

Cascio, Tom

To: Lyall, Arthur
Subject: PRE-DRAFT OF ACTION CRAFT

Art:

Overall, the permit looks fine. I do have one suggestion for readability -- you tend to mix the notation for specific conditions in some cases with headings for sub-topics -- see, for example the A.4.x., etc., part. It may be better to use a notation such as A.4.0 for the more general category condition, and A.4.1., A.4.2. when you need more specificity. Just a suggestion.

Tom

PRE - DRAFT

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul Guard, President
Action Craft, Inc.
2603 Andalusia Boulevard
Cape Coral, Florida 33909

Re: Lee County - AP
DRAFT Title V Permit No.: 0710128-003-AV
Action Craft, Inc.
EMA- Caloosahatchee to Lee Coast

Dear Mr. Guard:

One copy of the DRAFT Title V Air Operation Permit for Action Craft, Inc. located at 2603 Andalusia Boulevard, Cape Coral, Lee County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Ronald Blackburn, District Environmental Program Administrator, at the above letterhead address. If you have any other questions, please contact Arthur E. Lyall at (941) 332-6975, Ext. 130.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell
Director of
District Management

RWC/AEL/jw

Enclosures

In the Matter of an
Application for Permit by:

Action Craft, Inc.
2603 Andalusia Boulevard
Cape Coral, Florida 33909

Draft Permit No.: 0710128-003-AV
Action Craft, Inc.
Lee County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Action Craft, Inc. applied on September 22, 1999 to the permitting authority for a Title V air operation permit for the operation of a facility to manufacture fiberglass boats and tanks located at 2603 Andalusia Boulevard, Cape Coral, Lee County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, Florida Department of Environmental Protection, Post Office Box 2549, Fort Myers, Florida 33902-2549, (Telephone: 941/332-6975; Fax: 941/332-6969) within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the attached Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, (Telephone No.850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell
Director of
District Management

RWC/AEL/jw

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on _____ to the person(s) listed:

Mr. Paul Guard President

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed or as otherwise noted:

Tom John, Jr., P.E., Tom John Engineering, Inc.
Scott Sheplak, FDEP, Tallahassee (e-mail)
Mr. Gregg Worley, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Elizabeth Bartlett, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT
STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V DRAFT Permit No.: 0710128-003-AV
Action Craft, Inc.
Lee County

The State of Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit for the operation of a facility to manufacture fiberglass boats and fiberglass tanks located at 2603 Andalusia Boulevard, Cape Coral, Lee County. The applicant's name and address are: Action Craft Inc., 2603 Andalusia Boulevard, Cape Coral, Florida 33909.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the permitting authority's office Florida Department of Environmental Protection, Post Office Box 2549, Fort Myers, Florida 33902-2549. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, (Telephone No. 850/488-9730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

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

- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

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

Permitting Authority:

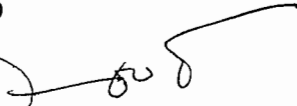
State of Florida Department of Environmental Protection
2295 Victoria Avenue, Suite 364W
Fort Myers, Florida 33901-3881
Telephone: (941) 332-6975
Fax: (941) 332-6969

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Arthur E. Lyall at the above address, or call (941) 332-6975, Ext. 127 for additional information.

Action Craft, Inc.
Action Craft
Facility ID No.: 0710128
Lee County

Initial Title V Air Operation Permit
DRAFT Permit No.: 0710128-003-AV

Permitting Authority:
Department of Environmental Protection
South District
Post Office Box 2549
Fort Myers, Florida 33902-2549
Telephone: 941/332-6975
Fax: 941/332-6969

Drafted on 

Initial Title V Air Operation Permit
DRAFT Permit No.: 0710128-003-AV

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Permittee:
Action Craft, Inc.

