



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen Castille
Secretary

PERMITTEE:

Seabring Marine Industries, Inc
Monterey Boats- Williston Downtown Plant
1579 SW 18th Street
Williston, FL 32696

I.D. Number:	0750027
Permit/Cert Number:	0750027-005-AC
Date of Issue:	DRAFT
Expiration Date:	
County:	Levy
Latitude/Longitude:	29°24'10"N; 82°26'20"W
UTM:	E-(17)360.4; N-3253.3
Project:	Boat Manufacturer.

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-204, 62-296, 62-297 and 62-4. 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 department and made a part hereof and specifically described as follows:

Project No. 005- This facility is currently classified as a Title V source due to potential emissions of hazardous air pollutants (HAPs) being greater than the major source threshold of 10 ton per year (individual basis) and 25 ton per year (total combined) and VOC emissions not greater than 220 TPY. The facility has requested the following facility-wide emissions caps: for total VOC <100TPY, single HAPs <10 TPY and total HAPs <25 TPY. Upon issuance of this construction permit, the requested emission limitations will become federally enforceable and the facility will be classified as a Synthetic Non-Title V source. Permit No. 0750027-003-AV will be expired and a Federally Enforceable State Operation Permit will be issued for this facility.

FACILITY DESCRIPTION

Seabring Marine Industries, Inc.- Monterey Boats- Williston Downtown Plant is a fiberglass boat manufacturing facility. Process operations include construction of fiberglass, woodworking and material storage and handling.

Based on the Non- Title V permit application received July 29, 2005 this facility is a synthetic minor source of hazardous air pollutants (HAPs).

E.U. ID No. 001 Fiberglass Boat Operation (PM emissions controlled by a fabric filter.)

Volatile organic compounds (VOC), organic solvents (OS), and hazardous air pollutants (HAPs) released during production, curing, and cleanup are discharged through the following emission points:

EP01 West Stack Main Building
EP02 North Stack Gel Coat Booth
EP03 Building Vents Small Parts Lamination

REGULATORY CLASSIFICATION

This emissions unit is regulated under Rule 62-296.320, F.A.C.- General Pollutant Emission Limiting Standards.

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POLLUTANTS

HAPs and VOC.

OPERATING LOCATION

The facility is located at 635 N. Main Street, Williston, Levy County, Florida.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application For Air Construction Permit – Non Title V Source received July 29, 2005

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.
2. 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 Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys not 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 interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does no 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 permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. 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 Department rules. This provision includes 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 Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any record that must be kept under the 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 Department rules.

Reasonable time may depend on the nature of the concern being investigated.

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8. 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 the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In 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 source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, 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. The permittee agrees to comply with changes in Department 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 Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 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 is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)
- () National Emission Standards for Hazardous Air Pollutants (NESHAPS)

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GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- 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 recordings 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 Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, 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 that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

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E.U. ID

<u>No.</u>	<u>Brief Description</u>
001	Fiberglass boat manufacturing operation consisting of laying up fiberglass, wood working, and materials storage and handling.

Emission Points: EP01 West stack, EP02 North stack, EP03 Building vents.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

1. **Hours of Operation.** Hours of operation are not limited. 8760 hrs/yr, 24 H/D, 7 D/W, 52 W/Y.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

2. **Maximum Allowable Emissions.** This facility shall not exceed the following VOC/OS material usage and emissions limitations:

POLLUTANT	MATERIAL USAGE RATE (lbs/12 month consecutive period)	MAXIMUM ALLOWABLE EMISSIONS (tons/12 month consecutive period)
Styrene from Resin	384,600	7.19 NOTE (1)
Styrene from Gel Coat	51,500	2.76 NOTE (1)
Total VOC	----	18.41 NOTE (1)
Individual HAPs	----	< 10 NOTE (1)
Total HAPs	----	< 25 NOTE (1)

NOTE (1) Styrene emissions shall be calculated as 11% of the available monomer for the resins; 48% of the available monomer for the pigmented and base gelcoats; and 51% of the available monomer for the tooling gelcoats. The total styrene content of each material shall be calculated based on the maximum weight percent stated in the MSDS for that particular material.

[FESOP Permit No. 0750027-001-AF]

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3. **VOC Emissions Rate.** For informational purposes, the maximum VOC emission rates referenced in **Specific Condition No. 2.** are based upon the following VOC material usage and emission rates:

MATERIAL NOTE (1)	USAGE RATE (lbs/12 month consecutive period)	EMISSIONS (tons/12 month consecutive period)
Catalyst	36,943	0.92
Contact Cement	20,024	0.3
Autofroth	10,000	0.01
Vinyl Paint	27,093	7.18
Mold Release Wax	218	0.05

NOTE (1) The usage of small amounts of miscellaneous solvents not listed in **Specific Condition 3.** is permitted. However, the maximum allowable VOC emissions stated in **Specific Condition 2.** shall not be exceeded.

[FESOP Permit No. 0750027-001-AF]

4. The permittee shall comply with the following:
- A. The 2 VOC/OS exhaust fans shall be operating whenever usage of materials containing VOC/OS's occurs and shall remain operating for at least 2 hours after the usage has been completed.
 - B. When determining the miscellaneous solvent emission rate(s) in accordance with **Specific Condition 6.**, the percent of solids in the recovered solvents shall be documented and accounted for in the emission calculations.
 - C. All material containing VOC/OS's shall be stored in closed containers and/or in small automatic closing safety cans.
 - D. Clean-up solvent washing shall be directed into containers that prevent evaporation into the atmosphere.

