

E-mailed on November 2, 2000.

To: Rita Felton-Smith

From : Tom Cascio

**Subject: Predraft Review of Seabring Marine Industries
(0750082-005-AV)**

Overall, the permit looks excellent. My only comment refers to using the term “common conditions” as a sub-section of the permit. This technique is normally used as an “umbrella” to tie a group of specific conditions to different emissions units (EUs). It appears that the permit only includes one EU.



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

Memorandum

TO: Barbara Boutwell, Title V Section, Tallahassee
THRU: Christopher L. Kirts, P.E., Northeast District Air Program Administrator
FROM: Rita Felton-Smith, Permit Engineer
DATE: 10/24/00
RE: pre DRAFT Title V Permit

Review By 0

11/6/00

The below Title V permit and associated documents are made available for your review/comment prior to issuance.

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File</u>
Seabring Marine Industries Monterey Boats – Williston Cruiser Plant	Levy	email	0750082d.doc 07500821.xls 07500822.xls 0750082h.doc 0750082.sob tv-3.doc a-1.doc

*WOULDN'T USE FROM "COMMON CONDITIONS"
ONLY ONE EMISSIONS UNIT?
ALTHOUGH A NUMBER OF EMISSIONS POINTS ARE IDENTIFIED.*

STATEMENT OF BASIS

Seabring Marine Industries, Inc.
Monterey Boats – Williston Cruiser Plant
Facility ID No.: 0750082
Levy County

Title V Air Operation Permit
Draft Permit No.: 0750082-005-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.

Seabring Marine Industries, Inc. is a fiberglass boat manufacturing facility. Process operations include construction of fiberglass, woodworking and material storage and handling.

Emission Unit 001 identifies Fiberglass boat operation consisting of main building stack EP1, two (2) gelcoat booth stacks, EP2 and EP3, and Wood Materials Processing dust collector, EP4.

EP1 consists of four horizontal exhaust fans, serving the lamination area, ducted into a single five-foot diameter stack with an increased discharge height of 30 feet above grade. Each of the four exhaust ducts have been fitted with fiber filters.

EP2 and EP3 consist of two three-foot diameter stacks discharging at an elevation of 20 feet above grade. Each of the two vents are fitted with a fiber filter.

EP4 consists of the wood materials processing with particulate matter emissions controlled by a dust collector.

On April 2, 1999, the facility was issued construction permit No. 0750033-001-AC for relocation of the facility from its previous location in Archer, Alachua County to its present location in Williston, Levy County.

On April 20, 2000, the facility received a construction permit, No. 0750033-002-AC, for the modification of the existing manufacturing process to allow for an increase in raw material usage and facility emissions. Estimated potential emissions from this modification of total VOCs, Styrene, and total HAPs will be 230, 116.3, and 145 tons per year, respectively. This modification required a Case-by-Case MACT Determination, which was issued on September 9, 1999.

The issuance of this Title V permit will replace and supercede Title V Permit No. 0010082-002-AV.

Based on the Title V permit application received May 26, 2000, this facility is a major source of hazardous air pollutants (HAPs).

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

Seabring Marine Industries, Inc.
 Monterey Boats - Williston Cruiser Plant

FINAL Permit No.: 0750082-005-AV
 Facility ID No.: 0750082

Applicable upon compliance with Condition B.17. of Referenced Permit.

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

E.U. ID No. Brief Description

001 Fiberglassboat operation of main building, stack E1 and two (2) gelcoat booths, stacks E2 and E3

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions		Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	TPY	lbs./hour	TPY		
VOC's		8760		228.0			Previous Construction Permit	III.B.9.
Styrene		8760		117.0			Previous Construction Permit	III.B.10.
Visible Emissions		8760	5% Opacity				Previous Construction Permit	III.B.11.

Notes:

* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 00100821.xls]

Table 2-1, Summary of Compliance Requirements

Seabring Marine Industries, Inc.
 Monterey Boats - Williston Cruiser Plant

FINAL Permit No.: 0750082-005-AV
Facility ID No.: 0750082

Applicable upon compliance with Condition B.17. of Referenced Permit.

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

E.U. ID No. Brief Description

001 Fiberglassboat operation. of main building, stack E1 and two (2) gelcoat booths, stacks E2 and E3, and Wood Working Operations.

