



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

April 6, 2000

RECEIVED

APR 11 2000

BUREAU OF AIR REGULATION

Mr. F.J. Gombash, President
Seabring Marine Industries, Inc.
212 Magnolia Street
Archer, Florida 32618

Dear Mr. Gombash:

Levy County - AP
Seabring Marine Industries, Inc.
Monterey Boats - Williston Cruiser Plant
Draft Air Construction Permit No. 0750033-002-AC
Specific Condition Permit Language

One copy of the "DRAFT PERMIT DETERMINATION" for Seabring Marine Industries, Inc., **Monterey Boats** - Williston Cruiser Plant, located at the Williston Airport Industrial park, off Highway 41, Williston, Levy County, is enclosed. Please consider this as a courtesy letter to inform you of the DRAFT permit language changes as a result of the comments submitted by Koogler & Associates Environmental Services on your behalf (letter dated November 17, 1999 and email dated March 27, 2000).

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Christopher L. Kirts, P.E. at the above letterhead address. If you have any other questions, please contact Rita Felton-Smith at (904) 448-4310, extension 237.

Sincerely,

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

CLK:RFS

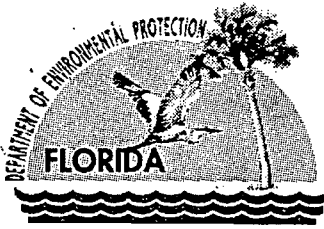
Enclosures

copy furnished to:

Pradeep Raval, Koogler & Associates
Cindy Phillips, P.E., DARM

"More Protection, Less Process"

Printed on recycled paper.



Department of Environmental Protection

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Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

PERMITTEE:

Seabring Marine Industries, Inc.
212 Magnolia Street
Archer, Florida 32618

I.D. Number: 0750033
Permit/Cert Number: 0750033-002-AC
Date of Issue:
Expiration Date:
County: Levy
UTM: E-(17)356.9 ; N-3249.2
Project: Monterey Boats -Williston
Cruiser Plant

4th Draft Permit

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-204, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For modification of the existing manufacturing process to allow for an increase in raw material usage and facility emissions. Estimated potential emissions of total VOCs, Styrene, and total HAPs will be 230, 116.3, and 145 tons per year, respectively.

Emission Unit is identified as follows:

Emissions Unit 001:	Fiberglass boat manufacturing facility.
Emissions Point 01:	Wood Materials Processing with particulate matter emissions controlled by a dust collector.

Located Williston Airport Industrial Park, off Highway 41, Williston, Levy County, Florida.

In accordance with:

Application For Air Permit - Long Form received 04-06-99
Additional Information received 06-16-99
Additional Information received 06-28-99
MACT Determination dated 09-10-99
Comments received 11-17-99
Comments received 03-27-00

PERMITTEE:

Seabring Marine Industries, Inc.
212 Magnolia Street
Archer, Florida 32618

I.D. Number: 0750033
Permit/Cert: 0750033-002-AC
Date of Issue:
Expiration Date:

4th Draft Permit

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys not title to land or water; does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any record that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

PERMITTEE:

Seabring Marine Industries, Inc.
212 Magnolia Street
Archer, Florida 32618

I.D. Number: 0750033
Permit/Cert: 0750033-002-AC
Date of Issue:
Expiration Date:

4th Draft Permit

GENERAL CONDITIONS:

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Compliance with New Source Performance Standards (NSPS)
- Compliance with National Emission Standards for Hazardous Air Pollutants (MACT)

PERMITTEE:

Seabring Marine Industries, Inc.
212 Magnolia Street
Archer, Florida 32618

I.D. Number: 0750033
Permit/Cert: 0750033-002-AC
Date of Issue:
Expiration Date:

4th Draft Permit

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:
 Seabring Marine Industries, Inc.
 212 Magnolia Street
 Archer, Florida 32618

I.D. Number: 0750033
 Permit/Cert: 0750033-002-AC
 Date of Issue:
 Expiration Date:

4th Draft Permit

SPECIFIC CONDITIONS:

1. The I.D. No. and Project name for this source shall be used on all correspondence.
2. The hours of operation are not restricted (24 H/D; 7 D/W; 52 W/Y; 8760 H/Y) per calendar year. [Rule 62-210.200(228), F.A.C., Definitions - Potential To Emit (PTE)]
3. The following maximum average total HAP content for the materials listed below shall not be exceeded without prior Department approval [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.

4. The permittee shall only use carpet and fabric adhesives that do not contain any HAPs. [MACT Determination dated September 10, 1999]
5. 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. [MACT Determination dated September 10, 1999]
6. The Permittee shall only apply production resins with non-atomizing application equipment. [MACT Determination dated September 10, 1999]
7. The permittee shall comply with either of the following provisions of 40 CFR Part 63, Subpart JJ, when 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].

NOTES:

- Aerosol adhesives and contact adhesives applied to nonporous substrates are excluded.
- 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.

[MACT Determination dated September 10, 1999]

PERMITTEE:

Seabring Marine Industries, Inc.
212 Magnolia Street
Archer, Florida 32618

I.D. Number: 0750033
Permit/Cert: 0750033-002-AC
Date of Issue:
Expiration Date:

4th Draft Permit

SPECIFIC CONDITIONS:

8. 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).

NOTES:

- 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.
- 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.
- Coatings applied to suitable prepared fiberglass surfaces for protective or decorative purposes are subject to the requirements of 40 CFR Part 63, Subpart II.

[MACT Determination dated September 10, 1999, 40 CFR Part 63, Subpart II Applicability Standards]

9. The HAP emissions from mold sealing, releasing, stripping, and repair materials are not required to be controlled. [MACT Determination dated September 10, 1999]

10. The HAP emissions from the coating processes for exterior wood parts are not required to be controlled. [MACT Determination dated September 10, 1999]

11. 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.

[MACT Determination dated September 10, 1999]

12. The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	LOCATION I.D.	EMISSION RATE TPY	FAC RULE
Styrene (H163)	Emissions Unit 001	117 NOTE (1)	--- NOTE (2)
Volatile Organic Compounds NOTE (3)	Emissions Unit 001	228 NOTE (1)	--- NOTE (2)
Visible Emissions	Emission Point 01	5% Opacity	62-297.620(4)

NOTE (1) Styrene emissions are 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 is calculated based on the maximum weight percent stated in the MSDS.

NOTE (2) Rule 62-210.200(228), F.A.C., Definitions - Potential To Emit (PTE)

NOTE (3) Emissions from all VOCs and styrene emissions combined.

PERMITTEE:
 Seabring Marine Industries, Inc.
 212 Magnolia Street
 Archer, Florida 32618

I.D. Number: 0750033
 Permit/Cert: 0750033-002-AC
 Date of Issue: **4th Draft Permit**
 Expiration Date:

SPECIFIC CONDITIONS:

13. 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:
- The identification of all coating used (resins, gelcoats, marine coating, adhesives, etc.),
 - Seabring shall use the highest HAP/VOC content value from its products MSD sheets when ranges are provided, in all calculations,
 - Certification of the as-supplied HAP/VOC content of each batch of coating, if different from Item b. above,
 - Certification of the as-applied HAP/VOC content of each batch of coating, if different from Item b. above,
 - The amount of each coating applied,
 - The amount of thinner use, and
 - Determination of compliance with the appropriate HAP limit which shall be based on a 3 month-rolling average.

[MACT Determination dated September 10, 1999]

14. 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. [MACT Determination dated September 10, 1999]
15. 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 modification of the existing manufacturing process under the terms of this permit.
16. Test the emissions for the following pollutant(s) within 45 days of startup under the terms of this permit, notify the Department 15 days prior to testing [FAC Rules 297.310(7)(a)1 and 297.310(7)(a)9], and submit the test report documentation to the Department within 45 days after completion of the testing [FAC Rule 297-310(8)(b)].

POLLUTANT	TEST METHOD
Visible Emissions NOTE (1)	EPA 9

NOTE (1) To be conducted at Emission Point 01.

Tests and test reports shall comply with the requirements of FAC Rules 62-297.310(8) and 62-297.401, respectively.

17. 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:
- All solvents and raw material are stored and handled in appropriate containers equipped with tight fitting lids.
 - Good housekeeping and training personnel in their respective task(s) at the facility.
 - 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.
 - The gelcoat area exhaust stack fans shall be run during all gelcoat activities.

