0090127-003

TomJohn Engineering, Inc.

8424 4th St. N. Suite G
St. Petersburg, FL 33702
(727) 579-0403
Fax (727) 579-0205

March 17, 2000

Mr. Alan Zahm, P.E.
Air Permitting Section
Dept. Of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, FL 32803

re: Vectorworks International, Incorporated

Dear Mr. Zahm:

As environmental engineer of record for the referenced facility, and in conjunction with Vectorworks International, Incorporated, we are submitting the enclosed set of three applications for an FDEP Title V Air Construction and Operating Permit Application for concurrent processing the Vectorworks fiberglass boat building facility located in Brevard County. Additional copies of the application are available upon request.

The facility is currently a Synthetic Minor Source; upon issuance of these permits the facility will become a Major Source under Title V. The applications contain original signatures and seal, and are accompanied by a check for $1000.00 as the processing fee for a construction/modification permit for a source emitting more than 5 but less than 25 tons per year.

Thank you for your assistance in this project. Should you have any questions or if I can provide any additional information, please contact me at my office.

Sincerely,

Tom T. John, P.E.

Encl: applications

cc: Vectorworks International, Ince

Tom John Engineering
8424 4th Street N. Suite K
St. Petersburg, FL 33702
(727) 579 - 0403

Title V
Air Construction /Operating Permit Application

VECTORWORKS INTERNATIONAL, INC
805 Marina Road
Titusville, Florida

March 16, 2000

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Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Vectorworks International, Inc.	
2. Site Name: Vectorworks International, Inc.	
3. Facility Identification Number: 0090127-002-AC	[ ] Unknown
4. Facility Location: Street Address or Other Locator: 805 Marina Road City: Titusville County: Brevard Zip Code: 32796	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: Tom T. John, P.E.
2. Application Contact Mailing Address: Organization/Firm: Tom John Engineering, Inc. Street Address: 8424 4th Street North, Suite K City: St. Petersburg State: Florida Zip Code: 33702
3. Application Contact Telephone Numbers: Telephone: (727) 579- 0403 Fax: (727) 579- 0205

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[ ] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number:_____

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:_____

Operation permit number to be revised:_____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected:_____

[ ] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised:_____

Reason for revision:_____

Air Construction Permit Application*

This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

* concurrent processing of Air Construction/Modification application requested

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Jeff Gray, Director of Operations

2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: Vectorworks International, Inc.
   Street Address: 805 Marina Road
   City: Titusville State: Florida Zip Code: 32796

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: (321) 269- 8444 Fax: (321) 269- 8483

4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative(check here [X], if so) or the responsible official (check here [ ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

Signature 3/17/00 Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Tom T. John, P.E
   Registration Number: 33157

2. Professional Engineer Mailing Address:
   Organization/Firm: Tom John Engineering, Inc
   Street Address: 8424 4th Street North, Suite K
   City: St. Petersburg State: Florida Zip Code: 33702

3. Professional Engineer Telephone Numbers:
   Telephone: (727) 579- 0403 Fax: (727) 579- 0205

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

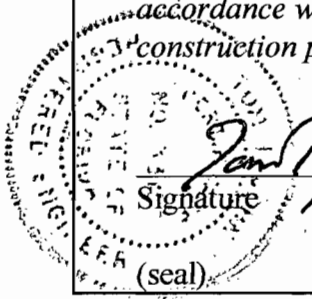
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [NA], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [**X**], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [**NA**], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*



Signature

16 March 2000
Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Fiberglass Boat Building - resin and gelcoat application, mold care, and related assembly and cleanup activities	AC1E	$1000.00 $ 0.00

Application Processing Fee

Check one: [*X*] Attached - Amount: $ 1000.00 [ ] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:
The initial project is discussed in the previous application. The construction/modification segment addresses the proposed increase in air emissions commensurate with increased raw material usages. The additional emissions will make the facility subject to Title III and Title V, CAAA (1990). This submission of the Title V Construction Permit Application (significant pages only) requests simultaneous processing of the construction/modification and operating permit applications.

2. Projected or Actual Date of Commencement of Construction: permit receipt

3. Projected Date of Completion of Construction: permit receipt

Application Comment

No physical construction is required; the applicant is therefore submitting the significant pages of the construction/modification application, followed by a complete Title V source operating application and is requesting simultaneous processing of this submittal. Activities and recordkeeping will be in accordance with the provisions of the MACT for fiberglass boatbuilding proposed by USEPA and, in the interim, with the case by case MACT requirements currently proposed by FDEP.

Facility Information

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): North (km):			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 028/37/24 Longitude (DD/MM/SS): 080/48/50			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 37, 30	6. Facility SIC(s): 3732, 3089
7. Facility Comment (limit to 500 characters): The facility is currently a synthetic minor source. The construction/modification application requests expanded capacity which will make the facility subject to CAAA (1990) Title III and Title V, and a full Title V operating permit application is presented here. The facility will comply with all MACT requirements proposed by USEPA and, in the interim, with the case by case MACT requirements currently proposed by FDEP.			

Facility Contact

1. Name and Title of Facility Contact: Jeff Gray, Director of Operations
2. Facility Contact Mailing Address: Organization/Firm: Vectorworks International, Inc. Street Address: 805 Marina Road City: Titusville State: Florida Zip Code: 32796
3. Facility Contact Telephone Numbers: Telephone: (321) 269- 8444 Fax: (321) 269- 8483

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source? [X] Unknown
2. [ ] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?
4. [X] Major Source of Hazardous Air Pollutants (HAPs)?
5. [ ] Synthetic Minor Source of HAPs?
6. [ ] One or More Emissions Units Subject to NSPS?
7. [ ] One or More Emission Units Subject to NESHAP?
8. [ ] Title V Source by EPA Designation?
9. Facility Regulatory Classifications Comment (limit to 200 characters): Monthly record keeping of materials used and calculation of emissions is proposed as demonstration of compliance with permit conditions and standards proposed for MACT by USEPA; facility will be subject to the NESHAP Boat building MACT when promulgated by USEPA.

List of Applicable Regulations

62-296.320(1), F.A.C.	General VOC Standards
62-296.320(2), F.A.C.	Objectionable Odor Prohibition
62-296.320(4)(b), F.A.C.	General Visible Emission Standard
62-296.320(4)(c), F.A.C.	Unconfined Emissions of Particulate Matter
62-297, F.A.C.	Testing, Reporting and Record Keeping
Title V Core List, following	

Title V Core List Effective: 03/25/96

[**Note:** The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

Federal: ***(description)***

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP)
40 CFR 61, Subpart M: National Emission Standard for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.
40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).
40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: ***(description)***

CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95

62-4.030, F.A.C.: General Prohibition.
62-4.040, F.A.C.: Exemptions.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.
62-4.060, F.A.C.: Consultation.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.
62-4.080, F.A.C.: Modification of Permit Conditions.
62-4.090, F.A.C.: Renewals.
62-4.100, F.A.C.: Suspension and Revocation.
62-4.110, F.A.C.: Financial Responsibility.
62-4.120, F.A.C.: Transfer of Permits.
62-4.130, F.A.C.: Plant Operation - Problems.
62-4.150, F.A.C.: Review.
62-4.160, F.A.C.: Permit Conditions.
62-4.210, F.A.C.: Construction Permits.
62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95

62-103.150, F.A.C.: Public Notice of Application and Proposed Agency Action.
62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 03-21-96

62-210.300, F.A.C.: Permits Required.
62-210.300(1), F.A.C.: Air Construction Permits.
62-210.300(2), F.A.C.: Air Operation Permits.
62-210.300(3), F.A.C.: Exemptions.
62-210.300(3)(a), F.A.C.: Full Exemptions.
62-210.300(3)(b), F.A.C.: Temporary Exemption.

62-210.300(5), F.A.C.: Notification of Startup.
62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.

62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.

62-210.650, F.A.C.: Circumvention.

62-210.900, F.A.C.: Forms and Instructions.
62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.
62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96

62-213.205, F.A.C.: Annual Emissions Fee.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.

