



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301 • 954-519-1220 • FAX 954-519-1495

FINAL PERMIT

Permittee:
Nautica International Inc.

Permit No: 0112599-003-AF
Date of Issue: July 27, 2007
Expiration Date: July 27, 2012

Project: Air Operating Permit Renewal

Location: Nautica International Inc., 1500 S. 66th Ave, Pembroke Pines, Broward County, Florida 33023

Latitude/Longitude: 25°59'55"N/80°13'06"W

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). The above-named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Broward County Environmental Protection Department (EPD) and made a part hereof and specifically described as follows:

Operate: An air pollution source consisting of fiberglass lamination of decks, hulls, and small parts, for rigid hull inflatable boat manufacturing using mechanical spraying and chopping equipment for depositing the resin and glass reinforcement. Gelcoat is applied in a spray booth.

The pollutants emitted to the atmosphere from the boat manufacturing operations include volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). Particulate matter (PM) emissions from grinding operations are confined within the building. The source operates as a synthetic minor source of HAPs by limiting the usage of materials with high HAP content.

In Accordance with: Construction Permit (0112599-001-AC) issued May 14, 2002, Federally Enforceable State Operating Permit (0112599-002-AF) issued June 25, 2002, and Operating Permit Application No. 1559-1 received April 25, 2007.

To Serve: Fiberglass Products Manufacturing Facility (SIC #3732).

Subject to: Conditions 1 -22.

General Conditions

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth herein are accepted and must be completed by the Permittee and enforceable by the Environmental Protection Department (EPD) pursuant to this Code and Sections 403.141, 403.727, or 403.859 through 403.861 of the Florida Statutes (F.S.). The Permittee is placed on notice that EPD will review this permit periodically and may initiate administrative and/or judicial action for any violation of the conditions by the Permittee, its agents, employees, servants or representatives.
2. Permit Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the EPD.
3. Disclaimer. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
4. Disclaimer. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained from the State. Only the Trustees of the Internal Improvement trust Fund may express State opinion as to title.
5. Liability. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and DEP rule, unless specifically authorized by an order from the EPD.
6. Operation and Maintenance. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by EPD and DEP rules.
7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized EPD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or EPD and DEP rules.
8. Notice of Noncompliance. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide EPD with the following information:

- (a) A description of and cause of noncompliance; and
- (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to educe, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by EPD for penalties or for revocation of this permit.

The Permittee shall report any periods of noncompliance to the EPD immediately by phone 954-519-1499 and (if available) by Email EPDHOTLINE@broward.org. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.

[Rules 62-4.160 (8), F.A.C.]

- 9. Evidence Materials. By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the EPD, may be used by the EPD as evidence in any enforcement proceeding arising under the Florida Statutes or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- 10. Rule Changes. The Permittee agrees to comply with changes in Florida Department of Environmental Protection rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or DEP rules.
- 11. Permit Transfer. This permit is transferable only upon EPD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the EPD.
- 12. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:
 - (a) Upon request, the Permittee shall furnish all records and plans required under DEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the EPD.
 - (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by EPD rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed.
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used;
 - 6. The results of such analyses.

14. Information Submittal. When requested by the EPD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the EPD, such facts or information shall be corrected promptly.
15. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.

Specific Conditions

16. Synthetic Minor Source of HAPs Emissions. The owner or operator shall maintain records and calculations to demonstrate that the total emissions for the previous twelve month period are less than the following thresholds: 10 tons of any individual HAP, and 25 tons of total HAPs.
[Rules 62-210.200(193) (a), F.A.C. – Potential-to-Emit (PTE) Rule]
{PTE Note. Based on the construction application data (year 2002), the 10 tpy HAP limit will be exceeded if the resin usages reached 75 tons of resin provided that there are no reduction (or substitutions) in usage of resins with high HAP content.}
{PTE Note. The source has a maximum capacity to laminate up to 8 boat hulls and decks (2 pieces per boat) in any 24-hour period to allow for the preparation and curing phases of the boat manufacturing operations. Resin and Gelcoat usage is 523.9 lbs per boat which corresponds to 764 tpy based on 365 days of operation per year.}
17. Emissions Computation and Reporting.
 - (1) *Annual Operating Report (AOR).* The AOR (DEP Form No. 62-210.900(5)) for the facility shall be completed each year and submitted to the EPD by March 1 of the following year.
 - (2) *Emissions Computing Approaches for the AOR.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate methodology to compute the emissions of a pollutant from an emissions unit. The following are available methodologies from most to least order of accuracy: Continuous emissions monitoring (CEMS), mass balance approach, site-specific emissions factor, and published emissions factor
 - (3) *Fugitive Emissions.* The owner or operator shall account for fugitive emissions of pollutants, to the extent quantifiable, associated with the source.
 - (4) *Recordkeeping.* The owner or operator shall retain a copy of all records used to compute emissions for a period of five years from the date on which such emissions information is submitted to the EPD.
[Rule 62-210.370, F.A.C.]
{Permitting Note. The owner or operator may also elect to submit the AOR electronically using the software provided by DEP. Electronic version of the AOR shall be sent directly to DEP.}
18. 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 EPD. VOC emission controls shall include, but not limited to:
 - (a) Tightly covering or closing all VOC containers when they are not in use.

- (b) Tightly covering, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use.
 - (c) Immediately confining and cleaning up VOC spills and ensuring that discarded hazardous materials are placed in closed containers for reuse, recycling or proper disposal.
 - (d) Maintaining spray lay-up equipment to ensure effective application with a minimum of overspray.
- [Rule 62-296.320(1) (a), and 62-4.070(3), F.A.C.]

19. Objectionable Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

20. General Particulate/Visible Limiting Standards. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4) (b) 1 & 4, F.A.C.]

21. 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.

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.

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), (c), and (d)]

22. Operating Permit Renewal. Sixty days before the expiration date of this operation permit, the Permittee shall apply for a renewal of permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[Rule 62-090 (1), F.A.C.]

{Note: The Permittee may also elect to submit the application electronically using the FDEP EPSAP software available at <http://www.dep.state.fl.us/air/software.htm> website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.]

Executed in Broward County, Florida
Environmental Protection Department

Daniela Banu, Air Quality Division Director