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	
						CMS**	See permit condition(s)
VOCs		Recordkeeping	Semi-Annual	Monthly	N/A	N/A	III.B.15. - B.16.
Styrene		Recordkeeping	Semi-Annual	Monthly	N/A	N/A	III.B.15. - B.16.
Visble Emissions		DEP Method 9	Annual	2-Jun-00	30 Minutes		III.B. 12 - B.14.

Notes:

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Seabring Marine Industries, Inc.
Monterey Boats – Williston Cruiser Plant

Facility ID No.: 0750082
Levy County

Initial Title V Air Operation Permit
DRAFT Permit No.: 0750082-005-AV

Permitting Authority:
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: 904/448-4310
Fax: 904/448-4363

Compliance Authority:
Department of Environmental Protection
Northeast District Branch Office
101 NW 75 Street, Suite 3
Gainesville, Florida 32607-1609
Telephone: 352/333-2850
Fax: 352/333-2856
Drafted in October 2000

Initial Title V Air Operation Permit
DRAFT Permit No.: 0750082-005-AV

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Permittee:
Seabring Marine Industries, Inc.
Williston Cruiser Plant

DRAFT Permit No.: 0750082-005-AV
Facility ID No.: 0750082
SIC Nos.: 37
Project: Initial Title V Air Operation Permit

This permit is for the operation of the air sources at Seabring Marine Industries, Inc.. This facility is located at 1579 SW 18th Street, Williston, Levy County, Florida; UTM Coordinates: Zone 17, 356.9 km East and 3249.2 km North; Latitude: 29° 21' 55.6" North and Longitude: 82° 28' 27.5" 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, 62-204, 62-210, 62-212, 62-296 and 62-297. 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 TV-3, TITLE V CONDITIONS (version dated 04/30/99)

Effective Date:
Renewal Application Due Date:
Expiration Date:

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK:RFS

Section I. Facility Information

Subsection A. Facility Description.

Seabring Marine Industries, Inc. is a fiberglass boat manufacturing facility. Process operations include construction of fiberglass, woodworking and material storage and handling.

The facility has relocated from its previous location in Archer, Alachua County to its present location in Williston, Levy County.

Based on the Title V permit application received **May 26, 2000**, 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 operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – Main Building Stack, EP2 and EP3 - two (2) gelcoat booth stacks, and EP4 - Wood Materials Processing with particulate matter emissions controlled by a dust collector.
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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:

Title V Permit Application received May 26, 2000

Request for Additional Information dated July 24, 2000.

Additional Information received September 25, 2000.

Case-by-Case MACT Determination dated September 9, 1999

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-3, TITLE V CONDITIONS is a part of this permit.

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.** The permittee shall not 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. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable ; and

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. **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. The permittee shall continue to use the operational practices listed below:

1. All solvents and raw material are stored and handled in appropriate containers equipped with tight fitting lids.
2. Good housekeeping and training personnel in their respective task(s) at the facility.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 0750033-001-AC]

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

6. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: the application of dust suppressants, the paving and maintenance of roads, parking areas and yards, the use of hoods, fans, filters, and similar equipment to contain, capture and or/ vent particulate matter.

[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit 0750033-001-AC]

7. When MACT standard(s) for the fiberglass boat manufacturing industry are promulgated, this facility shall comply with all the applicable requirements.

At such time as the U.S. EPA promulgates final regulations in 40 CFR 63 establishing standards for the Boat Manufacturing Industry, and the Department adopts such standards into its rules, the permittee may provide reasonable assurances of its ability to comply with the "new source" standards and may then, for purposes of MACT compliance, comply with any less restrictive specific provision of the promulgated MACT for "new" sources rather than the more restrictive specific provisions of the case-by-case MACT. However, if this change results in a modification, as defined by the State Implementation Plan (S.I.P.), it shall be processed as a permit revision in accordance with the S.I.P.

[F.A.C. Rule 62-213.440(1); Construction Permit 0750033-002-AC]

{Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4. F.A.C. (condition 58. of APPENDIX TV-3, TITLE V CONDITIONS.)}

8. 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.]

9. The permittee shall submit all compliance-related notifications and reports required of this permit to the Department's Northeast District Branch Office.

Department of Environmental Protection
Northeast District Branch Office
101 NW 75 Street, Suite 3
Gainesville, Florida 32607-1609
Telephone: 352/333-2850
Fax: 352/333-2856

10. Any reports, data, notifications, certifications, and requests are 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: 404/562-9163 or 404/562-9164

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

Section III. Emission Unit(s) and Conditions

Subsection A. Common Conditions

*normally used
with AIRBORNE
EMISSIONS UNITS*

E.U.

