



Environmental Protection and Growth Management Department  
**ENVIRONMENTAL ENGINEERING AND PERMITTING DIVISION**  
1 North University Drive, Mailbox 201, Plantation, Florida 33324  
954-519-1283 • FAX 954-519-1495

Pipewelders Marine, Inc.  
2965 W. State Road 84, Marina Mile  
Fort Lauderdale, Florida 33312

Air Permit No. 0112326-005-AF  
Federally Enforceable State Operating Permit  
Broward County, Florida

Authorized Representative:  
Mr. Javier Etchart, Composites Manager

## PROJECT

This is the final federally enforceable state operation permit, which authorizes Pipewelders Marine, Inc. to manufacture, assemble, repair and install custom boat accessories, such as boat tops, tuna towers and casing for electrical equipment. This project renews the federally enforceable state operating permit (FESOP) 0112326-004-AF which limits VOC and HAP emissions below the Title V major source thresholds, i.e. 100 tons per year (TPY) for Volatile Organic Compounds (VOC), 10 TPY for individual Hazardous Air Pollutants (HAPs) and 25 TPY total HAPs emissions in any consecutive twelve-month period. This project also revises the potential emissions. The regulatory classification, emissions limits and applicable requirements of the facility will not change.

The Standard Industrial Classification No. is 3089, and the North American Standard Classification System No. is 326121. The facility is located in Broward County at 2965 W. State Road 84, Marina Mile, Fort Lauderdale, Florida. The Latitude and Longitude are 26° 05' 8.97" North and 80° 10' 54.89" West, respectively. The permit is organized into five (5) sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Facility Wide Conditions); Section 4 (Emissions Unit Specific Conditions); and Section 5 (Appendices). The permit contains numerous acronyms and abbreviations defined in Appendix A of Section 5.

**Permitting Authority:** Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Environmental Engineering and Permitting Division (EPPD). The Permitting Authority's physical address is: One North University Drive, Mailbox 201, Plantation, Florida 33324. The Permitting Authority's telephone number is 954/519-1283.

**Petitions.** A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954/357-7600, Fax: 954/357-7641). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must 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

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## FINAL PERMIT

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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, F.A.C.

A petition that disputes the material facts on which the EEPD's action is based must contain the following information: (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 how and when each petitioner received notice of the agency action or proposed action; (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, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; 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 permitting authority'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, F.A.C.

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 permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954/357-7600, Fax: 954/357-7641, 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 EEPD.

0112326-005-AF Effective Date: June 15, 2017  
Renewal Application Due Date: April 15, 2017  
Expiration Date: June 15, 2022

Executed in Plantation, Florida

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Robert C. Wong  
Environmental Program Supervisor  
ENVIRONMENTAL ENGINEERING AND PERMITTING  
DIVISION

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**FINAL PERMIT**

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**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package 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 following persons.

Mr. Javier Etchart, Pipewelders Marine, Inc., [javieretchart@pipewelders.com](mailto:javieretchart@pipewelders.com)

[Mr. Scott Coller, Pipewelders Marine, Inc., scottcoller@pipewelders.com](mailto:Mr.ScottColler@pipewelders.com)

Ms. Diane Pupa, Permitting Program Administrator, Florida Department of Environmental Protection /Southeast District, [diane.pupa@dep.state.fl.us](mailto:diane.pupa@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.

