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## PERMITTEE

Bertram Yachts, LLC  
5250 West Tyson Avenue  
Tampa, FL 33611

Air Permit No. 0571456-002-AO  
Effective Date: July 19, 2017  
Renewal Application Due Date: May 20, 2022  
Expiration Date: July 19, 2022

Authorized Representative:  
Earl Blackwell, V.P. of Production

Bertram Yachts, LLC  
Hillsborough County, Florida

## PROJECT

This is the final air operation permit, which authorizes the operation of a new fiberglass boat manufacturing and repair facility at Bertram Yachts, LLC (Standard Industrial Classification No. 3732 – Fiberglass Boat Manufacturing Plant). This project is the facility's initial operating permit. The facility is located in Hillsborough County at 5250 West Tyson Avenue, Tampa, FL 33611. The UTM coordinates are Zone 17-348.52 kilometers (km) East and 3085.30 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

**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 Protection Commission of Hillsborough County. The Permitting Authority's physical and mailing address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is 813/627-2600.

**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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. 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 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 Department'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

**FINAL AIR OPERATION PERMIT**

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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.

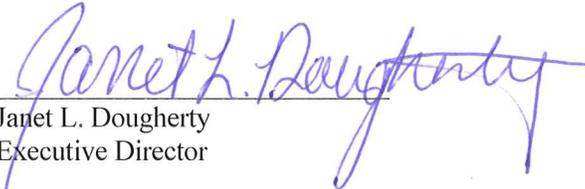
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of 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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, 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

  
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Janet L. Dougherty  
Executive Director



## SECTION 1. GENERAL INFORMATION

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### FACILITY DESCRIPTION

Bertram Yachts, LLC manufactures custom fiberglass boats, and repairs and refurbish fiberglass, steel and aluminum boats. The facility is located at 5250, 5300, and 5350 West Tyson Avenue. The boats are manufactured using both open molding and closed molding (infusion) techniques. The facility also performs painting of hulls and decks, bottom painting, and repair activities, and manufactures plugs and molds for internal use and for commercial sale.

Manufacturing activities are conducted in any of three buildings. Building 1 is primarily used for the manufacture and assembly of sub components and also for the lamination/gelcoating of hulls and decks, or repair of larger parts. There are spray paint booths and sanding stations located in the northeast corner of this building. The booths are used to apply coatings of various types to primarily fiberglass components and may also be used to apply coatings to any wood, plastic, or metal parts. The paint booths have filter pads in the wall sections for the control of paint overspray, which vent to three (3) 24-inch diameter stacks. Each stack height is approximately 20 feet above ground level with an air flow rate of 8,750 cfm. Since the materials used on metal surfaces may also be used on non-metal surfaces, the emissions from this activity are not separately calculated, but are included as part of the facility wide total. This building has four (4) sanding stations that only operate hand sanders and the particulate matter (PM) emissions from the sanders are vented to a small bag type dust collector, which vents back into the building.

Building 2 contains the "Mill" area, which consists of several work benches where hand tools are utilized for woodworking operations. These hand tools consist of; cut off and table saws, band saws, a planer, a drill press, a joiner, and a multi axis CNC router. The PM emissions from these stationary pieces of equipment are controlled by a DISA bag type collector and/or smaller bag type collectors on individual pieces of equipment, all of which vent back into the building. An additional multi axis router is also present in the building. The fugitive PM emissions from all the woodworking and plug/mold manufacturing are controlled by good housekeeping practices, which include frequent sweeping and cleaning of the work place.

Bertram Yachts also manufactures the majority of the wood shelves, desks, and other furniture that are installed in their boats. These components may be painted, varnished or otherwise coated before installation. The VOC/HAP emissions from this activity were estimated to be less than 5 TPY.

Building 3 is primarily utilized for repair, and also, for painting and gelcoating/lamination repair activities, as necessary. Resin, gel coat, and paint drums and pails are also stored in this building.

After a fiberglass reinforced boat or other components are designed, plugs and molds for the fiberglass components are manufactured, either for Bertram's internal use or for commercial clients. A plug is a "positive" (male) model of the finished part having the exact dimensions as the desired final part. From this plug, a mold (negative or female) is built, to which the gelcoat and resin will be applied. The plug is typically built from wood or other suitable material, often expanded polystyrene solid or foam blocks, by hand or using either of the multi axis CnC machines to cut the desired shape. Tooling resins are applied over the surface of the part and the plug is brought to the correct final dimensions. The mold is made by applying tooling materials (resins/gelcoats) to the surface of the plug, and removing the hardened part. The plug and mold construction may be outsourced or performed in house. Bertram Yachts may manufacture plugs and molds for other clients, and may sell plugs and molds on the open market.

