



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

Permittee:
Meritec Industries, Inc.
5980 Lakehurst Drive
Orlando, Florida 32819

Attention: Bob Ackerbloom
President

I.D. Number 0694826
Permit Number: 0694826-001-AC
Expiration Date: October 30, 2004
County: Lake
Latitude/Longitude:
28°38'22"N/81°48'56"W
Project: Fiberglass Boat Building Facility

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The applicant may construct a fiberglass boat building facility. The assembly operations are resin spraying, gelcoat spraying, mold care and preparation, solvent cleanup, wood and fiberglass cutting, shaping, grinding, painting, and boat assembly.

The majority of VOC emissions occur from Building 1 in which the gel coating and grinding are performed. The facility is considered one emission unit (EU001) for inventory purposes.

The emission units are located at the new facility 20150 Independence Boulevard, Groveland, Lake County, Florida.

General Conditions, which are pages 2 and 3, are mailed only to the permittee.

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 403.141, 403.727, or 403.859 through 403.861, F.S. 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), F.S., 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 this 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.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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 reasonable times, 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 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 noncompliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

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.

GENERAL CONDITIONS:

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 Section 403.111 and 403.73, F.S. 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 Rule 62-4.120 and 62-30.300, 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. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of compliance with state Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. 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 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:
 1. the date, exact place, and time of sampling or measurements;
 2. the person responsible for performing the sampling or measurements;
 3. the dates analyses were performed;
 4. the person responsible for performing the analyses;
 5. the analytical techniques or methods used;
 6. the results of such analyses.
15. 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 the 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.

Permittee:

Meritec Industries, Inc.

Atten: Bob Ackerbloom, President

I.D. Number: 0694826

Permit Number: 0694826-001-AC

Expiration Date: August 31, 2004

County: Lake

SPECIFIC CONDITIONS:

OPERATING CONDITIONS

1. The facility is permitted to operate continuously, per the application.
2. The maximum coating usage is 350 tons per consecutive twelve months.
3. No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOCs) or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department [Rule 62-296.320(1)(a), F.A.C.]. To comply, procedures to minimize pollutant emissions should include but not be limited to the following:
 - a) Tightly cover or close all VOC containers when they are not in use;
 - b) Tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use;
 - c) Maintain all piping, valves, fittings, etc. in good operating condition;
 - d) Prevent excessive air turbulence across exposed VOCs;
 - e) Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal; and
 - f) Maintain a monthly accounting of total VOCs based on beginning and ending inventories, deliveries, shipments, etc.

EMISSIONS LIMITS

4. The visible emissions from each source must comply with Rule 62-296.320(4)(b)1., F.A.C., and are limited to less than 20% opacity.
5. The maximum Meritec Industries emissions rate for VOCs, combined hazardous air pollutant (HAP) and for any single HAP is limited to less than 50 tons per consecutive twelve months.

Permittee:

Meritec Industries, Inc.

Atten: Bob Ackerbloom, President

I.D. Number: 0694826

Permit Number: 0694826-001-AC

Expiration Date: August 31, 2004

County: Lake

Styrene Emission Factors

Material	NVS Monomer - less than 35%	NVS Monomer - 35-42%
Resin Non-Spray Layup	11	12
Resin Spray Layup	16	20
Gel Coat	48	54

NVS = non-vapor suppressed

Emission factors as a percent (%) of Available Monomer

Other VOC emission factor is 100%

6. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

[Rules 62-296.320(2) and 62-210.200(203), F.A.C.]

MACT DETERMINATION

7. After reviewing the applicant's proposed MACT, information from EPA, information concerning facilities permitted in other states, and existing NESHAP standards, the Department has made the determination that Maximum Achievable Control Technology (MACT) for this facility shall be:
- a) the use of production resins that contain a maximum average of 35% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
 - b) the use of non-atomizing application equipment for production resins;
 - c) the use of pigmented gel coats and base gel coats that contain a maximum average of 33% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
 - d) the use of sprayed tooling resins, used for repair of molds, that contain a maximum average of 30% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;

Permittee:

Meritec Industries, Inc.