ID No. Brief Description

-001 Fiberglass boat operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – Main Building Stack, EP2 and EP3 - two (2) gelcoat booth stacks, and EP4 - Wood Materials Processing with particulate matter emissions controlled by a dust collector.

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

A.0. Conditions A.2 through A. 12. shall become null and void upon the date the permittee submits written notification of the facility modification as specified in Condition B.17. At that time, Conditions B.1. through B.18. shall become effective.
[Rule 62-4.070(3), F.A.C.]

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. The hours of operation for these emissions units shall not exceed 24 hours/day, 7 days/week, 52 weeks/year and 8760 hours/year, i.e. are not restricted.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction permit 0750033-001-AC]

A.2. Capacity. The percent (%) of available monomer (styrene) shall not exceed the following:

Resin Non-Spray Lay-up - 50%
Tooling/Pigmented/Base Gelcoats - 45%

[Rule 62-4.160(2), 62-210.200(PTE), F.A.C., Additional Information Response dated 09-25-00]

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.}

A.3. Volatile Organic Compounds. Total VOC emissions (including styrene) shall not exceed 28.0 tons per year.
[Construction Permit 0750033-001-AC]

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

A.4. Styrene. Styrene emissions shall not exceed 21.2 tons per year.
 [Construction Permit 0750033-001-AC]

<u>Application Method</u>	<u>NVS</u> Monomer 35%	<u>NVS</u> Monomer 38%	<u>NVS</u> Monomer 42%	<u>NVS</u> Monomer 45%	<u>NVS</u> Monomer 50%
Resin Non-Spray Lay-up	11%	11%	12%	12%	13%
Tooling/Pigmented/ Based Gelcoats	48%	51%	54%	56%	---

Styrene emissions shall be determined using the following equations:

$$\text{Emissions, in tons} = \text{Amount of material} \times \text{styrene monomer content (percent/100)} \\
 \times \text{emission factor (percent/100, from the table below)} \\
 \times \text{ton/2000 pounds}$$

The applicable emission factor shall be interpolated from the above table, in conjunction with the percent of available non-vapor suppressed (NVS) monomer in the resin/gelcoat.
 [Additional Information Response dated 09-25-00]

A.5. Visible Emissions. Visible emissions from Emission Point 04 shall not exceed 5% Opacity.
 [Rule 62-297.620(4); Air Construction Permit 0750033-001-AC]

not a common condition

A.6. Method of Operation (Exhaust Fans). The lamination area exhaust stack fan shall be run at all times, including nights and weekends (with the exception of when plant operations are to be ceased for one week or greater), in order to prevent the build-up of odor causing pollutants.
 [Construction Permit 0750033-001-AC]

A.7. Method of Operation (Exhaust Fans). The gelcoat area exhaust stack fans shall be run during all gelcoat activities.
 [Construction Permit 00750033-001-AC]

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. Visible Emissions. The test method for visible emissions shall be DEP Method 9, as incorporated in Chapter 62-297, F.A.C. The testing frequency shall be annually.
 [Rule 62-297.310(7)(a)4.]

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

A.9. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken. In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rules 62-297.310, and 62-297.401, F.A.C.]

A.10. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling port shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish

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

Condition A.10. Continued:

the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

Recordkeeping and Reporting Requirements

A.11. Recordkeeping. Compliance shall be determined by recording the following data for each material used that contains VOC (including Styrene)..

Quantity	
<ul style="list-style-type: none"> • Gallons of Material Used (Plant usage logs shall be maintained) 	
Emissions Factors	
<ul style="list-style-type: none"> • Density of Material in Pounds per Gallon (Manufacturer specification's data shall be maintained) 	<ul style="list-style-type: none"> • Pollutant Factor (Percentage by Weight) • Time Factor (Hours)
Emissions	
<ul style="list-style-type: none"> • Hourly VOC and Styrene Emissions in pounds per hour • Total Cumulative VOC and Styrene Emissions (Tons) 	

Styrene emissions shall be determined using the same method as stated in Specific Condition A.4.

[Permit 0750033-001-AC]

A.12. Reporting. A report of the data required by Condition A.9. shall be submitted to the Northeast District Office on a quarterly basis. All quarterly reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

<u>Reporting Period</u>	<u>Report Due Date</u>
January - March	May 15
April - June	August 15
July - September	November 15
October - December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the October-December quarterly report.