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Clerk

Date

## SECTION 1. GENERAL INFORMATION

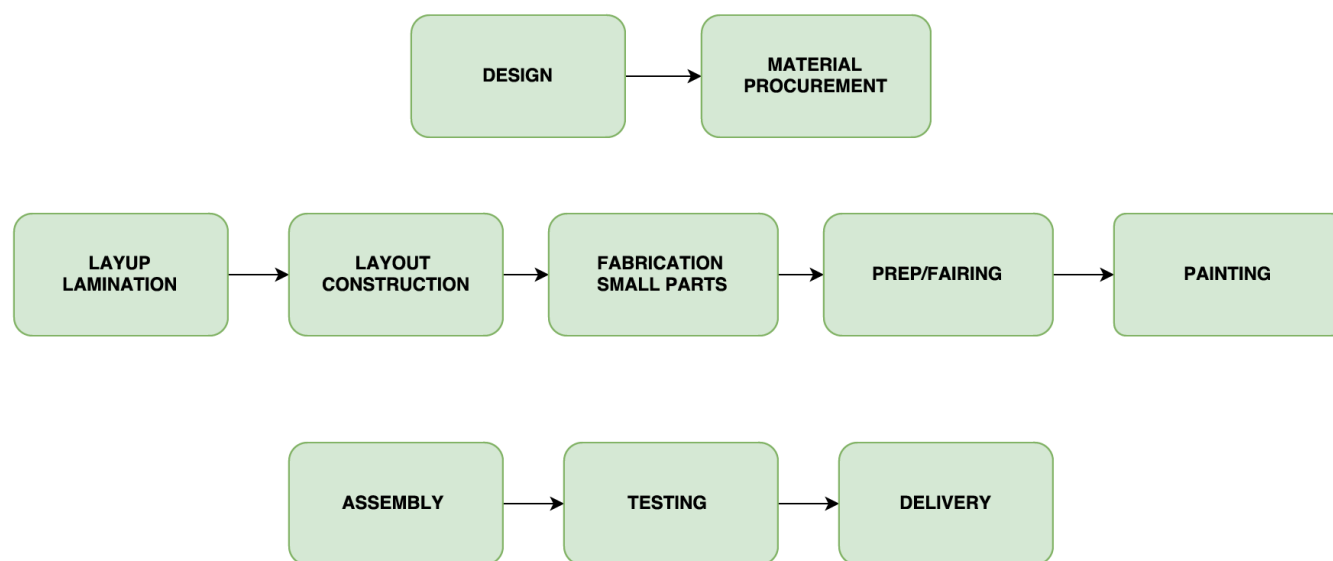
### FACILITY DESCRIPTION

This facility manufactures, assembles, repair and install custom boat accessories, such as boat tops, tuna towers and casings for electrical equipment. The operation consists of three (3) paint spray booths and a polyester resin hand lay-up application area. The facility also utilizes high volume low pressure (HVLP) spray equipment. Emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) result from the evaporation of solvents from gel coat and resin application, coatings, thinners and cleaners.

The gel coat and resin (polyester and epoxy resins) applications are performed in an enclosed ventilated area with two (2) exhaust units, referred as the hand lay-up area. Application of epoxy paints and sanding is done in the prep room which is enclosed with a 15,000 CFM JBI (Global Finishing Solutions) downdraft unit. The lamination process of fiberglass panels uses an industrial paint wall with a plenum IPW-FP/IPQ-1000-FPEX with exhaust fans and stacks. Primer and coating applications are performed in three (3) paint spray booths that are equipped with one (1) exhaust fan and one (1) exhaust stack each. Spray paint booths also have air filters to control overspray and capture particulate matter.

Also, the existing permit contains federally enforceable limitations to keep the facility within the minor source status. The existing operation permit (0112326-004-AF) contains VOC and HAP emission limitations below the major source (Title V) thresholds, recordkeeping and reporting requirements, that keeps the operation as a synthetic minor source of air pollution.

Below is the general flow diagram of the operation.



The facility consists of the following emissions unit (EU).

EU ID	Description of Emissions Unit
001	Three (3) paint spray booths each exhausting to the atmosphere through its own exhaust stack; and a polyester resin hand lay-up area with 40% closed and 60% open molding operations.

### APPLICABLE REGULATIONS

## SECTION 1. GENERAL INFORMATION

A summary of applicable regulations is shown in the table on the following page.

Summary of Federal Regulations	Summary of State of Florida Regulations
N/A	Rule 62-296.320(2) F.A.C. - Objectionable Odor
	Rule 62-296.320(4) (b) F.A.C. - General Visible Emissions Standards -20% opacity facility-wide. Rule 62-296.320(4)(c) Unconfined Particulate Matter and 62-4.070(3) F.A.C.
	Rule 62-296.320(1) (a) F.A.C. - VOC or Organic Solvent Emissions
	Rule 62-210-650 F.A.C. Circumvention of air pollution control equipment.
Summary of County Regulations	
Broward County Chapter 27 Air Pollution Control, Article IV, Sec. 27-175(b) & (d).	These regulations refer to: Concealment of emissions (b) and Maintenance (d) Note: Not Federally Enforceable.

### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate emission 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility is a synthetic minor source of HAP and also a synthetic minor source of VOC in accordance with Chapter 62-213 (Title V), F.A.C. VOC emissions are limited to 100 tons per year, and single and total HAP emissions are limited to 10 tons per year and 25 tons per year, respectively; eluding the applicability of 40 CFR 63, Subpart WWW- National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Environmental Engineering and Permitting Division (EPPD). The EPPD's physical and mailing is 1 North University Drive, Mailbox 201, Plantation, Florida 33324 and telephone number is 954-519-1483. All documents related to applications for permits to operate an emissions unit shall be submitted to the EPPD.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the EPPD at: 1 North University Drive, Mailbox 201, Plantation, Florida 33324 and telephone number is 954-519-1483.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions).
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: No new emissions unit shall be constructed and no existing emissions unit shall be modified beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1) (a), F.A.C.]
7. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]
8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the EPPD. All synthetic non-Title V sources or all facilities with the potential to emit 10 tons/year or more of volatile organic compounds (VOC) or 25 tons/year or more of nitrogen oxides (NOx) and located in an ozone nonattainment area or ozone air quality maintenance area shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

*{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at [eaor@dep.state.fl.us](mailto:eaor@dep.state.fl.us).}*

### SECTION 3. FACILITY-WIDE CONDITIONS

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1. **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.]
2. VOC or Organic Solvents Emissions. The owner or operator 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 EEPD.  
[Rule 62-296.320(1) (a), F.A.C.]
3. 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 requirements.  
[Rule 62-296.320(4) (b), F.A.C.]
4. Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.  
[Rule 62-210.650, F.A.C.,]
5. **Not Federally Enforceable** (b) Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Codes.  
  
