FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Roscioli International, Inc.
6111 21st Street East
Bradenton, FL, 34203

Authorized Representative:
Robert Roscioli, President

Air Permit No. 0810091-009-AF
Permit Expires: 11/27/2018
Donzi Yachts
Federally Enforceable State Operation Permit (FESOP)
Fiberglass Boat Manufacturing

This is the final permit to renew Air Operation Permit No. 0810091-008-AF for fiberglass boat manufacturing operation at Donzi Yachts (Standard Industrial Classification No. 3732). The facility is located in Manatee County at 6111 21st Street East in Bradenton, Florida. The UTM coordinates are Zone 17, 348.0 km East, and 3035.3 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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.

This air pollution 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(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 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 when and how the petitioner received notice of the agency decision;
(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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; 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 Department'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 of the Florida Administrative Code.

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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Kelley M. Boatwright 11/27/2013

Kelley M. Boatwright — Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Robert Roscioli, President

donziengineering@roscioliyachting.com

Erin Dibacco

Erin.DiBacco@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Rhonda Hughes 11/27/2013

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility consists of a custom fiberglass boat manufacturing operation.

Facility ID No. 0810091	
EU ID No.	**Emissions Unit Description**
001	Fiberglass Boat Manufacturing

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Sources/Activities

- Mill shop woodworking operation - which includes small mill shops on the second floor of the Main Building and the loft of the Rear Building located adjacent to main building in accordance with the provisions of Rule 62-4.040(1)(b), F.A.C. (insignificant emissions).
- Paint Spray Booth – on site for use on small projects in accordance with the provisions of Rule 62-4.040(1)(b), F.A.C. (insignificant emissions).
- Other exempt activities - include miscellaneous cutting, shaping, and trimming of fiberglass, wood, or foam parts in accordance with the provisions of Rule 62-4.040(1)(b), F.A.C. (insignificant emissions).

Exemptions under Rule 62-4.040(1)(b), F.A.C. (insignificant emissions), may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no 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.
- This facility is a synthetic non-Title V source for the pollutants Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC). The emission limitations in this permit will ensure that the facility's HAP and VOC emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 0810091-008-AF.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. 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.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an

increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) 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 Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent month of records/logs specified in Specific Condition No. A.9.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU No. 001 Fiberglass Boat Manufacturing

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Fiberglass Boat Manufacturing – The manufacturing operations are conducted in the (west) Main Building which consists primarily of an Assembly Area and a Lamination Area, and in the (east) Rear Building. In the Lamination Area of the Main Building and in the Rear Building, fiberglass and resin are applied to forms by hand or spray lay-up and/or infusion techniques, as appropriate. Gelcoating, as required, is performed in these areas via hand roller and airless air-assisted spray guns, as appropriate for the product being produced. Miscellaneous styrene-containing putties and fillers are used for touch-up, principally in the Assembly Area of the Main Building and in the Rear Building during the assembly activities. Adhesives and coatings, either water-based or containing miscellaneous solvents may be utilized principally in the Assembly Area of the Main Building, and in the Rear Building during the assembly activities, where items such as seat cushions, covers, and deck carpet may be prepared and applied to the product. Thermaclean Aquawash and acetone are the predominant cleanup solvents. The facility also includes a stand-alone paint spray booth. Ventilation of the organic solvents (OS)/volatile organic compounds (VOC) emissions from the Main Building and from the Rear Building will each be provided by 30-inch diameter exhaust fans which have a rated airflow of 9,950 cubic feet per minute, actual (acfm). The exhaust stack for the Main Building is located at the approximate center of the south-side wall of the building, while the exhaust fan for the Rear Building is in the roof of the building. Doors and windows are closed whenever feasible to insure that HAP/VOC emissions are captured and exhausted through the stack or roof vents with adequate dispersion. There is a third, smaller building adjacent to the Main building that is leased out to a third party marine service/fiberglass company, Tempest Offshore, Inc., who does contracted work for Donzi Yachts as well as other boat manufacturing companies. Donzi and the other companies track all materials used for their own projects performed by Tempest Offshore, Inc.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rule 62-210.200 (definition of Potential to Emit), F.A.C.; Construction Permit No. 0810091-006-AC]

EMISSIONS STANDARDS

A.2. Boat Manufacturing Operations - Fiberglass boat and related fiberglass components manufacturing, including resin and gelcoat application and related assembly and cleanup activities shall be done only in the Main Building and the Rear Building as shown on the site plans submitted with the construction modification application dated 07/15/03.
[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 0810091-006-AC]