DRAFT Permit No.: 0710128-003-AV
Facility ID No.: 0710128
SIC Nos.: 3732
Project: Initial Title V Air Operation Permit

This permit is for the operation of the Action Craft, Inc. fiberglass boat and tank fabricating facility. This facility is located at 2603 Andalusia Boulevard, Cape Coral, Lee County; UTM Coordinates: Zone 17, 404.85 km East and 2953.67 km North; Latitude: 26° 42' 10" North and Longitude: 81° 57' 23" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-3, TITLE V CONDITIONS version dated 04/30/99

Effective Date: **DRAFT**
Renewal Application Due Date: **DRAFT**
Expiration Date: **DRAFT**

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

DRAFT

Richard W. Cantrell
Director of
District Management

RWC/AEL/jw

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of a fiberglass boat and fiberglass tank manufacturing plant. There is a portion of the facility where various boat molds are coated with gel coat, and then a fiberglass-resin coating is applied to build up the hull and deck parts. The same area can be used to fabricate fiberglass tanks for domestic and industrial use. In another part of the facility the boats are assembled and finished, including hardware and trim. The facility also makes the molds that are used for the boats and tanks.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the initial Title V permit application received September 22, 1999, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

ID No. Brief Description

-001 Fiberglass boat and fiberglass tank manufacturing facility

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received September 22, 1999

All permits listed in Appendix H-1

Additional Information Request dated October 13, 1999

Warning letter for incompleteness dated February 1, 2000

Additional Information Response received February 14, 2000

Construction Permit 0710128-002-AC dated October 2, 2000

Revision to Title V Application received September 11, 2000

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-3, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Unregulated Emissions Units and/or Activities. Not applicable.
[Rule 62-213.440(1), F.A.C.]
5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
6. Compliance Plan. Not applicable.
[Rule 62-213.440(2), F.A.C.]
7. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Insert any required systems]
[Rule 62-296.320(1)(a), F.A.C.; Proposed by applicant in the initial Title V permit application received September 22, 1999.
8. The permittee shall insure that all VOC's and organic solvents are emitted through the exhaust stack and vents (i.e. ensure a high capture efficiency). The building shall be operated at a slight negative pressure. Doors and windows shall be closed whenever possible. In the event that there are complaints about objectionable odor from nearby facilities, it will be necessary to review the permit and determine if it will be necessary to add control equipment or modify the exhaust system.
[Rule 62-296.320, F.A.C. and Construction Permit 0710128-001-AC dated April 29, 1999]

9. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of solvent materials.
[Rule 62-296.320, F.A.C.]

10. The permittee shall report any proposed process changes or VOC specie changes to the Department for prior approval.
[Rule 62-4.070(3), F.A.C.]

11. To the extent it is reasonable practicable, each source of VOC emissions shall be equipped with a close fitting hood or cover. Whenever possible, the hood or cover shall be closed.
[Rule 62-296.320, F.A.C.]

12. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

13. The permittee shall submit all compliance related notifications and reports required of this permit to the South District office.

Department of Environmental Protection
South District Office
Post Office Box 2549
Fort Myers, Florida 33902-2549
Telephone: 941/332-6975
Fax: 941/332-6969

14. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155, Fax: 404/562-9164

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U.

ID No. Brief Description

-001 Fiberglass boat and fiberglass tank manufacturing facility

This emission unit is a portion of the facility where various boat molds are coated with gel coat, and then a fiberglass-resin coating to build up the hull and deck parts. The same area can be used to fabricate fiberglass tanks for domestic and industrial use with similar pollution emissions. HAP and VOC emissions are the result of evaporation during the application stage and also the curing stage of the resins and gel coats.

There are no emission controls except Work Practice Standards.

{Permitting note(s): This facility is subject to the following rules; Rule 62-210.200, F.A.C. (Potential to Emit); Rule 62-4.070(3), F.A.C. (Reasonable Assurance); Rule 62-296.320 (General Pollutant Emission Limiting Standards). This facility is NOT subject to a case-by-case MACT standard.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The permittee has accepted a voluntary cap on emissions in lieu of any limit on production. This facility is limited to 40 tons per year of any HAP, any combination of HAPs, or the combination of all HAPs and VOCs.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Title V Permit application dated September 5, 2000]

A.2. Material usage. Under current regulations and Rules of the Department, material usage is not limited by speciation or HAPs content. The data in **Table A.2.1., A.2.2., and A.2.3.** are estimates of proposed material usage and HAPs content, and illustrate how compliance with the cap on emissions is to be demonstrated. Their most recent emission factors approved by the Department and the USEPA are to be used.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Title V Permit application dated September 5, 2000]

Table 1-1, Summary of Air Pollutant Standards and Terms

Action Craft, Inc.
 No.: 0710128-003-AV
 Cape Coral, Florida

Permit

y ID No.: 0710128

Facilit

This table summarizes information for convenience purposes only. This table does not supersede any of the terms of conditions of this permit.

