20xx
Century Boats
Minor Air Construction Permit
Fiberglass Boat Assembly Facility

This is the final air construction permit to operate a fiberglass boat assembly facility. The work will be conducted at the Century Boats plant (Standard Industrial Classification No. 3732). The facility is located in Pasco County at 40047 County Road 54 East in Zephyrhills, Florida. The UTM coordinates are Zone 17, 386.78 km East, and 3125.71 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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

Due to 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 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.

Executed in Hillsborough County, Florida

DRAFT

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Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination), the Final Permit and the Appendices) 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 the date indicated below to the persons listed below.

Bryan Lucius, President, Century Boats, blucius@centuryboats.com

Fred Brown, Century Boats, fbrown@centuryboats.com

Dean H. Myers, PE, General Environmental Engineering, Inc. deanhmyers@earthlink.net

Erin DiBacco, SWD Compliance Assurance Program Team Leader Manager (erin.dibacco@dep.state.fl.us)

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

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(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility manufactures fiberglass boats. Boats of various sizes are assembled at the facility on an individual basis depending on demand. Fugitive styrene emissions throughout the boat production floor including application stations and curing processes discharge to the atmosphere through bay doors and five industrial ventilation fans (approximately 56" X 56", 10,000 cfm each) located along the west wall of the production area. Dust generated in cutting, drilling and grinding operations is captured by an industrial dust collector located inside the building with no external discharge. The existing facility consists of the following emissions unit (EU).

Project Description and Proposed Emission Units

This is an after-the-fact construction permit for a facility that began operation in February 2013. The facility manufactures fiberglass boats. Boats of various sizes are assembled at the facility on an individual basis depending on demand. This project will create the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Fiberglass Boat Manufacturing

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants VOC and HAP. The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

No previous air permits have been issued for this facility.

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SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

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; and

d. Appendix D. Common Testing Requirements; and

e. Appendix E. Unified Emission Factors for Open Molding of Composites

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 - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical

change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit - This permit authorizes initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after issuance of this permit. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent month of records/logs specified in Specific Condition No. A.7.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

A. EU No. 001 Fiberglass Boat Manufacturing

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Fiberglass Boat Manufacturing – Styrene based gelcoat catalyzed with peroxide is applied to a mold via spray lay-up techniques. The gelcoat surface contacting the mold becomes the boat surface. Styrene based and catalyzed resin is subsequently applied via non-atomized wet out guns to the fiberglass mat and roving material, or via chopper guns. The resin impregnated fiberglass is then hand applied to the mold over the gelcoat layer to provide the necessary structural support. After sufficient layers of resin coated fiberglass are applied to the mold, hand rollers are typically used to force the resin into the fiberglass. Additional layers of resin coated mat are applied as needed to achieve the required thickness. The boat is removed from the mold when fully cured. The rough edges are trimmed and ground by hand powered tools in the Ventilator Finish Room. Holes are cut as needed to accommodate hardware, controls and other items installed in the final assembly process.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

EMISSIONS STANDARDS

A.2. VOC/HAP Emission Limitations **-** In order to establish the facility as a non-Title V minor source of VOC and HAP emissions, the following emission limits shall apply facility-wide.

a. Hazardous Air Pollutants (HAPs) –

(1) Styrene emissions shall not exceed 7.0 tons in any 12 consecutive month period;

(2) Individual HAP emissions (other than Styrene) shall not exceed 1.0 tons in any 12 consecutive month period;

(3) Total combined emissions of all HAPs, including Styrene, shall not exceed 8.0 tons in any 12 consecutive month period.

c. Volatile Organic Compounds (VOC) - Total combined emissions of all VOC shall not exceed 8.0 tons in any 12 consecutive month period.

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit Application received 12-16-2013]

A.3. Unconfined Particulate Matter - In addition to the precautions to prevent unconfined particulate emissions listed in Common Condition #9 of Appendix C, all fiberglass cutting and grinding operations producing significant PM emissions will be conducted within the cutting and grinding room on the west wall equipped with extraction fans and panel filters.
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit Application Received December 16, 2013]

A.4. Volatile Organic Compound Emissions and/or Organic Solvent Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

a. all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials;

b. perform mixing/blending operations with vessel lids in place when practical;

c. tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;

d. immediately confine and clean up VOC and/or solvent spills, and ensure wastes are placed in closed containers for reuse, recycling or proper disposal; and

e. used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.]

A.5. Emission Calculations - In order to document compliance with Specific Condition No. A.2., the permittee shall calculate emissions based on the following methodology:

Material Usage Rate (lbs) ***x*** Species Concentration (% by weight)* ***x*** Emission Factor (lbs emitted/lbs applied)* = Species Emission Rate (lbs)

* Styrene and methyl methacrylate (MMA) emission factors shall be determined in accordance with the attached Unified Emission Factors (UEF) for Open Molding of Composites table dated July 23, 2001. Emission factors for any other VOC or HAP shall be 1.0 unless lower emission factors are approved by the Department in writing.

[Rules 62-4.070(3), F.A.C.; Construction Permit Application received 12/16/2013]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.6. Monthly VOC and HAP Recordkeeping - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition No. A.2. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased and the material is not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Century Boats, 1010518, E.U. No. 001, Fiberglass Boat Manufacturing);

b. month, year, and method used for records (usage or purchase);

c. monthly total quantity in gallons of each material (resin, gelcoat, solvent, etc.) that contains Styrene, HAPs, and/or VOCs;

d. percentage by weight of each individual HAP (including Styrene) and VOC for each material identified in c., above;

e. appropriate emission factor(s), and method(s) of application (i.e., mechanical atomized, mechanical non-atomized) used to determine emissions;

f. monthly total of Styrene, other individual HAP, total HAP and VOC emissions (tons/month) based on c., d. and e. above; and

g. most recent 12 consecutive month period total of Styrene, other individual HAP, total HAP and VOC emissions (tons/12 consecutive month period) based on f. above.

The monthly logs shall be completed by the 15th of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each VOC and HAP containing material.

[Rule 62-4.070(3), F.A.C.; Construction Permit Application Received 12/16/2013]