After applying a wax or other release material to the surface of the molds, they are sprayed with a (typically pigmented) styrene based gelcoat and catalyst. Once the gelcoat has sufficiently solidified, fiberglass and catalyzed styrene based polyester resin are applied to the gelcoated surface of the mold. The application methods may include hand layup, pressure fed roller, or non-atomized spray techniques. The required thickness of fiberglass and resin are built up using the selected process.

Alternatively, the resin may be infused, which is not an open molding process. In this procedure the gelcoat is applied to the surface of the mold in a traditional "open molding" method. Additional layers of styrene based

## SECTION 1. GENERAL INFORMATION

materials such as a spray core, skin coat, or barrier coat may be applied by open molding to prevent the pattern of the woven fiberglass from “printing through” and becoming visible in the thin gelcoat layer.

When the desired coatings have been applied, a fiberglass cloth or mat is then laid over the gelcoated surface and a second “half” of the mold, or as appropriate for the part, an impervious plastic sheet, is placed over the fiberglass. The edges of the mold half or plastic sheet are sealed against the glass covered mold except for a point where the transfer tubing will introduce the resin. A vacuum is applied to the part for several hours to verify the seal integrity. Catalyst is added to the resin drums and/or pails to be used as resin supply sources, depending on the size of the infused part, and thoroughly mixed prior to infusion into the part. The vacuum pump draws the catalyzed resin from the drum or pail into the part filling the glass void until resin appears at the exit hose, at which point the flow will be terminated. Vacuum is then continuously applied overnight. After curing overnight, the part is removed from the mold; from this point the parts manufactured by any method are further processed in a similar manner.

It is imperative that no air is introduced into the mold through the resin supply line. When the catalyzed resin level in the resin supply drum approaches the supply pickup hose level, an additional (typically) 5 gallons of resin is catalyzed and added to the drum. Further additions are made as necessary to ensure an adequate liquid level above the pickup hose without adding excessive liquid. The catalyst is added to the resin and mixed in an open container, and the supply drum must remain open during material removal to allow inspection of the liquid level and the transfer of additional material. The liquid is exposed to the air for the minimum time during material transfer and mixing, and VOC emissions during the mixing and observation are insignificant.

When fully solidified or cured, the hulls and decks are removed from their molds. The molds are subsequently cleaned, inspected and prepared for the lamination process in the “mold care” step, using solvent based materials, and a mold release agent may also be applied. Scratches and other imperfections observed on the mold surface are repaired if necessary, typically with resin or gel coat tooling. The unfinished hull and deck edges are trimmed, ground, or sanded by hand tools. The manufacture of small parts, which includes hatches, covers, consoles, and parts other than the hull or deck, is a similar process with corresponding smaller molds and by hand (hand layup). In the tent buildings outside of Building 3, the hulls and decks may be joined together. Adhesive and either water or solvent based coatings may be utilized in the assembly process. The finished yachts are transported to the water for final assembly and sea trials.

The facility-wide PTE for VOC, individual HAP (styrene) and collective HAPs emissions are 21.8 TPY, 9.2 TPY and 11.7 TPY, respectively. Compliance with the PTE and emission limits are demonstrated by a monthly and 12-month rolling total material usage recordkeeping and calculation of emissions for those periods. Also, in order not to be subject to the VOC RACT Rules of 62-296.513 (Surface Coating of Miscellaneous Metal Parts and Products) and 62-296.514 (Surface Coating of Flat Wood Paneling), F.A.C., the facility will limit the annual material usage to 750 gallon/12-month rolling period for each RACT Rule, and will maintain records to demonstrate compliance with that limit. Additionally, the finishing materials (coatings) and the adhesives in the manufacture of wood furniture or wood furniture components are exempt from the NESHAP regulations (40 CFR 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations), based on the limitation of the material usage.

The facility sub-leases parts of the land at 5350 West Tyson Avenue to Carbon Craft, which is an independent small carbon fiber boat manufacturer. The two companies are not under common control. Based on information provided by Carbon Craft, the facility is exempt from air permitting.

EU ID No.	Emission Unit (EU) Description
001	Fiberglass Boat Manufacturing (Lamination and Gelcoat Application)
002	Paint and Miscellaneous Solvent Evaporation
003	Woodworking Operations and Plug and Manufacturing

**SECTION 1. GENERAL INFORMATION**

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**APPLICABLE REGULATIONS**

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

<b>Regulations</b>	<b>EU No.</b>
<i>State Rule Citations</i>	
Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards	001, 002, 003
<i>Local Rule Citations</i>	
Chapter 1-3.22, 1-3.23 and 1-3.50, Rules of the EPC	001, 002, 003

**FACILITY REGULATORY CLASSIFICATION**

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate 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.