A.3. Volatile Organic Compound Emission Limitation - Total emissions of volatile organic compounds (VOC) from this facility shall not exceed 24.0 tons per any consecutive 12-month period.
[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Construction Permit No. 0810091-006-AC]

A.4. Hazardous Air Pollutant Emission Limitations - Emissions of HAPs (as defined in Rule 62-120.200, F.A.C.) from this facility shall be limited as follows:

a. total HAP emissions shall not exceed 24.0 tons per any consecutive 12-month period; and
b. emissions of styrene or any other individual HAP shall not exceed 9.4 tons per any 12 consecutive-month period. (*Note: The HAP with the greatest emissions is projected to be styrene.*)

[Rule 62-210.200(Definition "Potential to Emit"), F.A.C.; Construction Permit No. 0810091-006-AC]

A.5. Volatile Organic Compounds Emissions or Organic Solvents Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any process or installation, OS or VOC without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following operating procedures and work practices relating to HAPs/VOC-containing material use and emissions:

a. the building (Main and Rear) exhaust fans shall be operating whenever usage of materials containing HAPs/VOC occurs and shall remain operating for at least two (2) hours after the usage has been completed;

b. when determining the non-styrene VOC emission rate(s) in accordance with Specific Condition No. A.9., the percent of solids in the recovered solvents shall be documented and accounted for in the emission calculations;

c. all materials containing HAPs/VOC shall be stored in closed containers and/or in small automatic closing safety cans;

d. clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere;

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 the building (Main and Rear) 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; and

i. doors and windows shall be closed whenever feasible to insure that HAP/VOC-containing materials are captured and exhausted through the exhaust stacks/vents with adequate dispersion.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 0810091-006-AC]

A.6. 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.]

A.7. Unconfined Emissions of Particulate Matter - All reasonable precautions shall be taken to prevent and control generation of unconfined (fugitive) emissions of PM in accordance with the provisions in Rule 62-296.310(3), 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. portable "shop-vac" vacuum collectors and normal "good housekeeping procedures" shall be used as needed;

b. the Main Building and Rear Building exhausts shall have a fiber filter at the fan inlet to prevent the discharge of any particulate overspray; and

c. the fiber filter shall be changed and maintained in accordance with the manufacturer's recommendations.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 0810091-006-AC]

A.8. Visible Emissions as Indicators of Adequate Measures - In order to provide reasonable assurance that the precautions listed in Specific Condition No A.7. are adequate, visible emissions (VE) from the stack(s) and other building openings should not exceed five percent (5%) opacity. Exceedance of the five percent (5%) limit shall not be considered a violation in and of itself, but an indication that additional PM control precautions and/or practices may be necessary.
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit No. 0810091-006-AC]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.9. 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 Department. *Note: styrene and MMA are each considered a HAP and a VOC.*

a. Styrene emissions shall be determined using the following equation:

$$\text{Emissions (tons)} = \frac{Ms \times EF}{2000 \text{ lb/ton}}$$

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:

Percent 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

A. EU No. 001 Fiberglass Boat Manufacturing

Percent 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
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.

** 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.

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)

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:

$$\text{Emissions (tons)} = \text{Mvoc} \times 1.00 \times \text{Cvoc}$$

where:

Mvoc = amount of VOC containing material used (in tons)

Cvoc = VOC content (percent by weight/100)

(Permitting Note: For infusion techniques styrene emissions are expected to be significantly lower than for hand or spray lay-up techniques and should be calculated using the appropriate emission factors)

[Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit No. 0810091-006-AC]

A.9. Hazardous Air Pollutant and Volatile Organic Compound Emission Records - 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.). 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. A 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 HAP/VOC emission summary shall show the following:

a. total VOC emissions for the month, in lbs or tons;

b. total HAP emissions for the month, in lbs or tons;

c. individual HAP emissions (including styrene) for the month, in lbs or tons;

d. total VOC emissions, in tons, for the most recent consecutive 12-month period;

e. total HAP emissions, in tons, for the most recent consecutive 12-month period;

f. total individual HAP emissions (including styrene), in tons, for the most recent consecutive 12-month period;

g. the application method (where applicable) for each material used (see Table above);

h. each log, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle; and

i. when determining the VOC emissions and HAP/styrene emission rates, the percent of solids in the recovered materials shall be documented and accounted for in the emission calculations, if applicable.

The monthly logs shall be completed by the end of the following month. Supporting documentation (Material Safety Data Sheets (MSDS), purchase orders, etc.) shall be kept for each material which includes sufficient information to determine HAP and VOC emissions.

The logs/records shall be kept at the facility for a minimum of three (3) years in a permanent form suitable for inspection and made available to the Department upon request.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.; Construction Permit No. 0810091-006-AC]