CHAPTER 62-256, F.A.C.: OPEN BURNING AND FROST PROTECTION FIRES, effective 11-30-94

CHAPTER 62-257, F.A.C.: ASBESTOS NOTIFICATION AND FEE, effective 03/24/96

CHAPTER 62-281, F.A.C.: MOTOR VEHICLE AIR CONDITIONING REFRIGERANT RECOVERY AND RECYCLING, effective 03-07-96

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-13-96

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.
62-296.320(3), F.A.C.: Industrial, Commercial, and Municipal Open Burning Prohibited.
62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

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B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
styrene H163	M	Not Applicable	24	other	
total HAP	M	Not Applicable	24	other	includes styrene
total VOC	B	Not Applicable	24	other	includes HAP species

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location:
   [X] Attached, Document ID: 1 [ ] Not Applicable [ ] Waiver Requested

2. Facility Plot Plan:
   [X] Attached, Document ID: 1 [ ] Not Applicable [ ] Waiver Requested

3. Process Flow Diagram(s):
   [X] Attached, Document ID: 2 [ ] Not Applicable [ ] Waiver Requested

4. Precautions to Prevent Emissions of Unconfined Particulate Matter:
   [X] Attached, Document ID: 2 [ ] Not Applicable [ ] Waiver Requested

5. Fugitive Emissions Identification:
   [X] Attached, Document ID: 2 [ ] Not Applicable [ ] Waiver Requested

6. Supplemental Information for Construction Permit Application:
   [ ] Attached, Document ID: _____ [X] Not Applicable

7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
   [ ] Attached, Document ID: _____ [X] Not Applicable

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [X] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [X] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [X] Not Applicable

12. Identification of Additional Applicable Requirements:
    [ ] Attached, Document ID: _____ [X] Not Applicable

13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [X] Not Applicable

14. Compliance Report and Plan:
    [ ] Attached, Document ID: _____ [X] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [ ] Attached, Document ID: _____ [X] Not Applicable

Operating Permit Application

Operating Permit Application

Application Information

Application Information

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Vectorworks International, Inc.	
2. Site Name: Vectorworks International, Inc.	
3. Facility Identification Number: 0090127-002-AC	[ ] Unknown
4. Facility Location: Street Address or Other Locator: 805 Marina Road City: Titusville County: Brevard Zip Code: 32796	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: Tom T. John, P.E.
2. Application Contact Mailing Address: Organization/Firm: Tom John Engineering, Inc. Street Address: 8424 4th Street North, Suite K City: St. Petersburg State: Florida Zip Code: 33702
3. Application Contact Telephone Numbers: Telephone: (727) 579- 0403 Fax: (727) 579- 0205

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[*X*] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: 0090127002AC

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

[ ] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application ***not applicable****

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Air construction permit to construct or modify one or more emissions units.

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

* concurrent processing of Air Construction/Modification application requested

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Jeff Gray, Director of Operations

2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: Vectorworks International, Inc.
   Street Address: 805 Marina Road
   City: Titusville State: Florida Zip Code: 32796

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: (321) 269- 8444 Fax: (321) 269- 8483

4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative(check here [X], if so) or the responsible official (check here [ ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

Signature 3/17/00 Date

* Attach letter of authorization if not currently on file.

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1. Professional Engineer Name: Tom T. John, P.E
   Registration Number: 33157

2. Professional Engineer Mailing Address:
   Organization/Firm: Tom John Engineering, Inc
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   City: St. Petersburg State: Florida Zip Code: 33702

3. Professional Engineer Telephone Numbers:
   Telephone: (727) 579- 0403 Fax: (727) 579- 0205

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

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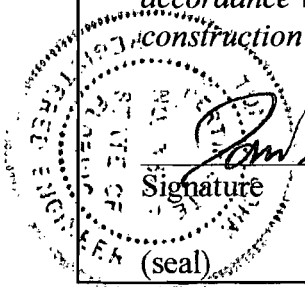

Signature

16 March 2000
Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Fiberglass Boat Building - resin and gelcoat application, mold care, and related assembly and cleanup activities	AO1C	$ 0.00

Application Processing Fee

Check one: [ ] Attached - Amount: $ 0.00 [X] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:
The initial project is discussed in the previous application. The construction/modification segment addresses the proposed increase in air emissions commensurate with increased raw material usages. The additional emissions will make the facility subject to Title III and Title V, CAAA (1990). This submission of the Title V Operating Permit Application requests simultaneous processing of the construction/modification and operating permit applications.

2. Projected or Actual Date of Commencement of Construction: permit receipt

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Application Comment

No physical construction is required; the applicant is therefore submitting the significant pages of the construction/modification application, followed by a complete Title V source operating application and is requesting simultaneous processing of this submittal. Activities and recordkeeping will be in accordance with the provisions of the MACT for fiberglass boatbuilding proposed by USEPA and, in the interim, with the case by case MACT requirements currently proposed by FDEP.

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Facility Regulatory Classifications

Check all that apply:

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3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [X] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [ ] Synthetic Minor Source of HAPs?	
6. [ ] One or More Emissions Units Subject to NSPS?	
7. [ ] One or More Emission Units Subject to NESHAP?	
8. [ ] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): Monthly record keeping of materials used and calculation of emissions is proposed as demonstration of compliance with permit conditions and standards proposed for MACT by USEPA; facility will be subject to the NESHAP Boat building MACT when promulgated by USEPA.	

List of Applicable Regulations

62-296.320(1), F.A.C.	General VOC Standards
62-296.320(2), F.A.C.	Objectionable Odor Prohibition
62-296.320(4)(b), F.A.C.	General Visible Emission Standard
62-296.320(4)(c), F.A.C.	Unconfined Emissions of Particulate Matter
62-297, F.A.C.	Testing, Reporting and Record Keeping
Title V Core List, following page 8 of construction application section	

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap lb/hour	tons/year	4. Basis for Emissions Cap	5. Pollutant Comment
styrene H163	M	Not Applicable	24	other	
total HAP	M	Not Applicable	24	other	includes styrene
total VOC	B	Not Applicable	24	other	includes HAP species

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [X] Attached, Document ID: 1 [ ] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: 1 [ ] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: 2 [ ] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [X] Attached, Document ID: 2 [ ] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [X] Attached, Document ID: 2 [ ] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [ ] Attached, Document ID: _____ [X] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
   [X] Attached, Document ID: 3 [ ] Not Applicable

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [X] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [X] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [X] Not Applicable

12. Identification of Additional Applicable Requirements:
    [X] Attached, Document ID: 4 [ ] Not Applicable

13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [X] Not Applicable

14. Compliance Report and Plan:
    [X] Attached, Document ID: 5 [ ] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [X] Attached, Document ID: 5 [ ] Not Applicable

Emission Unit Information

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[X] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Regulated or Unregulated Emissions Unit? (Check one)

[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
Fiberglass boat building utilizing styrene based resins and gelcoats; includes assembly and cleanup materials.

4. Emissions Unit Identification Number:
ID: 001
[ ] No ID
[ ] ID Unknown

5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	Not applicable	37	[ ] No

9. Emissions Unit Comment: (Limit to 500 Characters)
This operating permit application section is submitted in conjunction with a construction permit application and requests concurrent processing

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method): No controls for VOC emissions
2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit: **Not Applicable**	
Manufacturer: Not Applicable	Model Number: Not Applicable
2. Generator Nameplate Rating: **Not Applicable**	MW
3. Incinerator Information: **Not Applicable**	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: **Not Applicable**				
2. Maximum Incineration Rate: **Not Applicable** lb/hr				tons/day
3. Maximum Process or Throughput Rate: **Not Applicable**				
4. Maximum Production Rate: approximately **200** tons/year of VOC based raw materials				
5. Requested Maximum Operating Schedule:				
	24	hours/day	7	days/week
	52	weeks/year	8760	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):				
Annual material usages are a surrogate indicator of emissions, and should not be considered a permit limitation. See Attachment 2.				

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Page 8 of Facility Information section	

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? See Attachment 1	2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Roof mounted exhaust vents on each building conducting lamination/gelcoating activities		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **Not Applicable**		
5. Discharge Type Code: V	6. Stack Height: 38 feet	7. Exit Diameter: 2.5 feet
8. Exit Temperature: 77°F	9. Actual Volumetric Flow 9,950 each (Est.)	10. Water Vapor: negligible %
11. Maximum Dry Standard Flow Rate: Not Applicable	12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Applicable Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters):		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Styrene based resin combined with catalyst and spray applied to forms and molds.		
2. Source Classification Code (SCC): 3-14-015-17 Open contact molding, Resin/Laminate application, spray layup	3. SCC Units: Tons applied	
4. Maximum Hourly Not Applicable	5. Maximum Annual Rate: 100*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): *Individual values should not be considered permit limits; material usages should be considered as indicators only. Potentially all material used could be resin. Monthly record keeping and calculations are proposed as demonstration of compliance with proposed emission limits. See Attachment 2.		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Styrene based gelcoat combined with catalyst and spray applied to forms and molds		
2. Source Classification Code (SCC): 3-14-015-12	3. SCC Units: Tons of coating applied	
4. Maximum Hourly Rate: Not Applicable	5. Maximum Annual Rate: 100*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): *Individual values should not be considered permit limits; material usages should be considered as indicators only. Potentially all material used could be gelcoat. Monthly record keeping and calculations are proposed as demonstration of compliance with proposed emission limits. See Attachment 2.		