E.U. ID No. **Brief Description:**
 001 Manufacture of Fiberglass Boats and Tanks

e	Fuel	Hours per Year	Allowable Emissions			Equivalent Emissions		Regulatory Citation(s)	See P Cond
			Standard(s)	lbs/hour	TPY	lbs/hour	TPY		
		8760					40	62-4.160(2) and 62-210.200 (PTE)	Section
		8760					40	62-4.160(2) and 62-210.200 (PTE)	Section
		8760					40	62-4.160(2) and 62-210.200 (PTE)	Section
					40			CAP to ESCPSD	

Equivalent Emissions listed are for informational purpose only.

Table A.2.1. Material Usage and Emission Estimates Summary.

BEST AVAILABLE COPY

Materials Composition Sheet

Operating Hours This Period: 5246

A. Raw Material Usages and Compositions					Form R	Y	Y	Y	Y	Y	Y	Y	Y
Type	Material	lbs/year used	lbs from UOM	Used/yr @UOM	CAS #	100-42-5	80-62-6	1330-20-7	131-11-3	101-68-8	108-88-3	78-93-3	75-45-
					HAP	styrene	MMA	xylene	dimethyl phthalate	i-cyanate	toluene	methylethyl ketone	F2-C-C
gelcoat	pearl grey	64950	1	64950		40.0%							
	cameo white	98	1	98		31.3%	4.0%						
	med gray sandable	395	1	395		35.9%							
	gray snook	1162	1	1162		33.6%	9.7%						
	crimson red	494	1	494		31.3%	9.5%						
	forest green	136	1	136		31.9%	9.1%						
	sea foam	45	1	45		28.7%	9.8%						
	vivid blue	0	1	0		32.8%	9.4%						
	fighting lady yellow	711	1	711		30.1%	9.0%						
	black armorcote	189	1	189		32.9%	9.4%						
	blue armorcote	281	1	281		31.6%	9.3%						
resin	odd lot 7323789	243160	1	243160		37.8%							
	FDA AOC 8-3P	8000	1	8000		49.0%							
	summer 732-3788	40540	1	40540		37.8%							
	winter 732-3787	20400	1	20400		37.6%							
	vinyl ester mvr8031	19350	1	19350		44.9%							
misc	Tf 100 wax solution	431.178	9.174	47		88.0%							
	monomer	304	1	304		100.0%							
	fairing cmpd	357.786	9.174	39		30.0%							
	duraglass	10	1	10		20.0%							
	patch aid	180.144	10.008	18		68.8%							
	bondo mr 01278	12204.8	45.036	271		15.0%						12%	
	orange tooling	405	1	405		42.1%	4.7%						
	light wt bonding cmpd	48851.6	45.87	1065		30.0%							
	catalyst	5998.67	1	5999					43%			3%	
	webbing solution	0	1	0							43%	4%	
	mold release TR 210	600	10	60				4%			80%		
	wax TR100	400	50	8									
	adhesive rubber	0	1	0							10%	30%	
	sealer glaze	50	10	5									
	partall paste	0	1	0				1%					
	lacquers	0	1	0									
	foam part A	15977	1	15977						100%			
	foam part B	13963	1	13963									

total resin + gelcoat tons 199.96 total materials 249.82 tons

Action Craft, Inc
Page 7

DRAFT Permit No.: 07

Table A.2.2

B. Usages of materials/species		total lbs	172209	307	21	2579	15977	480	16
Type	Material	styrene	MMA	xylene	dimethyl phthalate	i-cyanate	toluene	methylethyl ketone	
gelcoat	pearl grey	25980	0	0	0	0	0	0	

1. Manually operated equipment used for buffing, polishing, carving, cutting, drilling, routing, sanding, sawing, trimming, machining, surface grinding or turning.
2. Polishing and buffing operations, including rubbing compound
3. Vehicle service and maintenance equipment, and related materials
4. Welding Equipment including acetylene torch and related materials
5. Fire and Safety Equipment
6. Space Heaters
7. Office Activities
8. Maintenance of grounds and equipment
9. Forklift operations
10. Acetone usage
11. Soldering activities

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Appendix H-1, Permit History/ID Number Changes

Action Craft, Inc.
Cape Coral, Florida

Facility ID

Permit History (for tracking purposes):

<u>E.U.</u> <u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Date of Issue</u>	<u>Expiration D</u>
-001	Fiberglass boat and tank Mfg.	0710128-001-AC	30-April-1996	30-April-2001
		0710128-002-AC	2-October- 2000	2-October-2000

(if applicable) ID Number Changes (for tracking purposes):

From:

To:

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
- 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96. {Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Table 2-1, Summary of Compliance Requirements

Action Craft, Inc.
 No.: 0710128-003-AV
 Cape Coral, Florida

Permit

y ID No.: 0710128

Facilit

This table summarizes information for convenience purposes only. This table does not supersede any of the terms of conditions of this permit.

E.U. ID No. **Brief Description:**
 001 Manufacture of Fiberglass Boats and Tanks

	Fuels	Compliance Method	Testing Time Frequency	Frequency Base Date*	Min. Compliance Test Duration	CMS**	See Permi Condition
s		Record Keeping	Annual	1-Mar-96			Section III
		Record Keeping	Annual	1-Mar-96			Section III
		Emissions calculations	Monthly	1-Mar-96	Summation over 12 month period		Section III

quency base date is established for planning only; see Rule 62-297.310, F.A.C.

=] continuous monitoring system

Initial Title V Air Operation Permit
DRAFT Permit No.: 0710128-003-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. 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 permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of a fiberglass boat and fiberglass tank manufacturing plant.

This emission unit is a portion of the facility where gel coat is applied to various boat molds, and then fiberglass-resin coatings are applied to build up the hull and deck parts. The same area can be used to fabricate fiberglass tanks for domestic and industrial use with similar technique and pollution emissions. HAP and VOC emissions are the result of evaporation during the application stage and also the curing stage of the resins and gel coats. Other portions of the facility consist of assembly areas having fugitive emissions of VOCs and minor amounts of HAPs.

There are no emission controls except Work Practice Standards. Exhaust fans with stacks and operating the building at a negative pressure are required to control dispersion of pollutants.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received September 22, 1999, this facility is a major source of hazardous air pollutants (HAPs).

This facility is subject to the following rules; Rule 62-210.200, F.A.C. (Potential to Emit); Rule 62-4.070(3), F.A.C. (Reasonable Assurance); Rule 62-296.320 (General Pollutant Emission Limiting Standards). This facility is NOT subject to a case-by-case MACT standard.

The Title V application will suffice for the notification requirements of 40 CFR 63, Subpart VVVV (Proposed) when promulgated.

Permitted Capacity. The permittee has accepted a voluntary cap on emissions in lieu of any limit on production. This facility is limited to 40 tons per year of any HAP, any combination of HAPs, or the combination of all HAPs and VOCs in order to escape from PSD requirements.

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Work Practice Standards

A.4. Resin and Gel Coat Mixing and Storage

*NOT A
Specific Condition*

A.4.1. All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters (55 gallons) must have a cover with no visible gaps in place at all times.
[Rule 62-296.320, F.A.C.]

A.4.2. The work practice standard in paragraph **A.4.1.** does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

A.4.3. To demonstrate compliance with the work practice standard in paragraph **A.4.1.**, you must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
[Rule 62-4.070(3), F.A.C.]

A.4.4. You must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.
[Rule 62-4.070(3), F.A.C.]

A.5. Standards for Resin and Gel Coat Application Equipment

X

A.5.1. A high transfer efficiency airless spray gun shall be used to apply gel coat.
[Rule 62-296.320(1), F.A.C., and Title V Permit application dated September 5, 2000]

A.5.2. Resin shall be applied using non-atomizing application equipment (pressure-fed rollers and/or flow coaters)
[Rule 62-296.320(1), F.A.C., and Title V Permit application dated September 5, 2000]

A.6. Standards for Resin and Gel Coat Application Equipment Cleaning Operations

*COMPLIANCE
IS IN CONSIDERATION
NEED TO
CLARIFY
MEANING
+ Specific Conditions.*

brushes, rollers, and squeegees), you must use a cleaning solvent that contains no HAP. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

[Rule 62-4.070(3), F.A.C.]

A.6.2. You must store HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container. Cured resin or gel coat means resin or gel coat that has changed irreversibly from a liquid to a solid.

[Rule 62-4.070(3), F.A.C.]

A.6.3. Recycled cleaning solvents that contain trace amounts of HAP (5 percent HAP or less by weight) are considered to contain no HAP for the purposes of this permit.

A.7. To demonstrate compliance with the resin and gel coat application equipment cleaning standards:

1. Determine and record the HAP content of the cleaning solvents subject to the standards specified in **Specific Condition A.6.** using the methods specified in **Specific Condition A.8.**
2. Record the amount of cleaning solvents purchased as recycled cleaning solvents, and, therefore, may contain trace amounts of HAP.
3. At least once per month, you must visually inspect any containers holding HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

no HAP?

[Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.8.1. To determine the HAP content of the materials used in your open molding resin and gel coat operations, carpet and fabric adhesive operations, use EPA Method 311 of appendix A to 40 CFR part 63. You may use EPA Method 311, an alternative method as provided in **Specific Condition A.8.2.**, or any other reasonable means for determining the HAP content. Other reasonable means of determining HAP content include, but are not limited to, a material safety data sheet (MSDS) or a manufacturer's hazardous air pollutant data sheet as defined in Sec. 63.5779. You are not required to test the materials that you use, but the Administrator may require a test using EPA Method 311 (or an approved alternative method) to confirm the reported HAP content. If the results of an analysis by EPA Method 311 are different from the HAP content determined by another means, the EPA Method 311 results will govern compliance determinations, except as provided in **Specific Condition A.8.2.**

[Rule 62-4.070(3), F.A.C.]

has been approved by the Administrator according to Sec. 62.7(1). The Administrator will approve alternative methods on a case-by-case basis. A formal request for an Alternate Sampling Procedure (ASP) shall be made to the Bureau of Air Monitoring, and approval is required before using any other than approved methods for determination of HAP content.
[Rule 62-297.620, F.A.C.]

A.8.3. If HAP content data are reported by a material supplier or manufacturer as a range, the upper limit of that range will be used for determining compliance.
[Rule 62-4.070(3), F.A.C.]

Recordkeeping and Reporting Requirements

A.9.1. Records of the material usage and HAP emissions from the five open molding operations listed below shall be kept at the site

- (1) Production resin.
- (2) Pigmented gel coat.
- (3) Clear gel coat.
- (4) Tooling resin.
- (5) Tooling gel coat.

A.9.2. The permittee shall keep records as specified below for each resin and gel coat.
(i) Hazardous air pollutant content for each individual component
(ii) Amount of material used per month.
(iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

A.10.1. Your records must be readily available and in a form so they can be easily inspected and reviewed.
[Rule 62-4.070(3), F.A.C.]

A.10.2. You must keep each record for 5 years following the date that each record is generated.
[Rule 62-213.440(1)(b)2.b., F.A.C.]

A.10.3. You must keep each record on site for at least 2 years after the date that each record is generated. ~~You can keep the records offsite for the remaining 3 years.~~
[Rule 62-4.070(3), F.A.C.]

A.10.4. You can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

A.11. Annual Operating Report Pursuant to Rule 62-210.370(3), F.A.C. Action Craft, Inc. shall submit an Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) to the Department (DEP) District office annually by March 1 of the following year unless otherwise indicated by permit condition or Department request.
[Rule 62-210.370(3), F.A.C.]

Fix nonatomized

Should be recorded.

A-10.0
A-10.1
etc.

Table A.2.3.

