



Environmental  
Science &  
Engineering, Inc.

RECEIVED

OCT 15 1990

Certified Mail - Return Receipt Requested

PER-BAQM

October 11, 1990  
3901050-0100-3160

Mr. C. H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Application for Permit No. AC 09-180615

Dear Mr. Fancy:

Please be advised that Pro-Line Boats, Inc., intends to submit to the Bureau of Air Regulation the information requested in your letter of June 12, 1990. Pro-Line Boats, Inc. intends to continue with this application and requests that Application for Permit No. AC 09-180615 not be removed from further consideration.

Sincerely,

Alan M. Trbovich, CCM  
Senior Scientist

AMT:kjh

cc: Mr. Ken Hall, Pro-Line  
Mr. Sid Kennedy, Pro-Line  
Mr. W. Thomas, SW District, FDER

W-MODPERAR.2/AMT1011.LET  
October 11, 1990

① after-the-fact construction permit (<sup>original and</sup> ~~several~~ modifications since 1971)

② emission factors (check factors used for other boat plants)  
less than 250 TPY?

③ increased capacity substantially (almost double)  
over original application, should require two application fees  
1 for old capacity - 1 for increased capacity (modification)  
Treat as two separate projects.

~~④ does resubmitted require new fee?~~





**KOOGLER & ASSOCIATES**

**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

KA 412-91-01

May 15, 1992

VIA FAX

Mr. J. Harry Kerns  
Florida Department of  
Environmental Regulation  
Southwest District Office  
4520 Oak Fair Blvd.  
Tampa, FL 33610-7347

Subject: Pro-Line Boats, Inc.  
Citrus County  
Permit AC09-180615  
VOC Compliance Demonstration

Dear Mr. Kerns:

Pro-Line Boats, Inc. (Pro-Line) was issued the subject air construction permit on December 13, 1991, for a fiberglass boat manufacturing facility located in Citrus County, Florida. The operation of the facility results in the release of volatile organic compounds comprised of styrene from resin and gel coat, acetone, lacquer thinner, resin stripper and a solvent used in a mold-release wax. In the subject permit, these volatile organic compounds are collectively referenced in Specific Condition No. 4 as "hydrocarbon emissions (VOC)", with the collective emission rate limited to 517 pounds per day (30 day average) and 94 tons per year.

Specific Condition No. 8 of the subject permit requires Pro-Line to demonstrate compliance with the VOC emission limits of Specific Condition No. 4 over a 90-day period and to report the results to the Department's Southwest District Office. Pro-Line's compliance has been demonstrated by documenting the usage of resin, gel coat, acetone, lacquer thinner, resin stripper and wax over a 90-day period, and applying factors for VOC content and fractional VOC release as reported in Pro-Line's application for permit and referenced in Specific Condition No. 4 of the subject permit. From the material use and the referenced factors, a total VOC emission rate for the 90-day period was calculated. From the 90-day emission rate, a daily average VOC emission rate and a projected annual average VOC emission rate was calculated. These calculated emission rates were then compared with the emission limits for the daily and annual periods specified in Specific Condition No. 4.

Mr. J. Harry Kerns  
Florida Department of  
Environmental Regulation

May 15, 1992  
Page 2

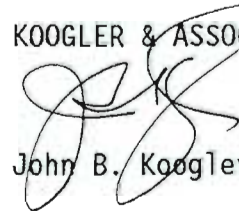
In my letter to Mr. Chi-Sun Lee of your office dated March 5, 1992, I outlined the procedure described herein for demonstrating Pro-Line's compliance and informed the Department that the 90-day demonstration period would be the period January 1, 1992 to March 31, 1992.

Attached is a copy of the materials inventory for the period January 1 to March 31, 1992, received from Pro-Line on April 3, 1992, and a copy of our calculations of the daily average and projected annual average total VOC emission rates. The calculations show a daily average VOC emission rate of 476 pounds per day compared with a permitted VOC emission rate of 517 pounds per day and a projected annual average VOC emission rate of 86.9 tons per year compared with a permitted annual average VOC emission rate of 94 tons per year. **These records and calculations demonstrate that Pro-Line is in compliance with the VOC emission limiting standards of Specific Condition No. 4 of the referenced permit as demonstrated in accordance with the requirements of Specific Condition No. 8 of the permit.**

If there are any questions regarding the information provided herein, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:wa  
Enc.

c: Mr. Chi-Sun Lee, FDER, Tampa  
Mr. John Reynolds, FDER, Tallahassee  
Mr. Glenn Bell, Pro-Line  
Mr. J.D.B. Kuersteiner



90-DAY VOC COMPLIANCE DEMONSTRATION  
 JANUARY 1 - MARCH 31, 1992

PRO-LINE BOATS, INC.  
 CITRUS COUNTY, FLORIDA

Material	Density (lb/gal)	VOC Content(1) (wt %)	3-Month Usage (lbs)	Fraction VOC Released(2)	90-Day VOC Release (lb)
Resin					
Polyester	9.2	0.40	361,921		
Tooling	9.2	0.40	6,975		
Total			368,896	67% @ 0.075 33% @ 0.110	7,415 5,356
Gel Coat	10.8	0.34	46,855	0.305	4,859
Acetone	6.5	1.00	21,710	1.0	21,710
Resin Stripper	10.8	0.98	313	1.0	307
Gum Cleaner	8.5	0.01	0	1.0	0
Lacquer Thinner	6.9	1.00	207	1.0	207
Wax	7.2	1.00	115	1.0	115
Contact Cement	10.58	0.87	3,490	0.95	2,886
<b>Total VOC</b>					<b>42,855</b>

Daily Average Total VOC Emission Rate =  $42,855/90$   
 = 476 lb/day  
 (permit limit = 517 lb/day)

Annual Average Total VOC Emission Rate =  $476 \times 365/2000$   
 = 86.9 tpy  
 (permit limit = 94 tpy)

- (1) From MSDS for each material.  
 (2) From AP-42; as used in permit application.



SELECTED ITEMS USAGE REPORT  
AS OF  
3/31/92

PART NUMBER	DESCRIPTION	UNIT MEAS	ON HAND 12/31/91	PURCH.	ON HAND 3/31/92	USAGE
400100	STORM WHITE GEL 1992	LB	3757	41574	6720	38611 *
400102	WIMBLETON WHITE GEL	LB	134	1363	230	1267 *
400103	ORANGE TOOLING GEL	LB	78	1195	576	697 *
400105	BLACK GEL-COAT	LB	7	9	0	16 *
400107	RED GEL-COAT	LB	143	251	220	174 *
400111	ACETONE	GAL	556	3309	525	3340
400119	RESIN	LB	44793	343592	26464	361921
400135	TOOLING RESIN	LB	0	7175	200	6975
400168	BRIGHT WHITE GEL	LB	937	0	937	0 *
400169	GREEN TOOLING GEL	LB	40	0	25	15 *
400179	YELLOW GEL-COAT	LB	347	0	280	67 *
400180	GRAY EXTERIOR GEL	LB	177	193	242	128 *
400183	GRAY INTERIOR GEL	LB	2368	4762	1768	5362 *
400184	TEAL GEL-COAT 1992	LB	263	223	245	241 *
400185	DK. BLUE TOOLING GEL	LB	0	0	0	0 *
400186	LACQUER THINNER	GAL	60	0	30	30
400195	MEDIUM BLUE GEL	LB	199	221	143	277 *
901278	RESIN STRIPPER	GAL	28	6	5	29
901279	WAX, LIQUID GOLDEN	GAL	28	0	12	16
	CONTACT CEMENT **	GAL	—	—	—	330

\* - Gel coat ; total = 46,855 lb / 3-mo

\*\* - Telecom from Glen Bell 5/12/92

Proline Boats Inc  
Crystal River, FL  
1/1/92 - 3/31/92



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 10, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ken Hall, President and CEO  
Pro-Line Boats, Inc.  
P.O. Box 1348  
Crystal River, Florida 32629

Dear Mr. Hall:

The Department received your request for extension of the construction permit referenced below. Since this is the second extension request for the purpose of drafting proposed amendments, the Department cannot grant a third extension for this purpose. The permit is amended as shown.

Permit No. AC 09-180615

Current Expiration Date: November 30, 1992

New Expiration Date: February 26, 1993

This letter shall become Attachment No. 3 to this permit.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statute

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

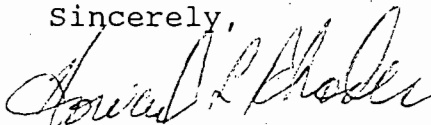


Mr. Ken Hall  
December 10, 1992  
Page Two

- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/JR/w

cc: W. Thomas, SWD  
J. Koogler, P.E.



**KOOHLE & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**  
4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

KA 412-91-01

November 6, 1992

Mr. John Reynolds  
Division of Air Resources  
Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: DER File AC09-180615  
Pro-Line Boats, Inc.  
Citrus County, Florida  
Request for Extension of Construction  
Permit

Dear Mr. Reynolds:

On behalf of Pro-Line Boats, Inc. I would like to request a ninety (90) extension of the expiration date of permit AC09-180615, from November 30, 1992 to February 26, 1993. The purpose of this request is to allow time to complete amendments to some of the Specific Conditions of the subject permit. Suggested permit amendments and the rationale for the amendments are being prepared and will be submitted to your office as soon as possible.