Emissions Unit Information Section 1 **of** 1

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mold care, assembly and acetone cleanup are included in this segment. Product is removed, trimmed and sanded as required, and assembled.		
2. Source Classification Code (SCC): 3-14-015-50 (-51, -52, -53, -60)	3. SCC Units: Tons of solvent	
4. Maximum Hourly Rate: Not Applicable	5. Maximum Annual Rate: 100*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): *Individual values should not be considered permit limits; material usages should be considered as indicators only. Potentially all material used could be cleanup and assembly materials. Monthly record keeping and calculations are proposed as demonstration of compliance with proposed emission limits. See Attachment 2.		

Emissions Unit Information Section 1 of 1

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
styrene H163	**not applicable**	**not applicable**	**NS**
total HAP	**not applicable**	**not applicable**	**NS**
total VOC	**not applicable**	**not applicable**	**NS**

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: total **VOC**	2. Total Percent Efficiency of Control: **Not applicable**
3. Potential Emissions: **not applicable** Lb/hr **24** tons/yr	4. Synthetically Limited ? Y
5. Range of Estimated Fugitive Emissions: [X] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37; Process Knowledge	7. Emissions Method Code: 5 (FDEP Guidance)
8. Calculation of Emissions (limit to 600 characters): See attached spreadsheet	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Total VOC includes styrene and other HAP species. Emissions are based on VOC content and appropriate emission factors; see Attachment 2.	

Allowable Emissions Allowable Emissions _____ of _____ **Not Applicable**

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **total HAP**	2. Total Percent Efficiency of Control: **Not applicable**
3. Potential Emissions: **not applicable** Lb/hr **24** tons/yr	4. Synthetically Limited ? Y
5. Range of Estimated Fugitive Emissions: [X] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37 Process Knowledge	7. Emissions Method Code: 5 (FDEP Guidance)
8. Calculation of Emissions (limit to 600 characters): See attached spreadsheet	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):Total HAP includes styrene and other HAP species. Emissions are based on VOC content and appropriate emission factors; see Attachment 2.	

Allowable Emissions Allowable Emissions _____ of _____ Not Applicable

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: total **Styrene** H-163	2. Total Percent Efficiency of Control: **Not applicable**
3. Potential Emissions: **not applicable** Lb/hr **24** tons/yr	4. Synthetically Limited ? Y
5. Range of Estimated Fugitive Emissions: [X] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37	7. Emissions Method Code: 5 (FDEP Guidance)
8. Calculation of Emissions (limit to 600 characters): See attached spreadsheet	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emissions are based on VOC content and appropriate emission factors; see Attachment 2.	

Allowable Emissions Allowable Emissions _____ of _____ Not Applicable

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION

(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: <20 % Exceptional Conditions: <20 % Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: EPA Method 9 as required by Agency	
5. Visible Emissions Comment (limit to 200 characters): See Attachment 4	

I. CONTINUOUS MONITOR INFORMATION

(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____ **Not Applicable**

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: 1 [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date: _____ [ ] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [ ] Attached, Document ID:_____ [X] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [X] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [X] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID: 4 [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[X] Attached, Document ID: 2 [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

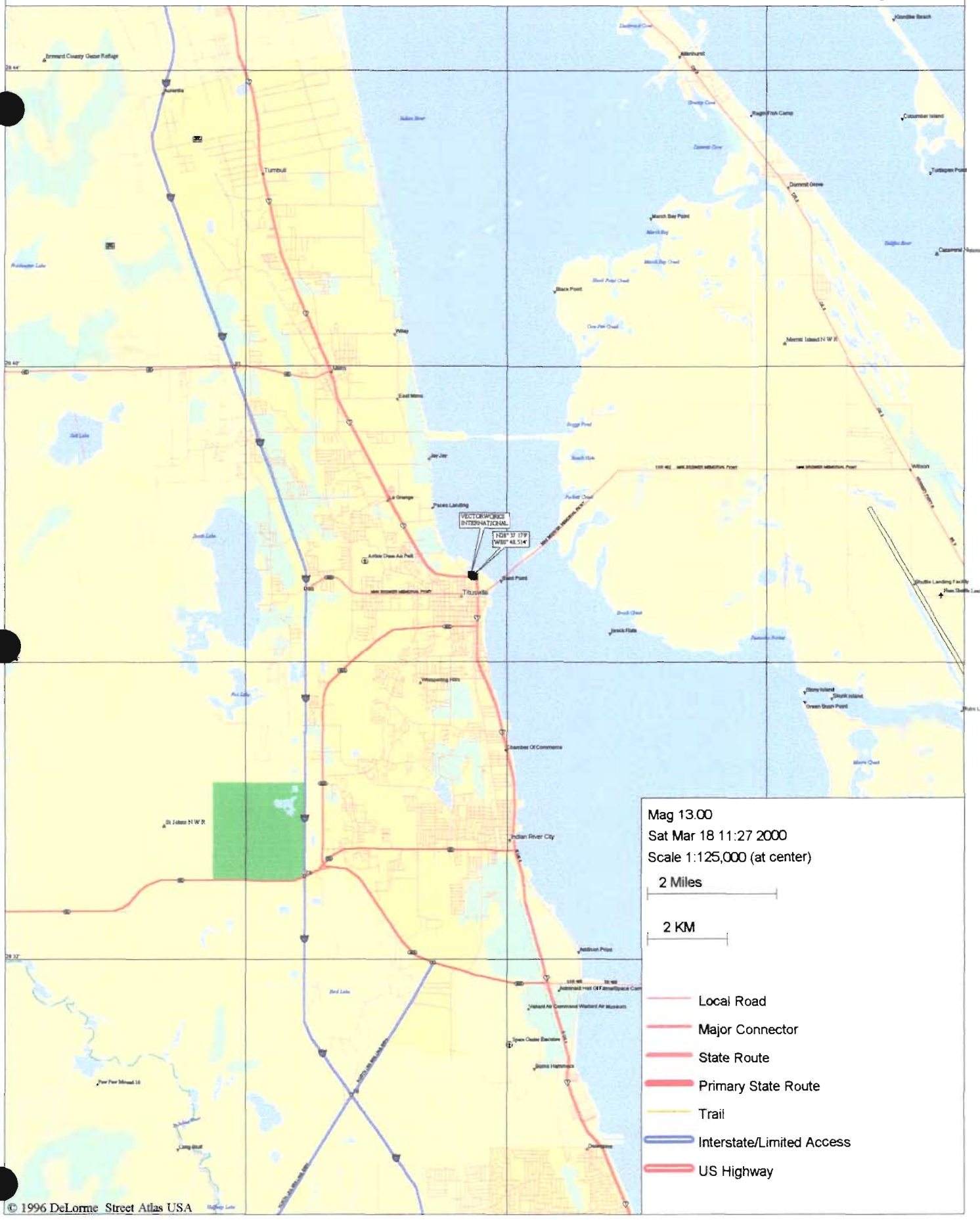
[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[X] Not Applicable

