Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Stamas Yacht, Inc.
300 Pampas Ave
Tarpon Springs, FL 34689

Air Permit No. 1030226-009-AC
Permit Expires: 12/31/2014
Minor Air Construction Permit
Project Name: Replace Permit No. 1030226-001-AC

Authorized Representative:
Mr. John Stamas, President

This is the final construction permit to remove the material usages as a specific condition and to state that the material usages are indicators of compliance with the emissions limits, but are not in themselves enforceable conditions in the fiberglass boat manufacturing operation, Emissions Unit No. 001. The proposed work will be conducted at the Stamas Yacht, Inc., (Standard Classification No. 3732). The facility is located in Pinellas County at 300 Pampas Ave, Tarpon Springs, Florida. The UTM coordinates are Zone 17, 326.87 km East, and 3115.30 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

_____ _____

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.

John Stamas, Stamas Yacht, Inc. (john@stamas.com)
Kate Dohme, Stamas Yacht, Inc. (accounting@stamas.com)
Tom John, P.E., Tom John, Professional Engineer (tjengr@msn.com)
Gary Robbins, PCAQD (grobbins@co.pinellas.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.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The fiberglass boat manufacturing facility consists of a Mold Storage Building, Wood Mill & Lumber Storage Building, Prototype & Development Building, Fiberglass Lamination Building, and an Assembly Building with Storage Room as shown in Attachment 1submitted with the renewal application dated October 17, 2013. Volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions from the facility are generated from the gelcoat application, resin application, and other miscellaneous VOC/HAP based adhesives, putties, mold care, paints/solvents, cleanup and related materials used in the manufacture of fiberglass boats.

Project Description and Affected Emissions Unit

This is a minor construction permit for an existing major facility. The applicant proposes to remove the material usages as a specific condition and to state that the material usages are indicators of compliance with the emissions limits, but are not in themselves enforceable conditions in the current permit.

This project will modify the following emissions unit:

Facility ID No. 1030226

EU ID No.	Emission Unit Description
001	Fiberglass Boat Manufacturing Operation

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

Brief Description of Exempt Emissions Units and/or Activities

1. Putty mixers, resin and gelcoat patch mixing (material usages (purchases) are included in site recordkeeping).
2. Foaming operations (material usage (purchases) are included in site recordkeeping).
3. Internal combustion engines for pressure washers, forklifts, travel lifts, and other activities.
4. Hazardous materials and recoverable solvents accumulation, storage and transfer, which activities are performed in accordance with applicable regulations.

[Rule 62-210.300(3)(b)1., F.A.C.]

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

Replaces Construction Permit 1030226-001-AC and modifies Title V Permit No. 1030226-007-AV

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Resource Management Section. The Southwest District Office's 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: 813-632-7600

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

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

   Pinellas County Air Quality Division
   509 East Avenue South, Suite 138
   Clearwater, Florida 33756
   Telephone: 727-464-4422

   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;
   d. Appendix D. Common Testing Requirements;
   e. Appendix E. NESHAP 40 CFR 63, Subpart A *(a separate document)*;
   f. Appendix F. NESHAP 40 CFR 63, Subpart VVVV *(a separate document)*; and
   g. Appendix G. NESHAP 40 CFR 63, Subpart VVVV Applicability Table *(a separate document)*.

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 emissions 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 Title V Air Operation Permit - This permit authorizes modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions unit(s) and is concurrently processed with this construction permit.

[Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

A. EU No. 001 – Fiberglass Boat Manufacturing Facility

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

EU ID No.	Emission Unit Description
016	Fiberglass Boat Manufacturing Facility: The styrene/VOC emissions are primarily from the resin and gelcoat applications used in the boat building operations. The facility also uses 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. The material usage as proposed by the facility is shown here for information only:

Material	Quantity
a. Resin	500,000 pounds
b. Gelcoat	100,000 pounds
c. Other materials containing VOCs	90,000 pounds
d. 766 E 8265 Surf Neo Gel0Kote (or equivalent) (= approx. 2.5 tons/yr. of titanium dioxide emissions)	50.0 tons
e. Cadox M-50 Red (or equivalent) (= less than 0.6692 tons/yr of MEKP emissions)	10,000 pounds
f. 353 Vinylux Primewash Base (or equivalent) (= approx. 0.00075 tons/yr. of Chromate emissions)	10 gallons
g. AL200 Fiberglass Primer Aluminum (or equivalent) (= approx. 0.203 tons/yr. of Methylene Chloride emissions)	50 gallons

(Permitting Note: The material usages shown above are indicators of compliance with emissions limits but are not in themselves enforceable conditions.)

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(1) & (3) and 62-210.200 (Definitions – Potential to Emit (PTE)), F.A.C.; Construction Permit No. 1030226-009-AC]

EMISSIONS LIMITATIONS AND STANDARDS

A.2. Styrene and Volatile Organic Compound (VOC) Emissions Limitation – The following Styrene and VOC emissions rates shall not exceed the following:

Pollutant	Tons per any consecutive 12-month period
Styrene	24.9
Total VOC, which also includes HAPs (e.g., Styrene) that are a VOC and VOCs from catalyst, putty, painting, fillers, cleanup, etc.	49.9

[Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit 1030226-009-AC]

Recordkeeping and Reporting Requirements

A.3. Recordkeeping Requirements - In order to demonstrate compliance with Specific Condition No. A.2., the permittee shall maintain monthly logs. The monthly logs shall be based on the monthly purchase of all VOC/Styrene containing materials (Resin, Gelcoat, Putties, Fillers, etc.) provided that all materials used at this facility are purchased. At a minimum, the logs shall record the following:

a. the total quantity, in lbs. of each material purchased that contains VOCs;

b. the total quantity, in lbs. of all materials purchased that contain VOCs for each category as shown in material usage information in the emissions unit description a, b. and c, along with a cumulative consecutive 12 month total for each of the 3 categories;

c. the total quantity of each material purchased as shown in material usage information in the emissions unit description d.,e.,f., and g. in the associated units shown along with a cumulative 12 consecutive month total for each of the 4 categories;

d. the percentage (%) by weight of VOCs along with the (%) by weight of styrene for each material/product purchased that contains VOCs and HAPs;

e. the method of application (where applicable) for each material purchased (see Table below); and

f. the total quantity, in tons, for each emission category (Styrene & Total VOC) as shown in Condition No. A.2., along with a cumulative 12 consecutive month total for each category.

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

When determining the VOC emissions and Styrene emission rates, the percent of solids in the recovered materials shall be documented and accounted for in the emission calculations, if applicable.

Supporting documentation (MSDS sheets, purchase orders, etc.) shall be kept for each material which includes sufficient information to determine VOC emissions and Styrene emissions.

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 or PCAQD upon request. The monthly records shall have the facility's name, emission unit number (001), and be completed by the end of the following month. The logs/records shall be kept at the facility for a minimum of 5 years.

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

A.4. Emissions Calculation Requirements - Emissions of Styrene, Methyl methacrylate (MMA), and other volatile organic compounds (VOC) shall be determined as follows until notified by the Department. Note, Styrene and MMA 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

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

Other Requirements

A.5. Federal Rule Requirements - In addition to the specific conditions listed above, this emissions unit is also subject to the applicable provisions of 40 CFR 63, Subparts A - General Provisions to 40 CFR 63 and VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing as adopted and incorporated by reference in Rule 62-204.800, F.A.C. The applicable provisions for this facility are listed in Attachment A - Applicability Table for 40 CFR 63 Subpart VVVV and Subpart A. 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. The complete MACT standard is in the attached Appendix 40 CFR 63, Subpart VVVV, which is a part of this permit.
[Rule 62-204.800, F.A.C.; 40 CFR 63, Subparts A and VVVV]