It is our opinion that it would be most appropriate to finalize the requested amendments to the air construction permit before Pro-Line applies for an air operating permit. The requested 90-day extension to the expiration date of the subject permit will allow the Department time to review and finalize these amendments.

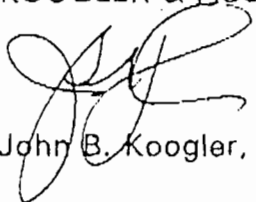
Mr. John Reynolds  
Florida Department of  
Environmental Regulation

November 6, 1992  
Page 2

I appreciate your consideration of the request set forth herein. If there are any questions or if additional clarification is required, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

  
John B. Koogler, Ph.D., P.E.

JBK:mem

c: Mr. Glen Bell, Pro-Line Boats, Inc.



Department of Environmental Regulation  
**Routing and Transmittal Slip**

To: (Name, Office, Location)

1.

2.

3.

4.

*John Reynolds*  
*TT 310A*

Remarks:

RECEIVED

JAN 26 1993

Division of Air  
Resources Management

From:

*Doug Beason*

Date

*1-25-93*

Phone

*8-9730*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

PRO-LINE BOATS, INC.,

Petitioner,

vs.

OGC CASE NO. 93-0148

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION,

Respondent.

---

**ORDER GRANTING REQUEST FOR EXTENSION  
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Regulation (Department) on receipt of a request made by Petitioner Pro-Line Boats, Inc., under Florida Administrative Code rule 17-103.070, to grant an extension of time to file a petition for an administrative hearing on Application No.AC09-180615. See Exhibit 1 attached.

Counsel for Petitioner has discussed this request with counsel for Respondent State of Florida Department of Environmental Regulation, which has no objection to it. Therefore,

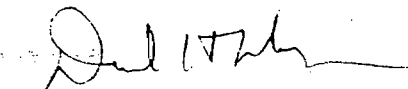
IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until February 22, 1993, to file a petition in this matter. Filing shall be complete upon receipt by the Office of General Counsel, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

**BEST AVAILABLE COPY**

DONE AND ORDERED on this 24<sup>th</sup> day of January 1993 in  
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



DANIEL H. THOMPSON  
General Counsel

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
Telephone: (904) 488-9730

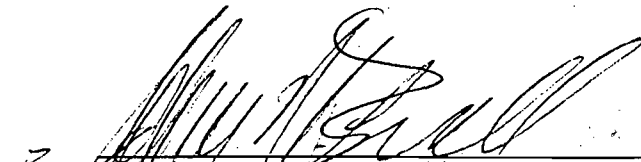
**CERTIFICATE OF SERVICE**

I CERTIFY that a true copy of the foregoing was mailed to:

John B. Koogler  
4014 N.W. 13th Street  
Gainesville FL 32609

on this 25<sup>th</sup> day of January 1993.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



W. DOUGLAS BEASON  
Assistant General Counsel

2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
Telephone: (904) 488-9730

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

JAN 20 1993

In the Matter of an Application  
for Air Permit by

By Cox 1-19-93 fjh  
Dept. of Environmental Reg.  
Office of General Counsel

Pro-Line Boats, Inc.  
P.O. Box 1348  
Crystal River, FL 32629

DER File No. AC09-180615

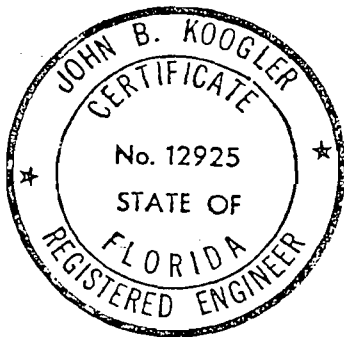
Citrus County - AP

MOTION FOR EXTENSION OF TIME

The Applicant, Pro-Line Boats, Inc., by and through its undersigned Engineer of Record and pursuant to Rule 17-103.070, FAC, requests the Secretary of DER to grant a 30-day extension of time in which to file a petition. The additional time will allow Pro-Line to provide information to FDER regarding the above-referenced project.

Mr. William Thomas, FDER, Southwest District, has indicated that he has no objection to such an extension.

Dated the 15th day of January 1993 in Gainesville, Alachua County, Florida.



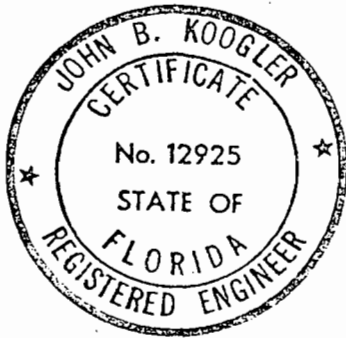
Koogler & Associates  
Environmental Services

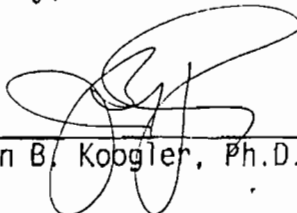
A handwritten signature in black ink, appearing to be "J. Koogler", written over a horizontal line.

John B. Koogler, Ph.D., P.E.  
Florida Registration No. 12925  
4014 N.W. 13th Street  
Gainesville, FL 32609  
(904) 377-5822  
Engineer of Record for  
Gates Energy Products, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to the General Counsel, DER, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. William Thomas, FDER Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-8318 and Mr. Ken Hall, President and CEO, Pro-Line Boats, Inc., P.O. Box 1348, Crystal River, Florida 32629, by FAX and by U.S. Mail, this 15th day of January, 1993.



  
\_\_\_\_\_  
John B. Koogler, Ph.D., P.E.





# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 1, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Ken Hall, President and CEO  
Pro-Line Boats, Inc.  
Post Office Box 1348  
Crystal River, Florida 32629

Dear Mr. Hall:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for after-the-fact construction of a boat manufacturing facility located in Homosassa, Citrus County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

*for* C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/JR/plm

Attachments

c: W. Thomas, SW Dist.  
A. Trbovich, E.S.E.  
M. Dybevick, P.E.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

DER File No. AC 09-180615  
Citrus County

Pro-Line Boats, Inc.  
Post Office Box 1348  
Crystal River, Florida 32629

---

INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Pro-Line Boats, Inc., originally applied on May 14, 1990, to the Department of Environmental Regulation for an after-the-fact construction permit for their existing facility located in Homosassa, Citrus County, Florida. The application was revised and resubmitted on September 25, 1991.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a

waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

*Barry D. Auburn*  
f- C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399  
904-488-1344

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 11-1-91 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

*Kerni J. J. J.*                      11-1-91  
Clerk    Date

Copies furnished to:

W. Thomas, SW Dist.  
A. Trbovich, E.S.E.  
M. Dybevick, P.E.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Regulation gives notice of its intent to issue a permit to Pro-Line Boats, Inc., Post Office Box 1348, Crystal River, Florida 32629, for after-the-fact construction of a boat manufacturing facility at their site in Homosassa, Citrus County, Florida. A determination of Best Available Control Technology (BACT) was not required. The proposed project is not subject to Prevention of Significant Deterioration regulations. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have

the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Department of Environmental Regulation  
Southwest District  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

Pro-Line Boats, Inc.  
Citrus County  
Homosassa, Florida

Fiberglass Boat Plant

Permit Number: AC 09-180615

Florida Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

October 31, 1991

I. Application

A. Pro-Line Boats, Inc.  
Post Office Box 1348  
Crystal River, Florida 32629

B. Request

The Department received an after-the-fact construction permit application on May 14, 1990, for an existing fiberglass boat plant at the applicant's site in Homosassa, Florida. The application was revised and deemed complete on September 25, 1991.

C. Location/Classification

The applicant's boat plant (SIC Code 3732) is located at 1520 South Suncoast Boulevard in Homosassa, Florida. Latitude and longitude of the boat plant are 28°50'30"N and 82°34'20"W, respectively. The UTM coordinates are Zone 17, 346.6 km E and 3,191.2 km N.

II. Project Description/Emissions

Fiberglass pleasure boats are manufactured by the applicant using an airless mold injection method. Laminations of resin and fiberglass are applied over gel coat before the wooden and foam structural parts are installed. After lamination the boats are extracted from their molds and trimmed of excess material. Upholstered parts are then prepared and used in the final assembly along with parts manufactured elsewhere.