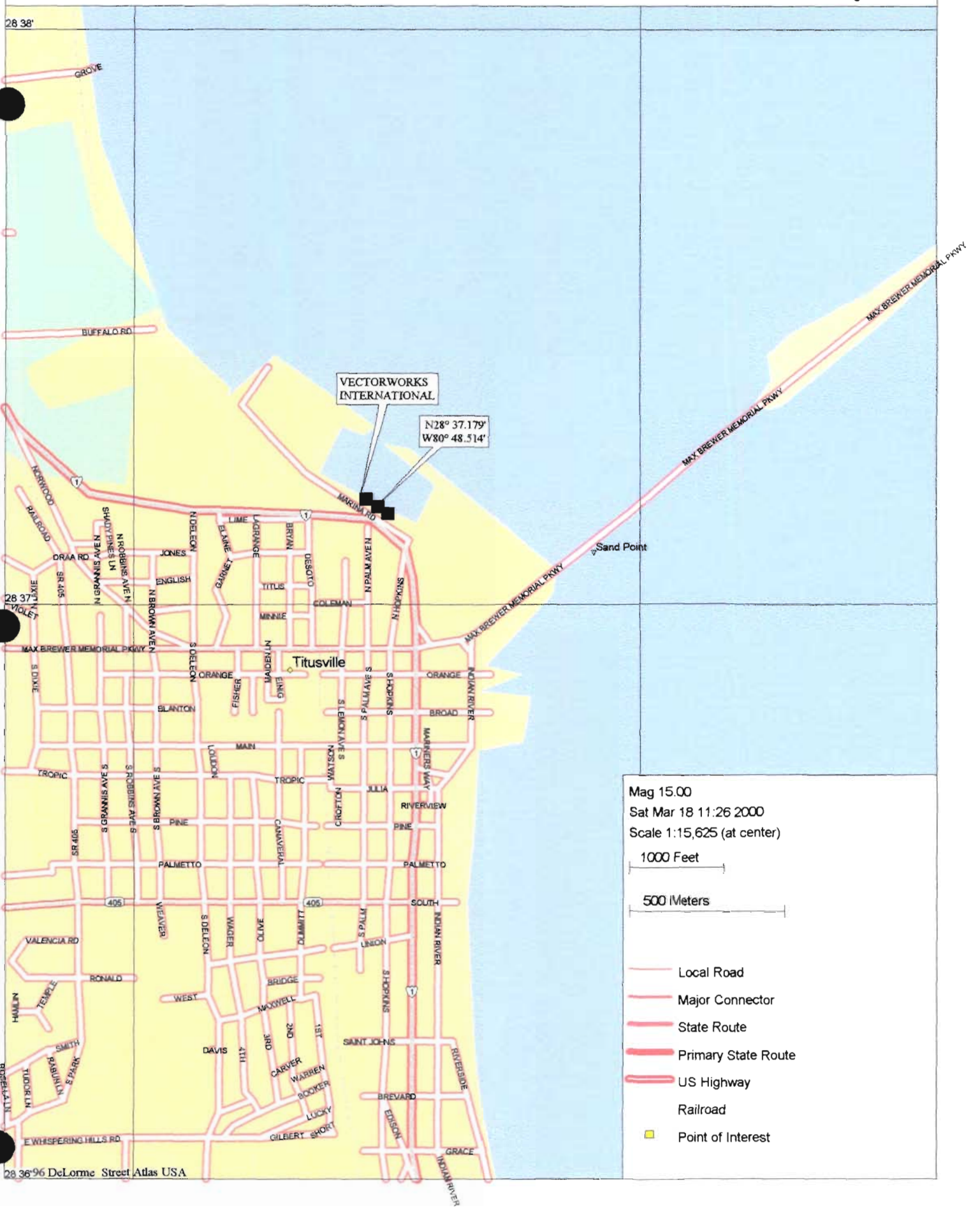
Site Location and Facility Layout

Attachment 1

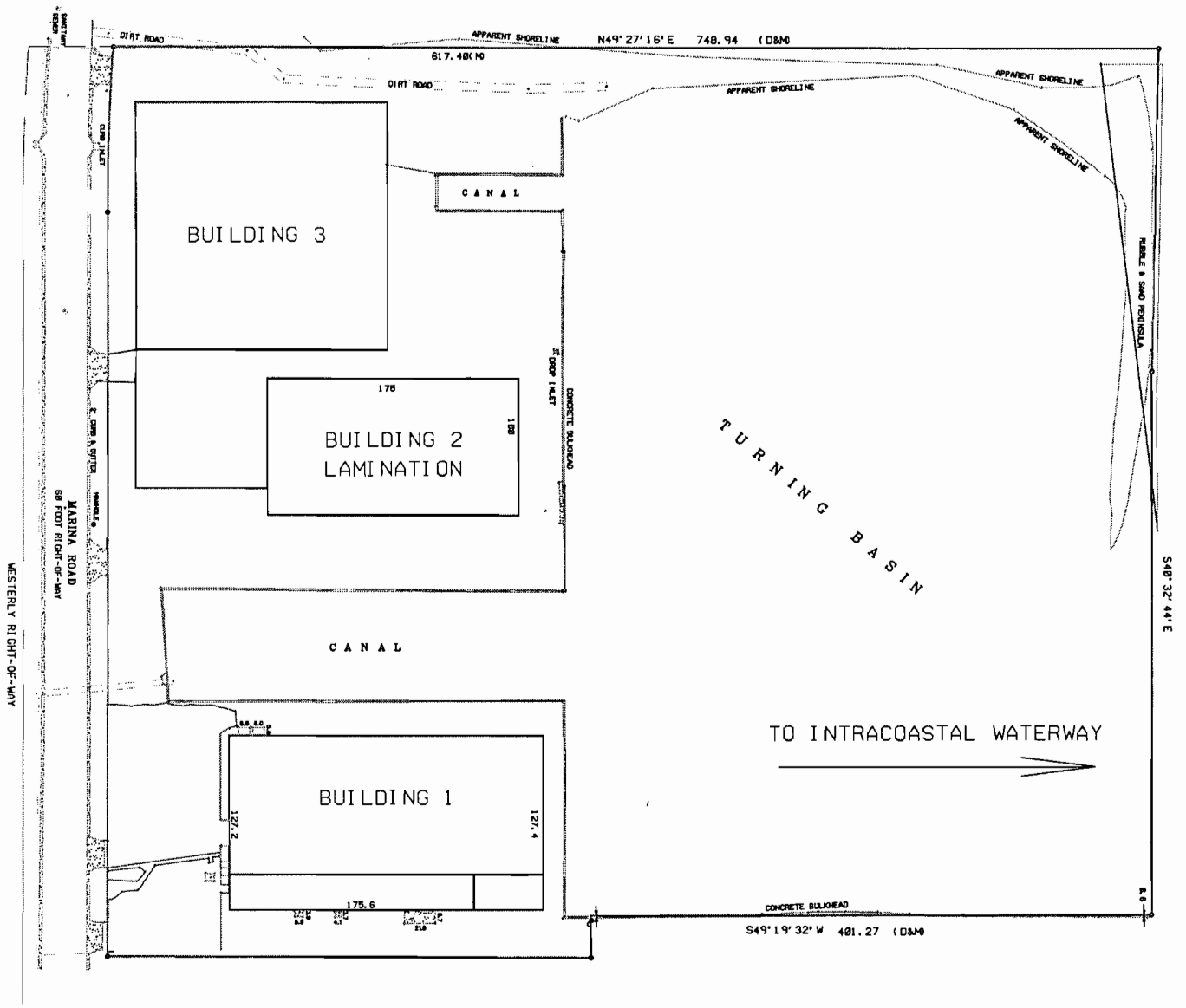
VECTORWORKS INTERNATIONAL Brevard County



VECTORWORKS INTERNATIONAL Brevard County



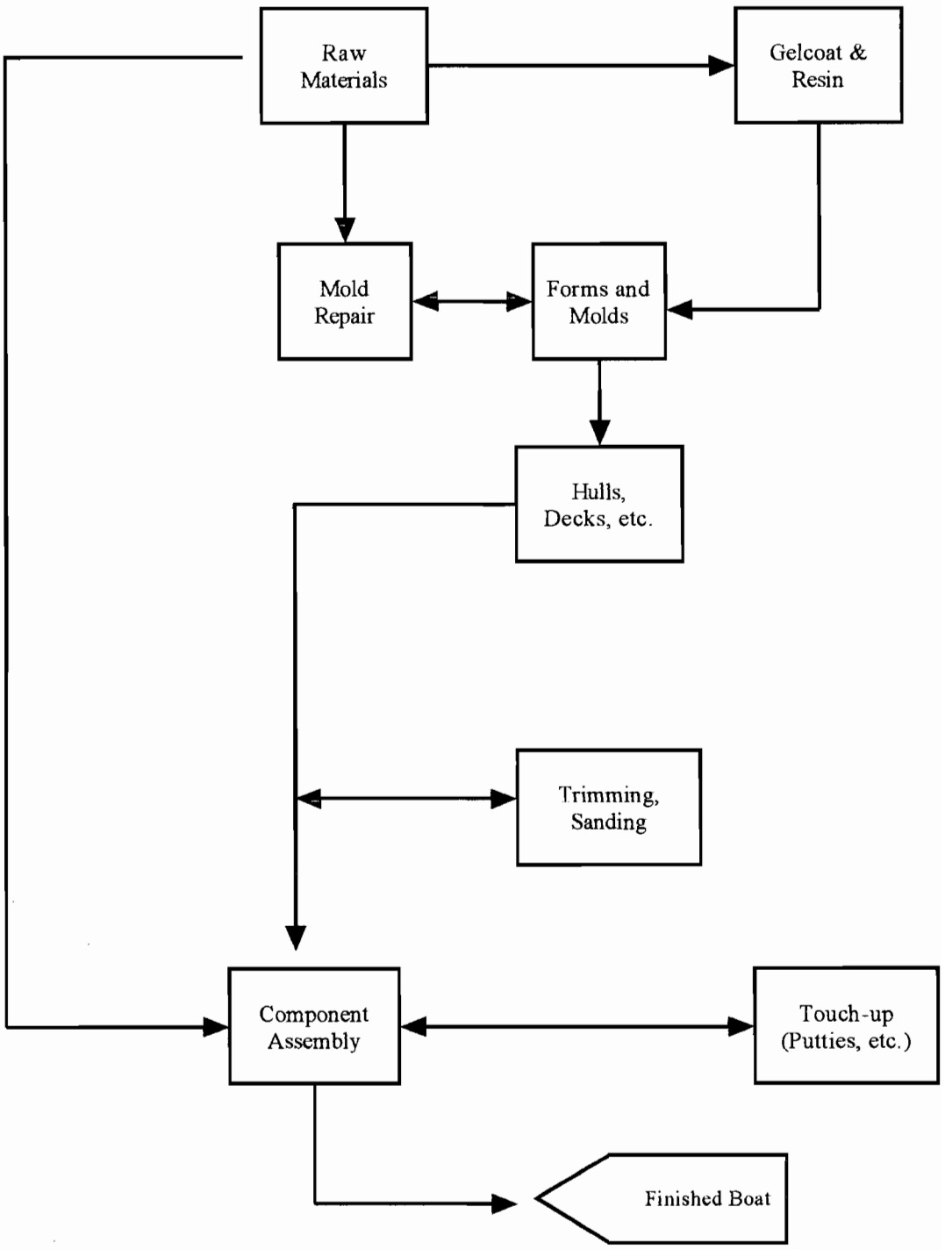
28 36'96 DeLorme Street Atlas USA


DIRT ROAD
APPARENT SHORELINE
N49°27'16"E 748.94 (D&M)
617.40(M)
DIRT ROAD
APPARENT SHORELINE
APPARENT SHORELINE
APPARENT SHORELINE
CANAL
BUILDING 3
BUILDING 2
LAMINATION
176
198
CONCRETE BULKHEAD
TURNING BASIN
CANAL
BUILDING 1
127.2
127.4
175.6
TO INTRACOASTAL WATERWAY
CONCRETE BULKHEAD
S49°19'32"W 401.27 (D&M)
S40°32'44"E
MARINA ROAD
60 FOOT RIGHT-OF-WAY
WESTERLY RIGHT-OF-WAY