PERMITTEE:

Seabring Marine Industries, Inc.
212 Magnolia Street
Archer, Florida 32618

I.D. Number: 0750033
Permit/Cert: 0750033-002-AC
Date of Issue:
Expiration Date:

4th Draft Permit

SPECIFIC CONDITIONS:

18. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, as necessary, 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.]
19. 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.]
20. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.
21. 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 my 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.
22. A completed **Application for Air Permit - Title V Source** (application for a permit revision), with the compliance report is due at least 90 days prior to expiration of this construction permit, but no later than 180 days after commencement of operation under the terms of this permit.
[Rule 62-213.420(1)(a)5.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

4th Draft Permit

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

DRAFT PERMIT DETERMINATION

I. Public Notice.

An "INTENT TO ISSUE" to Seabring Marine Industries, Inc. located at the Williston Airport Industrial park, off Highway 41, Williston, Levy County was clerked on September 16, 1999. The "PUBLIC NOTICE OF INTENT TO ISSUE CONSTRUCTION PERMIT" was published on September 24, 1999 in the Gainesville Sun newspaper. The DRAFT Air Construction Permit was available for public inspection at the Northeast District Office in Jacksonville. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE CONSTRUCTION PERMIT" was received October 12, 1999.

II. Public Comment(s).

Comments were received by Koogler & Associates Environmental Services on the applicant's behalf as well as Cindy Phillips, P.E., of the Division of Air Resource Management (DARM). As a result, the DRAFT Construction Permit was changed. The comments were considered significant enough to reissue the DRAFT Construction Permit, but another public notice was not warranted. Summarized below are the original comments followed by the department's response to each comment.

A. Koogler & Associates letter dated November 17, 1999. Comments from Mr. Pradeep Raval.

Comment #1:

Page 1 of 8, Permit Expiration Date:

It is requested that the permit expiration date be a minimum of three years from the date of issue. This will include sufficient time to construct, debug, conduct compliance testing and process a Title V permit application for the source.

Response: The permit can be issued for the period of time requested.

Comment #2:

Page 5 of 8, Specific Condition 3:

It is requested that a additional note be included to state that the HAP limits are not applicable to tooling resins and gelcoats if their respective usage is less than 100 gallons per year, a level at which EPA considers the usage to be incidental.

Response: This suggested language has not been added to the draft permit per guidance from DARM.

Comment #3

Page 5 of 8, specific Condition 7:

The following language is suggested in order to clarify the condition:

"The source shall comply with either of the following provisions of 40 CFR 63, Subpart JJ, when applicable:

..NOTE 2: Incidental use of wood furniture finishing materials and adhesives, of less than 100 gallons per month, is exempt pursuant to 40 CFR 63, Subpart JJ."

Response: The requested changes have been made to the draft construction permit as follows:

To:

7. The permittee shall comply with either of the following provisions of 40 CFR Part 63, Subpart JJ, when applicable:
- 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
 - 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].

NOTES:

- Aerosol adhesives and contact adhesives applied to nonporous substrates are excluded.
- 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.

[MACT Determination dated September 10, 1999]

Comment #4

Page 6 of 8, Specific Condition 8:

The following language is suggested in order clarify the condition:

“The source shall comply with the following provision of 40 CFR 63, Subpart II, when applicable:

..NOTE: 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 63, Subpart II.”

Response: In the Department’s initial response to the requested language change, a note was added consistent with the applicability language of Subpart II. However, the Department received additional comments from Mr. Pradeep Raval of Koogler & Associates via email on March 27, 2000. The comments are worded below:

The following language is suggested:

“The marine coating used by the permittee for bottom coatings and other exterior coatings (except for gelcoats, resins, adhesives, coating of wood parts and coatings used in a boat’s enclosed cabin) shall comply with 40 CFR...(the remaining sentence and notes are the same).

Based on these comments the condition is revised as follows:

To:

8. 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).

NOTES:

- 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.
- 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.
- Coatings applied to suitable prepared fiberglass surfaces for protective or decorative purposes are subject to the requirements of 40 CFR Part 63, Subpart II.

[MACT Determination dated September 10, 1999, 40 CFR Part 63, Subpart II Applicability Standards]

Comment #5

Page 6 of 8, Specific Condition 11:

The following language is suggested in order to clarify the condition:

“In order for the FDEP to approve such a request, the permittee must satisfy applicable air permitting requirements.”

Response: Based on these comments the condition is revised as follows:

To:

11. 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...

Comment #6

Page 7 of 8, Specific Condition 13:

The following language is suggested in order to clarify the condition:

“The permittee..

- a. Certification of the as-supplied HAP/VOC content of each batch of coating, if different from Item b. above,**
- b. Certification of the as-supplied HAP/VOC content of each batch of coating, if different from Item b. above,**
- c. The amount of each coating applied,..”**

Response: Based on these comments the condition is revised as follows:

To:

13. The permittee ...
 - 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.

[MACT Determination dated September 10, 1999]

Comment #7

Page 7 of 8, Specific Condition 14:

The following language is suggested to make the condition more practical:

“..period after commencing normal operation, the..”

Response: Based on these comments the condition is revised as follows:

From:

14. Within 60 days following the end of each 6-month period after startup, the Permittee shall submit a semi-annual compliance report. [MACT Determination dated September 10, 1999]

To:

14. 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. [MACT Determination dated September 10, 1999]

Comment #8

Page 7 of 8, specific Condition 15:

The following language is suggested to make the condition more practical:

"..45 days of achieving normal operation, the.."

Response: Based on these comments the condition is revised as follows:

From:

15. Test the emissions for the following pollutant(s) within 45 days of startup, notify the Department 15 days prior to testing [FAC Rules 297.310(7)(a)1 and 297.310(7)(a)9], ...

To:

16. Test the emissions for the following pollutant(s) within 45 days of startup under the terms of this permit, notify the Department 15 days prior to testing [FAC Rules 297.310(7)(a)1 and 297.310(7)(a)9], ...

Comment #9

Page 7 of 8, Specific Condition 16:

The following language is suggested to make the condition more practical:

"..3. A lamination area exhaust fan shall be run at all times.."

Response: Based on these comments the condition is revised as follows:

From:

- .. 3. 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.

To:

- .. 3. 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.

Comment #10

Page 8 of 8, Specific Condition 17:

The following language is suggested to make the condition more practical:

“..shall include, as necessary, the application..”

Response: Based on these comments the condition is revised as follows:

From:

17. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall 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]

To:

18. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, as necessary, 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]

Comment #11

Page 8 of 8, Specific Condition 18:

The following language is suggested to make the condition more practical:

“..odor. The plant is permitted to emit air pollutants addressed in specific condition 12.”

Response: This suggested language was not included in the permit. There is a rule under 62-213, F.A.C., that addresses compliance with Title V permit conditions and the odor rule. There is not a similar rule applicable to air construction permits.

B. Comments from Mr. Pradeep Raval, Koogler & Associates, received via email dated March 27, 2000.

“..the following note is requested to be added to SC 12: NOTE TO DEP TV FEE STAFF (3) Styrene emissions are calculated as 11% of total styrene content of the resins; 48% of total styrene content of the pigmented and base gelcoats; and, 51% of the total styrene content of the tooling gelcoats. The total styrene content of each material is calculated based on the maximum weight percent stated in the MSDS.”

C. Comments from Ms. Cindy Phillips, P.E., DARM, received via telephone on April 4, 2000.

It was believed that the additional language concerning the calculations of styrene emissions for Title V fee purposes, suggested by consultant could be misconstrued by someone not familiar with the permit. Therefore, based on the telephone discussion with Ms. Phillips, Specific Condition 12 was revised as follows:

From:

NOTE (1) Styrene emissions are calculated as 11% of total styrene content of the resins; 48% of total styrene content of the pigmented and base gelcoats; and, 51% of total styrene content of

the tooling gelcoats. The total styrene content of each material is calculated based on the maximum weight percent stated in the MSDS.

NOTE (2) Rule 62-210.200(228), F.A.C., Definitions - Potential To Emit (PTE)

NOTE (3) Emissions from all VOCs and styrene emissions combined.

To:

NOTE (1) Styrene emissions are 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 is calculated based on the maximum weight percent stated in the MSDS.

NOTE (2) Rule 62-210.200(228), F.A.C., Definitions - Potential To Emit (PTE)

NOTE (3) Emissions from all VOCs and styrene emissions combined.

III. Conclusion.

The permitting authority hereby issues the 4th DRAFT of Permit No.: 0750033-002-AC, with any changes noted above.