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St. Petersburg, FL 33702
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TomJohn Engineering, Inc.

April 10, 2000

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

re: Toyota Marine Sports



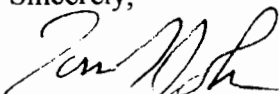
Dear Mr. Zahm:

As environmental engineer of record for the referenced facility, and in conjunction with Toyota Marine Sports, we are submitting the enclosed set of three applications for an FDEP Title V Air Construction Permit for a fiberglass boat building facility located in Lake County. Additional copies of the application are available upon request.

The facility will have individual and total HAP emissions above the thresholds for and will become a Major Source under Title V. The applications contain original signatures and seals, and are accompanied by a check for \$2000.00 as the processing fee for a construction permit for a source emitting more than 25 but less than 50 tons per year.

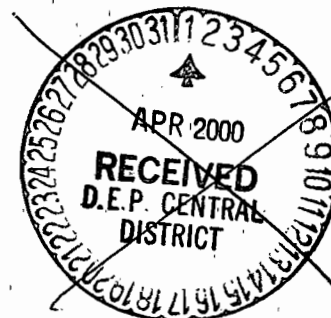
Thank you for your assistance in this project. Should you have any questions or if I can provide any additional information, please contact me at my office.

Sincerely,


Tom T. John, P.E.

Encl: applications

cc: Toyota Motor Sports



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

Title V

Air Construction

Permit Application

TOYOTA MARINE SPORTS
Lake County Plant
Groveland, Florida

April 10, 2000

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Application Information



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: TOYOTA MARINE SPORTS	
2. Site Name: Toyota Marine Sports Groveland	
3. Facility Identification Number: <input checked="" type="checkbox"/> Unknown	
4. Facility Location: Street Address or Other Locator: 330 Crittendon Street City: Groveland County: Lake Zip Code: 34788	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Application Contact

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

Application Processing Information (DEP Use)

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

Purpose of Application

Air Operation Permit Application NOT APPLICABLE

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

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

Current construction permit number: _____

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

Current construction permit number: _____

Operation permit number to be revised: _____

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

Operation permit number to be revised/corrected: _____

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

Operation permit number to be revised: _____



Reason for revision: _____

Air Construction Permit Application

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

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Mr. Isao Yoshino, Vice President
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Toyota Marine Sports Street Address: 7658 Municipal Drive City: Orlando State: Florida Zip Code: 32819-8928
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (407) 370 - 7000 Fax: (407) 370 - 7030
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  _____  _____ Signature Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Tom T. John, P.E Registration Number: 33157
2. Professional Engineer Mailing Address: Organization/Firm: Tom John Engineering, Inc Street Address: 8424 4 th Street North, Suite K City: St. Petersburg State: Florida Zip Code: 33702
3. Professional Engineer Telephone Numbers: Telephone: (727) 579 - 0403 Fax: (727) 579 - 0205

4. Professional Engineer Statement:

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

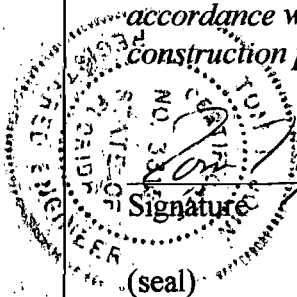
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions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

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

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

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

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



Signature

10 April 2000
Date

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Fiberglass Boat Building - resin and gelcoat application, mold care, and related assembly and cleanup activities	AC1D	\$2000.00

Application Processing Fee

Check one: [X] Attached - Amount: \$ 2000.00 [] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

This project is for the construction of a fiberglass boat building operation. The styrene emissions will make the facility subject to Title III and Title V, CAAA (1990).

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

3. Projected Date of Completion of Construction: one year from permit receipt

Application Comment

Activities and recordkeeping will be in accordance with the provisions of the MACT for fiberglass boatbuilding proposed by FDEP until adoption of the USEPA boat building MACT.

Facility Information

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input checked="" type="checkbox"/> Unknown
2. <input type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input checked="" type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): Monthly record keeping of materials used and calculation of emissions is proposed as demonstration of compliance with permit conditions and standards proposed for MACT by USEPA	

List of Applicable Regulations

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

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

Federal:*(description)*

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

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

State:*(description)***CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95**

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

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

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

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

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(3)(a), F.A.C.: Full Exemptions.

62-210.300(3)(b), F.A.C.: Temporary Exemption.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.350, F.A.C.: Public Notice and Comment.

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

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

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

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

62-210.900, F.A.C.: Forms and Instructions.

62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.

62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.

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

62-213.205, F.A.C.: Annual Emissions Fee.

62-213.400, F.A.C.: Permits and Permit Revisions Required.

62-213.410, F.A.C.: Changes Without Permit Revision.

62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.

62-213.420, F.A.C.: Permit Applications.

62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.

62-213.440, F.A.C.: Permit Content.

62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.

62-213.900(1) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.

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

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

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

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

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

62-296.320(3), F.A.C.: Industrial, Commercial, and Municipal Open Burning Prohibited.