Fiberglass boat manufacturing generates particulate matter (PM) emissions (sawdust from wood working and fiberglass from grinding) and hydrocarbon (VOC) emissions from various operations such as molding and clean-up. Dilution air is used to purge production buildings of VOC emissions with no air pollution controls. The estimated VOC and PM emissions are shown below:

VOC EMISSIONS:

	Utilization Rate (lbs/hr)	VOC Content	Fraction Emitted	Emissions (lbs/hr)
Styrene (Resin - Hand Layup)	133.9	0.4	0.08	4.0
Styrene (Resin - Spray Layup)	66.0	0.4	0.11	2.9
Styrene (Gel Coat - Hand Layup)	26.4	0.34	0.31	2.8



Styrene (Gel Coat - Spray Layup)	13.0	0.34	0.31	1.3
Acetone	20.5	1.0	1.0	20.5
Wax-Golden Liquid	0.5	0.9	1.0	0.5
Lacquer Thinner	0.1	1.0	1.0	0.1
Resin Stripper	<u>0.1</u>	1.0	1.0	<u>0.1</u>
Total	260.5			32.2

$$\text{TPY} = \frac{32.2}{2000} \times 5824 = \underline{\underline{94.0}}$$

PM EMISSIONS:

Particulate Matter				0.1
				TPY = $\frac{0.1}{2000} \times 5824 = 0.3$

In 1989, the Department adopted a policy requiring boat builders to develop control strategies designed to reduce these emissions. The applicant is required to submit a proposed plan of action providing reasonable assurance that odors and toxic air pollutants exceeding acceptable ambient concentrations will not be discharged pursuant to Florida Administrative Code (F.A.C.) Rule 17-2.620. The plan must contain various control strategies that could be implemented to reduce or eventually eliminate these emissions.

III. Air Quality Analysis

The project has been evaluated in accordance with the procedures contained in the Department's Air Toxics Permitting Strategy (draft). The maximum hourly emissions of potential air toxics were modeled to determine the maximum predicted ambient concentrations for comparison to the no threat levels contained in the air toxics permitting strategy. The primary pollutants evaluated were styrene and acetone. Styrene was the principal VOC air toxic of interest. The maximum predicted concentrations for other pollutants were based on the ratio of their projected emissions to those of styrene. Total facility-wide emissions of styrene were projected to be 11 lbs/hr.

The applicant used the Industrial Source Complex Short-Term (ISCST) model with one year of meteorological data (1986 Tampa National Weather Service data). The vents from the facility were modeled as point sources. Modeling was performed using polar receptors along 36 radials spaced at 10 degree increments at distances up to 10,000 meters from the facility. Additional receptors were placed along the property boundaries.

The modeling results are shown below. The maximum predicted concentrations are less than the appropriate no threat levels.

VOC	Averaging Time	Maximum Concentration (ug/m <sup>3</sup> )	No Threat Level (ug/m <sup>3</sup> )	Location (meters/degrees)
Styrene	8	111	2,150	159/310
	24	38	516	159/310
Acetone	8	206	35,600	159/310
	24	70	8,544	159/310
Other	8	8	NA	159/310
	24	3	NA	159/310

#### IV. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for regulated air pollutants. Since the boat manufacturing facility is classified as minor (total emissions less than 100 TPY), it is not subject to the new source review requirements of F.A.C. Rule 17-2.500. Applicable rules are (1) F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements; (2) F.A.C. Rule 17-2.610, General Particulate Emission Limiting Standards; and (3) F.A.C. Rule 17-2.620, General Pollutant Emission Limiting Standards.

#### V. Conclusion

Based on the information provided by Pro-Line Boats, Inc., the Department has reasonable assurance that the proposed project, as proposed herein, will not cause or contribute to a violation of an ambient air quality standard, PSD increment, or any other technical provisions of Chapter 17-2 of the Florida Administrative Code.

*J. [Signature]*  
 #41755  
 10/31/91



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Pro-Line Boats, Inc.  
Post Office Box 1348  
Crystal River, Florida 32629

**Permit Number:** AC 09-180615  
**Expiration Date:** August 31, 1992  
**County:** Citrus  
**Latitude/Longitude:** 28°50'30"N  
82°34'20"W  
**Project:** Fiberglass Boat Plant  
(After-the-Fact Construction)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For after-the-fact construction of a facility to produce fiberglass boats. This facility is located at 1520 South Suncoast Blvd., Homosassa, Citrus County, Florida. The UTM coordinates of this site are Zone 17, 346.6 km E and 3,191 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Resubmitted application received on September 25, 1991.

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**GENERAL CONDITIONS:**

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The plant shall be allowed to operate for up to 5,840 hours per year (two 8-hour shifts per day).

3. Visible emissions from the dust collection system shall not be greater than 5% opacity and compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

4. Hydrocarbon emissions (VOC) shall not exceed the following calculated hourly values. Total VOC emissions from the facility shall not exceed 517 lbs/day (30 day average), and 94 tons/year. Compliance shall be demonstrated by applying the following raw material utilization rates and emission factors:

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

SPECIFIC CONDITIONS:

	Utilization Rate (lbs/hr)	VOC Content	Fraction Emitted	VOC Emissions (lbs/hr)
Styrene (Resin - Hand Layup)	133.9	0.4	0.08	4.0
Styrene (Resin - Spray Layup)	66.0	0.4	0.11	2.9
Styrene (Gel Coat - Hand Layup)	26.4	0.34	0.31	2.8
Styrene (Gel Coat - Spray Layup)	13.0	0.34	0.31	1.3
Acetone	20.5	1.0	1.0	20.5
Wax-Golden Liquid	0.5	0.9	1.0	0.5
Lacquer Thinner	0.1	1.0	1.0	0.1
<u>Resin Stripper</u>	<u>0.1</u>	<u>1.0</u>	<u>1.0</u>	<u>0.1</u>

5. Nonvolatile acetone substitutes shall be used to the maximum extent practicable to further reduce the quantity of acetone consumed.

6. No air pollutants shall be discharged which cause or contribute to an objectionable odor (F.A.C. Rule 17-2.620(2)).

7. The dust collector compliance test shall be conducted within 90 days after this permit is issued and the results reported to the Department's Southwest District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the test.

8. VOC compliance shall be demonstrated over a 90-day period and the results reported to the Department's Southwest District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the commencement of the 90-day compliance demonstration period.



PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**SPECIFIC CONDITIONS:**

9. Six months from the date of the construction permit, the permittee shall submit a plan of action providing reasonable assurance that objectionable odors and toxic air pollutants exceeding acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan must contain various control system strategies that could be implemented to reduce or eventually eliminate VOC emissions from each type of operation.

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

11. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

STEVE SMALLWOOD, P.E., Director  
Division of Air Resources  
Management

ATTACHMENT 1

Available upon Request

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

OK, 2. The plant shall be allowed to operate for up to 5,840 hours per year ~~(two 8-hour shifts per day)~~.

OK 3. Visible emissions from the dust collection system shall not be greater than 5% opacity and compliance shall be demonstrated pursuant to Specific Condition No. 5 at 90-100% of permitted capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

OK 4. Hydrocarbon emissions (VOC) shall not exceed the following calculated hourly values. Total VOC emissions from the facility shall not exceed 517 lbs/day (30 day average), and 94 tons/year. Compliance shall be demonstrated pursuant to Specific Condition No. 6 by applying the following raw material utilization rates and emission factors:

	Utilization Rate (lbs/hr)	VOC Content	Fraction Emitted	VOC Emissions (lbs/hr)
Styrene (Resin - Hand Layup)	133.9	0.4	0.08	4.0
Styrene (Resin - Spray Layup)	66.0	0.4	0.11	2.9
Styrene (Gel Coat - Hand Layup)	26.4	0.34	0.31	2.8
Styrene (Gel Coat - Spray Layup)	13.0	0.34	0.31	1.3
Acetone	20.5	1.0	1.0	20.5
Wax-Golden Liquid	0.5	0.9	1.0	0.5
Lacquer Thinner	0.1	1.0	1.0	0.1
Resin Stripper	0.1	1.0	1.0	0.1

5. ~~Nonvolatile acetone substitutes shall be used to the maximum extent practicable to further reduce the quantity of acetone consumed.~~ [Merged into new Specific Condition No. 7.]

~~6. No air pollutants shall be discharged which cause or contribute to an objectionable odor (F.A.C. Rule 17-2.620(2)). [Merged into new Specific Condition No. 7.]~~

~~7.5. The dust collector compliance test shall be conducted within 90 days after this permit is issued and the results reported to the Department's Southwest District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the test.~~

~~8.6. VOC compliance shall be demonstrated over a 90-day period and the results reported to the Department's Southwest District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the commencement of the 90-day compliance demonstration period.~~

Prior to submission of the application for an operating permit, the permittee shall:

- a. Inventory all VOC emissions (lbs/hr) over a 90-day period from the following sources:
  1. Resin
  2. Gel Coat
  3. Acetone
  4. Wax - Golden Liquid
  5. Lacquer Thinner
  6. Resin Stripper
- b. Calculate the VOC emissions (lbs/hr) from the above-listed sources on a 90-day average;
- c. Demonstrate that the VOC emissions (lbs/hr) from the above-listed sources on a 90-day average are equal to or less than the VOC emissions (lbs/hr) set forth in Specific Condition No. 4.

~~9.7. Six months from the date of the construction permit, the permittee shall submit a plan of action providing reasonable assurance that objectionable odors and toxic air pollutants exceeding acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan must contain various control system strategies that could be implemented to reduce or eventually eliminate VOC emissions from each type of operation.~~

No later than six months from the date of this construction permit, the permittee shall submit a report of vapor emission control devices, systems and/or work practices reasonably available to the permittee considering technical and economic feasibility to:

- a. Reduce VOC emissions from each type of operation at the facility; and

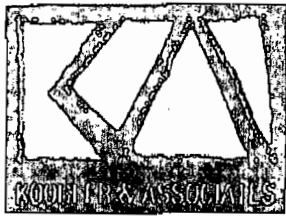
- b. Minimize the release of an objectionable odor off of the facility's property boundary or where the public has access, whichever area is the closest.

