Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

PERMITTEE

Seabring Marine Industries, Inc.
1579 SW 18th Street
Williston, Florida 32696

Authorized Representative:

Mr. Robert Pita, President

Air Permit No. 0750082-018-AC
Expiration Date: April 10, 2018

Williston Airport Plant

Minor Air Construction Permit

PROJECT

This is the final air construction permit revises Specific Condition No. 12 of Permit No. 0750033-002-AC/0750082-004-AC and Specific Condition No. 3 of Permit No. 0750082-011-AC by removing the obsolete styrene emissions calculation method stated within these permit conditions. Specific Condition No. 12 of Permit No. 0750033-002-AC/0750082-004-AC is also revised to replace the 5% opacity requirement for the dust collector controlling particulate matter emissions from the wood materials processing operation (EP 04) with 20% opacity based on Rule 62-296.320, F.A.C. The Williston Airport plant is a fiberglass manufacturing facility and is categorized under Standard Industrial Classification No. 3732-Boat Building and Repairing. The facility is located in Levy County at 1579 SW 18th Street, Williston, Florida 32696. The UTM coordinates are Zone 17, 356.9 km East and 3249.2 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Julie R. Hudson
Environmental Manger
Permitting Program

CERTIFICATE OF SERVICE
The undersigned duly designated deputy clerk hereby certifies that this permit and all copies were sent on the filing date below to the following listed persons:

Mr. Robert Pita, Seabring Marine Industries, Inc.: bob.pita@montereyboats.com
Ms. Veronica Sgro, P.E., Koogler and Associates, Inc: vsgro@kooglerassociates.com

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.

April 10, 2017
Clerk **Date**

FACILITY DESCRIPTION

This facility is a fiberglass boat manufacturing facility. Process operations include construction of fiberglass, woodworking and material storage and handling.

The Lamination Department is the start of the manufacturing process and this area is the primary source of VOC and HAP emissions. The process is an open mold process. The initial step starts with a fiberglass mold that has been treated with a release agent to allow the finished laminated part to be pulled or removed from the mold. The first step in the lamination process is the spray application of a gel coat to the mold which is the exterior finish once the part is pulled from the mold. The gel coat cures for a period. Next, a vinyl ester barrier coat is sprayed and allowed to cure. After that, chop strand fiberglass and resin are applied to form a skin coat. All air bubbles are rolled out (removed) and the material is allowed to cure. Next, certain models are sprayed with a print block material. After the print block cures, additional lamination is performed, which varies based on the boat model being produced. The final laminating is performed when the flooring or bracing is installed. Once the bracing is cured, all the cavities are filled with urethane foam and the installation holes are covered with fiberglass laminate. The next step involves painting the inside of the hulls and decks. Once cured the laminated part is pulled from the mold and placed on a fixture that helps the part retain the molded shape.

Various adhesives, solvents and lubricants are then used to finish the interior and during parts assembly. Engines are attached and tested. A final product inspection is conducted before covering up the boat with plastic film in preparation for delivery.

There are other areas throughout the plant that use solvents/cleaners/coatings, etc. that emit VOCs and HAPs but those quantities are negligible when compared to the emissions from the lamination process.

A workshop area has cutting and grinding tools that are used to cut various boards, as needed. The particulate matter emissions from this operation are vented to a cyclone.

Emission Points are identified as follows:

EP1 – gelcoat booth stack,

EP2 and EP3 - two (2) small parts grinding booth stacks,

EP4 – woodworking area dust collector stack, and

EP5 – parts cutting and grinding area cyclone stack.

There are numerous horizontal building exhaust fans in the plant. The facility has two lamination buildings.

The existing facility consists of the following emissions units.

Facility ID No. 0750082	
Emissions Unit ID No.	**Emission Unit Description**
001	Fiberglass boat manufacturing operation

PROPOSED PROJECT

Seabring Marine Industries, Inc. has submitted a request to remove from the current Title V permit an obsolete specific condition. The facility has stated that there are more appropriate emission factors now available for estimating VOC and HAP emissions from fiberglass boat manufacturing operations. Specifically, the facility is requesting that Condition A.7. in Permit No. 0750082-015-AV be deleted. The facility also requests that the

emissions calculations for the current year be revised as of January 1, 2017, so that the annual operating report for year 2017 can be based on a consistent calculation method.

