



Florida Department of
Environmental Protection
Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

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PERMITTEE:

American Marine Holdings, LLC
Dba Donzi Marine, LLC
7110 21st Street East
Sarasota, FL 34243

DRAFT Permit No.: 0810076-007-AC

County: Manatee

Effective Date: DRAFT

Expiration Date: 01/31/2008

Project: New Paint Booth

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-204, 62-210, 62-212, 62-213, 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:

This permit authorizes the installation of a new paint booth, which will replace one of two existing paint booths at the Fiberglass Boat Manufacturing Facility (Emission Unit 001). The replaced paint booth will be used for prep work only, which does not involve the use of any material containing volatile organic compounds (VOC) and/or hazardous air pollutants (HAP). The permit also removes the reference to two water-wall spray scrubbers, which are no longer used at this facility. The current paint usage is not expected to increase. The facility's allowable emissions of VOC remain the same as previously permitted.

FACILITY DESCRIPTION

This is a Title V source for VOC and HAPs and a synthetic non-PSD facility. The allowable VOC emissions are limited to a maximum of 248.8 tons per any consecutive 12-month period. Emissions of styrene and other miscellaneous solvents from the facility are controlled by monthly material usage logs, work practice requirements, and the dispersion of emissions.

This facility is subject to the requirements of 40 CFR 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

The manufacturing operations are conducted in three (3) areas as described below:

Fiberglass Lamination Building

In this building boat molds are coated with a friction reducing agent, usually wax, prior to beginning the lamination process of the fiberglass. A portion of the fiberglass is applied by hand (hand lay-up) and the remainder is applied with spraying equipment (spray lay-up). Upon completion of the lamination process

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and after adequate curing time, the laminated fiberglass is removed from the mold. The lamination area is approximately 103 ft. x 300 ft. x 30 ft. and is equipped with 17 forced air vents.

A gelcoat booth, a large piece grinding/sanding area (open east wall) for mainly hulls & decks, and a small piece grinding/sanding area (no east wall) are activities also performed in this building.

Assembly Building

This building contains a Wood Shop, Wood Mill, Foam Cutting/Adhesive Operation, Production Development Area, and an Assembly Area. In the assembly area, decks and hulls are connected and power trains are installed along with other miscellaneous associated activities that may include solvent usage. This building is equipped with 16 forced air vents.

Paint Booths

Paint booths are used to paint boats. There are two paint booths located outside the Assembly Building. One additional booth is used for prep work only, which does not involve the use of any material containing VOC and/or HAP. These three booths are side-by-side. The booth closest to the 21st Street East is the new booth, and the one furthest from on the 21st Street East will be used for prep work only. To control unconfined particulate matter, the two paint booths have air filters that are located at the bottom of the two side walls (west and east walls). There are also air intake filters located on the ceiling of each booth. The new paint booth has a propane gas fired heater, which is considered an insignificant source due to its low emissions. {*Permitting Note: According to calculations provided by the facility's consultant on 05/09/2007, emissions of NO_x, CO, PM and SO₂ from the heater are approximately 2.94, 0.41, 0.10 and 0.02 tons per year respectively.*}

Insignificant Emissions Units and/or Activities

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I-1).

FACILITY INFORMATION SUMMARY

Location: 7110 21st Street East, Sarasota, Manatee County

UTM coordinates: Zone 17, 349.37 East and 3033.07 North

Latitude: 27°24'51" N and Longitude: 82°32'20" W

Emission Unit No. 001: Fiberglass Boat Manufacturing Facility

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Permit History: Replaces Construction Permit Nos. 0810076-001-AC and 0810076-006-AC
Cross references Title V Air Operation Permit No. 0810076-005-AV

Permitting Note: Please reference the Permit No., Facility ID No., and appropriate Emissions Unit ID No. on all correspondence, test report submittals, applications, etc.

ATTACHMENT

Appendix I-1: List of Insignificant Emissions Units and/or Activities, attached to this permit as part of this permit.

Attachment – General Conditions (Version 11/1/2005)

SPECIFIC CONDITIONS

1. General Conditions. A part of this permit is the attached 15 General Conditions.
[Rule 62-4.160, F.A.C.]

2. Other Requirements. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. or any other requirements under federal, state, or local law.
[Rule 62-210.300, F.A.C.]

Operation Limitations

3. Permitted Capacity. The facility only utilizes a "resin non-spray layup" process and a "Flow Coater" application system, which is considered a "Mechanical Nonatomized" spray layup process. See Table in Specific Condition No. 12. The percent (%) of available monomer (styrene) shall not exceed the following:

- A. Resin Non-Spray Layup & Flow Coater - 50%
- B. Tooling/Pigmented/Base Gel Coats - 45%

[Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.]

