



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

FINAL PERMIT

PERMITTEE

Intrepid Powerboats, Incorporated
11700 South Belcher Road
Largo, FL 33773

Authorized Representative:
Mr. Ken Clinton, President

Air Permit No. 1030212-015-AC
Permit Expires: 09/01/2016
Site Name: Intrepid Powerboats, Inc.
Minor Air Construction/Operation Permit
Project: Installation of paint spray booth

This is the final air construction permit to install a new paint spray booth. The proposed work will be conducted at Intrepid Powerboats, Inc. (Standard Industrial Classification No. 3732). The facility is located in Pinellas County at 11700 South Belcher Road in Largo, Florida. The UTM coordinates are Zone 17, 328.1 km East, and 3085.4 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

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. 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 Hillsborough County, Florida


Kelley M. Boatwright
Permitting & Waste Cleanup
Program Administrator
Southwest District

08/24/2015
Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, 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.

Mr. Ken Clinton, Intrepid Powerboats, Inc. (kclinton@intrepidpowerboats.com)

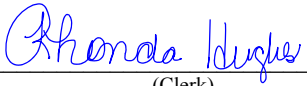
Mr. Tom Dye, Intrepid Powerboats, Inc. (TDye@intrepidpowerboats.com)

Mr. Tom John, P.E., Tom John Professional Engineer, Inc. (tjengr@msn.com)

Mr. Sherrill Culliver, Pinellas County Air Quality Division (sculliver@co.pinellas.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.



(Clerk)

August 24, 2015
(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility consists of a fiberglass boat manufacturing facility. Manufacturing operations at the facility occur in the western building, southern building (previously called the eastern building), and the northern building.

The western building is normally used for trim building, hull lamination, and deck-liner, etc. lamination activities. Although this building is not totally enclosed, it has 4 inlet openings each with a fan along with 6 exhaust vents each equipped with a fiber filter and fan.

The southern building is normally used for the small part patching, CNC (Computer Numerical Control) cutting operations, small parts lamination, and tooling activities, which includes a wood shop and metal machine shop. The building, which is not totally enclosed, has 10 exhaust stacks each equipped with a fiber filter and fan. Additionally, on the north side of the southern building is a paint spray booth (approx. 50 feet x 15 feet), which has 1 pre-filtered inlet opening with a fan along with 1 exhaust vent equipped with a fiber filter and fan.

The northern building is normally used for final assembly and mold care/preparation activities. The building, which is not totally enclosed, has 5 inlet openings each with a fan along with 6 exhaust vents each with a fiber filter and fan.

At the facility, wood and fiberglass cutting, shaping, grinding, and sanding operations are performed by hand held tools and limited tabletop equipment.

The existing facility consists of the following emissions units (EUs).

Facility ID No. 1030212	
EU ID No.	Emissions Unit Description
002	Fiberglass Boat Manufacturing Facility
004	Existing Emergency Stationary Spark Ignition (SI) Rice Engine \leq 100 HP

Project Description and Affected Emission Units

This project will add a new paint spray booth adjacent to the existing paint spray booth. The new paint spray booth will be approx. 23 feet x 10 feet and will be equipped with exhaust filters that meet the 6H standard for particulate removal over 95%. An exhaust fan with a 34-inch fan and 5-hp motor promotes air flow within the booth at a rate of approximately 12,800 cfm. The addition of the new paint spray booth will not affect the existing emission limits of the facility. This project will modify the following emissions unit (EU).

EU ID No.	Emissions Unit Description
002	Fiberglass Boat Manufacturing Facility

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

SECTION 1. GENERAL INFORMATION (FINAL)

Exempt Emission Sources/Activities

The emissions from the following emission sources at this facility are deemed insignificant and exempt from permitting per Rule 62-4.040, F.A.C.:

- VOC breathing and working emissions from the resins and gelcoats that are received.
- VOC emissions from miscellaneous solvents that result from product transfer.
- Activities involving the cutting, shaping, or trimming of fiberglass, wooden or foam parts, where not performed by hand held tools.
- Hazardous materials and recoverable solvents accumulation, storage, and transfer.
- Internal combustion engines for pressure washers, forklifts, travel lifts, and other activities.