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

Section III. Emission Unit(s) and Conditions

Subsection B. Common Conditions

E.U.

ID No. Brief Description

-001 Fiberglass boat operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – Main Building Stack, EP2 and EP3 - two (2) gelcoat booth stacks, and EP4 - Wood Materials Processing with particulate matter emissions controlled by a dust collector.

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

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The maximum average total HAP content for the following materials shall not be exceeded: [Case-by-Case MACT Determination dated September 10, 1999]

MATERIAL	MAXIMUM WEIGHTED AVERAGE TOTAL HAP CONTENT
Production Resins	35% NOTE (1)
Pigmented Gel Coats Base Gel Coats	33% NOTE (1)
Sprayed Tooling Resins NOTE (2)	30% NOTE (1)
Non-atomized Tooling Resins NOTE (2)	39% NOTE (1)
Tooling Gel Coats NOTE (2)	40% NOTE (1)

NOTE (1) Based on Manufacturer's Safety Data (MSD) Sheets

NOTE (2) Used for making and repairing of molds.

[Rule 62-4.160(2), 62-210.200(PTE), F.A.C., Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated 9-10-99]

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

B.2. Method of Operation (Materials).

1. The use of carpet and fabric adhesives that contain any HAPs is prohibited.
2. The permittee shall use resin and gel coat cleaning solvents that do not contain any HAPs unless the facility elects to use solvent cleaning machines which comply with the requirements of 40 CFR 63 Subpart T- National Emission Standards for Halogenated Solvent Cleaning.

[Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated September 10, 1999]

B.3. Method of Operation (Application). The Permittee shall apply production resins with only non-atomizing application equipment.

[Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated September 10, 1999]

B.4. Method of Operation (Exhaust Fans). A lamination area exhaust stack fan shall be run at all times, including nights and weekends (with the exception of when plant operations are to be ceased for one week or greater), in order to prevent the build-up of odor causing pollutants. The Department may require the running of additional fan(s), if deemed necessary.

[Construction Permit 0750033-002-AC]

B.5. Method of Operation (Exhaust Fans). The gelcoat area exhaust stack fans shall be run during all gelcoat activities.

[Construction Permit 0750033-002-AC]

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.}

B.6. The Marine coatings used for bottom coatings and other exterior coatings (except for gelcoats, resins, adhesives, the coating of wood parts and coating used in a boat's enclosed cabin) shall be in compliance with the requirements of 40 CFR 63, Subpart II – National Emission Standards for Shipbuilding and Ship Repair (Surface Coating).

It is noted that **1)** Incidental use of subject coating materials, of less than 52.8 gallons per coating and/or a total of 264 gallons per year, is exempt pursuant to 40 CFR Part 63, Subpart II, **2)** Coatings applied with hand-held, non-refillable, aerosol containers or to unsaturated polyester resin (i.e. fiberglass lay-up) coatings are not subject to the requirements of 40 CFR Part 63, Subpart II, and **3)** Coatings applied to suitable prepared fiberglass surfaces for protective or decorative purposes are subject to the requirements of 40 CFR Part 63, Subpart II.

[Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated September 10, 1999]

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

B.7. The Permittee shall comply with either of the following provisions of 40 CFR Part 63, Subpart JJ, when deemed applicable:

- a. Use carpentry adhesives with a Volatile Hazardous Air Pollutant (VHAP) content of no greater than 0.2 lb VHAP/lb solids (0.2 kg VHAP/kg solids) as applied; or
- b. Use of a control system that complies with the requirements of 40 CFR 63.804(e)(2) [National Emission Standards for Wood Furniture Manufacturing Operations, 40 CFR Part 63, Subpart JJ].

It is noted that 1) Aerosol adhesives and contact adhesives applied to nonporous substrates are excluded, and 2) Incidental use of wood furniture finishing materials and adhesives, of less than 100 gallons per month is exempt pursuant to 40 CFR Part 63, Subpart JJ.

[Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated September 10, 1999]

B.8. The HAP emissions from the following are not required to be controlled:

- Mold sealing, releasing, stripping, and repair materials
- The coating processes for exterior wood parts

[Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated September 10, 1999]

B.9. Volatile Organic Compounds. Total VOC emissions (including styrene) shall not exceed 228 tons per year.