C. Species Emissions		total tons	15.34	0.12	0.01	0.00	0.00	0.24	0.82	0.15
		total lbs	30690	230	21	0	2	480	1645	305
Type	Material		styrene	MMA	xylene	phthalate	dimethyl i-cyanate	toluene	methylethyl ketone	F2-C-C
gelcoat	pearl grey	14029	0	0	0	0	0	0	0	0
	cameo white	15	3	0	0	0	0	0	0	0
	med gray sandable	68	0	0	0	0	0	0	0	0
	gray snook	187	85	0	0	0	0	0	0	0
	crimson red	74	35	0	0	0	0	0	0	0
	forest green	21	9	0	0	0	0	0	0	0
	sea foam	6	3	0	0	0	0	0	0	0
	vivid blue	0	0	0	0	0	0	0	0	0
	fighting lady yellow	103	48	0	0	0	0	0	0	0
	black armorcote	30	13	0	0	0	0	0	0	0
	blue armorcote	43	20	0	0	0	0	0	0	0
	resin	odd lot 7323789	10111	0	0	0	0	0	0	0
FDA AOC 8-3P		470	0	0	0	0	0	0	0	0
summer 732-3788		1686	0	0	0	0	0	0	0	0
winter 732-3787		844	0	0	0	0	0	0	0	0
vinyl ester mvr8031		1043	0	0	0	0	0	0	0	0
Misc.	Tf 100 wax solution	46	0	0	0	0	0	0	0	0
	monomer	36	0	0	0	0	0	0	0	0
	fairing cmpd	12	0	0	0	0	0	0	0	0
	duraglass	0	0	0	0	0	0	0	0	0
	patch aid	15	0	0	0	0	0	0	0	0
	bondo mr 01278	220	0	0	0	0	0	0	1465	0
	orange tooling	20	14	0	0	0	0	0	0	0
	light wt bonding cmpd	1612	0	0	0	0	0	0	0	0
	catalyst	0	0	0	0	0	0	0	180	0
	webbing solution	0	0	0	0	0	0	0	0	0
	mold release TR 210	0	0	21	0	0	0	480	0	0
	wax TR100	0	0	0	0	0	0	0	0	0
	adhesive rubber	0	0	0	0	0	0	0	0	0
		sealer glaze	0	0	0	0	0	0	0	0
partall paste		0	0	0	0	0	0	0	0	0
lacquers		0	0	0	0	0	0	0	0	0
foam part A		0	0	0	0	0	2	0	0	0
foam part B		0	0	0	0	0	0	0	0	0

Emission Factors			
HAPs	35%	38%	42%
resin	0.11	0.11	0.12
gelcoat	0.48	0.51	0.54
MMA		0.75	
Reactive, low V.P.		0.0001	
freon		0.1	
gen VOC		1	

Emission Summary		
	lbs	tons
styrene	30690	15.34
HAP	33390	16.69
VOC	36275	18.14

note: acetone is exempt from VOC emission inventory

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	black armorcote	62	18	0	0	0	0	
	blue armorcote	89	26	0	0	0	0	
resin	odd lot 7323789	91914	0	0	0	0	0	
	FDA AOC 8-3P	3920	0	0	0	0	0	
	summer 732-3788	15324	0	0	0	0	0	
	winter 732-3787	7670	0	0	0	0	0	
	vinyl ester mvr8031	8688	0	0	0	0	0	
misc	Tf 100 wax solution	379	0	0	0	0	0	
	monomer	304	0	0	0	0	0	
	fairing cmpd	107	0	0	0	0	0	
	duraglass	2	0	0	0	0	0	
	patch aid	124	0	0	0	0	0	
	bondo mr 01278	1831	0	0	0	0	0	14
	orange tooling	170	19	0	0	0	0	
	light wt bonding cmpd	14655	0	0	0	0	0	
	catalyst	0	0	0	2579	0	0	1
	webbing solution	0	0	0	0	0	0	
	mold release TR 210	0	0	21	0	0	480	
	wax TR100	0	0	0	0	0	0	
	adhesive rubber	0	0	0	0	0	0	
	sealer glaze	0	0	0	0	0	0	
	partall paste	0	0	0	0	0	0	
	lacquers	0	0	0	0	0	0	
	foam part A	0	0	0	0	15977	0	
	foam part B	0	0	0	0	0	0	