## SECTION 2. FACILITY-WIDE & ADMINISTRATIVE REQUIREMENTS

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FW1. Permitting Authority: The permitting authority for this project is the Environmental Protection Commission of Hillsborough County. The Environmental Protection Commission of Hillsborough County mailing address is 3629 Queen Palm Drive, Tampa, FL 33619.

FW2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Drive, Tampa, FL 33619.

FW3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements); and Appendix E (Unified Emission Factors for Open Molding of Composites).

FW4. 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.]

FW5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

FW6. 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 Environmental Protection Commission of Hillsborough County. [Rule 62-4.090, F.A.C.]

FW7. 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 Environmental Protection Commission of Hillsborough County. All synthetic non-Title V sources 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).}*

FW8. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (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 or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EPCHC.

- a. Maintain tightly fitting covers, lids, etc., on all containers of VOC/OS when they are not being handled, tapped, etc.
- b. Prevent excessive air turbulence across exposed VOC/OS materials.
- c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, batch, etc., of VOC/OS so that it can be covered when not in use.
- d. All fittings, valve lines, etc., shall be properly maintained.

## SECTION 2. FACILITY-WIDE & ADMINISTRATIVE REQUIREMENTS

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- e. All VOC/OS spills shall be attended to immediately and the waste properly disposed of, or recycled.
- f. All of the fiberglass resin and gelcoat application activities shall be take place inside the production buildings with concrete floors in order to prevent contamination of the soils and groundwater.

[Rule 62-296.320(1), F.A.C.]

FW9. Facility-wide HAP Emissions: In order to limit the potential to emit, the facility is limited to 9.2 tons in any twelve consecutive month period for styrene emissions (individual HAP), and to 11.7 tons in any 12 consecutive month period for any combination of HAPs. [Rules 62-210.200, and 62-4.070(3), F.A.C., and Permit No. 0571456-001-001-AC]

FW10. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions shall include:

- a. Maintain grounds as necessary to preclude emissions caused by vehicular movement and transportation of equipment and products.
- b. Use of small "shop vac" type vacuum collectors on major fixed grinding, sanding, cutting, and shaping components.
- c. Movable vacuum collectors and collection bags will be used for portable tools.
- d. Frequent sweeping and cleaning of the woodworking area, as necessary.

[Rule 62-296.320(4)(c), F.A.C.]

FW11. 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 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. If odor problems occur the Department may require additional measures (such as changes to the building exhaust system) be taken to reduce the odor impact of styrene emissions. [Rules 62-210.200 and 62-296.320(2), F.A.C.]

FW12. When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

FW13. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Boat Manufacturing

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	Fiberglass Boat Manufacturing (Lamination and Gelcoat Application)

EQUIPMENT

A.1. The permittee is authorized to conduct fiberglass boat manufacturing operations, which includes the manufacture of hulls or decks of boats from fiberglass or assembly of boats from pre-manufactured hulls and decks, or build molds to make fiberglass hulls or decks [Permit No. 0571456-001-AC]

PERFORMANCE RESTRICTIONS

A.2. 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.3. Volatile Organic Compound (VOC): As requested by the permittee, the total emissions of VOC shall not exceed 16.3 tons per any consecutive 12-month period. [Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Permit No. 0571456-001-AC]

A.4. Hazardous Air Pollutant (HAP): As requested by the permittee, in order to establish the facility as a synthetic minor source of HAP emissions, emissions of styrene or any other individual HAP emissions from EU 001 shall not exceed 9.2 tons per any 12 consecutive-month period. [Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Permit No. 0571456-001-AC]

RECORDS AND REPORTS

A.5. Emission Calculation Requirements: For hand or spray lay-up techniques, emissions of styrene, methyl methacrylate (MMA), and other VOC shall be determined as follows until notified by the EPCHC. (*Note: styrene and MMA are each considered a HAP and a VOC*) [Rule 62-210.200, F.A.C. ("Potential to Emit"); Permit No. 00571456-001-AC]

- a. 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 table provided in Appendix E (Unified Emission Factors for Open Molding of Composites).

