Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vineyard, Jr.
Secretary

FINAL PERMIT

PERMITTEE

Nautical Structures Industries, Inc.
10351 72nd Street North
Largo, FL 33777

Authorized Representative:
Mr. Robert Bolline, President

Air Permit No. 1030540-002-AO
Permit Expires: 03/15/2016
Site Name : Largo Site
Minor Air Operation Permit
Project Name: Initial Operating Permit

This is the final air operation permit, which authorizes the manufacturing of aluminum and stainless steel boat/yacht accessories. The proposed work is conducted at the Largo Site (Standard Industrial Classification No. 3536). The facility is located in Pinellas County at 10351 72nd Street North in Largo, Florida. The UTM coordinates are Zone 17, 328.92 km East, and 3083.59 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

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 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

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice,

regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Mara Grace Nasca March 15, 2011
Mara Grace Nasca Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including 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 March 16, 2011 to the persons listed below.

Mr. Robert Bolline, Nautical Structures, Inc. (bbolline@nautical-structures.com)
Mr. Carl Freeburg, Nautical Structures, Inc. (cfreeburg@nautical-structures.com)
Mr. Kenneth E. Given, P.E., Air Testing & Consulting, Inc. (ken@airtest.fdn.com)
Mr. 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.

Patricia Pickett March 16, 2011
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Nautical Structures - Largo Site

The facility manufactures aluminum and stainless steel boat/yacht accessories. This includes davits, deck cranes, overhead beam cranes, transom lifts, gangplanks, passerelles, and accommodation stairs for use on board. The painting activities at this facility are subject to the Volatile Organic Compound - Reasonable Available Control Technology (VOC-RACT) requirements of Rule 62-296.513, F.A.C.

The existing facility consists of the following emissions unit:

Facility ID No. 1030540	
ID No.	Emission Unit Description
001	Painting Operations

Project Description

This is the initial operation permit for this facility to manufacture aluminum and stainless steel boat/yacht accessories.

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

Exempt Activities

- Grinding Activities (grinding metal materials, mostly aluminum)
  [Rule 62-210.300(3)(b), F.A.C.]

FACILITY REGULATORY CLASSIFICATION

- The facility is not 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 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 volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

Initial Operation Permit, Incorporate terms and conditions of Construction Permit 1030540-001-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

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

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   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 (PCAQD). The mailing address and phone number of the Local Air Program is:

   Pinellas County Air Quality Division
   300 South Garden Avenue
   Clearwater, Florida 33756
   Telephone: 727-464-4422

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.
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. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to Pinellas County Air Quality Division (PCAQD) no later than 60 days prior to the expiration date of the operation permit. To properly apply for an 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 two months of records/logs specified in Specific Condition No. A.7.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	The painting operations consist of two paint spray booths, each has its own stack. One paint spray booth is manufactured by Binks and the other is manufactured by DeVilbiss. Metal material, mostly aluminum, is brought from storage to fabrication. After fabrication it is prepped by grinding down excess material. The metal material is cleaned, and then goes to final prep where Bondo is used. Then the metal material goes into the Binks spray booth where primer is added. In the DeVilbiss booth, the parts are painted.

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(PTE), F.A.C.; Construction Permit 1030540-001-AC]

EMISSIONS STANDARDS

A.2. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emissions: Total emissions of VOCs and HAPs from this facility shall not exceed the following tons per any consecutive 12-month period:

Pollutant	Tons/consecutive 12-month period
Total VOC emissions	9.0
Total HAP emissions	9.0

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030540-001-AC]

A.3. Material VOC Content: This facility is limited to the use of coatings that do not exceed 3.5 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator ("as applied"). Unless directed into containers that prevent evaporation into the atmosphere, the use of solvent washings shall also be included in the "as applied" VOC coating content.
[Rules 62-296.513(2)(a)2. and (2)(c), F.A.C.]

A.4. General Standards - Objectionable Odor: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is 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.
[Rules 62-210.200("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, §58-178]

A.5. General Standards - (VOC) Emissions and/or (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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following:

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. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere or become subject to Specific Condition No. A.3.

c. Tightly cover or close all VOC and/or solvent containers when they are not in use.

d. Prevent excessive air turbulence across exposed VOCs.

e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Pinellas County Code, §58-178; Construction Permit 1030540-001-AC]

A.6. Fugitive Emissions Opacity Standard: In order to provide reasonable assurance the panel filter systems are adequately controlling emissions of unconfined particulate matter, visible emissions from the paint spray booths should not exceed 5 percent opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1030540-001-AC]

RECORDS AND REPORTS

A.7. VOC/HAP Recordkeeping: In order to document compliance with the limitations of Specific Condition Nos. A.2. and A.3., the permittee shall maintain a log at the facility which documents the following:

Daily:

a. Facility name, Facility ID No. (1030540), Emission Unit No. & Description (001-Painting Operations), and applicable rule [62-296.513(2)]

b. The application method and substrate type (metal, plastic, paper, etc.)

c. The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent used in gallons at each point of application, including exempt compounds

d. The VOC content as applied in each coating and solvent

e. The date for each application of coating and solvent

f. The amount of each Surface Preparation, Clean-Up, Wash-Up of solvent (including exempt compounds) used in gallons and the VOC content of each

Monthly:

g. Facility name, Facility ID No. (1030540), Emission Unit No. & Description (001-Painting Coating Operations)

h. The raw material usage of each coating and solvent (gallons)

i. The VOC and total HAP content in each coating and solvent (tons)

j. The VOC and total HAP emissions from the use of coatings (tons)

k. The VOC and total HAP emissions from the use of solvents (tons)

l. The most recent consecutive 12-month total of raw material (coatings and solvents) used (gallons)

m. The most recent consecutive 12-month totals of VOC emissions and total HAP emissions from the use of coatings (tons)

n. The most recent consecutive 12-month totals of VOC emissions and total HAP emissions from the use of solvents (tons)

o. The most recent consecutive 12-month totals (coatings and solvents) of total VOC emissions and total HAP emissions (tons)

Supporting documentation (MSDS sheets, purchase orders, U. S. EPA "VOC DATA SHEETS", etc.) shall be kept for each paint, coating, thinner, solvent and other material used in the painting and coating operations which includes sufficient information to determine VOC and HAP emissions.

Daily records shall be completed within five (5) calendar days and monthly records shall be completed within ten (10) calendar days of the end of each month. These records shall be retained on file at the facility for at least three (3) years and shall be made available to the Department and the Pinellas County Air Quality Division (PCAQD) upon request.

[Rules 62-4.070(3), 62-4.160(14)(b), 62-296.500(2)(b), and 62-296.513(2), F.A.C.; Pinellas County Code §58-90; Construction Permit 1030540-001-AC]