Process Flowsheet
Process Description and
Emission Estimates

Attachment 2

Process Flow Diagram



VECTORWORKS INTERNATIONAL, INC.
805 Marina Road, Tutusville, FL
Tom John Engineering, Inc. St. Petersburg, FL
Phone (727) 579 - 0403 FAX (727) 579-0205 www.tjengr.com

Process Description, Emission Estimates and Process Flowsheet

Process Description

Vectorworks International manufactures fiberglass boats and fiberglass products in a wide range of sizes and styles at their facility at 305 Marina Road, Titusville (Brevard County). The general process flowsheet for boat building is shown in Figure 2.0, preceding. The source is an existing facility with permitted styrene annual missions below the threshold for a Title V permit and is designated as a "minor" source under that program. This submittal requests an increase in emissions of Title III, CAAA (1990) species above the threshold levels, and the facility will become a Title V source upon receipt of permit. This submittal also request that daily record keeping requirements be omitted from the permit, in accordance with other permits for similar facilities permitted by FDEP.

The location of the facility and the site buildings are illustrated in layout in Attachment 1. The site consists of three main buildings. Due to the size of many of the boats and the extended time for completion, all required activities may be performed in any of the buildings. The gelcoating and lamination steps are the primary sources of the styrene emissions, the major component of the VOC emissions. VOC species are dispersed through exhaust fans in the roof of each of the buildings. Assembly and mold care/repair activities will be conducted in the building as appropriate.

Expected facility total operating hours to meet the projected demand for the facility will be 10 to 14 hours per day, 5 to 7 days per week, 52 weeks per year. Production demand will not be completely uniform throughout the year, and based on situation variables (product delivery schedule, preparation for trade shows, etc.) 24 hour days of resin and/or gelcoat use for seven days per week may be required for short periods. The facility therefore requests an unlimited daily facility operating schedule (8760 hours per year) and up to 24 hours per day, seven days per week for laminating/gelcoating activities, subject to a maximum regulated styrene and other HAP/VOC emissions as specified in the "facility information" section of the application. Record keeping of raw material usages and corresponding chemical species usage and estimated emissions, as illustrated in the spreadsheet of Figure 2.1 (and currently required by permit), is proposed as demonstration of "reasonable assurance" of compliance with permit emission limits.

Acetone, a VOC-exempt species, is the primary clean up solvent. Hazardous wastes are removed from the facility by a licensed hauler as necessary.

Adhesives and coatings, either water based or containing miscellaneous solvents, may be utilized principally in the assembly areas of the buildings. In these areas items such as seat cushions, covers and deck carpet may be prepared and applied to the boats. Two part foam may be introduced as needed. In general, these materials will be used in minor quantities, they do not contain sufficient single species or aggregate HAPs to trigger reporting concerns, and the contribution to total VOC will be small; however, the materials used on a routine basis will be identified and included in the facility spreadsheet illustrated in Figure 2.1.

The particulates generated from wood and fiberglass cutting, shaping and sanding operations not performed by hand tools (exempt activities list), e.g. the limited tabletop equipment, will be controlled by portable "shop-vac" vacuum collectors which do not vent external to the building. Careful "good housekeeping practices" providing control of fugitive particulates is necessary to prevent contamination of the fiberglass and gelcoat surfaces in the adjoining work areas, and will be given the appropriate consideration by employees and management. There are no outside discharge points from these operations.

The main Clean Air Act Amendment (CAAA) Title III VOC/HAP species emitted from the fiberglassing operation is styrene, which forms the base for polyester resins and gelcoats used in the product manufacture. In some gelcoat materials, (typically) 3% to perhaps 5% of the styrene may be replaced with methyl methacrylate (MMA); MMA would then be the CAAA Title III VOC species emitted in second highest quantity from the facility. Since proper flow characteristics of the gelcoat are held constant as styrene decreases by the increasing MMA concentration, the total VOC emissions would remain essentially unchanged by this substitution of MMA.

The typical anticipated chemical usages after receipt of the construction/modification permit will result in estimated facility emissions of Clean Air Act Amendments of 1990 Title III and V species above the triggers for "major source" categorization. Monthly record keeping, similar to that provided in the spreadsheet presented as Figure 2.1, and detailed report submissions for the FDEP Annual Operating Report are proposed as a method of demonstrating compliance with these limitations, the anticipated case-by-case MACT currently provided by FDEP, and the USEAP MACT requirements for fiberglass boat builders which will supercede the FDEP requirements.

Emission Estimates

Lamination/gelcoating activities

The general procedure for estimating VOC/OS emissions is:

Material Usage Rate x Species Concentration x Emission Factor =

Species Emission Rate

Figure 2.1 presents a representation of the major raw materials typically used, the species composition of those materials, and major raw material usage rates. Note that these values are not requested permit maximums, but are used as an illustration to demonstrate the type of recordkeeping proposed for the facility.

The styrene contents shown for resin and gelcoat are values based on current materials and vendors, obtained from the Material Safety Data (MSD) sheets. The complete set of MSD sheets is available for inspection upon request by the Department. Styrene contents will be demonstrated to comply with the Boatbuilding MACT, as discussed ina later section.

Also presented in the following spreadsheet is the calculated maximum VOC emissions of the major species from the materials currently used at the presented rates. Vectorworks International recognizes that a change in materials or usages that results in significant emissions of a new species or a significant increase in a currently identified species may require notification and approval by FDEP.

The styrene emission factors utilized for emission calculations and shown in the following spreadsheet are based on current FDEP guidance. Minor contributions of styrene from such materials as putty and fillers may be assumed to have an emission factor no greater than the hand layup of resin (0.1). Methyl methacrylate (MMA) present in gelcoat is assumed to have an emission factor approximately 1.5 times the factor for styrene in gelcoat (CFA test data). General VOC species are assumed to have an emission factor of 1.0, except for reactive species (e.g., isocyanates or peroxides) and for high molecular weight/low volatility species (kerosene, oils) which are assumed to have negligible emission factors. Acetone, delisted by EPA and FDEP in June of 1995, may be included in the spreadsheets for informational purposes but should not be included in the emission inventory.

Additional operations and chemicals which may be modified, added or deleted from the inventory include cleanup materials, propellants, mold care/cleaners, and adhesives. When these materials are introduced on site, the material data will be evaluated; new species or changes to existing species will be entered, and usages and emissions will be captured, in the facility data spreadsheet for all materials expected to be used on a routine basis. The changes are expected to represent a small variation in the total facility emissions. Fugitive sources, such as open product and waste containers, will be identified and minimized, and solvents in general will be subject to careful disbursement and general "good housekeeping" practices, including the use of solvent safety cans, etc. These emissions may be considered "negligible" in comparison to the major species emitted from the operations.

The styrene content of the resin and gelcoat may vary depending on particular type, purpose, blend or supplier, and the species and concentrations of all other raw materials are subject to change, outside the control of Vectorworks International. Despite these changes, the record keeping system will track each individual species, e.g., styrene, at its actual concentration in each shipment (as identified from its accompanying MSD sheet), assign an emission factor, and determine the emissions of an individual raw material or source as well as total facility emission. Compliance with the USEAP MACT standards, and prior to that the FDEP standards, will be demonstrated in a similar manner.

It should be noted that the raw material usage rate is a surrogate measure of the VOC species emission rate, which is the product of the usage rate, the species concentration and the emission factor for a particular species in a particular operation. If the species concentration varies up or down, as is often the case, the usage rate may be adjusted accordingly to maintain compliance with a VOC emission limitation. This will allow the potential for higher cost, lower styrene content resin and gelcoat materials to be used at correspondingly higher levels, or for varyations in the resin/gelcoat ratio as models change, without violating the emission limitations of the permit. Careful record keeping is proposed as a means of demonstrating compliance with VOC species emissions limitations imposed on the facility by permit. Those records will be provided to the Department with the Annual Operating Report required of facilities. This report will identify and quantify usages and emissions from the major VOC-containing production-related materials used at the facility.