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

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B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
Individual HAP (styrene, H163)	M	Not Applicable	45	other	styrene is anticipated to be dominant HAP species
total HAP	M	Not Applicable	45	other	includes styrene and other HAP species
total VOC	M	Not Applicable	45	other	includes all HAP species

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input checked="" type="checkbox"/> Attached, Document ID: <u>3</u> <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input checked="" type="checkbox"/> Attached, Document ID: <u>4</u> <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>5</u> <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input checked="" type="checkbox"/> Attached, Document ID: <u>5</u> <input type="checkbox"/> Not Applicable

Emission Unit Information

III. EMISSIONS UNIT INFORMATION

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

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Fiberglass boat building utilizing styrene based resins and gelcoats; includes assembly and cleanup materials.</p>			
<p>4. Emissions Unit Identification Number: ID: 001</p>		<p><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>	
<p>5. Emissions Unit Status Code: C</p>	<p>6. Initial Startup Date: Permit Receipt</p>	<p>7. Emissions Unit Major Group SIC Code: 37</p>	<p>8. Acid Rain Unit? <input checked="" type="checkbox"/> No</p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> 			

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

Emissions Unit Operating Capacity and Schedule

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

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

See Page 8 of Facility Information section	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? See Attachment 1		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Six exhaust fans in southern end of building terminating 10 feet above roof peak(proposed)			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Not Applicable			
5. Discharge Type Code: V	6. Stack Height: 40 (est.) feet	7. Exit Diameter: 3 (est.) feet	
8. Exit Temperature: 77°F	9. Actual Volumetric Flow 10,000 each (Est.)	10. Water Vapor: negligible %	
11. Maximum Dry Standard Flow Rate: Not Applicable		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Applicable Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

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

Segment Description and Rate: Segment 1 of 3

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

Segment Description and Rate: Segment 2 of 3

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

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mold care, product assembly and acetone cleanup are included in this segment. Product is removed from the molds, trimmed and sanded as required, and assembled.		
2. Source Classification Code (SCC): 3-14-015-50 (-51, -52, -53, -60)		3. SCC Units: Tons of solvent
4. Maximum Hourly Rate: Not Applicable	5. Maximum Annual Rate: 100*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): * Individual limitations on putties, fillers, solvents, coatings and adhesives usage are not required. Potentially all material used could be solvents under this category. Monthly record keeping is proposed as demonstration of compliance with emission limits.		

F. EMISSIONS UNIT POLLUTANTS

(All Emissions Units)

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

H. VISIBLE EMISSIONS INFORMATION

(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

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

I. CONTINUOUS MONITOR INFORMATION

(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____ **NOT APPLICABLE**

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

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

Supplemental Requirements

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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

H. VISIBLE EMISSIONS INFORMATION

(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

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

I. CONTINUOUS MONITOR INFORMATION

(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____ **NOT APPLICABLE**

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

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

Supplemental Requirements

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

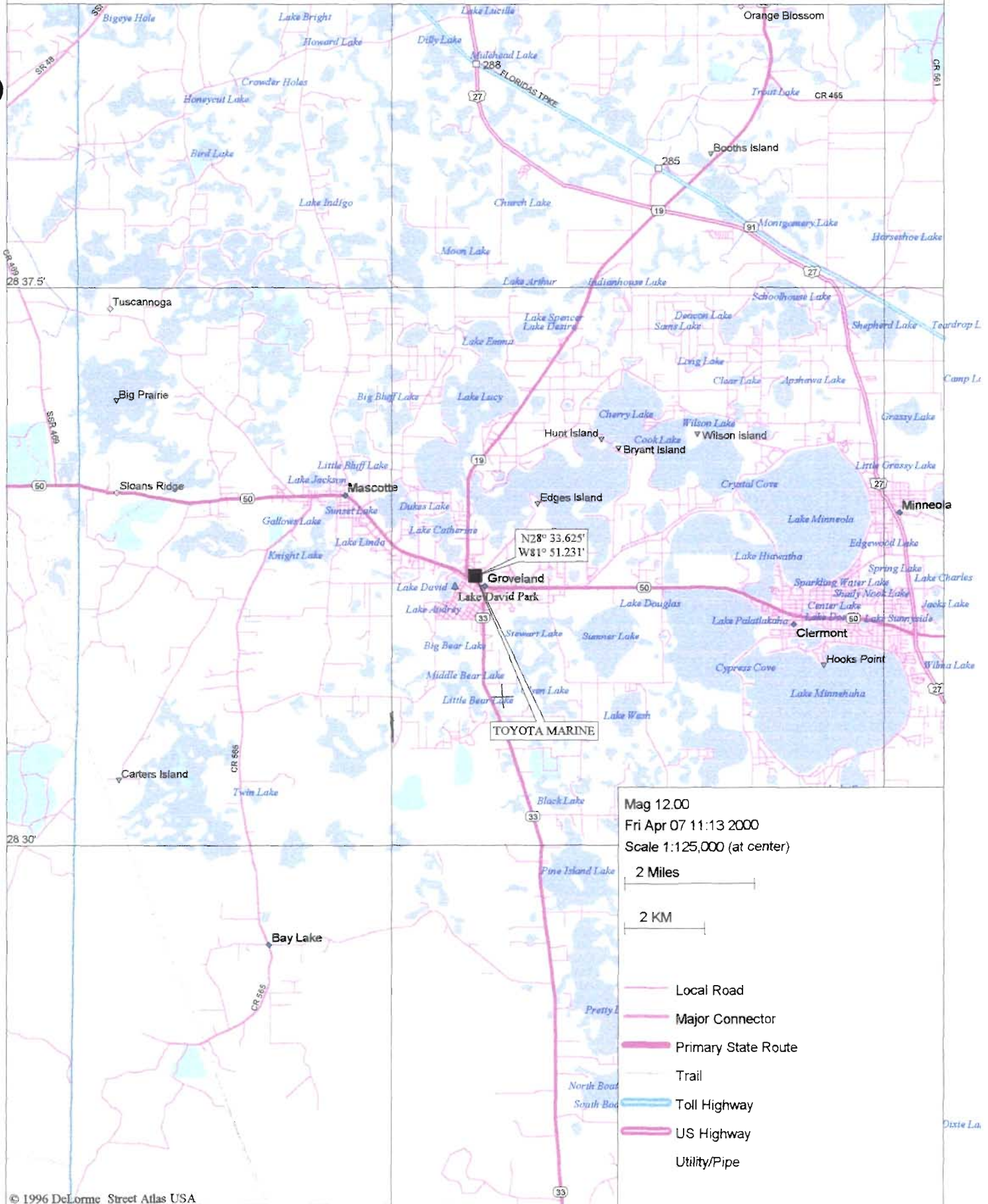
Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [] Attached, Document ID: _____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