~~10.8.~~ The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

~~11.9.~~ An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

[Substitute Amendment Specific Condition No. 6]

6. Permittee shall implement all practical measures to minimize the release of an objectionable odor off of the facility's property boundary or where the public has access, whichever area is the closest.



ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

KA 412-91-01

November 6, 1992

Mr. John Reynolds  
Division of Air Resources  
Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: DER File AC09-180615  
Pro-Line Boats, Inc.  
Citrus County, Florida  
Request for Extension of Construction  
Permit

Dear Mr. Reynolds:

On behalf of Pro-Line Boats, Inc. I would like to request a ninety (90) extension of the expiration date of permit AC09-180615, from November 30, 1992 to February 26, 1993. The purpose of this request is to allow time to complete amendments to some of the Specific Conditions of the subject permit. Suggested permit amendments and the rationale for the amendments are being prepared and will be submitted to your office as soon as possible.

It is our opinion that it would be most appropriate to finalize the requested amendments to the air construction permit before Pro-Line applies for an air operating permit. The requested 90-day extension to the expiration date of the subject permit will allow the Department time to review and finalize these amendments.

Mr. John Reynolds  
Florida Department of  
Environmental Regulation

November 6, 1992  
Page 2

I appreciate your consideration of the request set forth herein. If there are any questions or if additional clarification is required, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:mem

c: Mr. Glen Bell, Pro-Line Boats, Inc.





John's



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 29, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ken Hall, President and CEO  
Pro-Line Boats, Inc.  
Post Office Box 1348  
Crystal River, Florida 32629

Dear Mr. Hall:

The Department received your request for extension of the construction permit referenced below. The request is acceptable and the permit is amended as shown:

**Permit No. AC 09-180615**

Current Expiration Date: August 31, 1992

New Expiration Date: November 30, 1992

This letter shall become Attachment No. 2 to this permit.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

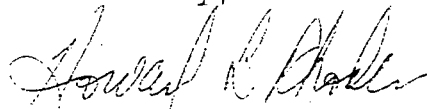
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

Mr. Ken Hall  
Page 2 of 2

- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Sincerely,



Howard L. Rhodes  
Interim Director  
Division of Air Resources  
Management

HLR/JR/plm

c: W. Thomas, SWD  
A. Trbovich, ESE  
M. Dybevick, P.E.  
J. Koogler, P.E.



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

KA 412-91-01

May 15, 1992

RECEIVED  
MAY 20 1992  
Division of Air  
Resources Management

VIA FAX

Mr. John Reynolds  
Division of Air Resources  
Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: DER File AC09-180615  
Pro-Line Boats, Inc.  
Citrus County, Florida  
Request for Extension of Construction  
Permit

Dear Mr. Reynolds:

On December 13, 1991, the Department issued the subject air construction permit to Pro-Line Boats, Inc. (Pro-Line) for a fiberglass boat manufacturing facility in Citrus County, Florida. The expiration date of the permit is August 31, 1992. Specific Condition No. 10 of the permit allows for the expiration date of the permit to be extended for good cause and requires that the request for extension be submitted to the Bureau of Air Regulation at least 60 days before the expiration date of the permit. By this letter, I am requesting that the expiration date of the subject permit be extended approximately 90 days to November 30, 1992.

Pro-Line has demonstrated compliance with the visible emission limit established by Specific Condition No. 3 of the subject permit. The demonstration was conducted in accordance with Specific Condition No. 7 and the report demonstrating compliance was submitted to the Department's Southwest District Office under cover of our letter dated April 9, 1992. Also, Pro-Line has demonstrated compliance with the daily average and annual average hydrocarbon emission limits of Specific Condition No. 4. This compliance was demonstrated in accordance with Specific Condition No. 8 and a report demonstrating compliance was submitted to your office and to the Department's Southwest District Office on May 15, 1992.

Mr. John Reynolds  
Florida Department of  
Environmental Regulation

May 15, 1992  
Page 2

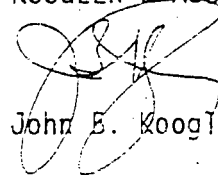
Pro-Line is presently in the process of reviewing control devices, systems and/or work practices available to the company that will reduce VOC emissions from the facility. It is estimated that 90 additional days will be required to complete this review. Therefore, by this letter, I am also requesting that the date in which Pro-Line is to submit a report and plan of action on control devices and/or work practices for reducing VOC emission in accordance with Specific Condition No. 9 be extended from June 13, 1992 (6 months from the date of issue of the construction permit) to September 13, 1992. The additional time required to complete this report and plan of action is one reason for requesting the extension of the expiration date of the subject permit.

The second reason for requesting the extension is to complete amendments to some of the Specific Conditions of the subject permit. These amendments were discussed with you during a meeting in your office on February 12, 1992. A draft of the proposed amendments and a Rationale for the amendments is presently being prepared and will be submitted to your office in the near future. It is our opinion that it would be most appropriate to finalize the requested amendments to the air construction permit before Pro-Line applies for an air operating permit. The requested 90-day extension to the expiration date of the subject permit will also allow these amendments to be finalized.

I appreciate your consideration of the requests set forth herein. If there are any questions or if additional clarification is required regarding these matters, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



John E. Koogler, Ph.D., P.E.

JBK:wa

cc: Mr. Harry Kerns, FDER, Tampa  
Mr. Glenn Bell, Pro-Line  
Mr. J.D.B. Kuersteiner





**KOGLER & ASSOCIATES**

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

KA 412-91-01

May 15, 1992

RECEIVED  
MAY 20 1992  
Division of Air  
Resources Management

VIA FAX

Mr. John Reynolds  
Division of Air Resources  
Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: DER File AC09-180615  
Pro-Line Boats, Inc.  
Citrus County, Florida  
Request for Extension of Construction  
Permit

Dear Mr. Reynolds:

On December 13, 1991, the Department issued the subject air construction permit to Pro-Line Boats, Inc. (Pro-Line) for a fiberglass boat manufacturing facility in Citrus County, Florida. The expiration date of the permit is August 31, 1992. Specific Condition No. 10 of the permit allows for the expiration date of the permit to be extended for good cause and requires that the request for extension be submitted to the Bureau of Air Regulation at least 60 days before the expiration date of the permit. By this letter, I am requesting that the expiration date of the subject permit be extended approximately 90 days to November 30, 1992.

Pro-Line has demonstrated compliance with the visible emission limit established by Specific Condition No. 3 of the subject permit. The demonstration was conducted in accordance with Specific Condition No. 7 and the report demonstrating compliance was submitted to the Department's Southwest District Office under cover of our letter dated April 9, 1992. Also, Pro-Line has demonstrated compliance with the daily average and annual average hydrocarbon emission limits of Specific Condition No. 4. This compliance was demonstrated in accordance with Specific Condition No. 8 and a report demonstrating compliance was submitted to your office and to the Department's Southwest District Office on May 15, 1992.

Mr. John Reynolds  
Florida Department of  
Environmental Regulation

May 15, 1992  
Page 2

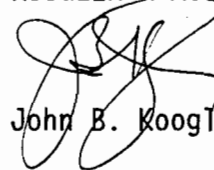
Pro-Line is presently in the process of reviewing control devices, systems and/or work practices available to the company that will reduce VOC emissions from the facility. It is estimated that 90 additional days will be required to complete this review. Therefore, by this letter, I am also requesting that the date in which Pro-Line is to submit a report and plan of action on control devices and/or work practices for reducing VOC emission in accordance with Specific Condition No. 9 be extended from June 13, 1992 (6 months from the date of issue of the construction permit) to September 13, 1992. The additional time required to complete this report and plan of action is one reason for requesting the extension of the expiration date of the subject permit.

The second reason for requesting the extension is to complete amendments to some of the Specific Conditions of the subject permit. These amendments were discussed with you during a meeting in your office on February 12, 1992. A draft of the proposed amendments and a Rationale for the amendments is presently being prepared and will be submitted to your office in the near future. It is our opinion that it would be most appropriate to finalize the requested amendments to the air construction permit before Pro-Line applies for an air operating permit. The requested 90-day extension to the expiration date of the subject permit will also allow these amendments to be finalized.

I appreciate your consideration of the requests set forth herein. If there are any questions or if additional clarification is required regarding these matters, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:wa

c: Mr. Harry Kerns, FDER, Tampa  
Mr. Glenn Bell, Pro-Line  
Mr. J.D.B. Kuersteiner





# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 2, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

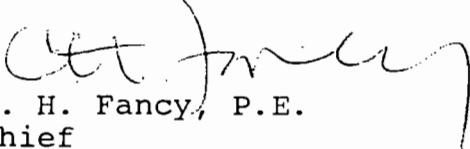
John B. Koogler, Ph.D., P.E.  
Koogler & Associates Environmental Services  
4014 N.W. 13th Street  
Gainesville, FL 32609

Dear Dr. Koogler:

RE: Pro-Line Boats, Inc.  
Citrus County, AC 09-180615  
Permit Extension Request

The Bureau of Air Regulation received your May 15, 1992, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$50 processing fee for permit extensions; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

  
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/pa

Enclosure

cc: John Reynolds

**BEST AVAILABLE COPY**  
**PROOF OF PUBLICATION**

**THE OCALA STAR-BANNER**  
Published—Daily  
**OCALA, MARION COUNTY, FLORIDA**

STATE OF FLORIDA,  
COUNTY OF MARION.