Material Usage and Emission Discussion

It is clear that the quantity and variety of VOC containing materials potentially used at the facility makes it impractical to provide (or accept permit limits for) specific usage limits for all raw materials. Many of these materials will be used infrequently and may be replaced by alternatives or substitutes. However, as noted the contribution of these miscellaneous VOC emissions to the total facility emission will be small; the actual material usages and speciated emissions will be captured accurately in the facility data record and spreadsheet as illustrated, and will provide assurance that the styrene and miscellaneous VOC emission limits are not exceeded. Vectorworks International requests that the Department limit by permit only the total facility general VOC emissions, total HAP emissions and total styrene emissions. Although the Emission Unit section of the Application lists "tons per year" values for resin, gelcoat and solvent based ancillary material usages, Vectorworks International requests that individual raw material usages and species concentrations be allowed to vary as necessary for facility operations (e.g., substitution of a high styrene resin for a low styrene resin or increased resin usage and corresponding reduced gelcoat usage) provided that Vectorworks International demonstrates in the facility usage and emission report that the variations result in emissions less than or equal to the FDEP permit limits and MACT requirements, as is common practice for fiberglass boat building permits. Vectorworks International further requests that the Department accept the determination of the FDEP case by case or presumptive MACT as an interim condition, to be superceded by the USEPA MACT requirements when promulgated. Vectorworks International requests that the Department revise by administrative action any permit conditions superceded by the USEPA MACT requirements when promulgated. Vectorworks International also requests that the Department revise by administrative action any permit conditions superceded by the USEPA MACT requirements.

Proposed Case by Case MACT Conditions

Although Florida DEP has not developed a Presumptive MACT for boat builders, recent permits have been issued with limits generally consistent with the proposed MACT standards of USEPA. Vectorworks International is proposing to comply with those recent Florida permits, in particular as related to styrene:

production resins containing a maximum of 35% (wt) total HAP, based on a 3 month weighted rolling average, applied by non atomizing techniques or equivalent (or better) point value techniques

pigmented and base gelcoats containing a maximum of 33% (wt) total HAP, based on a 3 month weighted rolling average

sprayed tooling resins, used for repair of molds, containing a maximum of 30% (wt) HAP content, based on a 3 month rolling weighted average

non atomized tooling resins, used for repair of molds, containing a maximum of 39% (wt) HAP content, based on a 3 month rolling weighted average

tooling gelcoats, used for making and repair of molds, containing a maximum of 40% (wt) HAP content, based on a 3 month rolling weighted average

use of the highest styrene content in these determinations and calculations when manufacturer's Material Safety Data Sheets are used.

Vectorworks International believes that compliance with these limitations is sufficient to allow the processing of this application.

Figure 2.1

VECTORWORKS INTERNATIONAL

Illustrative Example
Raw Material Usages and Emission Estimates

Period: proposed

Emission factors:			
Styrene* in Resins, tooling, putties: ——————>	0.13	MMA in gelcoat: —>	0.7
		General VOC: ——>	1.00
Gelcoats: ——>	0.54	Reactive/low V.P. –>	0.001

Composition

	Species					
Material	styrene	MMA	MEKP	DMP	MEK	misc VOC
Resins	44%					
putty/tooling	39%	5%				
gelcoats	37%	5%				
catalyst			32%	48%	2%	
waxes						76%
films						100%
paints/solvents						50%

Usages (lbs)

		Species Usage					
tons —>		90.25	6.30	1.54	2.31	0.10	2.24
lbs —>		180508	12599	3082	4623	193	4486
Material	used	styrene	MMA	MEKP	DMP	MEK	misc VOC
Resins	187630	82163	0	0	0	0	0
putty/tooling	239503	93694	11975	0	0	0	0
gelcoats	12478	4652	624	0	0	0	0
catalyst	9632	0	0	3082	4623	193	0
waxes	1050	0	0	0	0	0	798
films,adhesives	3492	0	0	0	0	0	3492
paints/solvents	390	0	0	0	0	0	195

Emissions (lbs)

	Species Emissions					
tons —>	12.69	4.41	0.00	0.00	0.10	2.24
lbs —>	25373	8819	3	5	193	4486
Material	styrene	MMA	MEKP	DMP	MEK	misc VOC
Resins	10681	0				
putty/tooling	12180	8383				
gelcoats	2512	437				
catalyst			3	5	193	0
waxes						798
films						3492
paints/solvents						195

proposed Total VOC, tons	19.44
Total HAP	17.10
Total Styrene	12.69

*Other factors are available, which generally yield different emission estimates. When USEPA approves a different set of factors, it may be necessary to revise and resubmit this report.

FOR ILLUSTRATION PURPOSES ONLY

VECTORWORKS INTERNATIONAL, INC.

Month of: Jan 1999 **Typical Raw Materials and Compositions**

Material	Material	Form R ?	Y	N	Y	Y	Y	Y	Y	Y	Y	N	Y	N	N	N	N
		HAP ?	Y	N	Y	Y	Y	Y	Y	Y	N	N	N	N	N	N	N
		CAS No. -->	100-42-5	67-64-1	78-93-3	108-10-1	80-62-6	108-88-3	1330-20-7	100-41-4	67-63-0	78-83-1	71-36-3	64-17-5	123-86-4	107-87-9	64744-88-1
		Species -->	styrene	acetone	MEK	MIBK	MMA	toluene	xylene	et-benzene	I-PrOH	I- BuOH	n- BuOH	EtOH	Bu Acetate	MePrketone	pet dist
RESINS**		LBS/Gal |	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GP Lam. Resin, 40-3714		9.09	42%														
Reichold Resin, 33233-35		9.09	43%														
Reichold Resin, 33233-05		9.09	42%														
Reichold Resin, 33253-02		8.64	44%														
Reichold Resin, 33250-02		8.64	44%														
Reichold Resin, 33350-02		8.64	44%														
Reichold Resin, 33350-22		8.64	44%														
Polylite GP Resin, 33087-00		9.09	48%														
McWhorter Resin, 1450667		8.91	38%														
Ashland Resin, MR12-504		9.09	39%														
Interplastic Resin, COR74-201-065		9.00	44%														
Interplastic Resin, COR VE8123M		8.18	47%														
Interplastic Resin, MVR8037M		9.09	45%														
Interplastic Resin, CORVE8121		8.18	48%														
Adtech Epoxy Resin, #355		8.90															
Epoxy Resin, 5-235-1A/B		9.00															
GELCOAT:																	
Metal Flake Clear		10.00	44%														
Cooks White, 945-W-016		9.09															
Cooks White, 944-W-005		9.00	31%				5%										
Polygard Ext. White		11.00	40%														
Cooks Red Exterior, ISO Gelcoat, RA050		10.00	33%				4%										
Cooks Blue Exterior ISO Gelcoat, LT019		10.00	32%				4%										
PUTTY, FILLER, TOOLING:																	
Cooks Black Tooling		9.00	42%														
Cooks Green Tooling		9.00	42%				5%										
Mold Putty		5.50	21%														
Akemi #4		11.00	15%														
Akemi #7		11.00	15%														
High Speed Hardner Paste, (Akemi)		0.16															
Awigrip #545 Converter, (Primer)		8.15			13%			12%							22%		
Awigrip 545 Epoxy Primer, Base White		12.36			6%				2%				4%		7%		
Arjay Syntactic Putty, 5002		6.20	21%														
Spraycore Putty, SC-2000-HS		4.83	35%														
Duratec, 707-002 Surface Primer		8.00	21%		10%												
Duratec, 904-001 HiGloss Clear		8.00	34%		15%												
Duratec, 707-051 Base Primer		8.00	18%		20%												
FOAMS																	
S1570B030S30, PART "B" COMPONENT		8.18															
IO732A30, PART "A" COMPONENT		9.09															
Catalyst ***																	
Lupersol DDM-9 Red M.E.K.P.		8.00															
Lupersol DDM-9 Clear M.E.K.P.		8.00			1%												
HI-Point 90 Red M.E.K.P.		8.00															
HI-Point 90 Clear M.E.K.P.		8.00															
DHD-9 Red M.E.K.P.		8.00															
DHD-9 Clear M.E.K.P.		8.00															
Misc ****																	
Co-Nap, 6%		10.00															
Styrene		7.6	100%														
Acetone		6.64		100%													
Crème Hardner		10.84															
Thermaclean		8.72															
TF-100 Tack Free Additive		7	88%														
Ultralight Bondo		7.5	18%														
Red Dye Solution, 48-748-00		8							14%	4%							
Partall Film #10		8.07											7%	45%			