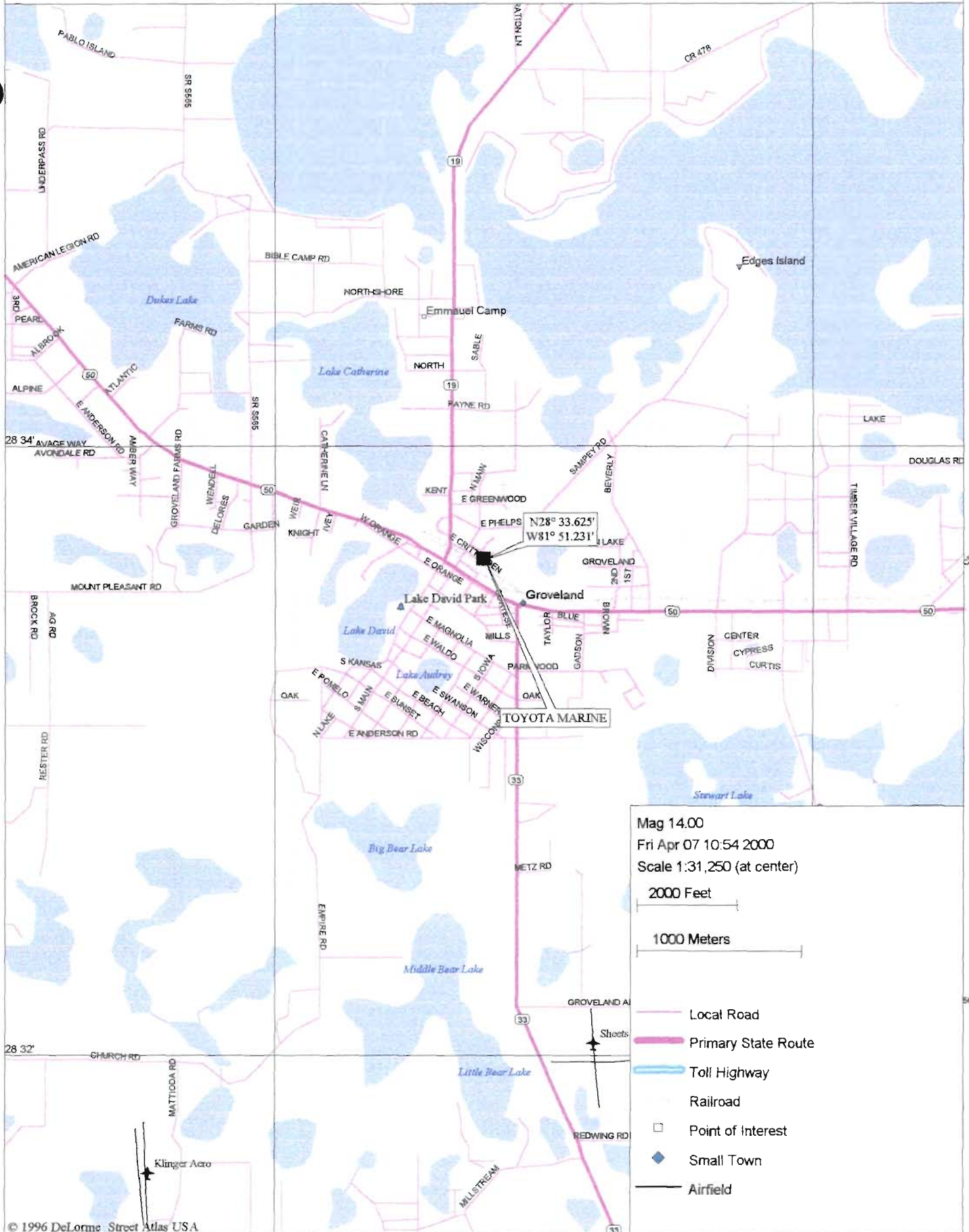
Site Location and
Facility Layout

Attachment 1

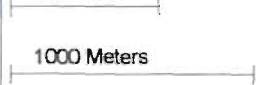
TOYOTA MARINE SPORTS Groveland Lake County



TOYOTA MARINE SPORTS Groveland Lake County

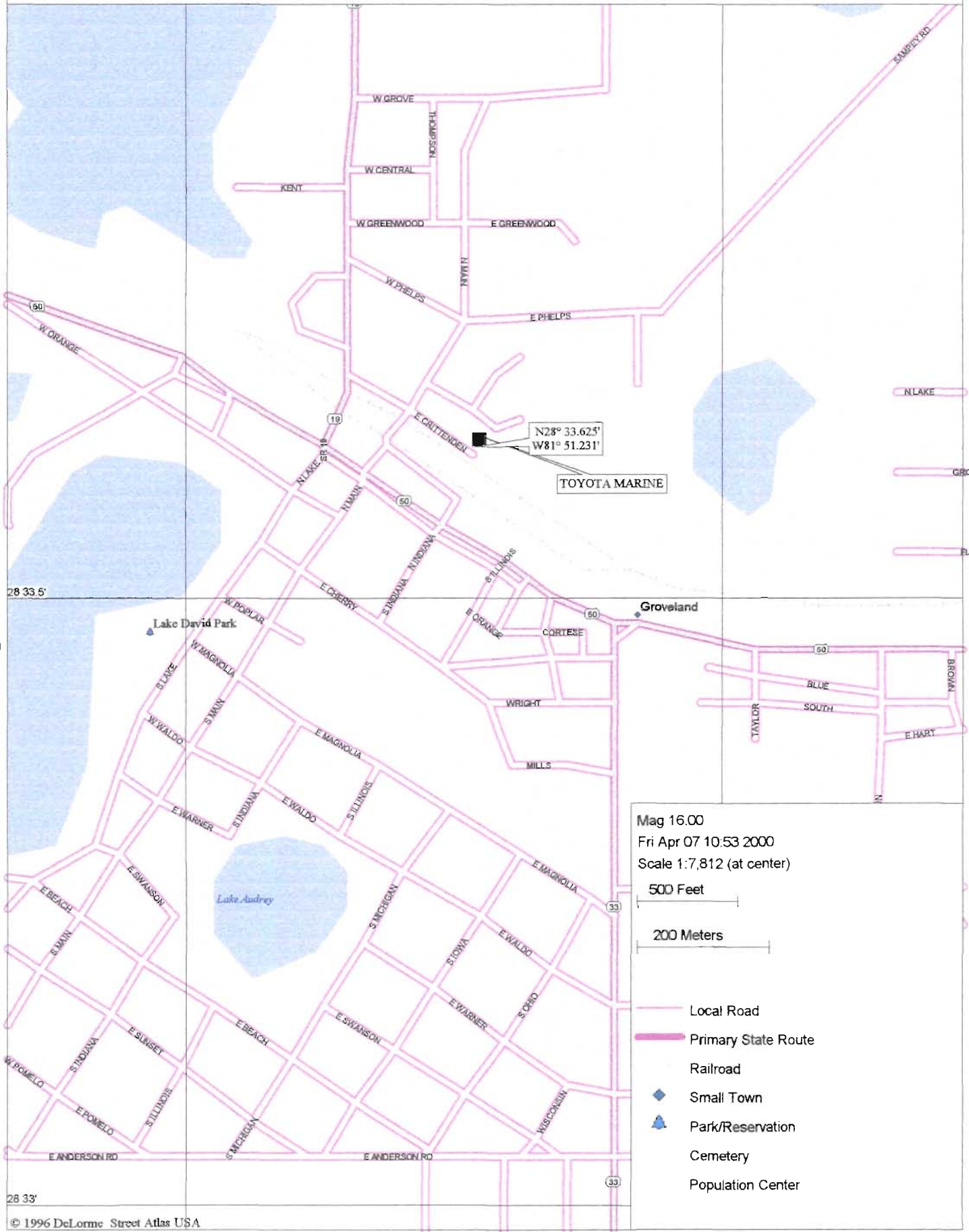


Mag 14.00
 Fri Apr 07 10:54 2000
 Scale 1:31,250 (at center)
 2000 Feet



- Local Road
- Primary State Route
- Toll Highway
- Railroad
- Point of Interest
- Small Town
- Airfield

TOYOTA MARINE SPORTS Groveland Lake County



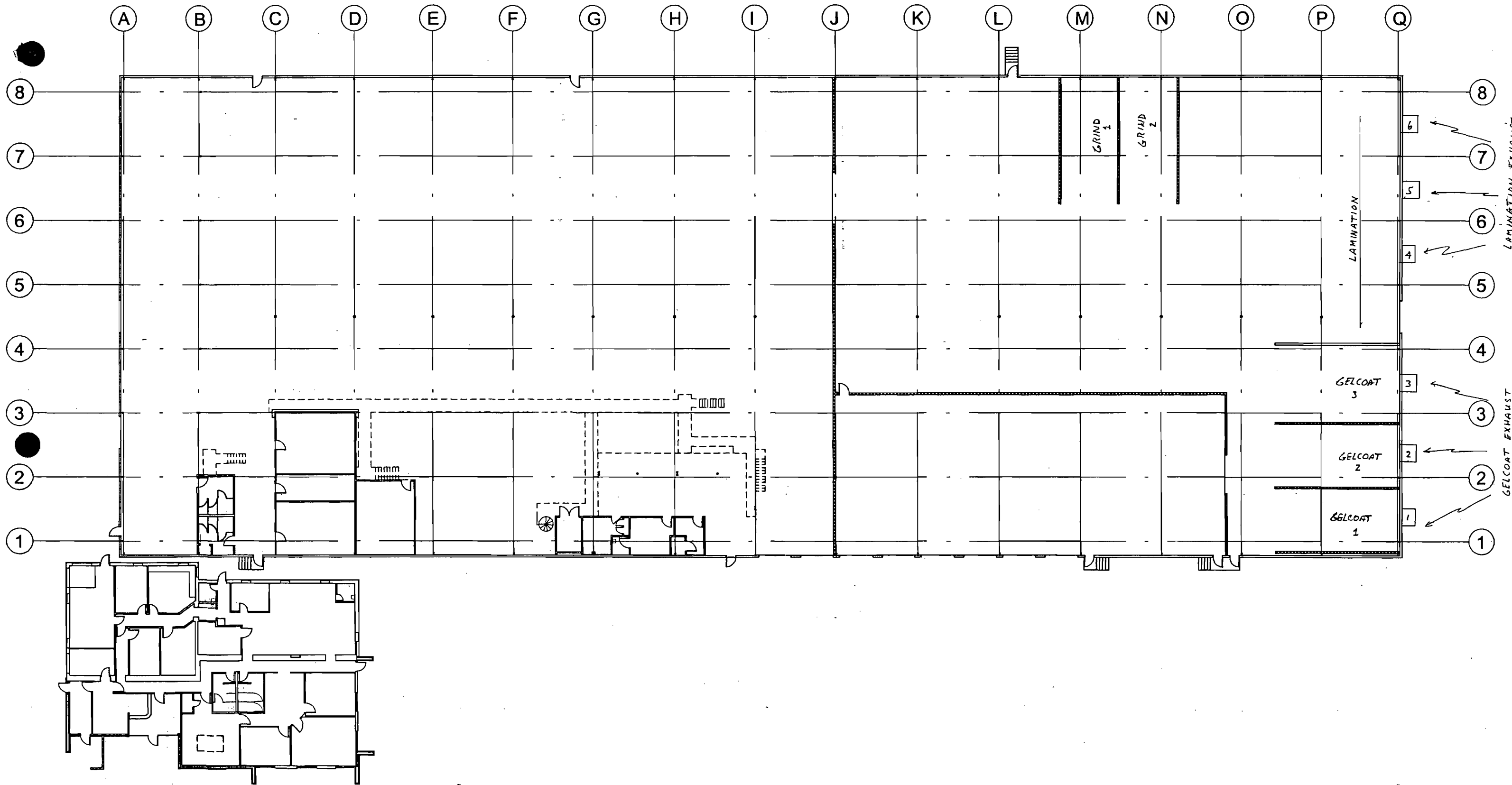
28 33.5'

28 33'

Mag 16.00
 Fri Apr 07 10:53 2000
 Scale 1:7,812 (at center)

500 Feet
 200 Meters

- Local Road
- Primary State Route
- Railroad
- Small Town
- Park/Reservation
- Cemetery
- Population Center

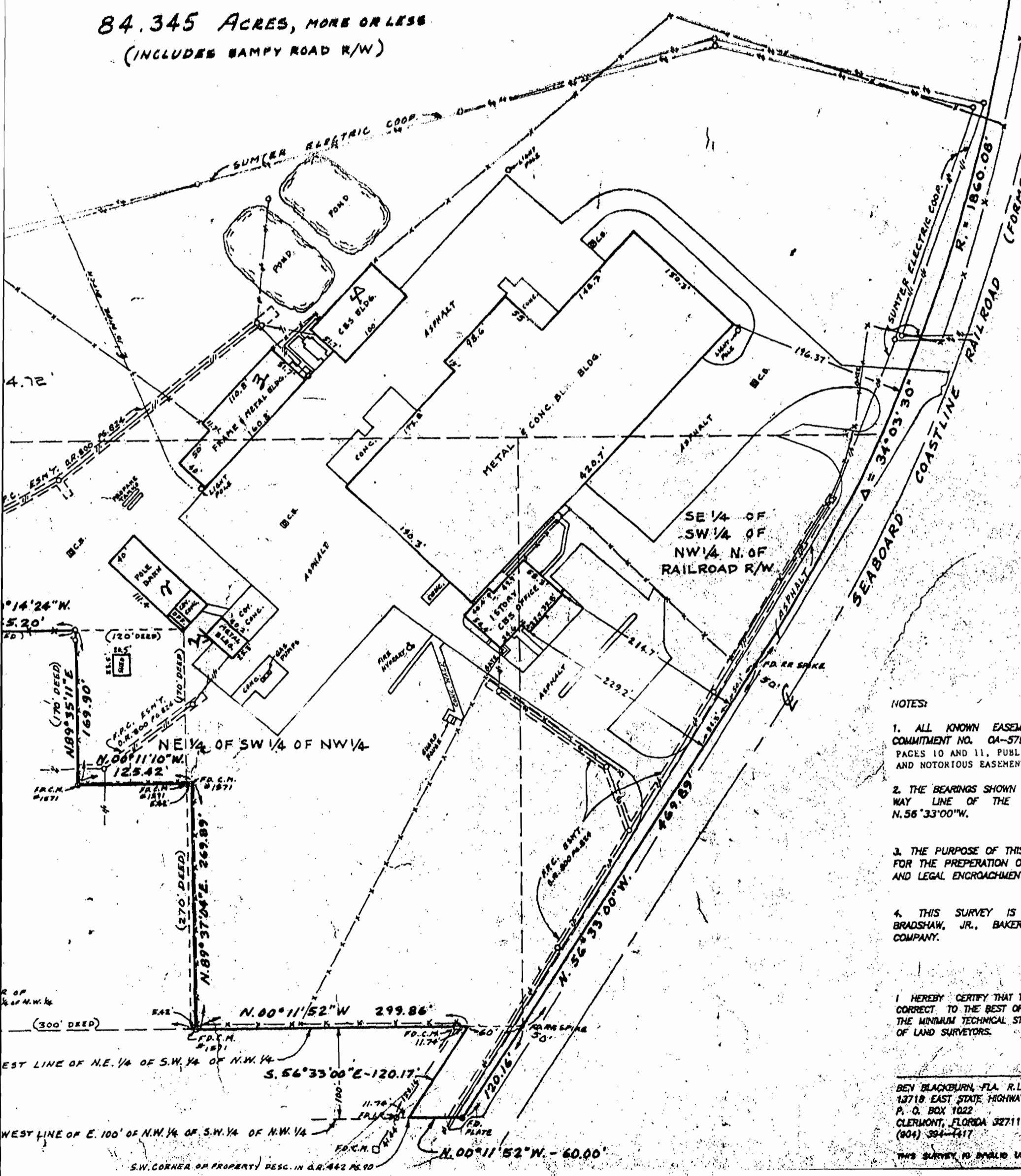


① FLOOR PLAN
 SCALE: 1/16" = 1'-0"
 PROJECT NORTH

BEST AVAILABLE COPY

SOUTHEAST 1/4 OF NORTHWEST 1/4
(NORTH OF RAILROAD R/W)

