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SEP 22 2004

**DIVISION OF AIR
RESOURCE MANAGEMENT**

September 17, 2004

Director
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

**RE: Wellcraft Marine, Sarasota, FL
- Initial Notification of 40 CFR Part 63 Subpart GGGGG Applicability**

Attention:

Wellcraft Marine is submitting this initial notification of applicability of 40 CFR Part 63 Subpart A and GGGGG for the referenced facility.

The National Emission Standard for Hazardous Air Pollutants (NESHAP) for site remediation (40 CFR Part 63 Subpart GGGGG) was promulgated on October 8, 2003. Owners or operators of a facilities that are considered major sources of HAP emissions (i.e., sources with a potential to emit, considering controls, 10 tons or more per year for an individual HAP or 25 tons or more per year of any combination of HAP) that conducting site remediation activities on materials that contain one or more of the HAPs listed in Subpart GGGGG are subject to this regulation. Remediation activities are defined as the cleanup of materials with the potential to emit the listed HAP(s). In addition, 40 CFR Part 63 Subpart A General Provisions 63.9(b) requires that affected facilities provide initial notification of applicability of the rule to the delegated State permitting authority, with a copy of this notification submitted to the Regional Office of the Environmental Protection Agency (EPA). This document fulfills the specific initial notification requirements.

Name and Address of Owner/Operator and Affected Source:

Wellcraft Marine
1651 Whitfield Avenue
Sarasota, FL 34243

Relevant Standard and Compliance Date:

All notification, recordkeeping, and reporting requirements in 40 CFR Part 63 General Provisions as well as the site remediation requirements of 40 CFR Part 63 Subpart GGGGG apply to this facility. Wellcraft Marine believes that the site remediation activities qualifies for exemption to all but the reporting and recordkeeping requirements of this part pursuant to 40 CFR Part 63.7881 (c) and must be in compliance with this subpart by October 9, 2006, unless the remediation project has been completed.

Facility Description:

Wellcraft Marine operates a fiberglass boat manufacturing facility that is a major source under Title V and has already submitted an applicability determination under 40 CFR Part 63 Subpart

VVV. Wellcraft Marine historically used acetone as a fiberglass solvent. A release of acetone occurred that impacted soil and groundwater. The acetone used at the facility was a recycled acetone containing impurities, including hazardous air pollutants (HAPs).

Pursuant to an administrative order from the FDEP, Wellcraft Marine completed contamination assessment and implemented remedial actions. The remedial actions consist of a multiphase (vapor and groundwater) extraction system. The extracted vapors are treated by a thermal oxidizer and a catalytic oxidizer. The extracted groundwater is heated, processed through two shallow tray air strippers (in series) and then polished with a fixed film, aerobic bioreactor prior to discharge under permit to the city sewer.

Emission Units and Types of HAPs Emitted:

The site remediation sources subject to this part include process vents. These include tank vents, the air stripper exhaust, and the bioreactor vent, which are all collected and routed to the thermal oxidizer. The thermal oxidizer and the catalytic oxidizer are also process vents. The two oxidizers are designed to destroy greater than 95% of the organic compounds, primarily acetone and isopropyl alcohol, but also trace HAPs. The following HAPs have been detected in the impacted groundwater and have the potential to be emitted:

- benzene
- carbon disulfide
- ethylbenzene
- isophorone
- methyl ethyl ketone
- methyl iso-butyl ketone
- styrene
- toluene
- xylene

Inlet and outlet sample of the catalytic and thermal oxidizer are collected monthly and analyzed for volatile organic compounds. The results are reported to the FDEP on a monthly and semi-annual basis for the thermal and catalytic oxidizers, respectively.

Source Category:

The Wellcraft Marine facility is classified as a major source and is subject to 40 CFR Part 63, Subpart VVV, for boat manufacturing and Subpart GGGG for site remediation. Wellcraft Marine previously submitted a notice of applicability for Subpart VVV, and are presently complying with that MACT. Wellcraft Marine has documented that the total quantity of HAP that is/will be extracted from the ground on an annual basis is less than 1 Mg. This documentation will be kept on file at the facility along with documentation of the methods and procedures to make this determination.