1a 1b 1b

Y
N
76-13-1
C13E3C2

N	N	N	N	N	N	N	N	N	N	N	Y	N	Y	Y	N	Y	[redacted]
N	N	N	N	N	N	N	N	N	N	N	N	N	Y	Y	N	N	[redacted]
64744-89-5	64742-88-7	64742-95-6	64742-89-8	64742-86-7	64742-48-9	64742-14-9	64742-94-5	64741-88-4	8052-41-3	8008-20-6	94-36-0	85-68-7	84-74-2	101-68-8	26447-40-5	75-45-6	[redacted]
pet dist	med naphtha	arom hydro	VMPnaphtha	hvy naphtha	naphthol	lt pet dist	pet naphtha	hvy pet dist	stoddard solv	kerosene	benzoylperoxide	Bubenzphthalate	DBP	4,4'MDI	MDI oligomers	CIF2HC	[redacted]

50% 28%

50%

47%

35% 60%

1c

Jan

Y	N	N	N	Y	N	N	Y	Y
N	N	N	N	Y	Y	N	N	N
1717-00-6	9003-07-0	1338-23-4	107-41-5	131-11-3	34590-94-8	142-96-1	71-55-6	123-91-1
HCFC 141B	1-propene	MEKP	hex glycol	DMP	DPG-ME	Dibutyl ether	trichloroethane	dioxane
-	-	-	-	-	-	-	-	-

18%

35%
33% 6% 56%
38% 47%
38% 47%

10%
10%

50%

Vectorworks International, Inc.

Month of: Jan 1999 **Species Material Usages**

Material:	Lbs/Month	5070	1460	285	0	17	0	0	0	0	0	0	0	0	0	0
	CAS No. -->	100-42-5	67-64-1	78-93-3	108-10-1	80-62-6	108-88-3	1330-20-7	100-41-4	67-63-0	78-83-1	71-36-3	64-17-5	123-86-4	107-87-8	64744-88-1
	Species -->	styrene	acetone	MEK	MIBK	MMA	toluene	xylene	et-benzene	I-PrOH	I- BuOH	n- BuOH	EtOH	Bu Acetate	MePrketone	pet dist
	Lbs Used	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RESINS**																
GP Lam. Resin, 40-3714		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33233-35		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33233-05	6000	2520	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33253-02		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33250-02		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33350-02		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33350-22		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Polylite GP Resin, 33087-00		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
McWhorter Resin, 1450667		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ashland Resin, MR12-504		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Interplastic Resin, COR74-201-085		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Interplastic Resin, COR VE8123M		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Interplastic Resin, MVR8037M		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Interplastic Resin, CORVE8121	900	428	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adtech Epoxy Resin, #355		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Epoxy Resin, 5-235-1A/B		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
GELCOAT:																
Metal Flake Clear	100	44	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cooks White, 945-W-016		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cooks White, 944-W-005		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Polygard Ext. White	330	132	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cooks Red Exterior, ISO Gelcoat, RA050	100	33	0	0	0	4	0	0	0	0	0	0	0	0	0	0
Cooks Blue Exterior ISO Gelcoat, LT019	100	32	0	0	0	4	0	0	0	0	0	0	0	0	0	0
PUTTY, FILLER, TOOLING:																
Cooks Black Tooling		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cooks Green Tooling	180	76	0	0	0	8	0	0	0	0	0	0	0	0	0	0
Mold Putty		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Akemi #4		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Akemi # 7	48.5	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0
High Speed Hardner Paste, (Akemi)	2.88	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Awlgrip #545 Converter, (Primer)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Awlgrip 545 Epoxy Primer, Base White		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arjay Syntactic Putty, 5002		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Spraycore Putty, SC-2000-HS	4240	1484	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Duratec, 707-002 Surface Primer	296	62	0	30	0	0	0	0	0	0	0	0	0	0	0	0
Duratec, 904-001 HiGloss Clear	104	35	0	16	0	0	0	0	0	0	0	0	0	0	0	0
Duratec, 707-051 Base Primer	1200	216	0	240	0	0	0	0	0	0	0	0	0	0	0	0
FOAMS																
S1570B030S30, PART "B" COMPONENT	1800	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IO732A30, PART "A" COMPONENT	2000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Catalyst ***																
Lupersol DDM-9 Red M.E.K.P.		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Lupersol DDM-9 Clear M.E.K.P.		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HI-Point 90 Red M.E.K.P.	224	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HI-Point 90 Clear M.E.K.P.	64	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DHD-9 Red M.E.K.P.		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DHD-9 Clear M.E.K.P.		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Misc ****																
Co-Nap, 6%		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Styrene		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Acetone	1460	0	1460	0	0	0	0	0	0	0	0	0	0	0	0	0
Crème Hardner		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Thermaclean		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TF-100 Tack Free Additive		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ultralight Bondo		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Red Dye Solution, 46-748-00		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Partall Film #10		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Month of: Jan 1999 **Species Material Emission Estimates**

2b

pet dist	med naphtha	arom hydro	VMPnaphtha	hvy naphtha	naphthol	lt pet dist	pet naphtha	hvy pet dist	stoddard solv	kerosene	benzoylperoxide	Bubenzphthalate	DBP	4,4'MDI	MDI oligomers	ClF2HC	Cl3F3C2
64741-89-5	64742-88-7	64742-95-6	64742-89-8	64742-96-7	64742-48-9	64742-14-9	64742-94-5	64741-88-4	8052-41-3	8008-20-6	94-36-0	85-68-7	84-74-2	101-68-8	26447-40-5	75-45-6	76-13-1
0	0	0	0	0	0	0	0	0	0	0	1	1	0	1000	0	0	0
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2c

324 1717-00-6 HCFC 141B	0 9003-07-0 1-propene	109 1338-23-4 MEKP	0 107-41-5 hex glycol	135 131-11-3 DMP	#VALUE! 34590-94-8 DPG-ME	0 142-96-1 Dibutyl ether	0 71-55-6 trichloroethane	0 123-91-1 dioxane
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
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0	0	0	0	0	0	0	0	0
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324	0	0	0	0	0	0	0	0
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0	0	0	0	0	0	0	0	0
0	0	85	0	105	0	0	0	0
0	0	24	0	30	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
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0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	#VALUE!	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0

Hours this Month: 208

Material:		tons/mon	0.30	0.00	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		cas no. -->	100-42-5	67-64-1	78-93-3	108-10-1	80-62-6	108-88-3	1330-20-7	100-41-4	67-63-0	78-83-1	71-36-3	64-17-5	123-86-4	107-87-8	64744-88-1
		species -->	styrene	acetone	MEK	MIBK	MMA	toluene	xylene	et-benzene	I-PrOH	I- BuOH	n- BuOH	EtOH	Bu Acetate	MePrketone	pet dist
		emitted lbs	605	0	285	0	5	0	0	0	0	0	0	0	0	0	0
		emitted lbs/hr	2.91	0.00	1.37	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RESINS**																	
GP Lam. Resin, 40-3714			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33233-35			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33233-05			277.2		0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33253-02			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33250-02			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33350-02			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Reichold Resin, 33350-22			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Polylite GP Resin, 33087-00			0		0	0	0	0	0	0	0	0	0	0	0	0	0
McWhorter Resin, 1450687			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Ashland Resin, MR12-504			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Interplastic Resin, COR74-201-065			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Interplastic Resin, COR VE8123M			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Interplastic Resin, MVR8037M			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Interplastic Resin, CORVE8121			47.025		0	0	0	0	0	0	0	0	0	0	0	0	0
Adtech Epoxy Resin, #355			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Epoxy Resin, 5-235-1A/B			0		0	0	0	0	0	0	0	0	0	0	0	0	0
GELCOAT:																	
Metal Flake Clear			13.493505		0	0	0	0	0	0	0	0	0	0	0	0	0
Cooks White, 945-W-016			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Cooks White, 944-W-005			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Polygard Ext. White			40.26		0	0	0	0	0	0	0	0	0	0	0	0	0
Cooks Red Exterior, ISO Gelcoat, RA050			10.072625		0	0	1.2627	0	0	0	0	0	0	0	0	0	0
Cooks Blue Exterior ISO Gelcoat, LT018			9.899985		0	0	1.27398	0	0	0	0	0	0	0	0	0	0
PUTTY, FILLER, TOOLING:																	
Cooks Black Tooling			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Cooks Green Tooling			8.37342		0	0	2.745	0	0	0	0	0	0	0	0	0	0
Mold Putty			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Akemi #4			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Akemi #7			0.80025		0	0	0	0	0	0	0	0	0	0	0	0	0
High Speed Hardner Paste, (Akemi)			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Awlgrip #545 Converter, (Primer)			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Awlgrip 545 Epoxy Primer, Base White			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Arjay Syntactic Putty, 5002			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Spraycore Putty, SC-2000-HS			163.24		0	0	0	0	0	0	0	0	0	0	0	0	0
Duratec, 707-002 Surface Primer			6.8376		29.6	0	0	0	0	0	0	0	0	0	0	0	0
Duratec, 804-001 HiGloss Clear			3.8896		15.6	0	0	0	0	0	0	0	0	0	0	0	0
Duratec, 707-051 Base Primer			23.78		240	0	0	0	0	0	0	0	0	0	0	0	0
FOAMS																	
S1570B030S30, PART "B" COMPONENT			0		0	0	0	0	0	0	0	0	0	0	0	0	0
IO732A30, PART "A" COMPONENT			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Catalyst ***																	
Lupersol DDM-9 Red M.E.K.P.			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Lupersol DDM-9 Clear M.E.K.P.			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Hi-Point 90 Red M.E.K.P.			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Hi-Point 90 Clear M.E.K.P.			0		0	0	0	0	0	0	0	0	0	0	0	0	0
DHD-9 Red M.E.K.P.			0		0	0	0	0	0	0	0	0	0	0	0	0	0
DHD-9 Clear M.E.K.P.			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Misc ****																	
Co-Nap, 6%			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Styrene			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Acetone			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Crème Hardner			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Thermaclean			0		0	0	0	0	0	0	0	0	0	0	0	0	0
TF-100 Tack Free Additive			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Ultralight Bondo			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Red Dye Solution, 46-746-00			0		0	0	0	0	0	0	0	0	0	0	0	0	0
Partall Film #10			0		0	0	0	0	0	0	0	0	0	0	0	0	0