Before me the undersigned authority personally appeared Lynn

Maxwell, who on oath says that he is Classified manager

of the Ocala Star-Banner, a daily newspaper published at Ocala, in Marion County,

Florida; that the attached copy of advertisement, being a notice in the matter of  
#B7010-Notice of Intent

\_\_\_\_\_ in the \_\_\_\_\_ Court,

was published in said newspaper in the issues of \_\_\_\_\_

November 9, 1991

Affiant further says that the said THE OCALA STAR-BANNER is a daily newspaper published at Ocala, in said Marion County, Florida, and that the said newspaper has heretofore been continuously published in said Marion County, Florida, daily, and has been entered as second class mail matter at the post office in Ocala, in said Marion County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or cooperation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

*[Signature]*

Sworn to and subscribed before me this 11 day

of November, A.D., 1991

*[Signature: Kelly Vanderveer]*

(Seal) \_\_\_\_\_ Notary Public

Notary Public, State of Florida at Large  
My Commission Expires Sept. 1, 1994

**PERMIT**

The Department of Environmental Regulation gives notice of its intent to issue a permit to Pro-Line Boats, Inc., Post Office Box 1348, Crystal River, Florida 32629, for after-the-fact construction of a boat manufacturing facility at their site in Homosassa, Citrus County, Florida. A determination of Best Available Control Technology (BACT) was not required. The proposed project is not subject to Prevention of Significant Deterioration regulations. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information: (a) the name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Southwest District  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

No. B7010 — November 9, 1991





September 23, 1991

RECEIVED  
SEP 25 1991  
Division of Air  
Resources Management

Mr. C.H. Fancy  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Pro-Line Boats, Inc.  
Citrus County, Florida  
Permit Application AC09-180615

Dear Mr. Fancy:

Pro-Line Boats, Inc. (Pro-Line) and its consultant, Dr. J.B. Koogler of Koogler & Associates Environmental Services, have recently reviewed the application that Pro-Line submitted to the Department for the referenced after-the-fact air construction permit. During this review, questions arose regarding the material usage rates reported in the application and in the emission factors used for estimating air pollutant emission rates. Pro-Line and its consultant are reviewing both of these matters and will be providing amended material use rates and air pollutant emission rates to the Department within the next 10 days. It is anticipated that the revisions will result in Pro-Line being classified as a minor emitting facility.

In view of the amended information that will be submitted by Pro-Line, we hereby request that the Department delay any further processing of the subject application until the revised information is received. To assure

that the Department has adequate time to receive the revised information, Pro-Line is submitting the attached waiver to the 90 day permitting process. The waiver expires November 30, 1991; giving the Department approximately 60 additional days to complete the permitting process.

Pro-Line also wishes to inform the Department that Dr. J.B. Koogler of Koogler & Associates Environmental Services will be our Engineer of Record for the amendments to the subject permit application and for future air permitting matters.

If there are any questions regarding this matter, please do not hesitate to contact either Dr. Koogler (904-377-5822) or myself.

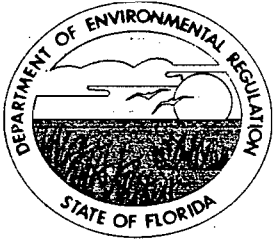
Very truly yours,



Cecil Davis  
Executive Vice President  
Pro-Line Boats, Inc.

CD/cw  
Enc.

c: Mr. John Reynolds, FDER, Tallahassee  
Mr. W.C. Thomas, FDER, Tampa  
Mr. Ralph DeMeo, Huey, Guilday, Kuersteiner & Tucker, Tallahassee  
Dr. J.B. Koogler, Koogler & Associates



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 26, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ken Hall, President/CEO  
Pro-Line Boats, Inc.  
P. O. Box 1348  
Crystal River, Florida 32629

Dear Mr. Hall:

Re: Resubmitted Permit Application for Boat Building Facility

On June 13, 1991, the Department received Pro-Line Boat's resubmitted application for an after-the-fact construction permit. This permit was originally applied for in May of 1990 requesting a resin utilization rate of 340 lbs/hr. The resubmitted application requests a resin utilization rate of 657 lbs/hr, almost double that of the original application. This poses several problems because the purpose of the original application was to obtain an after-the-fact permit for a previously unpermitted facility at the prior resin utilization rate of 340 lbs/hr.

Since the resubmitted application seeks a doubling of the production rate, the objective has become entirely different from the purpose of the original application. The Department must view these two objectives as separate projects which means that separate applications and separate permit fees are required. Please resubmit the original application with revised emission factors and a separate application and fee for the production increase. The new fee should be based on the difference between the previous actual and the new allowable emission rate.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/JR/plm

c: W. Thomas, SWD  
A. Trbovich, E.S.E.  
M. Dybevick, P.E.



Environmental  
Science &  
Engineering, Inc.

July 5, 1991

Mr. Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulations  
Florida Dept. of Environmental Regulation  
Twin Towers Office Bldg.  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Proline Boats  
ESE Project No. 3901050-0100-3160

Dear Mr. Fancy:

This letter is written in response to your letter dated June 26, 1991 regarding the different hourly resin utilization rate in the resubmitted permit application for the subject facility. A copy of the letter is attached for easy reference.

In the original application, the assumption made was that resin was used throughout the 16-hour workday. However, in actuality, resin usage generally occurs only during the day shift for fabrication processes, and coating during the evening shift. Therefore, the hourly usages were adjusted accordingly in the revised application, but the total yearly usage rate (thus, the production rate) remains the same.

Please feel free to contact Nay Hlaing (Extension 6061) or myself (Extension 6064) if you have any further questions.

Sincerely,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Michael Dybevick, P.E.

pc: Ken Hall, Proline Boats  
William Thomas, DER-SWD  
Al Trbovich, ESE  
*J. Reynolds*

RECEIVED  
JUL 10 1991  
Division of Air  
Resources Management

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

In the matter of an  
Application for Permit by:

DER File No. AC 09-180615  
Citrus County


Mr. Ken Hall, President and CEO  
Pro-Line Boats, Inc.  
Post Office Box 1348  
Crystal River, Florida 32629

Enclosed is Permit Number AC 09-180615 for after-the-fact construction of a boat manufacturing facility located in Homosassa, Citrus County, Florida, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

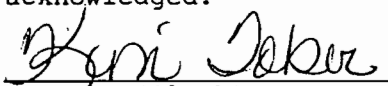
  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 12-16-91 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

  
(Clerk)

12-16-91  
(Date)

Copies furnished to:

W. Thomas, SWD  
~~A. Trbovich, ESE~~  
~~M. DyBevick, P.E.~~  
J. Koogler, P.E.

Final Determination

Pro-Line Boats, Inc.  
Citrus County  
Homosassa, Florida

Fiberglass Boat Plant

Permit Number: AC 09-180615

Florida Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

December 4, 1991

## Final Determination

The Technical Evaluation and Preliminary Determination for an after-the-fact construction permit for a boat manufacturing facility in Homosassa, Citrus County, Florida, was distributed on November 1, 1991. The Notice of Intent to Issue was published in the Ocala Star-Banner on November 9, 1991. Copies of the evaluation were available for public inspection at the Department's Tampa and Tallahassee offices.

No comments were submitted on the Department's Intent to Issue the permit. The final action of the Department will be to issue construction permit AC 09-180615 as proposed in the Technical Evaluation and Preliminary Determination.



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Pro-Line Boats, Inc.  
Post Office Box 1348  
Crystal River, Florida 32629

**Permit Number:** AC 09-180615  
**Expiration Date:** August 31, 1992  
**County:** Citrus  
**Latitude/Longitude:** 28°50'30"N  
82°34'20"W  
**Project:** Fiberglass Boat Plant  
(After-the-Fact Construction)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For after-the-fact construction of a facility to produce fiberglass boats. This facility is located at 1520 South Suncoast Blvd., Homosassa, Citrus County, Florida. The UTM coordinates of this site are Zone 17, 346.6 km E and 3,191 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Resubmitted application received on September 25, 1991.
2. Extension to Nov. 30, 1992.
3. Emission reduction report dated September 1992.
4. Koogler's letter dated 12/7/92
5. DER letter dated 12/21/92.



PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**GENERAL CONDITIONS:**

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

OK, 2. The plant shall be allowed to operate for up to 5,840 hours per year ~~(two 8-hour shifts per day)~~.  
*three*

3. Visible emissions from the dust collection system shall not be greater than 5% opacity and compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

4. Hydrocarbon emissions (VOC) shall not exceed the following calculated hourly values. Total VOC emissions from the facility shall not exceed ~~517 lbs/day (30 day average)~~, and ~~82.6~~ <sup>82.6</sup> tons/year. Compliance shall be demonstrated by applying the following raw material utilization rates and emission factors:

28.3 lb/hr

PERMITTEE:  
Pro-Line Boats, Inc.

Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

SPECIFIC CONDITIONS:

	Utilization Rate (lbs/hr)	VOC Content	Fraction Emitted	VOC Emissions (lbs/hr)
Styrene (Resin - Hand Layup)	133.9	0.4	0.08	4.0
Styrene (Resin - Spray Layup)	66.0	0.4	0.11	2.9
Styrene (Gel Coat - Hand Layup)	26.4	0.34	0.31	2.8
Styrene (Gel Coat - Spray Layup)	13.0	0.34	0.31	1.3
Acetone	15.0 <u>20.5</u>	1.0	1.0	15.0 <u>20.5</u>
Wax-Golden Liquid	0.5	0.9	1.0	0.5
Lacquer Thinner	0.1	1.0	1.0	0.1
Contact Cement	2.0	0.869	0.95	1.6
Resin Stripper	0.1	1.0	1.0	0.1
Totals	257.0	-	-	28.3

5. ~~Nonvolatile acetone substitutes shall be used to the maximum extent practicable to further reduce the quantity of acetone consumed.~~

6. No air pollutants shall be discharged which ~~cause or contribute to an objectionable odor~~ <sup>result in the Department receiving complaints from the public regarding</sup> (F.A.C. Rule 17-2.620(2)). <sub>coming from the facility.</sub>

7. The dust collector compliance test shall be conducted within 90 days after this permit is issued and the results reported to the Department's Southwest District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the test.

8. VOC compliance shall be demonstrated over a 90-day period and the results reported to the Department's Southwest District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the commencement of the 90-day compliance demonstration period.

*Delete  
(Combine with new condition)*

*gr. 2*

PERMITTEE:  
Pro-Line Boats, Inc.

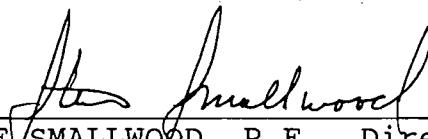
Permit Number: AC 09-180615  
Expiration Date: August 31, 1992

**SPECIFIC CONDITIONS:**

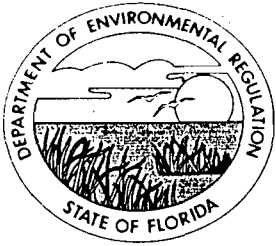
9. Six months from the date of the construction permit, the permittee shall submit a plan of action providing reasonable assurance that objectionable odors and (toxic air pollutants) exceeding acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan must contain various control system strategies that could be implemented to reduce or eventually eliminate VOC emissions from each type of operation.
10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
11. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 13<sup>th</sup> day  
of December, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
STEVE SMALLWOOD, P.E., Director  
Division of Air Resources  
Management

John R:5



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 30, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ken Hall, President and CEO  
Pro-Line Boats, Inc.  
Post Office Box 1348  
Crystal River, Florida 32629

Dear Mr. Hall:

Re: Construction Permit No. AC09-180615

The Department received a request dated December 7, 1992, from Koogler & Associates for amendment of certain conditions of the after-the-fact construction permit referenced above. Listed below are amendments acceptable to the Department:

### Specific Condition No. 2

#### Present:

The plant shall be allowed to operate for up to 5,840 hours per year (two 8-hour shifts per day).

#### Amended:

The plant shall be allowed to operate for up to 5,840 hours per year (three 8-hour shifts per day).

### Specific Condition No. 3

No change is necessary.

### Specific Condition No. 4

#### Present:

Hydrocarbon emissions (VOC) shall not exceed the following calculated hourly values. Total VOC emissions from the facility shall not exceed 517 lbs/day (30 day average), and 94 tons/year. Compliance shall be demonstrated by applying the following raw material utilization rates and emission factors:

Mr. Ken Hall  
 Pro-Line Boats, Inc.  
 Page 2

	Utilization Rate (lbs/hr)	VOC Content	Fraction Emitted	VOC Emissions (lbs/hr)
Styrene (Resin - Hand Layup)	133.9	0.4	0.08	4.0
Styrene (Resin - Spray Layup)	66.0	0.4	0.11	2.9
Styrene (Gel Coat - Hand Layup)	26.4	0.34	0.31	2.8
Styrene (Gel Coat - Spray Layup)	13.0	0.34	0.31	1.3
Acetone	20.5	1.0	1.0	20.5
Wax-Golden Liquid	0.5	0.9	1.0	0.5
Lacquer Thinner	0.1	1.0	1.0	0.1
Resin Stripper	0.1	1.0	1.0	0.1

Amended:

Hydrocarbon emissions (VOC) shall not exceed the following calculated hourly values. Total annual VOC emissions from the facility shall not exceed 76 tons. Compliance shall be demonstrated by applying the following raw material utilization rates and emission factors:

	Utilization Rate (lbs/hr)	VOC Content	Fraction Emitted	VOC Emissions (lbs/hr)
Styrene (Resin - Hand Layup)	133.9	0.4	0.08	4.0
Styrene (Resin - Spray Layup)	66.0	0.4	0.11	2.9
Styrene (Gel Coat - Hand Layup)	26.4	0.34	0.31	2.8



Mr. Ken Hall  
Pro-Line Boats, Inc.  
Page 3

Styrene (Gel Coat - Spray Layup)	13.0	0.34	0.31	1.3
Acetone	12.5	1.0	1.0	12.5
Wax-Golden Liquid	0.5	0.9	1.0	0.5
Lacquer Thinner	0.1	1.0	1.0	0.1
Resin Stripper	0.1	1.0	1.0	0.1
Contact Cement	2.0	0.87	0.95	1.7
Totals	254.5	--	--	25.9

Specific Condition No. 5

Deleted entirely. (No change in numbering for subsequent conditions).

Specific Conditions Nos. 6, 7 and 8

No change is necessary.

Specific Condition No. 9

Present:

Six months from the date of the construction permit, the permittee shall submit a plan of action providing reasonable assurance that objectionable odors and toxic air pollutants exceeding acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan must contain various control system strategies that could be implemented to reduce or eventually eliminate VOC emissions from each type of operation.

Amended:

The permittee shall at all times apply the following measures to control VOC emissions at the permitted facility:

- a) Follow work practices outlined in the emission reduction report (Attachment No. 3) including employees' hand protection, using covered acetone containers, and restricting employees' access to acetone.

- b) Convert from the use of acetone to an acetone substitute for all lamination steps in the boat manufacturing process and limit other acetone uses to the maximum extent practicable.
- c) Replace spray type resin applicators with roller applicators for the lamination process.

Specific Conditions Nos. 10 and 11

No change is necessary.

This letter shall become Attachment No. 5 to this permit, while the Koogler & Associates emission reduction report dated September, 1992, and Koogler's letter dated December 7, 1992, become Attachments Nos. 3 and 4, respectively.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;

Mr. Ken Hall  
Pro-Line Boats, Inc.  
Page 5

- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/JR/plm

cc: W. Thomas, SWD  
J. Koogler, P.E.



KOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET

GAINESVILLE, FLORIDA 32609

904/377-5822 • FAX 377-7158

KA 412-91-01

December 7, 1992

Mr. John M. Reynolds, Jr.  
Division of Air Resources Management  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Pro-Line Boats, Inc.  
Homosassa, Citrus County, Florida  
Construction Permit No. AC09-180615

Dear Mr. Reynolds:

Pro-Line Boats, Inc. (Pro-Line) owns and operates a facility that produces fiberglass boats. The company is located at 1520 South Suncoast Boulevard in Homosassa, Citrus County, Florida. On December 4, 1991, the Department issued Pro-Line an after-the-fact construction permit (AC09-180615) for the facility. As has been previously discussed with you, Pro-Line requests that certain Specific Conditions of the construction permit be revised to provide clarification of the permit as it relates to the operating practices and procedures of Pro-Line. The proposed amendments to the Specific Conditions are set forth in the following paragraphs with new language indicated by underlining. Deletions have been stricken through. Following each amendment is a rationale for the proposed change. On behalf of Pro-Line, I would appreciate it if you will review the following proposed amendments to the subject permit and incorporate these amendments into the subject permit.

1. Specific Condition No. 1 - No change.

RECEIVED

DEC 08 1992

Division of Air  
Resources Management

2. Specific Condition No. 2 - The plant shall be allowed to operate for up to 5,840 hours per year (~~two 8 hour shifts per day~~).

RATIONALE: The application for Permit AC09-180615 presented annual and hourly average material usages and estimated air pollutant emission rates based on an equivalent operating time of 16 hours per day (two 8-hour shifts) and 365 days per year. In actual practice, Pro-Line sometimes operates up to 24 hours per day, while at other times the entire plant may be shut down for several consecutive days. Under this variable operating schedule, the annual hours of operation will not exceed 5,840 hours per year; the total annual operating time set forth in Permit AC09-180615 and the operating time used in the application to calculate annual and hourly average emission rates.