84.345 ACRES, MORE OR LESS
(INCLUDES BAMPY ROAD R/W)



- NOTES:
1. ALL KNOWN EASEMENTS COMMITMENT NO. 0A-5786 PAGES 10 AND 11, PUBLIC AND NOTORIOUS EASEMENTS
 2. THE BEARINGS SHOWN H/W WAY LINE OF THE A. N. 56° 33' 00" W.
 3. THE PURPOSE OF THIS FOR THE PREPARATION OF AND LEGAL ENCROACHMENTS
 4. THIS SURVEY IS BY BRADSHAW, JR., BAKER COMPANY.

I HEREBY CERTIFY THAT THE CORRECT TO THE BEST OF THE MINIMUM TECHNICAL STANDARDS OF LAND SURVEYORS.

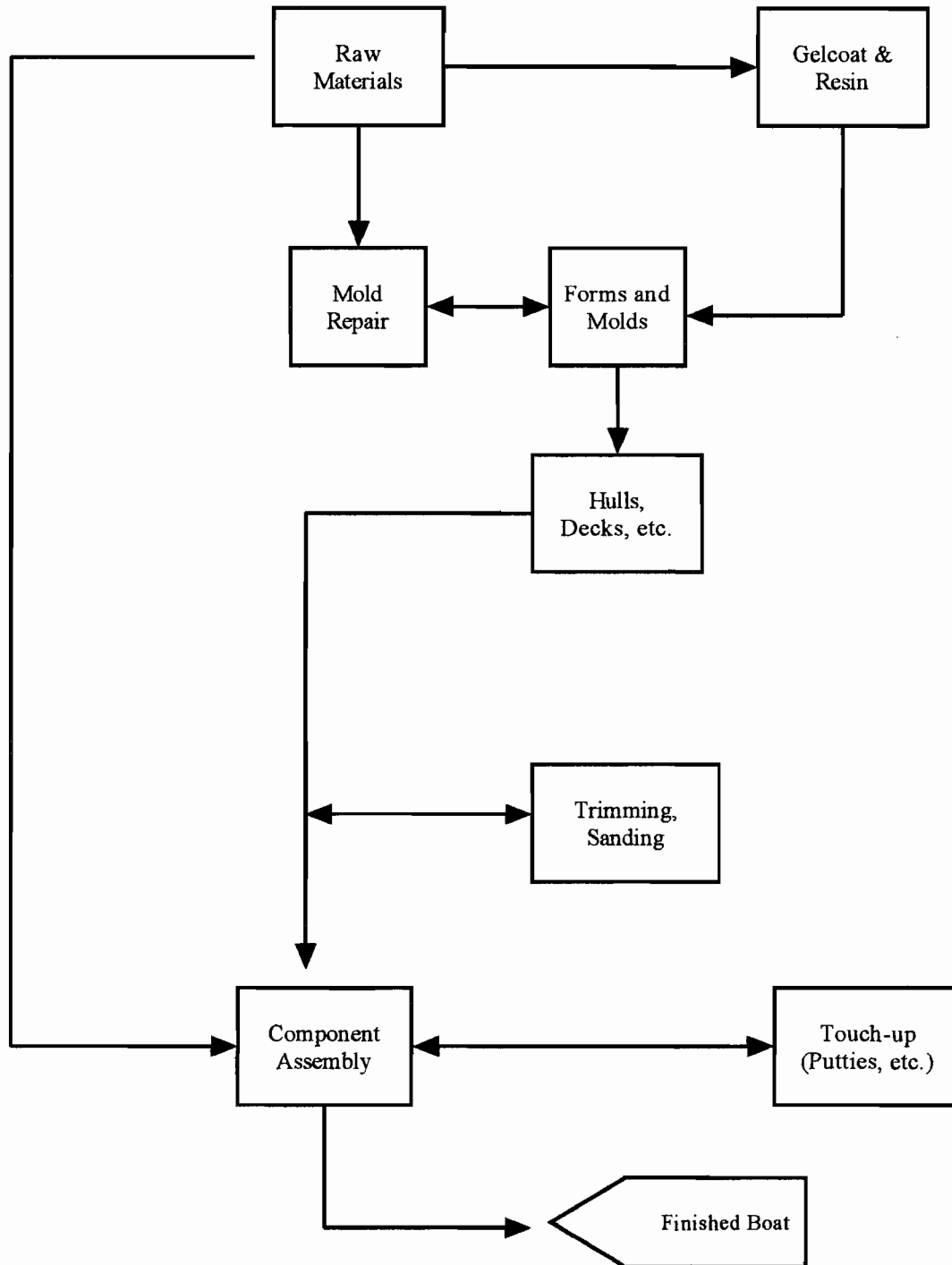
BY: BEN BLACKBURN, FLA. R.L.S.
13718 EAST STATE HIGHWAY
P. O. BOX 1022
CLERMONT, FLORIDA 32711
(804) 394-7417