0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
64744-89-5	64742-88-7	64742-95-6	64742-89-8	64742-96-7	64742-48-9	64742-14-9	64742-94-5	64741-88-4	8052-41-3	8008-20-6	94-36-0	85-68-7	84-74-2	101-68-8	26447-40-5	75-45-6	76-13-1
pet dist	med naphtha	arom hydro	VMPnaphtha	hvy naphtha	naphthol	lt pet dist	pet naphtha	hvy pet dist	stoddard solv	kerosene	benzoylperoxide	Bubenzphthalate	DBP	4,4'MDI	MDI oligomers	ClF2HC	Cl3F3C2
0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	1.44	0.8084	0	0	0	0	0
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0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

8c

0.16	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.00
1717-00-6	8003-07-0	1338-23-4	107-41-5	131-11-3	34590--94-8	142-96-1	71-55-6	123-91-1
HCFC 141B	1-propene	MEKP	hex glycol	DMP	DPG-ME	Dibutyl ether	trichloroethane	dioxane
324	0	0	0	135	0	0	0	0
1.56	0.00	0.00	0.00	0.65	0.00	0.00	0.00	0.00
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
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0	0	0	0	0	0	0	0	0
324	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
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0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	#VALUE!	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0

Trivial and Exempt Activities

Attachment 3

PROPOSED TRIVIAL AND EXEMPT ACTIVITIES

Vectorworks International, Incorporated, currently performs or may perform at a future date many of the activities presented in Attachment A, provided by FDEP and following, which lists "trivial" and presumptively exempt activities and emission units. No specific mention is made of these activities in the permit application.

All resins, gelcoats, paints and other VOC-based raw materials are received and stored in drums or totes, eliminating VOC breathing and working losses. Transfer losses are minimized by work practices as required (Rule 62-297.320). These activities are considered presumptively exempt from permitting.

Acetone is used in some applications as a solvent; acetone is no longer considered a VOC, and the use of this material in this activity is considered presumptively exempt from permitting.

Activities involving the cutting, shaping, or trimming of fiberglass, wooden or foam parts are performed by hand held tools (trivial list activity) or controlled by portable vacuum collectors which do not exhaust outside the building, and are performed with proper consideration. The generation of particulate emissions from these activities are minimized as discussed in Attachment 5, and the activities are considered exempt from permitting.

Additional Applicable Requirements

Attachment 4

ADDITIONAL APPLICABLE REQUIREMENTS

Additional applicable requirements for this facility are detailed in the current FDEP synthetic minor air permit, and in the Title V construction and operation permits, to be issued. The current permit describes, and the Title V permit will describe, the record keeping parameter requirements, the reporting requirements, and compliance testing requirements, as appropriate.

The facility will comply with the Specific Conditions and requirements of the current air permit and the Title V operating permit when issued, as noted in Attachment 5.

Vectorworks International Incorporated will comply with FDEP regulations stating that "no person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever...without taking reasonable precautions to prevent such emissions" and that "no person shall cause suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor."

Vectorworks International will continue to employ "good housekeeping" and other reasonable work practices to minimize the generation of odors and particulates, in particular in the woodworking and fiberglass/topcoat cutting, sanding and shaping activities.

Compliance Plan and Certification

Attachment 5

VECTORWORKS INTERNATIONAL, INCORPORATED
COMPLIANCE REPORT

The subject facility is in compliance with each existing applicable requirement outlined in the Title V application, except as noted below. A statement of compliance follows as required.

Emissions Unit ID	Description of Emission Unit	Compliance Status
001	Fiberglass Boatbuilding	In Compliance

Compliance Certification

I, the undersigned, am the responsible official as defined in Chapter 62-210.200 Florida Administrative Code (FAC) of the Title V source for which this report is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Signature

3/17/00
Date

Vectorworks International, Incorporated
COMPLIANCE PLAN

The purpose of this attachment is to document the methods by which the facility proposes to demonstrate compliance with its applicable requirements. Most of the facility-wide applicable requirements address general permitting standards for stationary air pollution sources and general prohibitions on certain types of activities (e.g., open burning and motor vehicle air conditioner repair). For these types of requirements, no specific actions are required to be performed by the facility except on a periodic, as-needed basis. The facility will continue to comply with these general requirements by taking the necessary steps to ensure that all necessary air permits are applied for and obtained in accordance with FDEP's protocols and by not performing those activities that are prohibited.

For the purposes of the following discussion, compliance plans have been included only for those substantive requirements that set work practice standards or emissions limits, or will necessitate regular monitoring, recordkeeping, or reporting. Compliance plans for the facility as a whole and for each regulated emissions unit are described below.

A. GENERAL FACILITY COMPLIANCE PLAN

The compliance plans presented in this section address monitoring, recordkeeping, and reporting requirements for the facility as a whole.

1. In accordance with 62-210.370(3) FAC, the facility will submit an annual operating report to the appropriate FDEP district office by March 1 of the following year unless otherwise indicated by permit condition or FDEP request. The annual operating report will be completed on the form 62-210.900(5) FAC or as instructed by FDEP.

2. In accordance with 62-213.205 FAC, between January 15 and March 1 of each year, the facility will pay upon written notice from FDEP, an annual emissions fee in an amount determined by the procedures specified by the rule. The emissions fee will be submitted along with a completed form 62-213.900(1) FAC.

3. In accordance with 62-296.320(4)(c), the facility will take reasonable precautions to prevent emissions of unconfined particulate matter from the facility. Activities which can cause fugitive particulate emissions at the facility include vehicular movement, transportation of materials, and industrially related activities such as materials loading, unloading, storing, and handling. Reasonable precautions to be taken by the facility include:

   Application of water to paved and unpaved areas accommodating vehicular traffic if a visible particulate plume is observed to extend more than 15 feet from the point of origin.

Removal of particulate matter from buildings or work areas to prevent a visible particulate plume of unconfined particulate greater than 20%.

Enclosure or covering of activities or equipment where necessary to prevent unconfined particulate emissions from having an opacity greater than 20%.

B. CONTROL DEVICE/WORK PRACTICE PLAN

In order to comply with the permit general and specific conditions, all control devices (regulated and unregulated) will be properly maintained. Routine facility inspections will be performed to confirm the effectiveness of control devices (if present) and work practice standards in minimizing emissions. Repairs to equipment and modifications to work practice procedures will be made as necessary. Records of these repairs or modifications will be maintained on site for a minimum of 5 years and will be available for review by FDEP or the Agency's designated representatives. All required compliance testing and facility recordkeeping will be conducted in a timely manner and in conformance with the applicable permit specific conditions.

The facility will comply with the conditions of the Boat Building MACT promulgated by USEPA in accordance with the schedule contained in that promulgation, and in the interim with the conditions of the case by case or presumptive MACT for boatbuilders proposed by FDEP Tallahassee Office. The conditions of the presumptive MACT will be considered to be superceded by the USEPA MACT when it becomes effective, and any more restrictive permit conditions based on the FDEP proposal will be considered to be revised by Administrative action to reflect the USEPA position.

C. COMPLIANCE TESTING

Compliance testing, as appropriate and required by permit, will be conducted in accordance with EPA Methods as contained in 40CFR60 Appendix A and adopted by reference in Rule 62-297, FAC. This testing will be performed within 60 days of the receipt of notification or as specified by the Department. Submission of the test results, and an addendum to this application if necessary, will be filed within 45 days of the testing.