From: Koerner, Jeff
To: "Randy Clunie"
Cc: Svec, Ed
Subject: RE: FW: draft of permits, Merritt Island facility
Date: Thursday, November 29, 2012 3:35:28 PM

Randy,

Just wondering when we could expect your final comments …

Jeff

Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
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Email: Jeff.Koerner@dep.state.fl.us
Web: http://www.dep.state.fl.us/air/

Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: www.title5feeholiday.com

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.

From: Randy Clunie [mailto:Randy.Clunie@searay.com]
Sent: Wednesday, November 21, 2012 2:44 PM
To: Koerner, Jeff
Subject: RE: FW: draft of permits, Merritt Island facility

Jeff,
Here is the some suggested wording for the NESHAP Subpart VVVV to further help clarify what associated requirements will be for the Cape Canaveral facility.

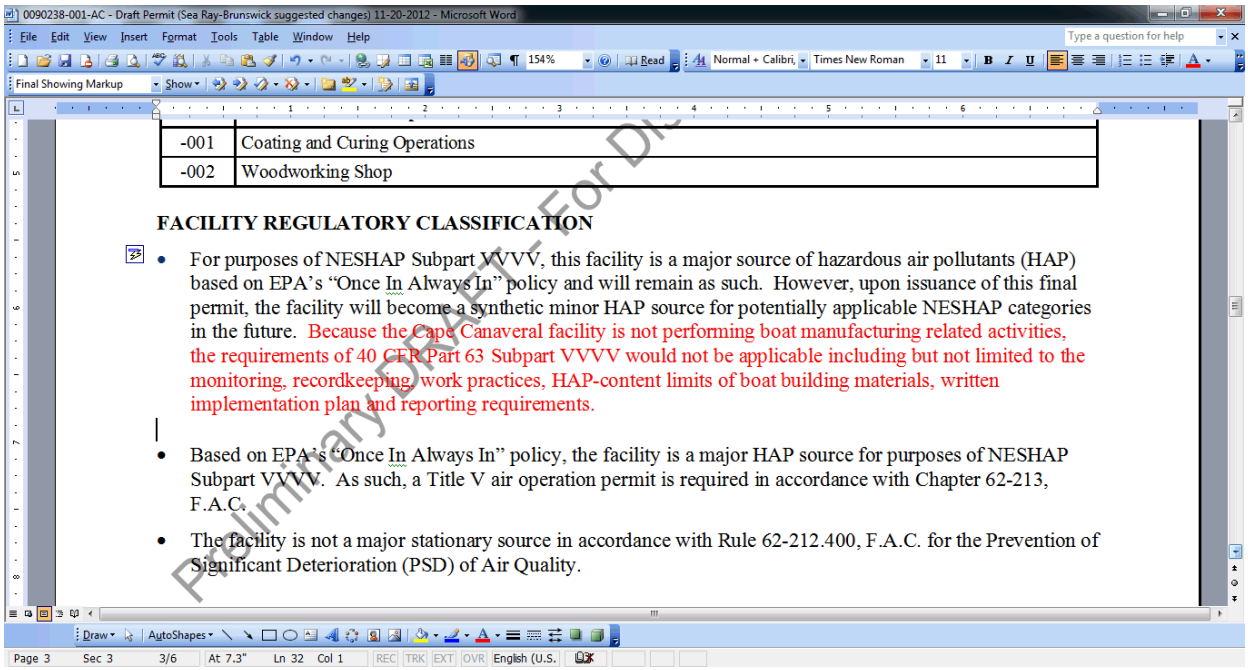
Draft Permit, Page 3 (suggest adding the following language to the first bullet under FACILITY REGULATORY CLASSIFICATION section):
Because the Cape Canaveral facility is not performing boat manufacturing related activities, the requirements of 40 CFR Part 63 Subpart VVVV would not be applicable including but not limited to the monitoring, recordkeeping, work practices, HAP-content limits of boat building materials, written implementation plan and reporting requirements.

Likewise, it would be beneficial to add same language to **Technical Evaluation & Preliminary Determination document, Page 5 at end of third paragraph.**

Please also insert this same language to the **Statement of Basis, Page 3, end of first paragraph.**

I have attached screen shots of the pages; whereby, I had inserted the language. I am also okay with FDEP inserting the additional NESHAP Subpart VVVV language that you had submitted. I believe your additional language and the Sea Ray's proposed language inserted together does a good job of clarifying the points to be made.

