

P 265 301-602

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

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

PS Form 3800, April 1995

Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

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

4a. Article Number

P265-301-602

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

5/10

5. Received By: (Print Name)

6. Signature (Addressee or Agent)

X

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

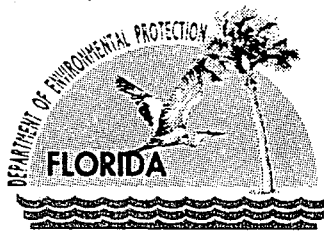
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION - TITLE V
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RECEIVED

MAY 11 1999

**BUREAU OF
AIR REGULATION**





Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 5, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

RE: Request for Additional Information
Seabring Marine Industries, Inc.
Monterey Boats - Williston Cruiser Plant
Air Construction Permit Application DEP File No. 0750033-002-AC

Dear Mr. Gombash:

On April 6, 1999, the Department received your application for a construction permit to increase your production. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Particulate emissions are listed as an insignificant source in your existing permit. What impact will the proposed increased production have upon the particulate emissions from the facility?
2. How is your proposed MACT different from your current control technology?
3. As stated in the attached 40 CFR 63.43(d)(1), the MACT emission limitation or MACT requirements recommended by the applicant and approved by the permitting authority shall not be less stringent than the emission control which is achieved in practice by the best controlled similar source, as determined by the permitting authority. Corsair Marine, located in Chula Vista, California, has used vacuum bagging to reduce HAP emissions for more than four years. In addition they have been using 35% styrene content resins and gelcoats. Please provide a more detailed justification as to why you think vacuum bagging and a 35% styrene content limit should not be MACT for your facility?
4. Please provide documentation to support your claim that resin flow-coaters will result in a 45% reduction in styrene emissions.

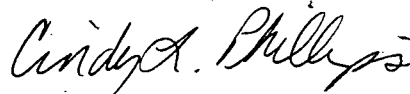
Mr. F. G. Gombash
Seabring Marine Industries, Inc.
May 5, 1999
Page 2 of 2

5. Please explain the Thermatrix PADRE System, the MIAB system, the C&C fluidized-bed preconcentrator, the biofiltration processes, the Polyad system. Are these systems currently being used by similar sources? Are thermal oxidizers, catalytic oxidizers, condensers, rotary concentrators, solvent recovery/oxidation, closed molding, non-spray resin applications currently being used by similar sources? What is the lowest styrene content material currently being used by similar sources?
6. Are the woodshop attachments and the Scientific dust collectors currently being used, or is this proposed new equipment?
7. The DEP Form No. 62-210.900(1) and instructions were revised February 11, 1999. Please review the new form and instructions and please submit any needed information revisions or additions, as opposed to format revisions, that may be needed due to the form change.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response should be certified by a professional engineer registered in the State of Florida. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Rule 62-4.055(1), F.A.C. requires that the applicant submit additional information requested by the Department, or request an extension of time to respond, within ninety days.

If you have any questions concerning this request for information, please call me at 850/921-9534, or send email to me at PHILLIPS_C@DEP.STATE.FL.US.

Sincerely,



Cindy L. Phillips, P.E.
Bureau of Air Regulation

attachment

c: Mr. John B. Koogler, PhD., P.E., w/attachment
Ms. Rita Felton-Smith, FDEP NED, w/attachment

What Information is Needed from the Applicant for a Case-by-Case MACT Determination?

{REFERENCE: Federal Register / Vol. 61, No. 250 / Friday, December 27, 1996 / Rules and Regulations}

63.43 (d) Principles of MACT determinations. The following general principles shall govern preparation by the owner or operator of each permit application or other application requiring a case-by-case MACT determination concerning construction or reconstruction of a major source, and all subsequent review of and actions taken concerning such an application by the permitting authority:

(1) The MACT emission limitation or MACT requirements recommended by the applicant and approved by the permitting authority shall not be less stringent than the emission control which is achieved in practice by the best controlled similar source, as determined by the permitting authority.