**Not Federally Enforceable** (d) Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.  
[Broward County Code, Sec. 27-175(b) and (d)]
6. Unconfined Emissions of PM. No person shall cause, let, permit, suffer or allow emission of PM from any source whatsoever, including but not limited to vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing or handling without taking reasonable precautions to prevent such emissions.  
Reasonable precautions include, but shall not be limited to, the following:
  - a) Proper maintenance and replacement of spray booth filters.
  - b) To prevent overspray, coating operations shall be conducted inside permitted spray booths.
  - d) Use of hoods, fans, filters, and similar equipment to contain or capture particulate matter.  
[Rule 62-296.320(4) (c), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(h)]
7. Special Compliance Tests. When EEPD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit, unless the Department obtains other information sufficient to demonstrate compliance.

The owner or operator of the emissions unit shall provide a report on the results of said tests to the EEPD in accordance with the provisions of subsection 62-297.310(10), F.A.C. [Rule 62-297.310(8) (c), F.A.C.]

### SECTION 3. FACILITY-WIDE CONDITIONS

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8. Minimizing VOC Emissions. The facility shall implement measures to minimize VOC emissions. Measures shall include, but are not limited to:

- (a) Tightly covering or closing all containers, all open troughs, basins, baths, tanks, etc. that store or handle VOC, when not in use.
  - (b) Immediately confining and cleaning up VOC spills and making sure discarded hazardous material is placed in closed containers for reuse, recycling or proper disposal.
  - (c) Ensuring that the filter media is securely fastened to the frames of the spray booth at all times of operation leaving no gaps around the perimeter or holes in the filter media, and verifying that the blower is in operation at all times of spraying.
- [Rule 62-4.070(3) F.A.C.].



## SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. EU 001

This section of the permit addresses the following emissions unit.

EU No.	Emissions Unit Description
001	Three (3) paint spray booths, each exhausting to the atmosphere through its own exhaust stack; and a polyester resin hand lay-up area with 40% closed and 60% open molding operations.

**Permitting Note.** **40 CFR 63, Subpart WWWW – National Emissions Standards of Hazardous Air Pollutants (NESHAPS) Reinforced Plastic Composites Production.** *Pipewelders Marine, Inc. applied to obtain a federally enforceable state operation permit (FESOP) on February 27, 2007, and requested to limit emissions of volatile organic compounds (VOC), total and single hazardous air pollutants (HAPs) below the major source (Title V) thresholds. In order to escape from Title V applicable requirements, a FESOP was issued on November 7, 2007, therefore, it is not subject to this rule.*

### EMISSIONS STANDARDS

1. In order to avoid major source (Title V) applicable standards, VOC emissions shall be less than 100 tons in any consecutive twelve-month period, HAP emissions shall be less than 10 tons in any consecutive twelve-month period and total HAP emissions shall be less than 25 tons in any consecutive twelve-month period.  
[Rule 62-4.070(3), F.A.C., Rule 62-213.420(3) (c) 1, F.A.C., initial FESOP 0112326-003-AF issued on November 7, 2007]  
**Permitting Note.** *The Potential to Emit (PTE) referenced in Rule 213.420 (3) (c)1, F.A.C. is an indicator of the extent of future modifications permitted before the source becomes a major VOC (Title V) or HAP (Title III) source. The major VOC and HAPs thresholds are 100 TPY VOC, 25 TPY total HAPs or 10 TPY of a single HAP, respectively}*

### NOTIFICATIONS AND RECORDKEEPING REQUIREMENTS

2. **Material Usage Records.** The permittee shall maintain monthly records of the usage rates of materials generating VOC and HAPs (e.g. Polyester Resin, Gel coat, Styrene, solvents). Records shall include the material safety data sheets (MSDS) of each chemical along with the monthly emissions calculations. These records shall be retained for a period of five years and be made available for inspection to EEPD staff.  
[Rule 62-4.070(3), F.A.C.]
3. **Emission Calculation Records.** The permittee shall calculate and maintain records of VOC emissions, individual HAP emissions and total HAP emissions on a consecutive twelve-month rolling period. These records shall be retained for five years and be made available, for inspection, to EEPD staff.  
[Rule 62-4.070(3), F.A.C.]
4. The permittee shall keep records of any change in products, and material safety data sheets (MSDS). These records shall be made available, for review, by EEPD staff.  
[Rule 62-4.070(3), F.A.C.]