FACILITY REGULATORY CLASSIFICATION

- The facility is 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 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.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Construction Permit No. 1030212-013-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

ADMINISTRATIVE REQUIREMENTS

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

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above e-mail address and/or address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division. The mailing address, phone number and e-mail of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756
Telephone: 727-464-4422
E-mail: Airquality@pinellascounty.org

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;
- d. Appendix D. Common Testing Requirements;
- e. Appendix E. 40 CFR 63, Subpart A – General Provisions;
- f. Appendix F. 40 CFR 63, Subpart VVVV – National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing Facilities.

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

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. Application for Title V Air Operation Permit - This permit authorizes construction of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Title V air 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.; (applies to non-Title V facilities and construction permits at a Title V facility that does not have an effective Title V permit)
 - c. copies of the most recent month of records/logs specified in Specific Condition No. A.7.

The application shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority).

[Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

8. 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” means 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 or life or property, or which creates a nuisance.
[Rule 62-296.320(2) and 62-210.200 (Definitions), F.A.C.; Pinellas County Code, Section 58-178]
9. 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 Department. The permittee shall comply with the following:
 - a. All materials containing volatile organic compounds/organic solvents (VOC/OS) shall be stored in closed containers and/or in small automatic closing safety cans.

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS
(FINAL)**

- b. Clean-up solvent washings (VOC/OS) shall be directed into containers that prevent evaporation into the atmosphere.
- c. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive VOC/OS emissions and spills of materials containing VOC/OS.
- d. Work practice controls, when practicable, shall include limiting the amount of clean-up VOC/OS issued to employees and employees shall use gloves whenever handling resins.
- e. Maintain tightly fitting covers, lids, etc. on all containers of VOC/OS when they are not being handled tapped, etc.
- f. Prevent excessive air turbulence across exposed VOC/OS.
- g. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC/OS so that it can be covered when not in use.
- h. All VOC/OS spills shall be properly attended to and any waste, which is collected, shall be properly disposed of, recycled, etc. in order to minimize emissions.
- i. The associated forced air vents/exhausts stacks shall be operating during activities/operations which release VOC/OS emissions and shall remain operating for at least 1 hour after the activities/operations have stopped.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1030212-013-AC]

- 10.** General Visible Emissions – No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.

[Rule 62-296.320(4)(b)1, F.A.C.]

- 11.** 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 to prevent emissions of unconfined particulate matter at this facility include:

- a. Application of water to paved and unpaved areas accommodating vehicular traffic.
- b. Removing particulate matter from buildings or work areas.
- c. Enclosing or covering activities or equipment.
- d. Use of shop-vacuum(s) as necessary and practical.

Whenever the 1 exhaust vent/fan for the paint spray booth, 10 exhaust vents/fans in the southern building, 6 exhaust vents/fans in the western building, and/or 6 exhaust vents/fans in the northern building are operating they shall be equipped with fiber filters. The filters shall be adequately maintained in order to assure proper airflow and particulate matter collection.

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS
(FINAL)**

As an indicator that adequate control measures are being employed, visible emissions from exhaust fans, doors, and vents shall not exceed 5% opacity. If this level is exceeded, additional controls or work practice changes may be required by the Department.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1030212-013-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 002 – Fiberglass Boat Manufacturing Facility

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

EU ID No.	Emissions Unit Description
002	<p><i><u>Fiberglass Boat Manufacturing Facility</u> – This facility consists of three production buildings (Building #2, #3 and #4) and a separate office building.</i></p> <p><i>The southern building (Building #2) is normally used for the small part patching, CNC (Computer Numerical Control) cutting operations, small parts, lamination, and tooling activities, which includes a wood shop and metal machine shop. Mold maintenance/repair activities are also conducted. The facility conducts vacuum infusion (closed) molding of a number of components, hull liners and decks for all of the model lines in this building. In addition parts such as hatchets are manufactured using “squeeze molding” techniques in which two open molded uncured halves are pressed together. The building, which is not totally enclosed, has 10 exhaust stacks each equipped with a fiber filter and fan. Additionally, on the north side of the southern building is a paint spray booth (approx.. 50 feet x 15 feet), which has 1 pre-filtered inlet opening with a fan along with 1 exhaust vent equipped with a fiber filter and fan.</i></p> <p><i>This project will add a new paint spray booth adjacent to the existing paint spray booth. The new paint spray booth will be approx. 23 feet x 10 feet and will be equipped with exhaust filters that meet the 6H standard for particulate removal over 95%. An exhaust fan with a 34-inch fan and 5-hp motor promotes air flow within the booth at a rate of approximately 12,800 cfm.</i></p> <p><i>The western building (Building #3) is the site of the major lamination activities. The building is ventilated through six vertical exhaust vents each equipped with a fiber filter at the inlet. A layer of catalyzed gelcoat is spray applied (typically using nonatomized applicators) to the prepared hull and deck molds. Then various layers of catalyzed resin and fiberglass are applied principally using nonatomized mechanical spray techniques. Gelcoating of “small parts” such as hatches, consoles and components is performed in a similar manner. After curing the parts are removed from the mold and excess material is trimmed, typically with hand held tools. Particulate matter emissions are controlled by portable “shop-vac” vacuum collectors and “good housekeeping” procedures.</i></p> <p><i>The northern building (Building #4) is the assembly building. Here, the completed hulls and decks are prepared for the addition of small parts and components and final assembly. Miscellaneous styrene-containing bonding and other putties, fillers, waxes and solvents may be used prior to final assembly. The building, which is not totally enclosed, has 5 inlet openings each with a fan along with 6 exhaust vents each with a fiber filter and fan.</i></p>

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- A.1.** Hours of Operation – This emission unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 (Potential to Emit), F.A.C., Permit Application Dated July 2, 2015]
- A.2.** Exempt from VOC RACT – In order for the coating of miscellaneous metal parts and products to be exempt from the VOC Reasonably Available Control Technology requirements of Rule 62-296.513, F.A.C. – Surface Coating of Miscellaneous Metal Parts and Products, the usage of paint, coatings, and

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 002 – Fiberglass Boat Manufacturing Facility

associated solvents (including clean-up) shall not exceed 750 gallons per any consecutive 12 month period when used on metal surfaces of any kind whether inside or outside a boat.

(Permitting Note – Rule 62-296.513, F.A.C. is not applicable to the exterior of a marine vessel. However, for recordkeeping simplicity, the permittee accepts the above usage limitations for both the interior and exterior of a marine vessel)

[Rule 62-296.500(3) and 62-4.040, F.A.C., Construction Permit 1030212-013-AC]

EMISSIONS LIMITATIONS AND STANDARDS

- A.3.** Hazardous Air Pollutant (HAP) Emissions Limitation – Total HAP emissions (including VOC emissions) shall not exceed 95 tons per any consecutive 12-month period.
[Permit Application Dated July 2, 2015]
- A.4.** Volatile Organic Compound (VOC) Emissions Limitation – Total VOC emissions shall not exceed 95 tons per any consecutive 12-month period.
[Permit Application Dated July 2, 2015]

NOTIFICATION REQUIREMENTS

- A.5.** Notification of Operation Commencement – The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 002 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDKEEPING AND REPORTING REQUIREMENTS

- A.6.** Recordkeeping Requirements – Compliance with the VOC and Total HAP emission limitations of Conditions A.3. and A.4., along with the amount of material used for coating/painting miscellaneous metal parts and products shall be documented on a monthly basis, based upon usage of all VOC/Styrene containing materials (Paints, Coatings, 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 provided the material is not used in multiple applications with different emission factors. The emission summary shall show the following:
- The total VOC emissions for the month, in tons.
 - The total HAP emissions for the month, in tons.
 - The total usage of paints, coatings, solvents, etc., in gallons, for the painting/coating of miscellaneous metal parts and products as determined in accordance with the following:
 - The facility's Health, Safety, and Environmental Coordinator shall monthly certify that each boat produced has a maximum total area of 72.5 square feet of metal surface (interior and exterior) and the coating applied to the metal surfaces has a maximum thickness of 7 mills. Note, any increase in either of these values shall be considered a modification, which requires an air pollution construction permit prior to such change.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 002 – Fiberglass Boat Manufacturing Facility

2. The monthly certification shall also specify that the paint thickness on each metal part coated was measured at least once using a wet film thickness gauge.
 3. The total number of gallons used shall be based on the constant factor of 2.5 gallons of paints/coatings/solvents per boat produced.
 4. For the painting/coating of miscellaneous metal parts and products, the total usage of paints, coatings, solvents, etc., in gallons for the most recent consecutive 12-month period.
- d. The total VOC emissions, in tons, for the most recent consecutive 12-month period.
- e. The total HAP emissions, in tons, for the most recent consecutive 12-month period.

(Permitting Notes: (a) These records are for determining emissions. There are additional recordkeeping requirements to determine compliance with MACT model point values. (b) The usage of gallons used on metal as stated in A.6.c.4, is the calculated value not the actual volumes from usage records.)

General Recordkeeping Requirements

- f. Record the method of application for all gel coat and resin usage (see Table below).
- 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 total HAP 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 (Material Safety Data Sheets, purchase orders, etc.) shall be kept for each material which includes sufficient information to determine VOC emissions and total HAP emissions.
- j. The VOC and Total HAP emission summary, calculations, records used to determine emissions, and records to determine coating/paint/solvent usage shall be recorded in a permanent form suitable for inspection by the Department or Pinellas County Air Quality Division upon request. The monthly records shall be completed by the end of the following month and be kept at the facility for a minimum of 5 years.

[Rule 62-4.070(3), F.A.C.]

- A.7.** Emissions Calculation Requirements – Emissions of Styrene, Methyl methacrylate (MMA), and other volatile organic compounds (VOC) 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:

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)**A. EU No. 002 – Fiberglass Boat Manufacturing Facility**

% 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

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 002 – Fiberglass Boat Manufacturing Facility

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* mean 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.

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

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

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:

$$\text{Emissions (tons)} = M_{\text{voc}} \times 1.00^* \times C_{\text{voc}}$$

Where:

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

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

*The following "Emissions Factors" may be used for the chemicals listed below.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 002 – Fiberglass Boat Manufacturing Facility

Chemical	Emissions Factor (lb species emitted per lb of VOC containing material used)
Di-isocyanates, when used as a catalyst for foam production	0.00021
Dimethyl Phthalate, when used as a catalyst for resins/gelcoats	0.001
Methyl Ethyl Ketone Peroxide, when used as a catalyst for resins/gelcoats	0.001

(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)

OTHER REQUIREMENTS

- A.8.** Federal Rule Requirements – In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions to 40 CFR 63 and VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing as adopted and incorporated by reference in Rule 62-204.800, F.A.C. (attached as part of this permit). Note, these requirements are for only Open Molding Resin and Gel Coat Operations using Emissions Averaging Option and/or Compliant Materials Option. Requirements relating to ad-on control devices have been deleted, since this emission unit does not utilize add-on-control devices. Additionally, when demonstrating compliance with 40 CFR 63, Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used, it must be use for a minimum of 12 consecutive months before switching to the other option.