4. Hours of Operation. The hours of operation of this facility are not restricted (8,760 hours per year).
[Rules 62-4.160(2) and 62-210.200 (definition of "potential to emit"), F.A.C; Construction Permit 0810076-006-AC]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

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Emission Limitations

6. The total VOC emissions from this facility shall be verifiable on a monthly basis and shall not exceed 248.8* tons per any consecutive 12 month period.

**233.8 tons per any consecutive month period of emissions from materials containing VOC that are not associated with insignificant emission units and/or activities. The remaining 15.0 tons per any consecutive 12 month period of emissions are allocated to the insignificant emission units and/or activities at the facility and are not required to demonstrate compliance as specified below. This allocation is considered a reasonable and practicable requirement for this type of facility in order to assure the facility remains a synthetic non-PSD facility.*

[Permittee's letter dated August 3, 2000; Construction Permit 0810076-001-AC]

Raw materials used in this facility include, but are not limited to, the compounds listed below, which constitute the majority of the materials used at this facility:

- Styrene**
- Methyl Methacrylate**
- Trichlorofluoro methane
- Dichlorodifluoro methane
- Methylene chloride
- Acetone

** VOCs

The chemicals/compounds listed above not designated as a VOC are excluded from the definition of a VOC contained in Rule 62-210.200, F.A.C. and shall not be included in the 248.8 tons per any consecutive month period limitation.

[Rule 62-4.070(3), F.A.C.; Construction Permit 0810076-001-AC]

7. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, 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.]

8. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants from this facility which cause or contribute to an objectionable odor. Objectionable odor is defined as 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.

[Rules 62-296.320(2) and 62-210.200 – Definition of Objectionable Odor, F.A.C.]

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9. Unconfined Particulate Matter Emissions. Pursuant to Rules 62-296.320(4)(c)1., 3. and 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements:

- A. Paving and maintenance of roads, parking areas, and yards.
- B. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter including the following:
 - 1. Wood Mill - Routers are pre-wired with a commercial shop vacuum cleaner to ensure that control equipment is operational during routing.
 - 2. Paint Spray Booths – Air filters are used in the paint booths and are serviced weekly.
 - 3. Lamination Building - Polyester Paint Arrestor Filters are used on all 17 exhaust fans and are serviced weekly.

As an indicator that adequate control measures are being employed, visible emissions from exhaust fans, doors, and vents should not exceed 5% opacity. If this level is exceeded, it shall not be considered a violation in and of itself, but may allow the Department to require additional controls or work practices. [Rule 62-296.320(4)(c)2., F.A.C.]

10. General Pollutant Emission Limiting Standards. 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 Department. The permittee shall comply with the following:

- A. Maintain tightly fitting covers, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.
- B. Prevent excessive air turbulence across exposed VOC's.
- C. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC so that it can be covered when not in use.
- D. All fittings, valve lines, etc. shall be properly maintained.
- E. All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.
- F. The associated forced air vents shall be operating during activities/operations which release VOC/OS emissions and shall remain operating for at least 2 hours after the activities/operations have stopped.
- G. Work practice controls shall include limiting the amount of clean-up solvents issued to employees and employees shall use gloves whenever handling resins.

[Rule 62-296.320(1)(a), F.A.C. and Construction Permit 0810076-001-AC]

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11. Circumvention of Control Equipment. The permittee shall not circumvent any air pollution control device (air filters at paint booths) or allow the emissions of air pollutants without the applicable air pollution control devices operating properly.
[Rule 62-210.650, F.A.C]

Recordkeeping Requirements

12. Monthly Records. Compliance with the VOC emissions limitation of Specific Condition No. 6 shall be documented monthly, based upon usage of all VOC/Styrene containing materials (Resin, Gelcoat, Putties, Fillers, etc.). Monthly usage of materials shall be based upon an inventory at the beginning of the month, receipt of material during the month, and inventory of the materials at the end of the month. Additionally, usage of materials may be based upon purchases, provided no materials are used which are not purchased. The emission summary shall show the following:

- A. The total VOC emissions for the month in tons.
- B. The total Styrene emissions for the month in tons.
- C. The total VOC emissions, in tons, for the most recent consecutive 12-month period.
- D. The total Styrene emissions, in tons, for the most recent consecutive 12-month period.

General Recordkeeping Requirements

- E. Record the method of application for all gel coat and resin usage (see Table below).
- F. Emissions of Styrene, Methyl methacrylate (MMA), and other volatile organic compounds (VOCs) shall be determined as follows until notified by the Department. Note, Styrene and MMA are each considered a VOC and a HAP.