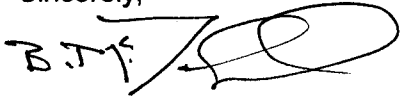
September 20, 2004

Name

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If you have any questions regarding this submittal, please feel free to contact me at (941) 753-7811.

Sincerely,

A handwritten signature in black ink, appearing to read "B. J. McDonald", with a large, stylized flourish extending to the right.

Bill McDonald
Environmental Manager, Wellcraft Marine

cc:USEPA, Region IV
Air, Pesticides, & Toxics Mgmt. Div.
61 Forsyth Street Southwest
Atlanta, GA 30303-8960

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APR 25 2005

BUREAU OF AIR REGULATION

April 22, 2005

Director
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

**RE: Wellcraft Marine, Sarasota, FL
- Initial Notification of 40 CFR Part 63 Subpart GGGGG Applicability**

Attention: Barbara Friday

Wellcraft Marine is submitting this initial notification of applicability of 40 CFR Part 63 Subpart A and GGGGG for the referenced facility.

The National Emission Standard for Hazardous Air Pollutants (NESHAP) for site remediation (40 CFR Part 63 Subpart GGGGG) was promulgated on October 8, 2003. Owners or operators of a facilities that are considered major sources of HAP emissions (i.e., sources with a potential to emit, considering controls, 10 tons or more per year for an individual HAP or 25 tons or more per year of any combination of HAP) that conducting site remediation activities on materials that contain one or more of the HAPs listed in Subpart GGGGG are subject to this regulation. Remediation activities are defined as the cleanup of materials with the potential to emit the listed HAP(s). In addition, 40 CFR Part 63 Subpart A General Provisions 63.9(b) requires that affected facilities provide initial notification of applicability of the rule to the delegated State permitting authority, with a copy of this notification submitted to the Regional Office of the Environmental Protection Agency (EPA). This document fulfills the specific initial notification requirements.

Name and Address of Owner/Operator and Affected Source:

Wellcraft Marine
1651 Whitfield Avenue
Sarasota, FL 34243

Relevant Standard and Compliance Date:

All notification, recordkeeping, and reporting requirements in 40 CFR Part 63 General Provisions as well as the site remediation requirements of 40 CFR Part 63 Subpart GGGGG apply to this facility. Wellcraft Marine believes that the site remediation activities qualifies for exemption to all but the reporting and recordkeeping requirements of this part pursuant to 40 CFR Part 63.7881 (c) and must be in compliance with this subpart by October 9, 2006, unless the remediation project has been completed.

Facility Description:

Wellcraft Marine operates a fiberglass boat manufacturing facility that is a major source under Title V and has already submitted an applicability determination under 40 CFR Part 63 Subpart

April 22, 2005

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Pursuant to an administrative order from the FDEP, Wellcraft Marine completed contamination assessment and implemented remedial actions. The remedial actions consist of a multiphase (vapor and groundwater) extraction system. The extracted vapors are treated by a thermal oxidizer and a catalytic oxidizer. The extracted groundwater is heated, processed through two shallow tray air strippers (in series) and then polished with a fixed film, aerobic bioreactor prior to discharge under permit to the city sewer.

Emission Units and Types of HAPs Emitted:

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Inlet and outlet sample of the catalytic and thermal oxidizer are collected monthly and analyzed for volatile organic compounds. The results are reported to the FDEP on a monthly and semi-annual basis for the thermal and catalytic oxidizers, respectively.

Source Category:

The Wellcraft Marine facility is classified as a major source and is subject to 40 CFR Part 63, Subpart VVVV, for boat manufacturing and Subpart GGGGG for site remediation. Wellcraft Marine previously submitted a notice of applicability for Subpart VVVV, and are presently complying with that MACT. Wellcraft Marine has documented that the total quantity of HAP that is/will be extracted from the ground on an annual basis is less than 1 Mg. This documentation will be kept on file at the facility along with documentation of the methods and procedures to make this determination.

April 22, 2005

Name

Page 2

If you have any questions regarding this submittal, please feel free to contact me at (941) 753-7811.

Sincerely,

A handwritten signature in black ink, appearing to read "B. McDonald", written over a horizontal line.

Bill McDonald
Environmental Director, Wellcraft Marine

cc:USEPA, Region IV
Air, Pesticides, & Toxics Mgmt. Div.
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Atlanta, GA 30303-8960