As mentioned in our telephone conversation, Sea Ray plans to submit its final suggestions to you by early next week. Thanks for your help & have a Happy Thanksgiving Holiday.



-001	Coating and Curing Operations
-002	Woodworking Shop

FACILITY REGULATORY CLASSIFICATION

- For purposes of NESHAP Subpart VVVV, this facility is a major source of hazardous air pollutants (HAP) based on EPA's "Once In Always In" policy and will remain as such. However, upon issuance of this final permit, the facility will become a synthetic minor HAP source for potentially applicable NESHAP categories in the future. Because the Cape Canaveral facility is not performing boat manufacturing related activities, the requirements of 40 CFR Part 63 Subpart VVVV would not be applicable including but not limited to the monitoring, recordkeeping, work practices, HAP-content limits of boat building materials, written implementation plan and reporting requirements.
- Based on EPA's "Once In Always In" policy, the facility is a major HAP source for purposes of NESHAP Subpart VVVV. As such, a Title V air operation permit is required 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.

Preliminary DRAFT - For Di

0090238-001-AC - TEPD (Sea Ray-Brunswick Suggested Changes 11-20-2012) - Microsoft Word

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Second, the two facilities perform substantially different work. The Merritt Island Complex manufactures boats, while Cape Canaveral is a wood coating operation. If these facilities were under separate ownership, it is likely that one facility would not be aware of the existence of the other.

Third, the two facilities have vastly different emissions and relative impacts. Emissions from the Merritt Island Complex are mostly styrene, while Cape Canaveral has small emissions of miscellaneous VOC. The potential VOC emissions from the Merritt Island Complex are 326.0 tons/year while the Cape Canaveral facility will be restricted to 30.0 tons/year of VOC and 9.0 tons/year of HAPs. Two facilities conducting similar work, with similar emissions, within a mile-and-a-half of each other, more easily lends itself to a single facility finding. That is not the case in the instant matter.

It should also be noted that the Cape Canaveral facility was originally permitted in 1999 as a boat manufacturing operation. However, boat manufacturing operations never occurred at the Cape Canaveral facility while under Sea Ray ownership. Sea Ray did not avail itself of the permissions allowed in the 1999 permit which found the Cape Canaveral facility to be a single facility with the Merritt Island Complex (i.e., an expansion of the existing Merritt Island Complex). However, due to subsequent permits and operations, the Cape Canaveral facility will remain subject to NESHAP Subpart VVVV pursuant to EPA's "Once In, Always In" policy. As such, the facility requests a Title V air operation permit. Because the Cape Canaveral facility is not performing boat manufacturing related activities, the requirements of 40 CFR Part 63 Subpart VVVV would not be applicable including but not limited to the monitoring, recordkeeping, work practices, HAP-content limits of boat building materials, written implementation plan and reporting requirements.

0090238-002-AV - SOB (Sea Ray-Brunswick suggested changes) 11-20-2012 - Microsoft Word

STATEMENT OF BASIS

NESHAP: Based on EPA's "Once In Always In" policy, this facility is a major HAP source and will remain as such for the purposes of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) in Subpart VVVV of Title 40, Part 63, Code of Federal Regulations. However, based on the application, none of the other potentially applicable NESHAP categories for major sources apply because the Cape Canaveral Plant has not conducted the type of work regulated by the provisions and, upon issuance of this permit, will be become an area source of HAP for any proposed new activities in the future. In addition, the application states that none of the potentially applicable NESHAP categories for area sources are applicable because the Cape Canaveral Plant has not conducted the type of work regulated by the provisions. Appropriate air permits must be obtained prior to conducting any work that will be regulated by a newly applicable NESHAP. Because the Cape Canaveral facility is not performing boat manufacturing related activities, the requirements of 40 CFR Part 63 Subpart VVVV would not be applicable including but not limited to the monitoring, recordkeeping, work practices, HAP-content limits of boat building materials, written implementation plan and reporting requirements.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

GHG: The facility is not identified as a major source of green house gas (GHG) pollutants.

CONCLUSION

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.

Discussion Purposes Only

Thank you,

Randy Clunie
EHS Director for BBG Recreation Group
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Vonore, TN 37885
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