To avoid misinterpretation at some future date, Pro-Line requests that the reference to two 8-hour shifts per day be stricken from Specific Condition No. 2 of the subject permit. Pro-Line has no objection to the annual operating time of 5,840 hours per year.

3. Specific Condition No. 3 - Visible emissions from the dust collection system shall not be greater than 5% opacity and compliance shall be demonstrated pursuant to Specific Condition No. 5 at 90-100% of permitted capacity using Department Method 9 in accordance with F.A.C. Rule 17-2.700.

RATIONALE: Specific Condition No. 3 limits the opacity of visible emissions from the dust collection system associated with the Pro-Line wood shop to five percent as determined by Department Method 9. Proposed Specific Condition No. 5 of Permit AC09-180615 specifies the schedule for conducting the visible emission compliance test on the wood shop. Pro-Line requests that the suggested language be added to Specific Condition No. 3 to tie together the two specific permit conditions related to the opacity standard.

4. Specific Condition No. 4 - Hydrocarbon emissions (VOC) shall not exceed the following calculated hourly values. Total VOC emissions from the facility shall not exceed 821 517 lbs/day (30 day average), and 99.8 94 tons/year. Compliance shall be demonstrated pursuant to Specific Condition No. 6 by applying the following raw material utilization rates and emission factors:

OK

NOT  
NECESSARY

REVISE  
THIS TO  
REFLECT  
NEW WORK  
PRACTICES FOR  
ACETONE



Material	Utilization Rate (lbs/hr)	VOC Content	Fraction Emitted	VOC Emissions (lbs/hr)
Styrene (Resin - Hand Layup)	133.9	0.4	0.08	4.0
Styrene (Resin - Spray Layup)	66.0	0.4	0.11	2.9
Styrene (Gel Coat - Hand Layup)	26.4	0.34	0.31	2.8
Styrene (Gel Coat - Spray Layup)	13.0	0.34	0.31	1.3
Acetone	<del>20.5</del> <sup>12.5</sup>	1.0	1.0	<del>20.5</del> <sup>12.5</sup>
Wax-Golden Liquid	0.5	0.9	1.0	0.5
Lacquer Thinner	0.1	1.0	1.0	0.1
Resin Stripper	0.1	1.0	1.0	0.1
Contact Cement	<u>2.0</u>	<u>0.869</u>	<u>0.95</u>	<u>1.6</u>

*See Documented Reduction in Report*

RATIONALE: Specific Condition No. 4 limits total hydrocarbon emissions by limiting the use of all materials containing VOCs. Proposed Specific Condition No. 6 of Permit AC09-180615 establishes the procedures by which compliance is to be demonstrated. Pro-Line requests that the suggested language be added to proposed Specific Condition No. 4 to tie together the two specific permit conditions related to VOC emission standards.

Specific Condition No. 4 also includes typical hourly utilization rates of the VOC containing materials used by Pro-Line. The purpose of this inventory was to establish a basis for the daily average and the annual average VOC emission rate limits set forth in Specific Condition No. 4.

During the review of control technologies and work practices required by Specific Condition No. 9 of the existing permit and during the inventorying of materials as required for the demonstration of compliance with existing Specific Condition No. 4 (in accordance with Specific



Condition No. 8 of the existing permit), it came to the attention of Pro-Line that contact cement had not been included as a VOC containing material in the permit application. Pro-Line uses two 55-gallon drums per month of the cement or 1164 pounds of cement per month. The cement is Number 505, non-flammable contact cement, supplied by Horizon Chemicals. The VOC content of the cement is 86.9 percent, and the fraction of VOCs released is estimated to be 95 percent. This utilization rate is equivalent to 2.4 pounds of cement per hour, resulting in a VOC emission rate of 2.0 pounds per hour. On an annual basis, this is equivalent to a VOC emission rate of 5.8 tons per year; increasing the annual VOC emission rate from the Pro-Line facility to 99.8 tons per year.

For permitting purposes, Pro-Line requests that contact cement be included in the typical inventory of materials as set forth in Specific Condition No. 4. The addition of this material will also require that the annual average total VOC emission rate from the Pro-Line facility, as limited by Specific Condition No. 4, be amended from 94 tons per year to 99.8 tons per year.

The daily average emission rate of total VOCs as limited by Specific Condition No. 4 must also be amended to incorporate the use of contact cement. Additionally, and to be consistent with the amendment requested to Specific Condition No. 2, Pro-Line requests that the daily average VOC emission rate be amended to reflect a maximum daily work schedule of 24 hours. As stated in the Rationale for amending Specific Condition No. 2, this schedule will provide Pro-Line the operating flexibility to meet market demands without increasing the annual hours of operation. The addition of contact cement to the material use inventory and a maximum daily operating time of 24 hours will increase the maximum daily VOC emission rate from 517 pounds per day to 821 pounds per day (30-day average).

In requesting these amendments to Specific Condition No. 4, it should be noted that since the date of issue of the subject permit, Pro-Line has adopted work practice standards in accordance with Specific Condition No. 9 of the existing permit to reduce acetone consumption, and hence reduce VOC emissions. The reduction in acetone use, which has been documented in the report required by Specific Condition No. 9 of the existing permit, is approximately 40 percent (or 8 pounds per hour and 24 tons per year). The subject permit is representative of Pro-Line activities at the time of permitting (December 1991) and should therefore incorporate the material usage and VOC emissions presently documented in Specific Condition No. 4 (with the addition of the contact cement). Reductions in VOC emissions as a result of the requirement of Specific Condition No. 9 can be addressed in future permits.

*Eliminate  
30 day average  
keeping only  
10/yr & tons/yr*

*Acetone  
Reduction  
should be  
Addressed  
in this  
amendment*



5. ~~Specific Condition No. 5 - Nonvolatile acetone substitutes shall be used to the maximum extent practicable to further reduce the quantity of acetone consumed. [Merged into new Specific Condition No. 7.]~~

RATIONALE: Specific Condition No. 5 of existing Permit AC09-180615 requires Pro-Line to use non-volatile acetone substitutes to the maximum extent practical to reduce total VOC emissions. Specific Condition No. 9 of the permit essentially duplicates Specific Condition No. 5 by requiring Pro-Line to submit a plan of action to the Department within six months of the date of the construction permit defining various strategies and/or work practices reasonably available to the permittee, considering technical and economic feasibility, to reduce total VOC emissions from each type of operation at the Pro-Line facility. To eliminate the duplication of conditions, Pro-Line is suggesting a new Specific Condition No. 7 to replace existing Specific Condition Nos. 5 and 9. To be responsive to existing Specific Condition No. 5, new Specific Condition No. 7 will require Pro-Line to prepare and submit to the Department a report of VOC emission control devices, systems and/or work practices reasonably available to the permittee considering technical and economic feasibility to reduce total VOC emissions from each type of operation, including the use of acetone. New Specific Condition No. 7 will further require Pro-Line to develop an action plan to implement use of acetone supplement(s) determined in the report to be available, practical and feasible. (Note that this report has been submitted to the Department).

NOT  
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RACT-  
PERMIT

6. ~~Specific Condition No. 6 - No air pollutants shall be discharged which cause or contribute to an objectionable odor (F.A.C. Rule 17-2.620(2)). [Merged into new Specific Condition No. 7.]~~

RATIONALE: Specific Condition No. 6 of Permit AC09-180615 parallels Rule 17-2.620(2), F.A.C. and requires that no air pollutants which cause or contribute to an objectionable odor be discharged from a facility. Pro-Line recognizes that compliance with applicable rules of Chapter 17-2, F.A.C. are mandated by both Chapter 17-2 and 17-4 of the F.A.C. whether or not the specific rules are contained in an air permit.

To comply with the requirements of existing Specific Condition No. 6 and the requirements set forth in proposed Specific Condition No. 7, Pro-Line has prepared and submitted to the Department a report of VOC emission control devices, systems and/or work practices that are feasible and reasonably available to reduce VOC emissions from the facility and to minimize the release of odors off the facility's property. Also, as required by proposed Specific Condition No. 7, Pro-Line has developed an action plan for implementing the practices, control devices and systems reported to be available, feasible and practical.





Pro-Line recognizes that it must comply with the requirements of Rule 17-2.620(2), F.A.C. and is of the opinion that compliance with new Specific Condition No. 7 will provide this assurance to the Department. It is Pro-Line's opinion that the reference to a specific section of Rule 17-2 in the construction permit is unnecessary and redundant as the intent of existing Specific Condition No. 6 is covered in new Specific Condition No. 7, and by the fact that compliance with all applicable requirements of Chapter 17-2 are required whether or not they are referenced in a permit.

7. Specific Condition No. ~~5~~ 7 - The dust collector compliance test shall be conducted within 90 days after this permit is issued and the results reported to the Department's Southwest District Office before this construction permit expires. The Department shall be notified at least 15 days in advance of the test.

RATIONALE: Existing Specific Condition No. 7 is renumbered as proposed Specific Condition No. 5. This condition sets forth the schedule and the notification requirements for demonstrating compliance with the opacity standard applicable to the Pro-Line wood shop and established by Specific Condition No. 3 of Permit AC09-180615.