In addition, Seabring Marine Industries, Inc. is requesting that Condition A.9. in Permit No. 0750082-015-AV, which requires annual VE testing for EP 04 (woodworking area) be revised to require VE testing every 5 years (prior to permit renewal). The facility states that there is no applicable source specific standard and emissions from this operation have been minimal based on past compliance testing which show that there are no visible emissions.

The specific conditions of the underlying construction permits are being revised accordingly. Specific Condition No. 12 of Permit No. 0750033-002-AC/0750082-004-AC and Specific Condition No. 3 of Permit No. 0750082-011-AC are being revised by removing the obsolete styrene emissions calculation method stated within these permit conditions.

Specific Condition No. 12 of Construction Permit No. 0750033-002-AC/0750082-004-AC is also being revised to replace the 5% opacity requirement for the dust collector controlling particulate matter emissions from the wood materials processing operation (EP 04) with the general visible emissions standard of 20 percent opacity. The general visible emissions standard in Rule 62-296.320(4)(b), F.A.C. is considered to be a facility-wide limitation and the permittee is not required to perform a visible emissions compliance test to demonstrate compliance with the facility-wide limitation annually or before renewal. If the Department believes that the general visible emission standard is being violated, the Department may require that the owner or operator perform a visible emissions test per the Special Compliance Test Rule of Chapter 62-297., F.A.C.

Specific Condition 3 of Construction Permit No. 0750033-001-AC is also being revised to replace the 5% opacity requirement for the dust collector controlling particulate matter emissions from the wood materials processing operation (EP 04) with the general visible emissions standard of 20 percent opacity.

FACILITY REGULATORY CLASSIFICATION

- The facility **is** 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.
- The facility **is** a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight.

Permit Being Modified: Permit No. 0750033-001-AC

Affected Emissions Unit: EU-001

Specific Condition 3.: This condition is revised as follows.

3. The permitted maximum allowable emissions rate for each pollutant is as follows:

POLLUTANT	LOCATION I.D.	EMISSION RATE	FAC RULE
Styrene (H163)	Emissions Unit 001	21.2	--- **NOTE(1)**
Volatile Organic Compounds **NOTE(2)**	Emissions Unit 001	28.0	--- **NOTE(1)**
Visible Emissions	Emission Point 01	~~5% Opacity~~ 20% Opacity	~~62-297.620(4)~~ 62-296.320(4)(b)

NOTE(1) A self-imposed emissions limit in order to avoid a P-MACT determination and to establish the facility installation as relocation.

NOTE(2) Emissions from all VOC and styrene emissions combined.

Permit Being Modified: Permit No. 0750033-002-AC/0750082-004-AC

Affected Emissions Unit: EU-001

Specific Condition 12.: This condition is revised as follows.

12. The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	LOCATION I.D.	EMISSION RATE	FAC RULE
Styrene (H163)	Emissions Unit 001	117 ~~**NOTE(1)**~~	--- **NOTE(2)**
Volatile Organic Compounds **NOTE(3)**	Emissions Unit 001	228 ~~**NOTE(1)**~~	--- **NOTE(2)**
Visible Emissions	Emission Point 01	~~5% Opacity~~ 20% Opacity	~~62-297.620(4)~~ 62-296.320(4)(b)

~~**NOTE(1)** Styrene emissions are 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 is calculated based on the maximum weight percent stated in the MSDS.~~

NOTE(2) Rule 62-210.200(228), F.A.C., Definitions – Potential To Emit (PTE)

NOTE(3) Emissions from all VOCs and styrene emissions combined.

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Permit Being Modified: Permit No. 0750082-011-AC

Affected Emissions Unit: EU-001

Specific Condition 3.: This condition is revised as follows.

3. Permitted Capacity: The maximum operating rates are listed below and shall not be exceeded without prior Department approval

MATERIAL	EMISSION UNIT/POINT	RATE
Styrene	EU001	**NOTE(1), NOTE(2)**

~~**NOTE(1)** Styrene emissions shall be calculated as 11% of the available monomer for the resins; 48% of the available monomore 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.~~

NOTE(2) Total Styrene and all VOC emissions shall not exceed 228 TYP.

[Applicant requested 10/06/05, Application No. 0750082-018-AC]