



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

## FINAL PERMIT

### PERMITTEE

Nautical Structures Industries, Inc.  
7301 114<sup>th</sup> Avenue North  
Largo, FL 33773

Authorized Representative:  
Mr. Robert Bolline, President

Air Permit No. 1030540-004-AO  
Permit Expires: 03/15/2016  
Site Name : Nautical Structures  
Minor Air Operation Permit  
Project Name: Operation Permit Revision

This is the final permit for the revision of Air Operation Permit No. 1030540-002-AO for aluminum and stainless steel boat/yacht accessories manufacturing facility at Nautical Structures (Standard Industrial Classification No. 3536). The facility is located in Pinellas County at 7301 114<sup>th</sup> Avenue North in Largo, Florida. The UTM coordinates are Zone 17, 328.72 km East, and 3084.76 km North.

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.

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      11/21/2012  
Kelley M. Boatwright      Effective Date  
District Air Permitting 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.

Mr. Robert Bolline, President  
Nautical Structures Industries, Inc.  
[bbolline@nautical-structures.com](mailto:bbolline@nautical-structures.com)

Mr. Carl Freeburg, Environmental & Safety Manager  
Nautical Structures Industries, Inc.  
[cfreeburg@nautical-structures.com](mailto:cfreeburg@nautical-structures.com)

Mr. Kenneth E. Given, P.E.  
Air Testing & Consulting, Inc.  
[ken@airtest.fdn.com](mailto:ken@airtest.fdn.com)

Mr. Gary Robbins, Environmental Program Coordinator  
Pinellas County Air Quality Division  
[grobbins@pinellascounty.org](mailto:grobbins@pinellascounty.org)

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)

\_\_\_\_\_  
(Date)

## SECTION 1. GENERAL INFORMATION (FINAL)

### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

The facility manufactures aluminum and stainless steel boat/yacht accessories. This includes davits, deck cranes, overhead beam cranes, transom lifts, gangplanks, passerelles, and accommodation stairs for use on board. The painting activities at this facility are subject to the Volatile Organic Compound - Reasonable Available Control Technology (VOC-RACT) requirements of Rule 62-296.513, F.A.C.

Facility ID No. 1030540	
ID No.	Emission Unit Description
001	Painting Operations

#### Project Description

This is the initial operation permit for this facility at its new location.

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

#### Exempt Emission Activities

- Buffing, Sanding, and Polishing Activities ( mostly aluminum) in the following booths:

Booth	Activity
1	Buffing
3	Bondo Application
5	Final Sanding
7	#1 Sanding & Polishing
8	#2 Sanding & Polishing

[Rule 62-210.300(3)(b), F.A.C.]

### 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 volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source/PSD major source.

**SECTION 1. GENERAL INFORMATION (FINAL)**

---

**PERMIT HISTORY/AFFECTED PERMITS**

Replaces Operation Permit No. 1030540-002-AO and incorporates the terms and conditions of Construction Permit No. 1030540-003-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's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection  
Southwest District Office  
Air Resource Management Section  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above 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 (PCAQD). The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division  
300 South Garden Avenue  
Clearwater, Florida 33756  
Telephone: 727-464-4422

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

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

---

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 with a copy to the Pinellas County Air Quality Division (PCAQD) no later than 60 days prior to the expiration date of the 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.5.

[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.]

### FACILITY WIDE SPECIFIC CONDITIONS

9. General Standards - Objectionable Odor - 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.

[Rules 62-210.200 ("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, §58-178]

10. General Standards - (VOC) Emissions and/or (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 (VOC) or organic solvents (OS) without applying known and vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following:

- 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. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere or become subject to Specific Condition No. A.3.
- c. Tightly cover or close all VOC and/or solvent containers when they are not in use.

