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. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Nautical Structures
7301 114th Avenue North
Largo, FL 33773

Authorized Representative:
Mr. Robert Bolline, President

Air Permit No. 1030540-003-AC
Permit Expires: 12/31/2012
Minor Air Construction Permit
Project Name: Facility Relocation and Modification

This is the final air construction permit, which authorizes the relocation and modification of Nautical Structures. The proposed work will be conducted at Nautical Structures (Standard Industrial Classification No. 3536). The new facility will be located in Pinellas County at 7301 114th – Avenue North in Largo, Florida. The UTM coordinates are Zone 17, 328.7 km East, and 3084.8 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 Final permit.

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. 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

_____ _____

Cindy Zhang-Torres, P.E. Effective Date
Air Permitting Manager
Southwest District

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 _____ to the persons listed below.

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

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 facility manufactures aluminum and stainless steel boat/yacht accessories. This includes boat 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 Rules 62-296.500 and 62-296.513, F.A.C.

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

Project Description and Affected Emission Unit

This construction permit is for the relocation and modification of the existing facility. The facility will be moved from 10351 72nd Street North in Largo, Florida to 7301 114th Avenue North in Largo, Florida. The new facility will have eight booths for various purposes, as described in the exempt emission activities and emission unit specific conditions sections of the permit. This project will modify the following emissions units.

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

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

Exempt Emission Activities

– Buffing, Sanding, and Polishing Activities (mostly aluminum) in the following booths:

Booth	Activity
1	Buffing
3	Bondo Application
5	Final Sanding
7	#1 Sanding & Polishing
8	#2 Sanding & Polishing

[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 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

Replaces Permit No.103540-001-AC; relocating the facility.

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 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.]

9. 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.]

11. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit(s) and 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(s). The permittee shall apply for a Non-Title V air operation permit no later than 180 days after commencing operation at the new facility (see Section 3., Specific Condition No. A.7.). 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 two months of records/logs specified in Specific Condition No. A.9.

The application shall be submitted to the Permitting Authority with a copy to PCDEM (Compliance Authority).

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

A. EU No. 001 Painting Operations

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	The painting operations consist of three paint spray booths, each has its own stack: Booth #2 – 1st Prime Application Booth #4 – Paint Application Booth #6 – 2nd Prime Application 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 a spray booth where primer is added. The parts are then 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.]

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.; Permit application dated 08/24/11]

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]

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.]

NOTIFICATION REQUIREMENTS

A.7. Notification of Operation Commencement: The permittee shall notify the Permitting and Compliance Authorities in writing of the date of commencing operation at the new facility of the EU No. 001, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

A.8. Notification of Renovation/Demolition: If there are any activities during the relocation that meet the definitions of renovation or demolition activities under 62-257 F.A.C. (Asbestos Program) or Pinellas County Code 58-146 through 149 the permittee shall ensure that asbestos surveys, notifications and removals are properly conducted under those rules. Compliance assistance is available at the Pinellas County website

http://www.pinellascounty.org/environment/airquality/default.htm, or by calling Pinellas County at 727-464-4422.
[Rule 62-257, F.A.C.; Pinellas County Code §58-146 through 149]

RECORDS AND REPORTS

A.9. 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]