THIS SURVEY IS VALID UNLESS

EST LINE OF N.E. 1/4 OF S.W. 1/4 OF N.W. 1/4
WEST LINE OF E. 100' OF N.W. 1/4 OF S.W. 1/4 OF N.W. 1/4
S.W. CORNER OF PROPERTY DESC. IN G.R. 442 P. 90

Process Flowsheet
Process Description and
Emission Estimates

Process Flow Diagram



Toyota Marine Sports
300 Crittendon Street Groveland, FL
Tom John Engineering, Inc. St. Petersburg, FL
(727) 579 - 0403

Process Description, Emission Estimates and Process Flowsheet

Process Description

Toyota Marine Sports is proposing to manufacture sport fiberglass boats in a wide range of sizes and styles at their facility at 1330 Crittenden Road, Groveland (Lake County). The general process flowsheet for boat building is shown in Figure 2.0, preceding. The source is a new facility which will have permitted individual (styrene) and total HAP annual missions above the threshold for a Title V permit and will be designated as a "Major" source under that program.

The location of the facility and the site buildings are illustrated in layout in Attachment 1. The site consists of one main building. The gelcoating and lamination steps, performed primarily in the area along the southern wall of the building, are the primary sources of the styrene emissions, the major component of the VOC emissions. VOC species are dispersed through exhaust fans controlling the active areas and exiting the south side of the building, terminating 10 feet above roof peak. Assembly and mold care/repair activities will be conducted in the building as appropriate. Grinding and sanding will be performed primarily in the two grind areas indicated in the layout of Attachment 1.

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

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

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

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

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

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

Emission Estimates

Lamination/gelcoating activities

The general procedure for estimating VOC/OS emissions is:

$$\text{Material Usage Rate} \times \text{Species Concentration} \times \text{Emission Factor} = \\ \text{Species Emission Rate}$$

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

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

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

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

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

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

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

Material Usage and Emission Discussion

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

Proposed Case by Case MACT Conditions

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

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

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

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

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

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

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

Toyota Marine Sports believes that compliance with these limitations is sufficient to allow the processing of this application.

TOYOTA MARINE SPORTS
Raw Material Usage and Emissions Estimates for TITLE V CONSTRUCTION PERMIT

Figure 2.1

A. Materials Usage		estimated		conversion to lbs	units of measure	usage at UOM	Process Data	
		annual tons	usage lbs				total material (less acetone)	tons
resin	Hydrex 33250	156.33	312650.0	1.0	lbs	8450	resin	156.33
gelcoat	white	15.63	31265.0	1.0	lbs	845	gel	19.98
	color	4.35	8695.0	1.0	lbs	235	other styrene matl	32.47
catalyst	clear	0.48	962.0	1.0	lbs	26	resin catalyst	3.13
	red	3.61	7215.0	1.0	lbs	195	gel catalyst	0.40
							catalyst for other	0.65
misc	putty	4.81	9620.0	1.0	lbs	260	resin+gel	176
	ceramic core	27.66	55315.0	1.0	lbs	1495	total catalyst	4.18
	blowing agent	5.53	11063.0	1.0	lbs	299	resin/gel	7.8
	foam	9.82	19240.0	1.0	lbs	520	catalyst added wt%	2.0%
	plexus activator	2.68	5363.4	15.9	gal	9.1		
	plexus adhesive	14.04	28080.8	8.3	gal	91		
	contact cement	4.83	9668.1	6.7	gal	39		
	acetone	not regulated as VOC			lbs	455		

B. Species Compositions, wt %									
material	HAP?	100-42-5	80-62-6	131-11-3	0078-93-3	110-54-3	108-88-3	75-45-6	N
	cas#	styrene	methylmeth acrylate	dimethyl phthalate	methyl ethyl ketone	hexane	toluene	Cl-F2 methane	general VOC
resin	Production	35%							
gelcoat	white	28%	5%						
	color	24%	9%						
catalyst	clear			43%	2%				34%
	red			41%	2%				34%
misc	putty	22%							
	ceramic core	31%						15%	
	blowing agent								100%
	foam								
	plexus activator		85%						100%
	plexus adhesive				0.1%	9%	14%		32%
	contact cement								

C. Estimated Usage by Species								
material	styrene	methylmeth acrylate	dimethyl phthalate	methyl ethyl ketone	hexane	toluene	Cl-F2 methane	general VOC
resin	Hydrex 33250	109428	0	0	0	0	0	0
gelcoat	white	8754	1563	0	0	0	0	0
	color	2087	794	0	0	0	0	0
catalyst	clear	0	0	414	19	0	0	327
	red	0	0	2958	144	0	0	2453
misc	putty	2116	0	0	0	0	0	0
	ceramic core	17148	0	0	0	0	0	8297
	blowing agent	0	0	0	0	0	0	11063
	foam	0	0	0	0	0	0	0
	plexus activator	0	0	0	0	0	0	0
	plexus adhesive	0	23869	0	0	0	0	28081
	contact cement	0	0	0	10	860	1373	3055