(2) Based upon available information, as defined in this subpart, the MACT emission limitation and control technology (including any requirements under paragraph (d)(3) of this section) recommended by the applicant and approved by the permitting authority shall achieve the maximum degree of reduction in emissions of HAP which can be achieved by utilizing those control technologies that can be identified from the available information, taking into consideration the costs of achieving such emission reduction and any non-air quality health and environmental impacts and energy requirements associated with the emission reduction.

(3) The applicant may recommend a specific design, equipment, work practice, or operational standard, or a combination thereof, and the permitting authority may approve such a standard if the permitting authority specifically determines that it is not feasible to prescribe or enforce an emission limitation under the criteria set forth in section 112(h)(2) of the Act.

(4) If the Administrator has either proposed a relevant emission standard pursuant to section 112(d) or section 112(h) of the Act or adopted a presumptive MACT determination for the source category which includes the constructed or reconstructed major source, then the MACT requirements applied to the constructed or reconstructed major source shall have considered those MACT emission limitations and requirements of the proposed standard or presumptive MACT determination.

(e) Application requirements for a case-by-case MACT determination.

(1) An application for a MACT determination (whether a permit application under title V of the Act, an application for a Notice of MACT Approval, or other document specified by the permitting authority under paragraph (c)(2)(ii) of this section) shall specify a control technology selected by the owner or operator that, if properly operated and maintained, will meet the MACT emission limitation or standard as determined according to the principles set forth in paragraph (d) of this section.

(2) In each instance where a constructed or reconstructed major source would require additional control technology or a change in control technology, the application for a MACT determination shall contain the following information:

(i) The name and address (physical location) of the major source to be constructed or reconstructed;

(ii) A brief description of the major source to be constructed or reconstructed and identification of any listed source category or categories in which it is included;

(iii) The expected commencement date for the construction or reconstruction of the major source;

- (iv) The expected completion date for construction or reconstruction of the major source;
 - (v) the anticipated date of start-up for the constructed or reconstructed major source;
 - (vi) The HAP emitted by the constructed or reconstructed major source, and the estimated emission rate for each such HAP, to the extent this information is needed by the permitting authority to determine MACT;
 - (vii) Any federally enforceable emission limitations applicable to the constructed or reconstructed major source;
 - (viii) The maximum and expected utilization of capacity of the constructed or reconstructed major source, and the associated uncontrolled emission rates for that source, to the extent this information is needed by the permitting authority to determine MACT;
 - (ix) The controlled emissions for the constructed or reconstructed major source in tons/yr at expected and maximum utilization of capacity, to the extent this information is needed by the permitting authority to determine MACT;
 - (x) A recommended emission limitation for the constructed or reconstructed major source consistent with the principles set forth in paragraph (d) of this section;
 - (xi) The selected control technology to meet the recommended MACT emission limitation, including technical information on the design, operation, size, estimated control efficiency of the control technology (and the manufacturer's name, address, telephone number, and relevant specifications and drawings, if requested by the permitting authority);
 - (xii) Supporting documentation including identification of alternative control technologies considered by the applicant to meet the emission limitation, and analysis of cost and non-air quality health environmental impacts or energy requirements for the selected control technology; and
 - (xiii) Any other relevant information required pursuant to subpart A.
- (3) In each instance where the owner or operator contends that a constructed or reconstructed major source will be in compliance, upon startup, with case-by-case MACT under this subpart without a change in control technology, the application for a MACT determination shall contain the following information:
- (i) The information described in paragraphs (e)(2)(i) through (e)(2)(x) of this section; and
 - (ii) Documentation of the control technology in place.



Florida
Department of
Environmental Protection

Jeb Bush
Governor

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

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 5/6/99

TO: Rita Felton Smith

PHONE: _____

FAX: 904-448-4363

FROM: Cindy Phillips

PHONE: 850/921-9534

Division of Air Resources Management

FAX: 850.922.6979

RE: _____

CC: _____

Total number of pages including cover sheet: 5

Message

If there are any problems with this fax transmittal, please call the above phone number.