From:	Koerner, Jeff
To:	"Randy Clunie"
Cc:	Svec, Ed
Subject:	RE: FW: draft of permits
Date:	Monday, November 19, 2012 5:27:18 PM
Attachments:	NESHAP VVVV Excerpts.docx 0090238-002-AV - SOB.doc 0090238-002-AV - Appendices.docx 0090238-002-AV - Draft-Proposed Permit.docx

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Randy,

Attached are preliminary drafts of the Canaveral Title V permit for your review. Again, these are just for purposes of discussion. I'll send the preliminary draft for the Title V permit Merritt Island facility separately.

With regard to your question about the NESHAP and notifications, we were thinking about adding the following to the Technical Evaluation along with a brief explanation:

40 CFR Part 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

§ 63.5680 What is the purpose of this subpart?

(a) This subpart establishes national emission standards for hazardous air pollutants (HAP) for new and existing boat manufacturing facilities with resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards.

§ 63.5689 What parts of my facility are covered by this subpart?

The affected source (the portion of your boat manufacturing facility covered by this subpart) is the combination of all of the boat manufacturing operations listed in paragraphs (a) through (f) of this section.

(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(b) Closed molding resin operations.

(c) Resin and gel coat mixing operations.

(d) Resin and gel coat application equipment cleaning operations.

(e) Carpet and fabric adhesive operations.

(f) Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

{Permitting Note: Wood coating is not identified as an operation regulated by NESHAP Subpart VVVV. Adhesives used in carpet and fabric operations are covered.}

§ 63.5683 Does this subpart apply to me?

(a) This subpart applies to you if you meet both of the criteria listed in paragraphs (a)(1) and (2) of this section.

(1) You are the owner or operator of a boat manufacturing facility that builds fiberglass boats or aluminum recreational boats.

(2) Your boat manufacturing facility is a major source of HAP either in and of itself, or because it is collocated with other sources of HAP, such that all sources combined constitute a major source.

(b) A boat manufacturing facility is a facility that manufactures hulls or decks of boats from fiberglass or aluminum, or assembles boats from premanufactured hulls and decks, or builds molds to make fiberglass hulls or decks. A facility that manufactures only parts of boats (such as hatches, seats, or lockers) or boat trailers is not considered a boat manufacturing facility for the purpose of this subpart.

(c) A major source is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or can potentially emit, considering controls, in the aggregate, 9.1 megagrams (10 tons) or more per year of a single HAP or 22.7 megagrams (25 tons) or more per year of a combination of HAP.

(d) This subpart does not apply to aluminum coating operations on aluminum boats intended for commercial or military (nonrecreational) use, antifoulant coatings, assembly adhesives, fiberglass hull and deck coatings, research and development activities, mold sealing and release agents, mold stripping and cleaning solvents, and wood coatings as defined in §63.5779. This subpart does not apply to materials contained in handheld aerosol cans.

§ 63.5779 What definitions apply to this subpart?

Assembly adhesive means any chemical material used in the joining of one fiberglass, metal, foam, or wood parts to another to form a temporary or permanently bonded assembly. Assembly adhesives include, but are not limited to, methacrylate adhesives and putties made from polyester or vinylester resin mixed with inert fillers or fibers.

Carpet and fabric adhesive means any chemical material that permanently attaches carpet, fabric, or upholstery to any surface of a boat.

Wood coatings means coatings applied to wooden parts and surfaces of boats, such as paneling, cabinets, railings, and trim. Wood coatings include, but are not limited to, primers, stains, sealers, varnishes, and enamels. Polyester and vinylester resins or gel coats applied to wooden parts to encapsulate them or bond them to other parts are not wood coatings.