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Specific Condition 4. continued:

- E. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of materials.
- F. Work practice controls, when practicable, shall include limiting the amount of clean-up solvents issued to employees and employees shall use gloves whenever handling resins.
- G. Immediately attend to all spills as appropriate,
- H. For each of the 2 VOC/OS exhaust stacks there shall be no device which (a) reduces the vertical momentum of the stack gas, or (b) reduces the vertical dispersion of the stack gas.
- I. Gelcoating and spraying of resin shall only use applicators approved by FDEP.
- J. All bay doors along the north side of the building shall remain closed during lamination, while make up air is drawn through 2 east bay doors, 1 west bay door, and all south bay doors.

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

5. Visible Emissions EP03. Visible emissions shall not exceed 5% opacity.

[Rule 62-297.620(4), F.A.C.]

Recordkeeping Requirements

- 6. The Permittee logs shall maintain the following information to document compliance with the limitation of **Specific Condition No. 2.** The information shall be retained on file at the facility for at least 5 years. At a minimum, the logs shall record the following:

Daily Logs

- A. Date
- B. Hours of Operation.

Monthly Logs

- C. Record the total quantity, in pounds of each material/product used. Be sure to also record the method of application (where appropriate) for each material used (hand lay-up, spray lay-up, etc.).
- D. For each material/product used, record the percentage (%) and quantity (pounds) for each VOC/OS specie be sure to also identify each chemical specie that is a HAP.

Note:

Since some solvents used may not contain 100% solvent, the log shall specify each specific miscellaneous solvent which was used. Documentation of miscellaneous solvents used shall be determined by a mass balance method (amount used minus amount captured for disposal or recycle).

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- E. Record the total quantity, in pounds for each chemical (styrene, miscellaneous solvents) emitted as shown in **Specific Condition 2 and 3.**
- F. Record the total quantity, in tons for each chemical (styrene, miscellaneous solvents) emitted as shown in **Specific Condition Nos.2 and 3.**
- G. Record, in tons, the total cumulative 12 consecutive month period of emissions for each chemical (styrene, miscellaneous solvents) emitted as shown in **Specific Condition Nos.2 and 3.**
- H. Record, in tons, the total cumulative 12 consecutive month period of emissions from all 2 chemical (styrene, miscellaneous solvent) emitted as shown in **Specific Condition Nos.2 and 3.**
- I. Record the total monthly hours of operation.
- J. Record the pounds per hour (monthly average) for each chemical (styrene and miscellaneous solvents) emitted.
- K. Record the cumulative 12 consecutive months hours of operation.
- L. Record for each HAP the total quantity in pounds emitted.
- M. Record, in tons for each HAP, the cumulative 12 consecutive month period of emissions.
- N. Record, in tons, for all the cumulative 12 consecutive month period of emissions.

General Requirements

- O. Each log shall have the appropriate footnotes listing any emissions factors used. Should there be a change in the AP-42 emission factor used, the most current factor shall be employed.
- P. Each log, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle.
- Q. Daily logs shall be completed by the next business day. The monthly logs shall be completed by the end of the following month. Supporting documentation (MSDS sheets, purchase orders, etc.) shall be kept for each material which include sufficient information to determine VOC/OS emissions. These records shall be made available to the Department upon request.

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7. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to be taken shall include the following:

- A. Each of the 2 VOC/OS exhaust stacks shall have a fiber filter in the fan inlet to prevent the discharge of any particulate overspray.
- B. The fiber filters in the fan inlets shall be changed and maintained in accordance with the manufacturer’s recommendations.
- C. Particulate matter emissions generated from hand held tools are deemed insignificant. Each electric or pneumatic powered fiberglass cutting and/or grinding tool will be attached to a shop vacuum type dust collector. These dust collectors will use disposable filters and will be changed as needed.
- D. Normal “good housekeeping procedures” shall be used as needed.

TESTING REQUIREMENTS

8. **Visible Emissions (EP03).** The test method for visible emissions shall be EPA Method 9 as incorporated in Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)4., F.A.C.]

9. **Testing:** The testing frequency shall be annually during each federal fiscal year (October 1- September 30).
[Rule 62-297.310(7)(a)4.,F.A.C.]

10. **Compliance Test Procedures:** Reports of the required compliance tests shall be filed with the Air Compliance Section of this Office as soon as practical but no later than 45 days after the last test is completed.
[Rule 62-297.310(8), F.A.C.]

11. **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.
[Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited; and, Rule 62-210.200(181), F.A.C., Definitions-Objectionable Odor]

ADMINISTRATIVE

12. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

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13. **Modifications:** No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

[Rule 62-210.300(1), F.A.C.]

14. **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(1), F.A.C.]

15. **Circumvention:** No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

[Rule 62-210.650, F.A.C.]

16. **Special Compliance Tests:** When the department, 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 to those rules is being violated, it shall require the owner or operator of the emission unit to conduct compliance tests which identify the nature and the quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7)(b), F.A.C.]

17. **Plant Operation – Problems:** If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner’s intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.

[Rule 62-4.130, F.A.C.]

18. **Excess Emissions:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700(1) and (4), F.A.C.]

{Permitting Note: The Excess Emissions Rule at 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision}

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19. Malfunctions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

20. Issuance of a permit does not relieve the owner or operator of an emissions unit from complying with any applicable requirement, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state or local law.
[Rule 62-210.300, F.A.C.]

21. Statement of Compliance: Within 60 days after the end of each calendar year during which the Title V permit was effective, the source must submit a Statement of Compliance with all terms and conditions of the permit that includes all the provisions of 40 CFR 70.6(c)(5)(iii), incorporated by reference at Rule 62-204.800, F.A.C. for Title V requirements. Such statement shall be submitted (postmarked) to the Department and EPA.
[62-213.440(3)(a)2., F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

DRAFT

Christopher L. Kirts, P.E.
District Air Program Administrator