Atten: Bob Ackerbloom, President

I.D. Number: 0694826

Permit Number: 0694826-001-AC

Expiration Date: August 31, 2004

County: Lake

- e) the use of non-atomized tooling resins, used for making and repair of molds, that contain a maximum average of 39% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
- f) the use of tooling gel coats, used for making and repair of molds, that contain a maximum average of 40% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
- g) no control of hazardous air pollutants emitted from mold sealing, releasing, stripping, and repair materials;
- h) no control of hazardous air pollutants emitted from coating processes for exterior wood parts;
- i) the use of marine coatings for coating surfaces (except for wood parts) that are compliant with 40 CFR 63 Subpart II - NESHAPs for Shipbuilding and Ship Repair (Surface Coating);
- j) the use of resin and gel coat cleaning solvents that contain no HAPs. An exception is the use solvent cleaning machines which comply with the requirements of 40 CFR 63 Subpart T- Halogenated Solvent Cleaning;
- k) the use of carpet and fabric adhesives solvents that contain no HAPs;
- l) the use of carpentry adhesives that achieve a volatile hazardous air pollutant (VHAP) limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied using either of the compliance methods in 40 CFR 63.804(e);
- m) the use of the highest styrene content in calculations when Manufacturer's Safety Data (MSD) Sheets with styrene content ranges are used;
- n) **Recordkeeping and Reporting Requirements:**
 - (1) Maritec shall compile records on a monthly basis and maintain those records for a minimum of 5 years. At a minimum, these records shall include:
 - (a) the identification of all coatings used (resins, gelcoats, marine coatings, adhesives, etc.),
 - (b) certification of the as-supplied HAP/VOC content of each batch of coating,
 - (c) certification of the as-applied HAP/VOC content of each batch of coating,
 - (d) the volume of each coating applied,
 - (e) amount of thinner used, and
 - (f) determination of compliance with the appropriate HAP limit.

Permittee:

Meritec Industries, Inc.

Atten: Bob Ackerbloom, President

I.D. Number: 0694826

Permit Number: 0694826-001-AC

Expiration Date: August 31, 2004

County: Lake

- (2) Within 60 days following the end of each 6-month period after startup, Meritec shall submit a semi-annual compliance report.

COMPLIANCE TESTING

8. Each stack must be tested for visible emissions in accordance with EPA Method 9, as incorporated in Rule 62-297.401, F.A.C., at least 30 days after being placed into operation. The test shall last thirty minutes or the length of the batch/cycle.
[Rule 297.401, F.A.C.]
9. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Department's Central Florida District office air compliance section. The notification must include the following information:
- a) The date, time, and location of each test;
 - b) The name and telephone number of the facility's contact person who will be responsible for coordinating the test; and
 - c) The name, company, and telephone number of the person conducting the test.

The Department may waive the 15-day notice requirement on a case by case basis.
[Rule 62-297.310(7)(a)9., F.A.C.]

10. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]
11. Reports of the required compliance tests shall be filed with the Department's Central Florida District office as soon as practical but no later than 45 days after the last test is completed [Rule 62-297.310(8)(b), F.A.C.]

Permittee:

Meritec Industries, Inc.

Atten: Bob Ackerbloom, President

I.D. Number: 0694826

Permit Number: 0694826-001-AC

Expiration Date: August 31, 2004

County: Lake

RECORD KEEPING

12. Pursuant to Rule 62-4.070(3), F.A.C., a log shall be kept for this facility to document compliance with the limitations of specific conditions 1,5, and 8. The log shall be completed by the end of the following month and shall be retained on file at the facility for at least 3 years. At a minimum, the monthly log shall:
- a) Quantify the consecutive twelve-month period total of emissions from VOCs, each HAP, and combined HAPS.

Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request.

Volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coating, and inks, using EPA Reference Method 24 and 24A, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings".

PERMIT APPLICATION

13. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing at least 90 days prior to the expiration of the construction permit and submit an application for an extension of the construction permit.

Permittee:

Meritec Industries, Inc.

Atten: Bob Ackerbloom, President

I.D. Number: 0694826 .

Permit Number: 0694826-001-AC

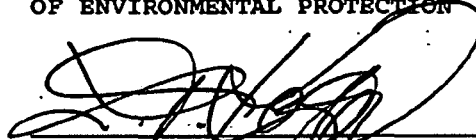
Expiration Date: August 31, 2004

County: Lake

A Title V operating permit is required for operation of this source. To obtain an operating permit, the permittee must demonstrate compliance with the conditions of the construction permit and submit the compliance test results to the Central Florida District office. The compliance test results shall be submitted no later than 180 days after the source has been placed in operation.

[Rule 62-4.220, F.A.C.]

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Issued: 11-5-99