Either in Section 2 (Administrative Requirements) or in Section 3A for the coating and curing, we were thinking of adding a new condition in the AC permit:

5. NESHAP Applicability: 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) for boat building in Subpart VVVV of Title 40, Part 63, Code of Federal Regulations. Subpart VVVV does not apply to wood coatings or assembly adhesives. Based on present operations, there are no currently applicable requirements for this facility. The permittee shall apply for appropriate air permits prior to conducting any work that will be regulated under NESHAP Subpart VVVV or any future applicable area source NESHAP. [NESHAP Subpart VVVV in 40 CFR 63

and Rule 62-4.070(3), F.A.C.] In addition, if an area source that otherwise would be subject to an emission standard or other requirement established under this part if it were a major source subsequently increases its emissions of hazardous air pollutants (or its potential to emit hazardous air pollutants) such that the source is a major source that is subject to the emission standard or other requirement, such source also shall be subject to the notification requirements of this subpart. [NESHAP Subpart A, 40 CFR 63.1(c)(5)]

Thanks!

Jeff

From: Koerner, Jeff
Sent: Thursday, November 15, 2012 10:23 PM
To: 'Randy Clunie'
Subject: RE: FW: draft of permits

Randy,

OK, I'll continue to go through the Title V documents, but may not be able to get these to you until Monday.

Hopefully, Ed will be back tomorrow …

Thanks!

Jeff

From: Randy Clunie [mailto:Randy.Clunie@searay.com]
Sent: Thursday, November 15, 2012 10:09 PM
To: Koerner, Jeff
Subject: Re: FW: draft of permits

Jeff,
Let me get back with our Maintenance & Operations Manager in regards to dust collector. The plants do not work on Friday, so it will be early next week when I get back with you..

I plan on getting everyones input from our side and get those comments (if any) before Thanksgiving to you as well.

Thanks,
Randy

From: "Koerner, Jeff" [Jeff.Koerner@dep.state.fl.us]
Sent: 11/15/2012 09:54 PM EST
To: Randy Clunie
Subject: RE: FW: draft of permits

Randy,

Good point on the NESHAP … we'll check it out and get back to you.

Reporting monthly records by the end of the following month is probably OK.

As for inspecting the dust collector, how about a monthly check and logging of: the date, the pressure differential, whether visible emissions were detected, and if visible emissions were detected the corrective actions taken?

Let me know.

Thanks!

Jeff

Jeffery F. Koerner, Program Administrator
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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: Thursday, November 15, 2012 6:24 PM
To: Koerner, Jeff
Subject: RE: FW: draft of permits

Jeff,

I have a few minor questions. With regards to Cape Canaveral having a Title V Air Permit, I recognize the facility would need to maintain VOC reports, submit semi-annual & annual reports, and pay Title V fees. In regards to NESHAP VVVV will the plant be required to submit MACT-related reports even though there will be no such activities, written plan...stating no activity, etc. OR how will that part be

handled. For example; Will the Responsible Official need to create and sign a report stating non NESHAP VVVV activity occurred during the ? time period on semi-annual, annual report & certification.

I am thinking it would be a good idea to insert some statement that Sea Ray/Brunswick Cape Canaveral plant has no reporting or certification obligations for NESHAP VVVV as long as no such activities is occurring. Also, FDEP may want to add some other clarification statements that it would like to insert into the permit. Your thoughts?

Also, I see that you have under RECORDS AND REPORTS: "The monthly records shall be available within 14 days following the end of each month. If acceptable to you, please change that statement to: "The monthly logs shall be completed by the end of the following month." Our industry has plant shutdowns, furloughs, etc. that could make it challenging at times to get completed within the 14-day time period. **NOTE: Under Condition A.13 (f) of our current Title V permit for MI Complex (page 9 of 52), it includes the statement: "The monthly logs shall be completed by the end of the following month."** This request would align with our current permit requirements.

You mention...Operator shall inspect the dust collector, but I don't see a inspection frequency mentioned. **Please e-mail me your thoughts on this matter.**

My Team will have a conference call on Monday, and I will get back with you if there are any other issues.
Thank you,

Randy Clunie
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