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

December 3, 2015

PERMITTEE

Statement Marine, LLC
6101 45th Street North, Unit 4
St Petersburg, FL 33714

Authorized Representative:
Nicholas Buis, President

Air Permit No. 1030525-004-AF
Federally Enforceable State Operation Permit

Statement Marine
Pinellas County, Florida

PROJECT

This is the final Federally Enforceable State Operation Permit, which authorizes the operation of Statement Marine, which is a Fiberglass Boat Manufacturer (Standard Industrial Classification No. 3732). This project is the initial FESOP for a facility that has been operating under a general permit, but now exceeds the emission threshold allowed under a general permit. The facility is located in Pinellas County at 6101 45th Street North, Unit 4 in St Petersburg, Florida. The UTM coordinates are Zone 17, 333.3 kilometers (km) East, and 3079.2 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of 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.

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.

1030525-004-AF Effective Date: December 3, 2015
Renewal Application Due Date: October 4, 2020
Expiration Date: December 3, 2020

Executed in Hillsborough County, Florida.

for

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Federally Enforceable State Operation Permit package 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 following persons.

Nicholas Buis, Statement Marine, LLC: (nick@statementmarine.com)
John Amerman, Statement Marine, LLC: (john@statementmarine.com)
Tim Denhof, PE, Vanguard Environmental, (tdenhof@vanguardenvl.com)
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.

Rhonda Hughes December 3, 2015
(Clerk) (Date)

FACILITY DESCRIPTION

The boat manufacturing facility consists of a reinforced plastics composites production operation and associated activities. The primary source of emissions is the resin/gelcoat application process using both mechanical (non-atomized) and manual application techniques. This operation includes preparation of molds, the application of resin and gelcoat to the molds, product assembly, touch-up and clean-up activities using VOC/HAP (Volatile Organic Compounds/Hazardous Air Pollutants) containing solvents. VOC/HAP emission from the resin/gelcoat application, touch up and cleaning solvents are emitted fugitively. The building ventilation system is used to disperse the VOC/HAP emissions into the atmosphere to avoid and/or minimize odor impacts off-site.

The existing facility consists of the following emissions unit (EU).

EU No.	Emission Unit Description
001	Fugitive emission from fiberglass boat manufacturing

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No.
State Rule Citations	
Rule 62-210.300, F.A.C., Permits Required	001

EXEMPT EMISSION SOURCES/ACTIVITIES

- Painting and Sanding Operations finishing booth 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 (HAP).
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility is a synthetic non-Title V source for the pollutants Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP).

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces General Permit No. 1030525-003-AG.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). 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 to operate an emissions unit 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 the Pinellas County Air Quality Division. The mailing address, phone number and e-mail address 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

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

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements) and Appendix E (Unified Emission Factors for Open Molding of Composites).

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: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

8. Renewal. Prior to sixty (60) days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty (60) days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. 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. 6.

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

9. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Approved Local Program. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C.

   [Rule 62-210.370(3), F.A.C.]

   {Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

A. EU 001, Fugitive Emissions from Fiberglass Boat Manufacturing

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	Fugitive emission from fiberglass boat manufacturing - Styrene based gelcoat is applied to a mold via spray lay-up techniques. The gelcoat surface contacting the mold becomes the boat surface. Styrene based resin is subsequently applied via non-atomized wet out guns to the fiberglass mat and roving material, or via chopper guns. The resin impregnated fiberglass is then hand applied to the mold over the gelcoat layer to provide the necessary structural support. After sufficient layers of resin coated fiberglass are applied to the mold, hand rollers are typically used to force the resin into the fiberglass. Additional layers of resin coated mat are applied as needed to achieve the required thickness. The boat is removed from the mold when fully cured. The rough edges are trimmed and ground by hand powered tools in the enclosed finishing booth. Holes are cut as needed to accommodate hardware, controls and other items installed in the final assembly process.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation: The hours of operation of are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.2. Emissions Standards:

a. Hazardous Air Pollutants (HAPs):

(1) Styrene emissions shall not exceed 9.5 tons in any 12 consecutive month period;

(2) Individual HAP emissions (other than Styrene) shall not exceed 9.5 tons in any 12 consecutive month period;

(3) Total combined emissions of all HAPs, including Styrene, shall not exceed 24.5 tons in any 12 consecutive month period.

b. Volatile Organic Compounds (VOC): Total combined emissions of all VOC shall not exceed 96 tons in any 12 consecutive month period.

[Application No. 1030525-004-AF and Rule 62-210.200 ("Potential to Emit"), F.A.C.]

A.3. Unconfined Particulate Matter: In addition to the precautions to prevent unconfined particulate emissions listed in Common Condition #9 of Appendix C, all fiberglass cutting, painting and grinding operations producing significant PM emissions will be conducted within the enclosed finishing booth.
[Application No. 1030525-004-AF and Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

A. EU 001, Fugitive Emissions from Fiberglass Boat Manufacturing

A.4. Volatile Organic Compound Emissions and/or Organic Solvent Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

a. all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials;

b. perform mixing/blending operations with vessel lids in place when practical;

c. tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;

d. immediately confine and clean up VOC and/or solvent spills, and ensure wastes are placed in closed containers for reuse, recycling or proper disposal; and

e. used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.]

A.5. Emission Calculations: In order to document compliance with Specific Condition No. A.2., the permittee shall calculate emissions based on the following methodology:

Material Usage Rate (lbs) x Species Concentration (% by weight)* x Emission Factor (lbs emitted/lbs applied)* = Species Emission Rate (lbs)

* Styrene and methyl methacrylate (MMA) emission factors shall be determined in accordance with the attached Unified Emission Factors (UEF) for Open Molding of Composites table dated July 23, 2001. Emission factors for any other VOC or HAP shall be 1.0 unless lower emission factors are approved by the Department in writing.

[Application No. 1030525-004-AF and Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

A.6. Monthly Log for VOC and HAP: The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition No. A. 2. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased and the material is not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Statement Marine, 1030525, E.U. No. 001, Fugitive Emissions from Fiberglass Boat Manufacturing);

b. month, year, and method used for records (usage or purchase);

c. monthly total quantity in gallons of each material (resin, gelcoat, solvent, etc.) that contains Styrene, HAPs, and/or VOCs;

d. percentage by weight of each individual HAP (including Styrene) and VOC for each material identified in c., above;

e. appropriate emission factor(s), and method(s) of application (i.e., mechanical atomized, mechanical non-atomized) used to determine emissions;

f. monthly total of Styrene, other individual HAP, total HAP and VOC emissions (tons/month) based on c., d. and e. above; and

g. most recent 12 consecutive month period total of Styrene, other individual HAP, total HAP and VOC emissions (tons/12 consecutive month period) based on f. above.

The monthly logs shall be completed by the 15th of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department or PCAQD upon request. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each VOC and HAP containing material.

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