- 1. 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 following table, in conjunction with the percent of available non-vapor suppressed (NVS) styrene monomer in the resin/gelcoat:

	Resin** Hand (Non- Spray) Layup	Resin** Mechanical Atomized Spray Layup	Resin Mechanical Nonatomized* Spray Layup	Gel Coat** Mechanical Atomized Spray Layup	Gelcoat Mechanical Nonatomized* Spray Layup
% Monomer					

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% Monomer	Resin** Hand (Non- Spray) Layup	Resin** Mechanical Atomized Spray Layup	Resin Mechanical Nonatomized* Spray Layup	Gel Coat** Mechanical Atomized Spray Layup	Gelcoat Mechanical Nonatomized* Spray Layup
18	39	51	39	138	67
19	41	54	41	148	70
20	43	58	43	158	79
21	45	61	45	168	88
22	48	64	47	178	97
23	50	68	49	189	106
24	52	71	51	200	115
25	55	75	54	211	124
26	57	78	56	221	133
27	59	82	58	233	142
28	62	86	60	244	151
29	64	90	62	256	160
30	67	94	64	269	169
31	69	97	66	281	178
32	71	102	68	295	187
33	74	105	71	308	196
34	77	112	74	322	205
35	80	118	77	336	214
36	83	127	80	354	223
37	86	136	83	371	232
38	90	146	86	390	241
39	92	156	89	408	250
40	95	166	93	427	259
41	98	176	96	446	268
42	100	187	99	466	278
43	112	192	102	477	287
44	117	202	105	495	296
45	122	212	108	513	305
46	127	221	111	532	314
47	133	232	115	551	323
48	138	242	118	571	332
49	143	252	121	590	341
50	148	263	124	609	350

* *Nonatomized* means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, and pressure fed resin rollers. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures.

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*** The emission factors in these columns are based on a weighted average using the following assumptions:*

- *Using the Unified Emission Factors - 20% by weight of the facility's usage of resins and gelcoats are for reinforced plastic composites production for items such as hatches and doors, but not for hulls and decks.*
- *Using the National Marine Manufacturer Association's Factors – 80% by weight of the facility's usage of resins and gelcoats are for items such as decks and hulls.*

2. MMA emissions shall be determined by the following equations:

$$\text{Emissions (tons)} = M_{mma} \times C_{mma} \times 0.75$$

where:

M_{mma} = amount of MMA containing material used (in tons)

C_{mma} = MMA content (percent/100)

3. 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:

$$\text{Emissions (tons)} = M_{voc} \times C_{voc} \times R_f$$

where:

M_{voc} = amount of VOC containing material used (in tons)

C_{voc} = VOC content (percent/100)

R_f = Release factor (percent/100), if applicable (The Department may request technical documentation to support how the factor was determined/derived.)

- G. Each log, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle.
- H. When determining the VOC emissions and Styrene emission rates, the percent of solids in the recovered materials shall be documented and accounted for in the emission calculations, if applicable.
- I. 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 includes sufficient information to determine VOC emissions and Styrene emissions.
- J. The logs/records shall be kept at the facility for a minimum of 5 years. The VOC, styrene, and MMA emission summary, calculations, and records used to determine emissions shall be recorded in a permanent form suitable for inspection by the Department or the Manatee County Environmental Management Department (MCEMD) upon request.

[Rule 62-213.440(1)(b), F.A.C.]

Reporting Requirements

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13. Annual Operating Report (AOR) - The permittee shall submit to the Air Program of the Southwest District Office of the Department each calendar year on or before March 1, a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Air Compliance section of the Southwest District Office of the Department.
[Rule 62-210.370(3), F.A.C.]

MACT - 40 CFR 63, Subparts A and VVVV, Requirements

14. This facility shall comply with 40 CFR 63, Subparts A and VVVV, which is part of the facility's Title V Air Operation Permit.
[Rule 62-204.800(11)(b)77., F.A.C.]

Title V Air Operation Permit Revision

15. Title V Air Operation Permit Revision Application - A completed application to revise the facility Title V Air Operation Permit shall be submitted to the Air Permitting Section of the Department's Southwest District Office within 90 days of the issuance of this construction permit. The applicant shall submit the following:

- A. the appropriate operation permit application form (*see current version of Rule 62-210.900, F.A.C., and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*); and
- B. copies of the records specified Specific Condition No. 12 for the most recent two (2) months.

[Rules 62-4.050, 62-4.070(3), 62-210.300(2), 62-210.900, and 62-297.310(7)(a)1., F.A.C.]

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

DRAFT

Mara Grace Nasca
District Air Program Administrator
Southwest District