- b. 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)

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### A. Boat Manufacturing

- c. Other VOC emissions shall be determined by the following equation for each material. These values shall be used in conjunction with the above styrene and MMA emissions to determine total VOC:

$$\text{Emission (tons)} = M_{\text{voc}} \times 1.00 \times C_{\text{voc}}$$

Where:

$M_{\text{voc}}$  = Amount of VOC containing material used (in tons)

$C_{\text{voc}}$  = VOC content (percent by weight/100)

A.6. Compliance with the VOC and HAP emission limitations of Condition Nos. A.3. and A.4 shall be documented on a monthly basis, based upon usage of all HAP/VOC-containing materials (e.g. resin, gelcoat, putty, filler, etc.). Records, including purchase orders and invoices, shall be maintained at least for the most current three years. HAP/VOC monthly log shall include the quantity of each HAP/VOC-containing material used, along with its HAP/VOC content, and a monthly HAP/VOC emission summary. The records shall show the following: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., Permit No. 0571456-001-AC]

- a. Monthly total quantity in gallons or pounds of each material (resin, gelcoat, solvent, etc.);
- b. Percentage by weight of each individual HAP (including Styrene) and VOC for each material identified in a., above;
- c. Appropriate emission factor(s), and method(s) of application (i.e., mechanical atomized, mechanical non-atomized) used to determine emissions;
- d. Monthly total of Styrene, other individual HAP, total HAPs and VOC emissions (tons/month) based on a., b. and c. above; and
- e. Rolling 12-month total of Styrene, other individual HAP, total HAPs and VOC emissions (tons/12 consecutive month period) based on d. above.

A.7. If the twelve month rolling summary of individual HAP (styrene) emissions shows that the emissions equal or exceed 80% of the permitted limit, as specified in Specific Condition No.A.4., the facility shall maintain daily records as specified below. Once the twelve month rolling summary of HAP emissions show that the emissions are less than 80% of the permitted limit, the facility can return to monthly recordkeeping. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., Permit No. 0571456-001-AC]

- a. Daily records of the individual HAPs (styrene) emissions.
- b. Rolling 12-month total of individual HAP.

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### B. Miscellaneous Painting Activities

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
002	Paint and Miscellaneous Solvent Evaporation
003	Woodworking Operations and Plug and Manufacturing

#### PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity: As requested by the permittee, in order to be exempt from VOC RACT Rules 62-296.513 and 62-296.514, F.A.C., and 40 CFR 63, Subpart JJ

- A) **EU 002**: The total quantity of coatings, reducers, adhesives, clean-up solvents, and paints, applied to miscellaneous metal parts and products, shall not exceed 750 gallons in any 12-month rolling period. [Rules 62-296.500(3) and 62-4.070(3), F.A.C.; Permit No. 0571456-001-AC]
- B) **EU 003**: The total quantity of finishing materials (coatings) and adhesives in the manufacturing and surface finishing of wood furniture or wood furniture components shall not exceed 750 gallons in any 12-month rolling period. [Rules 62-296.500(3) and 62-4.070(3), F.A.C.]

#### TESTING REQUIREMENTS

B.2. The VOC content of each coating shall be determined using EPA Method 24 or Method 24A contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPCHC may accept, instead of the coating analysis methods required under Rules 62-296.500(2)(b)2., F.A.C., a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings." [Rule 62-296.500(2)(b)4., F.A.C.]

B.3. The permittee may use Safety Data Sheets (SDS) in lieu of the requirements specified under Specific Condition No. B.2., in order to determine the VOC content of each material in cases where the EPA Method 24 or Method 24A or the manufacturer's certification (consistent with EPA's document number 450/3-84-019) are not available. [Rule 62-4.070(3), F.A.C.]

B.4. The spray booths and filters shall be operated in accordance with the manufacturer's recommendations. The paint booths shall have a pressure gauge in other to measure the pressure drop across the filter systems. The filters shall be replaced when the pressure drop reaches a maximum of 0.11 inches of water. [Rule 62-4.070(3), F.A.C.]

#### RECORDS AND REPORTS

B.5. Safety Data Sheets for all VOC-containing materials used at this facility shall be kept current and made available to EPC staff upon request. [62-4.070(3), F.A.C.]

B.6. The permittee shall implement and maintain a recordkeeping system to demonstrate compliance with the restrictions in Specific Condition B.1. Records, including purchase orders and invoices, shall be maintained and made available for inspection/verification by the Environmental Protection Commission of Hillsborough County for at least the most recent three years. The system shall include, as a minimum, the following information.

- a. Log book identifying the type of substrate being coated (plastic, fiberglass, metal, wood, or other)
- b. Monthly total of coatings, reducers, adhesives, clean-up solvents, and paints to metal parts and other substrates, in gallons.
- c. VOC and HAP contents of materials used (lbs/gallon, as applied).
- d. Monthly VOC, total HAP, and individual HAP emissions.

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### B. Miscellaneous Painting Activities

- e. Records of pressure drop and filter replacement.
- f. Rolling twelve month total of coatings, reducers, adhesives, clean-up solvents, and paints to metal parts and other substrates in gallons.
- g. Rolling twelve month total of VOC, total HAP, and individual HAP emissions.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., and Permit No. 0571456-001-AC]