8. Specific Condition No. ~~6~~ 8 - ~~VOC compliance shall be demonstrated over a 90 day period and the results reported to the Department's Southwest District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the commencement of the 90 day compliance demonstration period.~~

Prior to submission of the application for an operating permit, the permittee shall:

- a. Inventory the use of all VOC containing materials over a 90-day period, including:
  1. Resin
  2. Gel Coat
  3. Acetone
  4. Wax-Golden Liquid
  5. Lacquer Thinner
  6. Resin Stripper
  7. Contact Cement
- b. Calculate the average VOC emissions (lbs/hr) from the above-listed materials based on a 90-day average usage;



- c. Demonstrate that the total VOC emissions (lbs/hr) from the above-listed materials on a 90-day average are equal to or less than the total VOC emissions (lbs/hr) set forth in Specific Condition No. 4.

RATIONALE: Specific Condition No. 8 of the existing Permit AC09-180615 is renumbered as proposed Specific Condition No. 6. Based upon discussions with Department staff, the proposed wording is intended to more specifically detail the procedure that is to be used by Pro-Line to demonstrate compliance with the total VOC emission limiting standard established by Specific Condition No. 4. The proposed condition specifies how the total VOC emissions are to be determined and that the total VOC emission rate is to be equal to or less than the total VOC emissions (pounds per hour) set forth in proposed Specific Condition No. 4. (Note that this compliance report has been submitted to the Department).

9. ~~Specific Condition No. 7 9 - Six months from the date of the construction permit, the permittee shall submit a plan of action providing reasonable assurance that objectionable odors and toxic air pollutants exceeding acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan must contain various control system strategies that could be implemented to reduce or eventually eliminate VOC emissions from each type of operation.~~

No later than six months from the date of issue of this construction permit, the permittee shall submit a report and develop a plan of action of emission control devices, systems and/or work practices reasonably available to the permittee considering technical and economic feasibility to:

- a. Reduce VOC emissions from each type of operation at the facility; and
- b. Minimize the release of objectionable odors beyond the facility's property boundary or where the public has access, whichever area is closer.

RATIONALE: Specific Condition No. 9 of existing Permit AC09-180615 requires that Pro-Line submit a plan of action providing the Department with reasonable assurance that objectionable odors and toxic air pollutants exceeding acceptable ambient concentrations will not be present beyond the facility boundary or where the public has access. The plan is to contain a review of various control system strategies that could be implemented to reduce VOC emissions from each type of operation at the Pro-Line facility. Also, Specific Condition Nos. 5 and 6 of the existing permit, as previously referenced, contain requirements directed toward

NOT  
NECESSARY!  
REPORT HAS  
BEEN SUBMITTED

DELETE  
No. 9



reducing or minimizing VOC emissions and the emissions of odor causing compounds.

Pro-Line is suggesting a new Specific Condition No. 7 which combines the requirements of existing Specific Condition Nos. 5, 6 and 9. The new condition requires that Pro-Line submit to the Department, within six months of the date of the construction permit (consistent with the requirement of existing Specific Condition No. 9), a report of VOC emission control devices, systems and/or work practices reasonably available to Pro-Line considering technical and economic feasibility to reduce total VOC emissions from each type of operation and to minimize the release of objectionable odors off the Pro-Line property or at points where the public has access, whichever is closer. (It should be noted that this report has been submitted to the Department). Proposed Specific Condition No. 7 also requires that Pro-Line develop a plan of action to implement the reasonable available and feasible control devices, systems and work practices within a reasonable period of time.

Assurance that concentrations of toxic air pollutants in excess of Acceptable Ambient Concentrations will not occur beyond the Pro-Line property, as required by existing Specific Condition No. 9, was provided in the application for Construction Permit AC09-180615. Pro-Line is of the opinion that further demonstration of this condition is redundant and unnecessary. Hence, proposed Specific Condition No. 7 requires no additional demonstration of compliance with Acceptable Ambient Concentrations for toxic air pollutants.

10. Specific Condition No. ~~8~~ ~~10~~ - The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

RATIONALE: Existing Specific Condition No. 10 has been renumbered as proposed Specific Condition No. 8.

11. Specific Condition No. ~~9~~ ~~11~~ - An application for an operation permit must be submitted to the Southwest District Office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

RATIONALE: Existing Specific Condition No. 11 has been renumbered as proposed by Specific Condition No. 9.



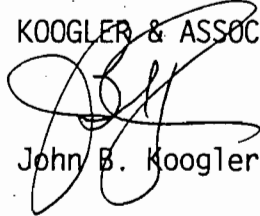
Mr. John M. Reynolds, Jr.  
Florida Department of  
Environmental Regulation

December 7, 1992  
Page 9

Your review and consideration of these proposed amendments is appreciated. If you have any questions regarding these suggested changes, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES

  
John B. Koogler, Ph.D., P.E.

JBK:wa

c: Mr. Glenn Bell, Pro-Line



John's  
copy



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 4, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ken Hall, President/CEO  
Pro-Line Boats, Inc.  
P. O. Box 1348  
Crystal River, Florida 32629

Dear Mr. Hall:

Re: Application for Permit No. AC 09-180615

The Department has not received the additional information required for review of the above permit application. We requested this information by certified mail on June 12, 1990.

Unless you provide this additional information within 30 days of receipt of this letter, we will deny the permit application.

If you have any questions, please contact John Reynolds at 904-488-1344.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/JR/plm

c: W. Thomas, SW District  
A. Trbovich, E.S.E.

**PRO-LINE®**

June 11, 1991

RECEIVED

Mr. C. H. Fancy, P.E., Chief  
 Bureau of Air Regulation  
 Twin Towers Office Bldg.  
 2600 Blair Stone Road  
 Tallahassee, FL 32399-2400

JUN 13 1991

Division of Air  
 Resources Management

RE: Application for Permit No. AC 09-180615

Dear Chief Fancy:

We are in receipt of your letter dated June 4, 1991 in regard to the above permit application. Please be advised that Cecil Davis, Vice President, and Bob Brewster, Safety Director, have been in contact with Alan Trbovich, E.S.E. on a regular basis. When we received an unscheduled visit from two individuals from the Tampa Air Compliance Center last week, they became annoyed that we were not in compliance with the department's request. Since I and most of the staff were involved in a boat show in Maryland, we could not accommodate the gentlemen at that time.

On the other hand, E.S.E. has assured us that they have been communicating on a regular basis with Tallahassee, and that since the permit was being handled through Tallahassee, they did not see a need to communicate with the Tampa division. E.S.E. said they had to re-calculate the information we had given them as the original method of calculation they received from the Tampa office was incorrect for our company.

We have been cooperative and supplied information to the proper departments, and have paid out numerous sums of money in the process, and are doing our part to hasten the procedure. We now understand that E.S.E. will have 6 copies sent out on Thursday of this week; two will go to DER, Tampa, two will be sent to DER, Tallahassee and two copies will be for our office.

Since we are not familiar with the permitting process, we are dependent upon your department and E.S.E. to assist us in obtaining the application. If this procedure is incorrect, we apologize. However, we presently have been assured by E.S.E. that everything was and is being taken care of.

Please call my office if I can be of further assistance.

Sincerely,

PRO-LINE BOATS, INC.



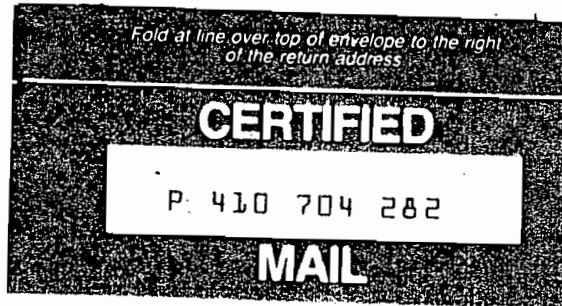
Ken Hall  
 President & CEO

cc: A. Trbovich, E.S.E.  
 W. Thomas, SW District  
 C. Davis, V.P.  
 B. Brewster, Safety Director

*Q. Reynolds*  
 ESE

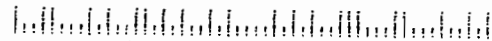
**PRO**  **LINE**®  
*MAIL*

P.O. Box 1348, Crystal River, FL 32623-1348



RETURN RECEIPT REQUESTED

Mr. C. H. Fancy, P.E., Chief,  
Bureau of Air Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400





# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 12, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ken Hall, President and CEO  
Pro-Line Boats, Inc.  
P. O. Box 1348  
Crystal River, Florida 32629

Dear Mr. Hall:

Re: Permit Application AC 09-180615  
Boat Fabrication - Building #6

This is to provide notice that the following additional information is required for preliminary review of the above application:

- 1) Data verifying that when the facility began operation in November 1971, capacity was such that VOC emissions were within 40 tons per year of current levels (otherwise PSD review is required along with an additional \$2,500 application fee).
- 2) Utilization rates and emission factors for other VOC compounds used at the facility including but not limited to the following:
  - a) acetone and other solvents
  - b) paints
- 3) Particulate emission rates from sawing, grinding or other operations at the facility.

If you have any questions, please call John Reynolds at (904)488-1344 or write to me at the above address.

Sincerely,

*fr* C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/JR/plm

c: B. Thomas SW District  
T. Davis, P.E.