D. Estimated Emissions by Species									
material	styrene in		resin		MMA		Cl-F2-CH		N
	emission factors:	styrene in	gelcoat	misc	reactive	low v.p.	gen VOC	1	
resin	Hydrex 33250	12037	0.11	0.48	0.75	0.0001	0.0001	0.15	
gelcoat	white	4202	0.11	0.48	0.75	0.0001	0.0001	0.15	
	color	1002	0.11	0.48	0.75	0.0001	0.0001	0.15	
catalyst	clear	0	0.11	0.48	0.75	0.0001	0.0001	0.15	327
	red	0	0.11	0.48	0.75	0.0001	0.0001	0.15	2453
misc	putty	233	0.11	0.48	0.75	0.0001	0.0001	0.15	0
	ceramic core	1886	0.11	0.48	0.75	0.0001	0.0001	0.15	1245
	blowing agent	0	0.11	0.48	0.75	0.0001	0.0001	0.15	11063
	foam	0	0.11	0.48	0.75	0.0001	0.0001	0.15	0
	plexus activator	0	0.11	0.48	0.75	0.0001	0.0001	0.15	0
	plexus adhesive	0	17901	0.11	0.48	0.75	0.0001	0.15	28081
	contact cement	0	0	0.11	0.48	0.75	0.0001	0.15	3055

FACILITY TOTALS (tpy): styrene 9.68 HAP total 21.34 VOC total 43.83

This spreadsheet represents the proposed record keeping method and should not be used as permit limits

Trivial and Exempt
Activities

Attachment 3

PROPOSED TRIVIAL AND EXEMPT ACTIVITIES

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

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

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

Activities involving the cutting, shaping, or trimming of fiberglass, wooden or foam parts, where not performed by hand held tools (trivial list activity) or in an area utilizing a vacuum collector venting internal to the building are conducted under Good Work Practice Standards. Particulate emissions from these activities are minimized as discussed in Attachment 5, and the activities are considered exempt from permitting.

ATTACHMENT A

LIST OF ACTIVITIES THAT MAY BE TREATED AS "TRIVIAL"

The following types of activities and emissions units may be presumptively omitted from part 70 permit applications. Certain of these listed activities include qualifying statements intended to exclude many similar activities.

Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.

Air-conditioning units used for human comfort that do not have applicable requirements under title VI of the Act.

Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

Non-commercial food preparation.

Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.

Janitorial services and consumer use of janitorial products.

Internal combustion engines used for landscaping purposes.

Laundry activities, except for dry-cleaning and steam boilers.

Bathroom/toilet vent emissions.

Emergency (backup) electrical generators at residential locations.

Tobacco smoking rooms and areas.

Blacksmith forges.

Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit

modification¹

Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.

Portable electrical generators that can be moved by hand from one location to another.²

Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.

Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.³

Air compressors and pneumatically operated equipment, including hand tools.

Batteries and battery charging stations, except at battery manufacturing plants.

Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.⁴

Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

¹Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise required.

²"Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.

³Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production level thresholds. Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair of maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

⁴Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Drop hammers or hydraulic presses for forging or metalworking.

Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

Vents from continuous emissions monitors and other analyzers.

Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.

Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.

CO₂ lasers, used only on metals and other materials which do not emit HAP in the process.

Consumer use of paper trimmers/binders.

Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

Salt baths using nonvolatile slats that do not result in emissions of any regulated air pollutants.

Laser trimmers using dust collection to prevent fugitive emissions.

Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.⁵

Routine calibration and maintenance of laboratory equipment or other analytical instruments.

Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

⁵Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.

Hydraulic and hydrostatic testing equipment.

Environmental chambers not using hazardous air pollutant (HAP) gasses.

Shock chambers.

Humidity chambers.

Solar simulators.

Fugitive emission related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

Process water filtration systems and demineralizes.

Demineralized water tanks and demineralizer vents.

Boiler water treatment operations, not including cooling towers.

Oxygen scavenging (de-aeration) of water.

Ozone generators.

Fire suppression systems.

Emergency road flares.

Steam vents and safety relief valves.

Steam leaks.

Steam cleaning operations.

Steam sterilizers.

Additional Applicable
Requirements

ADDITIONAL APPLICABLE REQUIREMENTS

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

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

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

Toyota Marine Sports will continue to employ “good housekeeping” and other reasonable work practices to minimize the generation of odors and particulates, in particular from the woodworking and fiberglass/topcoat cutting, sanding and shaping activities.

Compliance Plan and Certification

Attachment 5

TOYOTA MARINE SPORTS
COMPLIANCE REPORT

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

Emissions Unit ID	Description of Emission Unit	Compliance Status
001	Fiberglass Boat building	In Compliance

Compliance Certification

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


Signature

4-27-00
Date

TOYOTA MARINE SPORTS COMPLIANCE PLAN

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

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

A. GENERAL FACILITY COMPLIANCE PLAN

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

1. In accordance with 62-210.370(3) FAC, the facility will submit an annual operating report to the appropriate FDEP district office by March 1 of the following year unless otherwise indicated by permit condition or FDEP request. The annual operating report will be completed on the form 62-210.900(5) FAC or as instructed by FDEP.
2. In accordance with 62-213.205 FAC, between January 15 and March 1 of each year, the facility will pay upon written notice from FDEP, an annual emissions fee in an amount determined by the procedures specified by the rule. The emissions fee will be submitted along with a completed form 62-213.900(1) FAC.
3. In accordance with 62-296.320(4)(c), the facility will take reasonable precautions to prevent emissions of unconfined particulate matter from the facility. Activities which can cause fugitive particulate emissions at the facility include vehicular movement, transportation of materials, and industrially related activities such as materials loading, unloading, storing, and handling. Reasonable precautions to be taken by the facility include:

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

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

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

4. Material usages, material compositions, and methods of use will be documented in accordance with the specific conditions of the construction permit.

B. CONTROL DEVICE/WORK PRACTICE PLAN

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

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

C. COMPLIANCE TESTING

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