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

---

- d. Prevent excessive air turbulence across exposed VOC.
- e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Pinellas County Code, §58-178; Construction Permit 1030540-003-AC]

**SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)**

**A. EU No. 001 Painting Operations**

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	<p>The painting operations consist of three paint spray booths, each has its own stack:</p> <p style="text-align: center;">Booth #2 - 1<sup>st</sup> Prime Application Booth #4 - Paint Application Booth #6 - 2<sup>nd</sup> Prime Application</p> <p>Metal material, mostly aluminum, is brought from storage to fabrication. After fabrication it is prepped by grinding down excess material. The metal material is cleaned, and then goes to final prep where Bondo is used. Then the metal material goes into a spray booth where primer is added. The parts are then painted.</p>

**PERFORMANCE RESTRICTIONS**

**A.1. Restricted Operation** - The hours of operation are not limited (8760 hours per year).  
[Construction Permit 1030540-003-AC]

**EMISSIONS STANDARDS**

**A.2. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emissions** - Total emissions of VOC and HAPs from this facility shall not exceed the following:

Pollutant	Tons per any consecutive 12-month period
VOC	9.0
Total HAP	9.0

[Construction Permit 1030540-003-AC]

**A.3. Material VOC Content** - This facility is limited to the use of coatings that do not exceed 3.5 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator (“as applied”). Unless directed into containers that prevent evaporation into the atmosphere, the use of solvent washings shall also be included in the “as applied” VOC coating content.  
[Rules 62-296.513(2)(a)2 and (2)(c), F.A.C.]

**A.4. Fugitive Emissions Opacity Standard** - In order to provide reasonable assurance the panel filter systems are adequately controlling emissions of unconfined particulate matter, visible emissions from the paint spray booths should not exceed 5 percent opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.  
[Rule 62-4.070(3), F.A.C.; Construction Permit 1030540-003-AC]

---

**SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)**

---

**A. EU No. 001 Painting Operations**

**RECORDS AND REPORTS**

**A.5. VOC/HAP Recordkeeping** - In order to document compliance with the limitations of Specific Condition Nos. A.2. and A.3., the permittee shall maintain a log at the facility which documents the following:

Daily:

- a. facility name, facility ID No. (1030540), emission unit No. & description (EU 001-Painting Operations), and applicable Rule (62-296.513(2), F.A.C.);
- b. application method and substrate type (e.g., metal, plastic, paper);
- c. amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent used, in gallons, at each point of application, including exempt compounds;
- d. VOC content as applied in each coating and solvent;
- e. date of each application of coating and solvent;
- f. amount of each surface preparation, clean-up, wash-up solvent (including exempt compounds) used, in gallons, and the VOC content of each;

Monthly:

- g. facility name, facility ID No. (1030540), emission unit No. & description (EU 001- Painting Operations);
- h. raw material usage of each coating and solvent (gallons);
- i. VOC and total HAP content in each coating and solvent (lbs./gallon) ;
- j. VOC and total HAP emissions from the use of coatings (tons);
- k. VOC and total HAP emissions from the use of solvents (tons);
- l. most recent consecutive 12-month total of raw material (coatings and solvents) used (gallons);
- m. most recent consecutive 12-month totals of VOC emissions and total HAP emissions from the use of coatings (tons);
- n. most recent consecutive 12-month totals of VOC emissions and total HAP emissions from the use of solvents (tons); and
- o. most recent consecutive 12-month totals (coatings and solvents) of total VOC emissions and total HAP emissions (tons).

Supporting documentation (MSDS sheets, purchase orders, U. S. EPA "VOC DATA SHEETS", etc.) shall be kept for each paint, coating, thinner, solvent and other material used in the painting and coating operations which includes sufficient information to determine VOC and HAP emissions.

**SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)**

---

**A. EU No. 001 Painting Operations**

Daily records shall be completed within five (5) calendar days and monthly records shall be completed within ten (10) calendar days of the end of each month. These records shall be retained on file at the facility for at least three (3) years and shall be made available to the Department and the Pinellas County Air Quality Division (PCAQD) upon request.

[Rules 62-4.070(3), 62-4.160(14)(b), and 62-296.500(2)(b), F.A.C.; Construction Permit 1030540-003-AC; Pinellas County Code §58-90]