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# Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

## FAX TRANSMITTAL FORM

TO: Cindy Phillips

LOCATION: \_\_\_\_\_

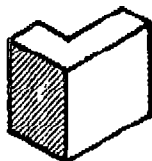
FAX NUMBER: 5C 292-6979DATE: 1/20/00FROM: Tim RosemoreFAX NUMBER: 5C 695-8096PHONE NUMBER: 5C 695-8364**COMMENTS:**

Cindy, this is the draft of a request  
from Blazer Boat, Inc. for an exemption  
of a case by case NACE. Could you  
give me a call and let me know what  
you think of it. Thanks!

NO. PAGES INCLUDING COVER SHEET: 4FAXED BY: TR

If there is any problem with this facsimile transmission, please call (850) 595-8364.

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**CORNERSTONE  
ENGINEERING, INC.**P.O. Box 12101  
Pensacola, Florida 32590(850) 438-3449  
Fax (850) 438-9376125 S. Alcaniz St., Suite 2  
Pensacola, Florida 32501

January 20, 2000

Mr. Ed. K. Middleswart  
Air Program Administrator  
Florida Department of Environmental Protection  
160 Governmental Center  
Pensacola, Florida 32501

Re: File No. 0330264-001-AV,  
Request for Additional Information

Dear Mr. Middleswart,

In regards to your letter dated January 12, 2000, Blazer Boats, Inc. would like to request an exemption from conducting a MACT determination for the proposed new facility to be located on 3300 Bill Metzger Lane. Blazer Boats Inc. is a family owned business that has been manufacturing small boats since 1978 and is in process of trying to produce boats more efficiently by relocating to a new facility designed to handle the ergonomics associated with manufacturing boats.

Blazer Boats' initial styrene emissions for the proposed facility are below the Title V requirements, but the company anticipated growth over the life of the permit that would classify their emissions within the Title V guidelines. Because of this projected growth Blazer Boats, decided it would be better to go ahead and obtain a Title V permit at this time.

*no construction or reconstruction*

Blazer Boats has been environmental conscious in the past and feels that additional environmental controls would increase their production cost and affect their market position. Based on the items listed below we would like the FDEP to provide Blazer Boats an exemption from conducting the MACT study:

- 1) The proposed facility styrene emissions currently do not fall into the Title V permit range of 10 to 25 tons per year. The facility estimates that it emissions will be at 9.2 tons per year at start-up and anticipates a 10% growth after the first year bring the to emissions to 10.2 tons per year. (See attached table)

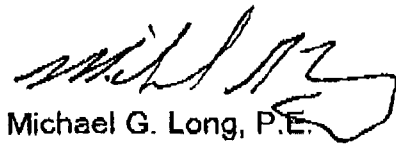
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Mr. Ed. K. Middleswart  
January 20, 2000  
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- 2) Through out the life of the five-year permit it is estimated that the facility will have approximately a 25% growth. This would raise the styrene emissions to 11.5 tons per year.
- 3) The cost of installing a Thermal Oxidizer is in the range of \$250,000 to \$500,000. The cost to operate the unit is approximately \$20/hr or \$40,000 per year based on the current operating schedule. These cost are extremely prohibitive for this small boat manufacturing facility.
- 4) Blazer Boats has taken steps in the past to reduce waste when economically feasible. Current waste reduction practices are:
  - Acetone recovery still
  - Reduced styrene content from resin from 45% to 38%
  - Purchase resin in re-usable bulk containers and eliminate waste drums generated from the resin
  - Use of Non-atomizing application equipment when possible. (Not all gelcoats applied will allow the use of this equipment.)

If I can provide any additional information, please contact me at (850) 438-3449. As we have previously discussed, Blazer Boats would like to start construction as soon as possible.

Very truly yours,



Michael G. Long, P.E.  
Chemical Engineer

c - Keith Craft

Material	Estimated Maximum lbs/yr	Species Type	Species Wt. %	Amount of Species lbs/yr	FDEP interim Emission Factors lb of Styrene per lb of styrene	Annual Emissions lbs/yr	Annual Emissions tons/yr	Days Operated	Hours per day	emitted lbs/hr
	(A)		(B)	(E)=(A)*(B)/100	(C)	(D)=(E)*(C)	(F)=(D)/2000	(G)	hrs	(H)=(D)/G/hrs
Resin	205000	Styrene	37.8	77490	0.18	13948	7.0	2000	6	1.2
Gelcoat	25000	Styrene	33	8250	0.48	3960	2.0	2000	3	0.7
Mod wax	1000	Styrene	100	1000	0.48	480	0.2	2000		
<b>Total Styrene</b>	<b>231000</b>					<b>18388</b>	<b>9.2</b>			
MEKP	3500	MEKP	100	3500	0.001	4	0.0	2000	8	
<b>Total VOC</b>						<b>18392</b>	<b>9.2</b>		<b>8</b>	

Project emissions After year 1 - 10% production increase. 10.2

Project emissions after year 4 - 25% production increase 11.5

Reading File

Florida Department of  
**Environmental Protection**

**Memorandum**

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TO: Tim Rosemore, Engineer, NWD

FROM: Cindy L. Phillips, P.E. *CP*  
Air Toxics Permitting  
Bureau of Air Regulation

SUBJECT: 112(g) Applicability Determination for Blazer Boats, Inc.  
File No. 0330264-001-AV

DATE: January 21, 2000

I have reviewed the January 20 letter regarding Blazer Boats from Michael Long of Cornerstone Engineering to Ed Middleswart of your office. Based on the information contained in that letter, and my telephone conversation with you yesterday, it is my opinion that a 112(g) Case-by-case MACT Determination is not required for Blazer Boats. Relocation of an existing facility does not trigger 112(g). If you have any questions, please call me at SC 291-9534 or 850/921-9534.