[Construction Permit 0750033-002-AC]

B.10. Styrene. Styrene emissions shall not exceed 117 tons per year.

Styrene emissions shall be calculated as 11% of the available monomer for the resins; 48% of the available monomer for the pigmented and base gelcoats; and, 51% of the available monomer for the tooling gelcoats. The total styrene content of each material shall be calculated based on the maximum weight percent stated in the MSDS for that particular material.

[Construction Permit 0750033-002-AC]

B.11. Visible Emissions. Visible emissions from Emission Point 04 shall not exceed 5% Opacity.

[Rule 62-297.620(4); Air Construction Permit 0750033-002-AC]

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.}

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

B.12. Visible Emissions. The test method for visible emissions shall be DEP Method 9, as incorporated in Chapter 62-297, F.A.C. The testing frequency shall be annually.
[Rule 62-297.310(7)(a)4.]

B.13. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken. In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rules 62-297.310, and 62-297.401, F.A.C.]

B.14. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling port shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

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

Condition B.14. Continued:

- b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

B.15. Recordkeeping. The permittee shall compile records on a monthly basis and maintain those records for a minimum of 5 years. The records shall include the following as a minimum:

- a. The identification of all coating used (resins, gelcoats, marine coating, adhesives, etc.),
- b. Seabring shall use the highest HAP/VOC content value from its products MSD sheets when ranges are provided, in all calculations,
- c. Certification of the as-supplied HAP/VOC content of each batch of coating, if different from Item b. above,
- d. Certification of the as-applied HAP/VOC content of each batch of coating, if different from Item b. above,
- e. The amount of each coating applied,
- f. The amount of thinner use, and
- g. Determination of compliance with the appropriate HAP limit which shall be based on a 3 month-rolling average.

[Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated September 10, 1999]

B.16. Reporting. The Permittee shall submit a semi-annual compliance report within 60 days of each 6-month period. The first report shall be submitted no later than 60 days following commencement of operation as established by the written notification date in Condition B.17.

[Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated September 10, 1999]

B.17. Notification. The Permittee shall submit written notification to the Northeast District Office as soon as practicable, but no later than 30 days prior to commencement of the modification of the existing manufacturing process.

[Construction Permit 0750033-002-AC]

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

B.18. The permittee may request alternative emissions standards in lieu of the above standards. In order for the FDEP to approve such a request, the permittee must satisfy applicable air permitting requirements, not limited to, but including the following:

- a. Provided reasonable assurance of the resulting emissions being equivalent to FDEP's MACT level;
- b. Propose a method of demonstrating compliance; and,
- c. Propose a mean of demonstrating on-going compliance.

[Construction Permit 0750033-002-AC; Case-by-Case MACT Determination dated September 10, 1999]

Appendix H-1, Permit History/ID Number Changes

Seabring Marine Industries, Inc.
Monterey Boats – Williston Cruiser Plant

Facility ID No.: 00750082

Permit History (for tracking purposes):

E.U.	<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
	001	Fiberglass boat manufacturing	AC01-211357	5/28/93	9/28/93		
	001	Fiberglass boat manufacturing	0010082-001-AC	1/29/97	8/11/97		
	001	Fiberglass boat manufacturing	0010082-002-AV	8/21/98	8/21/03		
	001	Fiberglass boat manufacturing	0750033-001-AC	4/2/99	9/2/00		
	001	Fiberglass boat manufacturing	0750033-002-AC	4/20/00	7/20/03		

ID Number Changes (for tracking purposes):

From: Facility ID No.: 31JAX010082	To: Facility ID No.: 0010082
Facility ID No.: 0010082	To: Facility ID No.: 0750033
Facility ID No.: 0750033	To: Facility ID No.: 0750082

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}

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 02/05/97)

Abbreviations and Acronyms:

°F: Degrees Fahrenheit
BACT: Best Available Control Technology
CFR: Code of Federal Regulations
DEP: State of Florida, Department of Environmental Protection
DARM: Division of Air Resource Management
EPA: United States Environmental Protection Agency
F.A.C.: Florida Administrative Code
F.S.: Florida Statute
ISO: International Standards Organization
LAT: Latitude
LONG: Longitude
MMBtu: million British thermal units
MW: Megawatt
ORIS: Office of Regulatory Information Systems
SOA: Specific Operating Agreement
UTM: Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
(version dated 02/05/97) (continued)**

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering