

P 832 539 859



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Mr. Gordon C. Houser	
President & CEO	
Street & No.	
Donzi Marine Corp.	
P.O. Box 987	
PO, State & ZIP Code	
Tallevast, FL 34270-0987	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
mailed: 7/05/91	
AC 41-165759 & -192558	

PS Form 3800, June 1990

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- 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 next to the article number.

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. Gordon C. Houser
President & CEO
Donzi Marine Corporation
P.O. Box 987
Tallevast, FL 34270-0987;

4a. Article Number

P832 539 859

4b. Service type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery

JUL 11 1991

5. Signature (Addressee)

Mr. Houser

6. Signature (Agent)

7-9-81



8. Division of Air
Addressee's Address (Only if requested
Return fee is paid)
Resources Management

PS Form 3811, October 1990

U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

File Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMITS

In the matter of an
Application for Permits by:

DER File Nos. AC 41-165759
AC 41-192558
Manatee County

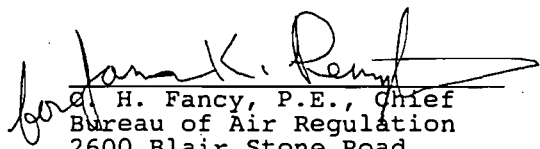
Donzi Marine Corporation
P.O. Box 987
Tallevast, Florida 34270-0987

Enclosed are Permit Numbers AC 41-165759 and AC 41-192558 for after-the-fact construction permits for a fiberglass boat manufacturing facility, which includes the fiberglass application operation and the wood & fiberglass cutting and sanding operation, located in Tallevast, Manatee County, Florida, issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permits pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMITS and all copies were mailed before the close of business on 7-5-91 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


Clerk

7-5-91
(Date)

Copies furnished to:
B. Thomas, SW District
W. Priesmeyer, MCHD
T. John, TTJE, Inc.
R. Evangelisti, OMC
Ready File }
Brown Mitchell } 7-5-91 RAN

Final Determination

Donzi Marine Corporation
Manatee County
Sarasota, Florida

Construction Permit Nos.
AC 41-165759
AC 41-192558

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

June 27, 1991

Final Determination

The construction permit application package and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Bradenton Herald on May 31, 1991. The Technical Evaluation and Preliminary Determination was distributed on March 14, 1991, and available for public inspection at the Department's Southwest District office and the Department's Bureau of Air Regulation office.

Comments were received prior to the public notice period. The comments received on May 10, 1991, were addressed in a meeting on May 15, 1991, with the Department and representatives with Donzi Marine Corporation, resulting in the additional comments received on May 20, 1991. The Department's response to the comments are as follows:

A. AC 41-192558: Wood & Fiberglass Cutting and Sanding Operation

1. The Department is in agreement to allow the "wood and fiberglass cutting and sanding operation" to operate at 8760 hours per year, since the source and facility will retain the minor status category for particulate matter emissions (i.e., 15.2 TPY vs. 63.9 TPY) and no further emissions evaluation is required. Therefore, the following will be changed:

SPECIFIC CONDITIONS

a. No. 2.:

From: The facility shall be allowed to operate 8 hours/day, 5 days/week, and 52 weeks/year, for a total of 2,080 hours/year. Because the facility will be open for a nine-hour day, production personnel will be required to take a one-hour per day production break (i.e., lunch hour, etc.).

To: Continuous operations are permitted (i.e., 8760 hrs/yr).

b. No. 4.:

From: Particulate matter emissions shall not exceed 14.6 lbs/hr, 15.2 TPY. Compliance shall be demonstrated using EPA Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

To: Particulate matter emissions shall not exceed 14.6 lbs/hr, 63.9 TPY. Compliance shall be demonstrated using EPA Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

2. The Department agrees with the request to change the expiration date from July 31, 1992, to December 31, 1992, to allow additional time to apply for an alternate procedure to demonstrate compliance for the cyclone collector in accordance with F.A.C. Rule 17-2.700(3).

B. AC 41-165759: Fiberglassing Application Operation

1. The Department feels that Specific Condition No. 2 allows the facility to be open for 9 hours per day, while production hours are allowed for 8 hours per day. Therefore, the Department will not alter Specific Condition No. 2.

2. The Department agrees with the request to allow verification of pollutant emissions on a monthly basis, which is in agreement with EPA policy. Therefore, the following will be changed:

SPECIFIC CONDITION

a. No. 3.:

From: VOC/organic solvent emissions shall be verifiable on a 24-hour basis and shall not exceed the following:

<u>VOC/Organic Solvent</u>	<u>Allowable Emissions Limit</u>	
Acetone	160.0 lbs/hr,	166.4 TPY
Styrene	64.8 lbs/hr,	67.3 TPY
Methyl Methacrylate	3.0 lbs/hr,	3.1 TPY
Trichlorofluoro Methane	6.6 lbs/hr,	6.9 TPY
Dichlorodifluoro Methane	2.5 lbs/hr,	2.6 TPY
Methylene Chloride	2.4 lbs/hr,	2.5 TPY
	Total	248.8 TPY

To: VOC/organic solvent emissions shall be verifiable on a monthly basis and shall not exceed the following:

<u>VOC/Organic Solvent</u>	<u>Allowable Emissions Limit</u>	
Acetone	160.0 lbs/hr,	166.4 TPY
Styrene	64.8 lbs/hr,	67.3 TPY
Methyl Methacrylate	3.0 lbs/hr,	3.1 TPY
Trichlorofluoro Methane	6.6 lbs/hr,	6.9 TPY
Dichlorodifluoro Methane	2.5 lbs/hr,	2.6 TPY
Methylene Chloride	2.4 lbs/hr,	2.5 TPY
	Total	248.8 TPY

3. The Department agrees with the request to delete the requirements relating to the conceptual plan of action regarding the reduction of pollutant emissions until such time that the Department goes to rule making regarding fiberglassing operations. Therefore, Specific Condition No. 6 will be deleted and the subsequent Specific Conditions will be renumbered.

C. Attachments to be Incorporated:

1. AC 41-192558

- o Mr. Christopher Lashley's letter received April 2, 1991, via FAX.
- o Mr. Robert Evangelisti's letter with attachment received May 10, 1991.
- o Mr. Tom T. John's letter with enclosure received May 20, 1991.

2. AC 41-165759

- o Mr. Christopher Lashley's letter received April 2, 1991, via FAX.
- o Mr. Robert Evangelisti's letter with attachment received May 10, 1991.

Therefore, it is recommended that the construction permits be issued as drafted, with the above referenced changes incorporated.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
Donzi Marine Corporation
Post Office Box 987
Tallevast, Florida 34270-0987

Permit Number: AC 41-165759
Expiration Date: July 31, 1992
County: Manatee
Latitude/Longitude: 27°20'25"N
82°32'36"W

Project: Fiberglass Boat
Manufacturing: Fiberglassing
Application Operation

This after-the-fact permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1989 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the after-the-fact permitting of a facility to produce fiberglass boats. The facility is located at 7110 21st Street East in Sarasota, Manatee County, Florida. The UTM coordinates are Zone 17, 347.85 km East and 3,033.29 km North.

The SIC is: 3732 - Boat Manufacturing Plant
The SCC is: 3-08-007-20 General Fiberglass Resin Products
Tons Coating Applied

The source shall be constructed in accordance with the permit application, plans, documents, supplementary information, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received June 2, 1989.
2. Mr. C. H. Fancy's letter dated June 30, 1989.
3. Mr. Tom T. John's letter with enclosures received April 24, 1990 (confidential).
4. Mr. William W. Deane's letter with enclosures received May 4, 1990.
5. Mr. J. Harry Kern's letter dated May 23, 1990.
6. Mr. C. H. Fancy's letter dated May 23, 1990.
7. Mr. Tom T. John's letter with enclosures received August 15, 1990 (modeling output confidential).
8. Mr. C. H. Fancy's letter dated September 18, 1990.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

Attachments Cont'd:

9. Mr. C. Gordon Houser's letter with enclosures received October 17, 1990.
10. Mr. C. H. Fancy's letter dated November 15, 1990.
11. Mr. C. Gordon Houser's letter received December 21, 1990.
12. Technical Evaluation and Preliminary Determination dated March 14, 1991.
13. Mr. Christopher Lashley's letter received April 2, 1991, via FAX.
14. Mr. Robert Evangelisti's letter with attachment received May 10, 1991.

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 these 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 no title to land or water, does not constitute State recognition or acknowledgement 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.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

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 permittee 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 or 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 records 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.

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 noncompliance, 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.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

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 proscribed 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 17-4.120 and 17-30.300, 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. 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

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

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 measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

14. 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.

SPECIFIC CONDITIONS:

1. The operation of this facility shall be in accordance with the capacities and specifications stated in the application and supplementary information.

2. The facility shall be allowed to operate 8 hours/day, 5 days/week, and 52 weeks/year, for a total of 2,080 hours/year. Because the facility will be open for a nine-hour day, production personnel will be required to take a one-hour per day production break (i.e., lunch hour, etc.).

3. VOC/organic solvent emissions shall be verifiable on a monthly basis and shall not exceed the following:

VOC/Organic Solvent	Allowable Emissions Limit
Acetone	160.0 lbs/hr, 166.4 TPY
Styrene	64.8 lbs/hr, 67.3 TPY
Methyl Methacrylate	3.0 lbs/hr, 3.1 TPY
Trichlorofluoro Methane	6.6 lbs/hr, 6.9 TPY
Dichlorodifluoro Methane	2.5 lbs/hr, 2.6 TPY
Methylene Chloride	2.4 lbs/hr, 2.5 TPY
	Total 248.8 TPY

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

SPECIFIC CONDITIONS:

4. Compliance shall be demonstrated by applying a material balance scheme, which is to compare the beginning inventory, recycled and disposed of (shipped-out) material, and ending inventory. Annual actual emissions shall be required to be submitted to the Department's Southwest District in an annual operating report by March 31 of each calendar year.

5. In accordance with F.A.C. Rule 17-2.620(1), no person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. All vats, containers, etc., that are used for temporary and permanent storage of VOC/organic solvents, shall be covered when not in use.

6. Any change in the method of operation pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, requires an application and appropriate processing fee to be submitted to the Department's Bureau of Air Regulation.


7. The facility's operation is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4.

8. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

9. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed, noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 3rd day
of July, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


STEVE SMALLWOOD, P.E., Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
Donzi Marine Corporation
Post Office Box 987
Tallevast, Florida 34270-0987

Permit Number: AC 41-192558
Expiration Date: Dec. 31, 1992
County: Manatee
Latitude/Longitude: 27°20'25"N
82°32'36"W

Project: Fiberglass Boat
Manufacturing: Wood & Fiber-
glass Cutting and Sanding
Operation

This after-the-fact permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1989 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the after-the-fact permitting of a facility to produce fiberglass boats. The facility is located at 7110 21st Street East in Sarasota, Manatee County, Florida. The UTM coordinates are Zone 17, 347.85 km East and 3,033.29 km North.

The SIC is: 3732 - Boat Manufacturing Plant.
The SCC is: 3-08-007-20 General Fiberglass Resin Products
Tons Coating Applied

The source shall be constructed in accordance with the permit application, plans, documents, supplementary information, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received February 11, 1991.
2. Technical Evaluation and Preliminary Determination dated March 14, 1991.
3. Mr. Christopher Lashley's letter received April 2, 1991, via FAX.
4. Mr. Robert Evangelisti's letter with attachment received May 10, 1991.
5. Mr. Tom T. John's letter with enclosure received May 20, 1991.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: Dec. 31, 1992

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 these 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 no title to land or water, does not constitute State recognition or acknowledgement 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 permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: Dec. 31, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 records 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.

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 noncompliance, 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.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: Dec. 31, 1992

GENERAL CONDITIONS:

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 proscribed 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 17-4.120 and 17-30.300, 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. 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

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: Dec. 31, 1992

GENERAL CONDITIONS:

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 measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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.

SPECIFIC CONDITIONS:

1. The operation of this facility shall be in accordance with the capacities and specifications stated in the application and supplementary information.

2. Continuous operations are permitted (i.e., 8760 hrs/yr).

3. Visible emissions from the dust collector shall be less than 20% opacity in accordance with F.A.C. Rule 17-2.610(2) and compliance shall be demonstrated using EPA Method 9 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. Alternate procedures and requirements shall be evaluated and approved in accordance with F.A.C. Rule 17-2.700(3).

4. Particulate matter emissions shall not exceed 14.6 lbs/hr, 63.9 TPY. Compliance shall be demonstrated using EPA Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

PERMITTEE:
Donzi Marine Corporation

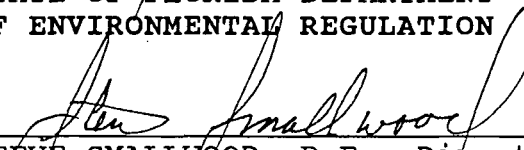
Permit Number: AC 41-192558
Expiration Date: Dec. 31, 1992

SPECIFIC CONDITIONS:

5. No air pollutants shall be discharged which cause or contribute to an objectionable odor in accordance with F.A.C. Rule 17-2.620(2).
6. The Department's Southwest district office shall be notified in writing at least 15 days in advance of the test and the test reports shall be submitted no later than 45 days after completion of the last test run in accordance with F.A.C. Rule 17-2.700.
7. Any change in the method of operation pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, requires an application and appropriate processing fee to be submitted to the Department's Bureau of Air Regulation.
8. The facility's operation is subject to all applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.700: Stationary Point Source Emission Test Procedures; and 17-4.130: Plant Operation-Problems.
9. The facility's operation is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR 60 (July, 1989 version).
10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
11. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed, noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 3rd day
of July, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


STEVE SMALLWOOD, P.E., Director
Division of Air Resources
Management



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Steve Smallwood
FROM: Clair Fancy *CF*
DATE: June 27, 1991
SUBJ: Approval of Construction Permits Nos. AC 41-192558
AC 41-165759
Donzi Marine Corporation

Attached for your approval and signature are after-the-fact construction permits prepared by the Bureau of Air Regulation for the above referenced company, which is a fiberglass boat manufacturing facility. The facility is located in Sarasota, Manatee County, Florida. Comments were received prior to the public notice period.

Day 90, after which these permits will be issued by default, is July 6, 1991.

I recommend your approval and signature.

CF/BM/rbm

OK / [Signature] 7-3-91

BA
CWF, OK BA
6-26-91
FYI, review, edit,
initial & forward. Return
to Patty for processing.
John
Bum

→ P 4/15

Check Sheet

Company Name: Donzi Marine Corp
Permit Number: AC41-165759
PSD Number:
County: Manatee AC41-192558
Permit Engineer:
Others involved:

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Final Application (if applicable)
- Waiver of Department Action
- Department Response

Intent:

- Intent to Issue
- Notice to Public
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Attachments:

-
-
-
- Correspondence with:
 - EPA
 - Park Services
 - County
 - Other

Mr. J. Harry Kern's letter
~~no enclosure needed~~
W/1992 5/23 dated 5/23/70

- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination

Post Permit Correspondence:

- Extensions
- Amendments/Modifications
- Response from EPA
- Response from County
- Response from Park Services

Tom T. John Engineering, Inc.



Tom T. John, P.E.
President

7522 N. 40th St.
Tampa, FL 33604
813/985-7881
Fax 813/980-3564

- Environmental Permitting
- Air Toxics / Modeling
- Environmental Engineering
- Site Selection / Audits

OMC OUTBOARD MARINE CORPORATION

Robert Evangelisti, P.E.
Manager, Environmental Compliance

190 Sea-Horse Drive
Waukegan, IL 60085

708/689-5713
Fax: 708/689-5684

OMC OUTBOARD MARINE CORPORATION

J. Roger Crawford
Corporate Director, Environmental Control

190 Sea-Horse Drive
Waukegan, IL 60085

708/689-5219
Fax 708/689-5684

P 360 185 699



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Send to:	Lawrence Tierney
Street and No.	Donji Marine
P. O., State and ZIP Code	Sarasota, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	5-10-93 AC 41-165759

PS Form 3800, June 1991

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Lawrence S. Tierney
Donji Marine Corp
8161 15th St E
Sarasota, FL 34243

4a. Article Number
P360 185 699

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)

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

6. Signature (Agent)
Jean M. Lann

SC 5/12

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

May 7, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Lawrence S. Tierney
Executive V.P. & Chief Operating Officer
Donzi Marine Corporation
8161 15th Street East
Sarasota, Florida 34243

Dear Mr. Tierney:

Re: Request for Expiration Date Extension and Approval of
Procedure for Assessing Monthly VOCs
Donzi Marine Corporation: AC 41-165759

The Department has reviewed the requests contained in Mr. Mike Schenk's letter received December 28, 1992, and Mr. Robert Murray's letter received April 23, 1993. After discussions between the Department's Southwest District and Bureau of Air Regulation, the requests are acceptable and the following will be changed and added:

A. Expiration Date

From: December 31, 1992
To: October 31, 1993

B. Specific Conditions

No. 4.:

FROM: Compliance shall be demonstrated by applying a material balance scheme, which is to compare the beginning inventory, recycled and disposed of (shipped-out) material, and ending inventory. Annual actual emissions shall be required to be submitted to the Department's Southwest District in an annual operating report by March 31 of each calendar year.

TO: Compliance shall be demonstrated by applying a monthly material balance scheme, which is to compare the beginning inventory, recycled and disposed of (shipped-out) material, and ending inventory. Using the Annual Operation Report form, actual emissions on a quarterly basis (i.e., Jan.-Mar., Apr.-June, and July-Sept.) shall be submitted to the Department's Southwest District by the end of the month following the ending quarter; and, the final quarterly report (i.e., Oct.-Dec.) shall also provide the total for the year.

Mr. Lawrence S. Tierney
Amendment letter to AC 41-165759
May 7, 1993
Page 2

Specific Conditions cont.:

No. 10.: (new)

The permittee will comply with Specific Conditions Nos. 3 and 4 by making physical measurements of the chemicals used on a monthly basis. Hourly usage will then be calculated based on man-hours of lamination on a daily basis. Total daily lamination man-hours will be logged with notation given to the number of hours of operations per shift to better represent the hourly chemical usage values calculated, which procedurally "back calculates" the data for the previous month. To ensure compliance, scheduled laminating hours for the forthcoming month will be used to predict chemical usages. In the unlikely event that these projections indicate potential exceedence, appropriate changes in scheduling or other operational variations will be made. Monthly reports will be summarized (i.e., spreadsheets) to prepare the required quarterly emissions operating reports. All records and documentation shall be kept of file for a minimum of two years.

C. Attachments to be Incorporated:

- o Mr. Mike Schenk's letter with enclosure received December 28, 1992.
- o Mr. Robert Murray's letter with enclosure received April 23, 1993.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

Mr. Lawrence S. Tierney
Amendment letter to AC 41-165759
May 7, 1993
Page 3

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

This letter must be attached to the construction permit, No. AC 41-165759, and shall become a part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

Mr. Lawrence S. Tierney
Amendment letter to AC 41-165759
May 7, 1993
Page 4

HLR/RBM/rbm

Attachment

cc: B. Thomas, SWD
J. Harper, EPA
T. John, P.E., TTJEI
R. Evangelisti, P.E., OMC
D. Beason, Esq., DER

OMCCC, INC.



Chris★Craft®



DONZI®

April 20, 1993

Mr. Bruce Mitchell
Air Section
FDER
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Donzi Marine, AC41-165789

Dear Mr. Mitchell:

We regret any confusion our earlier correspondence concerning Donzi Marine's request for an operating permit may have caused, and we appreciate your discussing the options with our consulting environmental engineer of record, Tom John, P.E. He has presented your recommendations to us, and we accept your suggestion to extend the air construction permit expiration date and modify the permit to provide for quarterly record keeping and a gradual buildout to the currently-permitted operating level.

We understand that the appropriate fees will be deducted from the checks previously submitted, and that the balance remaining will be allocated to the Tampa District and applied towards the actual processing fee for the operating permit request, when that is made.

We have enclosed a copy of the signed and sealed COCOC that was inadvertently omitted from our earlier submittal.

Again, thank you for your concern and attention on our behalf. If you have any questions, please contact Tom John, P.E. at (813) 985-7881 or Mike Schenk of my staff at (813) 351-4900.

Sincerely,

Robert Murray
Vice President, Operations

RM/tv

Enclosure

cc: L. Keller OMC
T. John
M. Schenk

RECEIVED

APR 23 1993

**Division of Air
Resources Management**



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTION SOURCES
CERTIFICATE OF COMPLETION OF CONSTRUCTION*

PERMIT NO. AC41-165759 DATE: December 8, 1992

Company Name: OMCCC d/b/a/ Donzi Marine County: Manatee

Source Identification(s): fiberglass boatbuilding

Actual costs of serving pollution control purpose: \$ NA

Operating Rates: NA Design Capacity: NA

Expected Normal NA During Compliance Test NA

Date of Compliance Test: NA (Attach detailed test report)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge
	<u>VOC</u>	<u>recordkeeping requirements - copies attached</u>	

Date plant placed in operation: 1989

This is to certify that, with the exception of deviations noted**, the construction of the project has been completed in accordance with the application to construct and Construction Permit No. AC41-165759 dated July 5, 1991.

A. Applicant:

Name of Person Signing (Type) Signature of Owner or Authorized Representative and Title

Date: _____ Telephone: _____

B. Professional Engineer:

Tom T. John, P.E. _____
Name of Person Signing (Type) Signature of Professional Engineer

Tom John Engineering, Inc. _____
Company Name Florida Registration No. 33157

Date: December 8, 1992

(Seal)

7522 N 40th Street, Tampa, FL 33604
Mailing Address

813-985-7881
Telephone Number

*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

**As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

Donzi Marine Chemical Usage and Emission Inventory Beginning August 1992

	Donzi Marine Chemical Usage and Emission Inventory Beginning August 1992																
	GELCOAT					RESIN			ACETONE			STYRENE			Misc. Solvents		
	Hours	lbs used	lbs/hr used	lbs/hr emitted	lbs used	lbs/hr used	lbs/hr emitted	lbs used	lbs/hr used	lbs/hr emitted	lbs used	lbs/hr used	lbs/hr emitted	lbs used	lbs/hr used	lbs/hr emitted	Acetone Hauled
Aug	3	5	4.3	0.9	0.1	4.1	0.8	0.0	6.8	1.4	1.4	0.7	0.1	0.0			
	4	6	5.0	0.8	0.1	18.2	3.0	0.2	13.6	2.3	2.3	0.7	0.1	0.0			
	5	5	4.3	0.9	0.1	9.1	1.8	0.1	13.6	2.7	2.7	0.7	0.1	0.0			
	6	5	4.3	0.9	0.1	8.2	1.6	0.1	20.4	4.1	4.1	0.7	0.1	0.0			
	7	4	4.3	1.1	0.1	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	10	5	4.3	0.9	0.1	18.2	3.6	0.2	13.6	2.7	2.7	0.7	0.1	0.0			
	11	7	4.3	0.6	0.1	27.3	3.9	0.2	13.6	1.9	1.9	0.7	0.1	0.0			
	12	4	4.3	1.1	0.1	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	13	6	4.3	0.7	0.1	27.3	4.6	0.2	13.6	2.3	2.3	0.7	0.1	0.0			
	14	5	5.0	1.0	0.1	18.2	3.6	0.2	13.6	2.7	2.7	0.7	0.1	0.0			
	17	3	4.3	1.4	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.0			
	18	3	4.3	1.4	0.2	18.2	6.1	0.3	13.6	4.5	4.5	0.7	0.2	0.0			
	19	6	5.0	0.8	0.1	36.4	6.1	0.3	13.6	2.3	2.3	0.7	0.1	0.0			
	20	4	4.3	1.1	0.1	18.2	4.6	0.2	6.8	1.7	1.7	0.7	0.2	0.0			
	21	3	4.3	1.4	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.0			
	24	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	25	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	26	4	5.0	1.3	0.2	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	27	3	1.3	0.4	0.1	18.2	6.1	0.3	13.6	4.5	4.5	0.7	0.2	0.0			
	28	4	2.0	0.5	0.1	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	31	3	0.0	0.0	0.0	9.1	3.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0			
*Total for																	
Month	93		82.8		10.1	321.7		16.7	224.4		224.4	14.0		1.7	0.0	0.0	0.0
*Cumulative																	
year	93		82.8		10.1	321.7		16.7	224.4		224.4	14.0		1.7	0.0	0.0	0.0
Sept	1	4	5.0	1.3	0.2	9.1	2.3	0.1	13.6	3.4	3.4	0.7	0.2	0.0			
-----	2	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	3	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	4	3	4.3	1.4	0.2	9.1	3.0	0.2	13.6	4.5	4.5	0.7	0.2	0.0			
	7	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
	8	3	4.3	1.4	0.2	9.1	3.0	0.2	13.6	4.5	4.5	0.7	0.2	0.0			
	9	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
	10	3	4.3	1.4	0.2	0.0	0.0	0.0	6.8	2.3	2.3	0.0	0.0	0.0			
	11	2	4.3	2.1	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.0			
	14	3	5.0	1.7	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.0			
	15	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.0	0.0	0.0			
	16	0	0.0	0.0	0.0	0.0	0.0	0.0	6.8	0.0	0.0	0.0	0.0	0.0			
	17	4	5.0	1.3	0.2	9.1	2.3	0.1	20.4	5.1	5.1	0.7	0.2	0.0			
	18	4	7.0	1.8	0.2	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	21	2	4.3	2.1	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.0			
	22	3	4.3	1.4	0.2	0.0	0.0	0.0	6.8	2.3	2.3	0.7	0.2	0.0			
	23	2	5.0	2.5	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.0			
	24	3	4.3	1.4	0.2	0.0	0.0	0.0	6.8	2.3	2.3	0.7	0.2	0.0			
	25	2	4.3	2.1	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.0			
	28	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
	29	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
	30	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
*Total for																	
Month	60		95.0		11.6	109.2		5.7	231.2		231.2	13.3		1.6	0.0		0.0
*Cumulative																	
for year	153		177.8		21.7	430.9		22.4	455.6		455.6	27.3		3.3	0.0		0.0

Date	Gelcoat			Resin			Acetone			Styrene			Misc			Acetone		
	Hour	lbs	used	lbs	used	emitted	lbs	used	emitted	lbs	used	emitted	lbs	used	emitted	lbs	used	emitted
Oct	1	2	4.3	2.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.4	0.1			
	2	1	4.3	4.3	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.7	0.1			
	5	2	4.3	2.1	0.3	9.1	4.6	0.2	0.0	0.0	0.0	0.0	0.7	0.4	0.0			
	6	2	4.3	2.1	0.3	9.1	4.6	0.2	6.8	3.4	3.4	0.7	0.4	0.1				
	7	4	5.0	1.3	0.2	18.2	4.6	0.2	6.8	1.7	1.7	0.7	0.2	0.1				
	8	2	4.3	2.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
	9	2	4.3	2.1	0.3	9.1	4.6	0.2	20.4	10.2	10.2	0.7	0.4	0.1				
	12	1	4.3	4.3	0.5	0.0	0.0	0.0	6.8	6.8	6.8	0.7	0.7	0.2				
	13	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.1				
	14	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.0	0.0	0.0				
	15	2	4.3	2.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.4	0.1				
	16	3	5.0	1.7	0.2	0.0	0.0	0.0	13.6	4.5	4.5	0.7	0.2	0.1				
	19	3	4.3	1.4	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.1				
	20	4	4.3	1.1	0.1	18.2	4.6	0.2	20.4	5.1	5.1	0.7	0.2	0.1				
	21	1	4.3	4.3	0.5	9.1	9.1	0.5	6.8	6.8	6.8	0.7	0.7	0.2				
	22	3	4.3	1.4	0.2	18.2	6.1	0.3	20.4	6.8	6.8	0.0	0.0	0.0				
	23	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.1				
	26	2	4.3	2.1	0.3	9.1	4.6	0.2	20.4	10.2	10.2	0.7	0.4	0.1				
	27	2	4.3	2.1	0.3	18.2	9.1	0.5	34.0	17.0	17.0	0.7	0.4	0.1				
	28	3	4.3	1.4	0.2	9.1	3.0	0.2	13.6	4.5	4.5	0.7	0.2	0.1				
	29	3	4.3	1.4	0.2	9.1	3.0	0.2	20.4	6.8	6.8	0.7	0.2	0.1				
	30	2	4.3	2.1	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.1				
*Total for																		
Month	52		95.0		11.6	163.8		8.5	238.0	238.0	13.3		4.1	0.0			0.0	
*Cumulative																		
for year 205		272.8		33.3	594.7		30.9	693.6	693.6	40.6		12.4	0.0				0.0	
	2	3	4.9	1.6	0.2	18.2	6.1	0.3	13.6	4.5	4.5	0.7	0.2	0.0				
	3	3	4.4	1.5	0.2	27.3	9.1	0.5	13.6	4.5	4.5	0.7	0.2	0.0				
	4	5	4.4	0.9	0.1	27.3	5.5	0.3	20.4	4.1	4.1	0.7	0.1	0.0				
	5	4	4.4	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0				
	6	3	4.4	1.5	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.0				
	9	5	4.5	0.9	0.1	27.1	5.4	0.3	13.6	2.7	2.7	0.7	0.1	0.0				
	10	3	4.5	1.5	0.2	18.2	6.1	0.3	13.6	4.5	4.5	0.7	0.2	0.0				
	11	5	5.0	1.0	0.1	27.3	5.5	0.3	20.4	4.1	4.1	0.7	0.1	0.0				
	12	1	4.3	4.3	0.5	0.0	0.0	0.0	6.8	6.8	6.8	0.7	0.7	0.1				
	13	2	3.8	1.9	0.2	18.2	9.1	0.5	13.6	6.8	6.8	0.7	0.4	0.0				
	16	1	0.0	0.0	0.0	18.2	18.2	0.9	13.6	13.6	13.6	0.7	0.7	0.1				
	17	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0				
	18	4	5.0	1.3	0.2	27.3	6.8	0.4	20.4	5.1	5.1	1.4	0.4	0.0				
	19	5	5.0	1.0	0.1	27.3	5.5	0.3	13.6	2.7	2.7	0.7	0.1	0.0				
	20	3	2.0	0.7	0.1	18.2	6.1	0.3	20.4	6.8	6.8	0.7	0.2	0.0				
	23	1	0.0	0.0	0.0	18.2	18.2	0.9	13.6	13.6	13.6	0.0	0.0	0.0				
	24	1	0.0	0.0	0.0	9.1	9.1	0.5	6.8	6.8	6.8	0.0	0.0	0.0				
	25	2	0.0	0.0	0.0	27.3	13.7	0.7	20.4	10.2	10.2	0.0	0.0	0.0				
	26	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0				
	27	1	0.0	0.0	0.0	18.6	18.6	1.0	20.4	20.4	20.4	0.0	0.0	0.0				
	30	1	0.0	0.0	0.0	18.6	18.6	1.0	6.8	6.8	6.8	0.0	0.0	0.0				
*Total for																		
Month	53		56.5		6.9	373.7		19.4	272.0	272.0	10.5		1.3	0.0			0.0	
*Cumulative																		
for year 258		329.3		40.2	968.4		50.4	965.6	965.6	51.1		6.2	0.0				0.0	

* Values denote total hours operated, lbs used, and lbs emitted for the month and year to date

Notes for emission calculations:

1 Average emission factors of 0.305 (gelcoat) and 0.11 (resin) used

2 Emission factor for styrene monomer assumed to be 0.305

3 Emission factor for acetone assumed to be 100% - quantity tabulated includes material returned to drum

4 No miscellaneous solvents used during this period



RECEIVED
DER - MAIL ROOM
1992 DEC 28 AM 11: 25

December 8, 1992



Mr. Bruce Mitchell
Air Section
Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Request for Operating Permit
Donzi Marine, Sarasota (AC41-165759)

Dear Mr. Mitchell:

Donzi Marine wishes to obtain a VOC operating permit for the subject facility. Included with this letter are the appropriate application fee (\$2,000.00), Certificate of Completion of Construction, and monthly chemical usage and emission estimates for the past three months.

As you know, due to the generally depressed market, the Donzi Marine facility has not operated in a "boat production" capacity since approximately May of 1991. At this point it appears unlikely that the facility will return to full production in the near future. Warranty and repair work, including gelcoat and fiberglass repairs, will continue. We anticipate the possibility of building certain larger boats at the facility during the 1993 calendar year and would like the operating permit to be in place when the market demand improves.

In a recent conversation with Tom John, you indicated that you would consider an adequate recordkeeping demonstration for the current activities as sufficient to allow Donzi to apply for an operating permit. We would prefer to receive, the operating permit rather than to continue to extend the construction permit. The facility proposes to provide quarterly chemical usage and emission summaries to the Department to ensure that as production increases, satisfactory records will be maintained. A check for \$50.00 is included in the event that you choose to extend the existing construction permit rather than issue an operating permit.

We appreciate your consideration of our operating permit request. If you wish to discuss this in more detail, please contact me at 813-351-4900 or Tom John at his office in Tampa at 813-985-7881.

Sincerely,


Mike Schenk
Manager, Environmental Control

Enclosure
cc: B. Mitchell

OMCCC Inc.
A Subsidiary of Outboard Marine Corporation

8161 15th Street East, Sarasota, Florida 34243
813-359-2397 FAX 813-351-8053

Air

Donzi Marine Chemical Usage and Emission Inventory Beginning August 1992

Date	Hours	Gelcoat			Resin			Acetone			Styrene			Misc			Acetone Hauled
		lbs	used	emitted	lbs	used	emitted	lbs	used	emitted	lbs	used	emitted	lbs	used	emitted	
Aug	3	5	4.3	0.9	0.1	4.1	0.8	0.0	6.8	1.4	1.4	0.7	0.1	0.0			
	4	6	5.0	0.8	0.1	18.2	3.0	0.2	13.6	2.3	2.3	0.7	0.1	0.0			
	5	5	4.3	0.9	0.1	9.1	1.8	0.1	13.6	2.7	2.7	0.7	0.1	0.0			
	6	5	4.3	0.9	0.1	8.2	1.6	0.1	20.4	4.1	4.1	0.7	0.1	0.0			
	7	4	4.3	1.1	0.1	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	10	5	4.3	0.9	0.1	18.2	3.6	0.2	13.6	2.7	2.7	0.7	0.1	0.0			
	11	7	4.3	0.6	0.1	27.3	3.9	0.2	13.6	1.9	1.9	0.7	0.1	0.0			
	12	4	4.3	1.1	0.1	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	13	6	4.3	0.7	0.1	27.3	4.6	0.2	13.6	2.3	2.3	0.7	0.1	0.0			
	14	5	5.0	1.0	0.1	18.2	3.6	0.2	13.6	2.7	2.7	0.7	0.1	0.0			
	17	3	4.3	1.4	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.0			
	18	3	4.3	1.4	0.2	18.2	6.1	0.3	13.6	4.5	4.5	0.7	0.2	0.0			
	19	6	5.0	0.8	0.1	36.4	6.1	0.3	13.6	2.3	2.3	0.7	0.1	0.0			
	20	4	4.3	1.1	0.1	18.2	4.6	0.2	6.8	1.7	1.7	0.7	0.2	0.0			
	21	3	4.3	1.4	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.0			
	24	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	25	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	26	4	5.0	1.3	0.2	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	27	3	1.3	0.4	0.1	18.2	6.1	0.3	13.6	4.5	4.5	0.7	0.2	0.0			
	28	4	2.0	0.5	0.1	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	31	3	0.0	0.0	0.0	9.1	3.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0			
*TOTAL		93	82.8		10.1	321.7		16.7	224.4		224.4	14.0		1.7	0.0		0.0
*CUM TOTAL		93	82.8		10.1	321.7		16.7	224.4		224.4	14.0		1.7	0.0		0.0
Sept	1	4	5.0	1.3	0.2	9.1	2.3	0.1	13.6	3.4	3.4	0.7	0.2	0.0			
	2	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	3	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	4	3	4.3	1.4	0.2	9.1	3.0	0.2	13.6	4.5	4.5	0.7	0.2	0.0			
	7	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
	8	3	4.3	1.4	0.2	9.1	3.0	0.2	13.6	4.5	4.5	0.7	0.2	0.0			
	9	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
	10	3	4.3	1.4	0.2	0.0	0.0	0.0	6.8	2.3	2.3	0.0	0.0	0.0			
	11	2	4.3	2.1	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.0			
	14	3	5.0	1.7	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.0			
	15	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.0	0.0	0.0			
	16	0	0.0	0.0	0.0	0.0	0.0	0.0	6.8	0.0	0.0	0.0	0.0	0.0			
	17	4	5.0	1.3	0.2	9.1	2.3	0.1	20.4	5.1	5.1	0.7	0.2	0.0			
	18	4	7.0	1.8	0.2	9.1	2.3	0.1	6.8	1.7	1.7	0.7	0.2	0.0			
	21	2	4.3	2.1	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.0			
	22	3	4.3	1.4	0.2	0.0	0.0	0.0	6.8	2.3	2.3	0.7	0.2	0.0			
	23	2	5.0	2.5	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.0			
	24	3	4.3	1.4	0.2	0.0	0.0	0.0	6.8	2.3	2.3	0.7	0.2	0.0			
	25	2	4.3	2.1	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.0			
	28	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
	29	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
	30	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.0			
*TOTAL		60	95.0		11.6	109.2		5.7	231.2		231.2	13.3		1.6	0.0		0.0
*CUM TOTAL		153	177.8		21.7	430.9		22.4	455.6		455.6	27.3		3.3	0.0		0.0

Date	Hours	Gelcoat			Resin			Acetone			Styrene			Misc			Acetone Hauled
		lbs	used	emitted	lbs	used	emitted	lbs	used	emitted	lbs	used	emitted	lbs	used	emitted	
Oct	1	2	4.3	2.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.4	0.1			
	2	1	4.3	4.3	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.7	0.1			
	5	2	4.3	2.1	0.3	9.1	4.6	0.2	0.0	0.0	0.0	0.7	0.4	0.0			
	6	2	4.3	2.1	0.3	9.1	4.6	0.2	6.8	3.4	3.4	0.7	0.4	0.1			
	7	4	5.0	1.3	0.2	18.2	4.6	0.2	6.8	1.7	1.7	0.7	0.2	0.1			
	8	2	4.3	2.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
	9	2	4.3	2.1	0.3	9.1	4.6	0.2	20.4	10.2	10.2	0.7	0.4	0.1			
	12	1	4.3	4.3	0.5	0.0	0.0	0.0	6.8	6.8	6.8	0.7	0.7	0.2			
	13	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.7	0.4	0.1			
	14	2	4.3	2.1	0.3	0.0	0.0	0.0	6.8	3.4	3.4	0.0	0.0	0.0			
	15	2	4.3	2.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.4	0.1			
	16	3	5.0	1.7	0.2	0.0	0.0	0.0	13.6	4.5	4.5	0.7	0.2	0.1			
	19	3	4.3	1.4	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.1			
	20	4	4.3	1.1	0.1	18.2	4.6	0.2	20.4	5.1	5.1	0.7	0.2	0.1			
	21	1	4.3	4.3	0.5	9.1	9.1	0.5	6.8	6.8	6.8	0.7	0.7	0.2			
	22	3	4.3	1.4	0.2	18.2	6.1	0.3	20.4	6.8	6.8	0.0	0.0	0.0			
	23	4	4.3	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.1			
	26	2	4.3	2.1	0.3	9.1	4.6	0.2	20.4	10.2	10.2	0.7	0.4	0.1			
	27	2	4.3	2.1	0.3	18.2	9.1	0.5	34.0	17.0	17.0	0.7	0.4	0.1			
	28	3	4.3	1.4	0.2	9.1	3.0	0.2	13.6	4.5	4.5	0.7	0.2	0.1			
	29	3	4.3	1.4	0.2	9.1	3.0	0.2	20.4	6.8	6.8	0.7	0.2	0.1			
	30	2	4.3	2.1	0.3	0.0	0.0	0.0	13.6	6.8	6.8	0.7	0.4	0.1			
*TOTAL		52	95.0		11.6	163.8		6.5	238.0		238.0	13.3		4.1	0.0		0.0
*CUM TOTAL		205	272.0		33.3	594.7		30.9	693.6		693.6	40.6		12.4	0.0		0.0
Nov	2	3	4.9	1.6	0.2	18.2	6.1	0.3	13.6	4.5	4.5	0.7	0.2	0.0			
	3	3	4.4	1.5	0.2	27.3	9.1	0.5	13.6	4.5	4.5	0.7	0.2	0.0			
	4	5	4.4	0.9	0.1	27.3	5.5	0.3	20.4	4.1	4.1	0.7	0.1	0.0			
	5	4	4.4	1.1	0.1	18.2	4.6	0.2	13.6	3.4	3.4	0.7	0.2	0.0			
	6	3	4.4	1.5	0.2	9.1	3.0	0.2	6.8	2.3	2.3	0.7	0.2	0.0			
	9	5	4.5	0.9	0.1	27.1	5.4	0.3	13.6	2.7	2.7	0.7	0.1	0.0			
	10	3	4.5	1.5	0.2	18.2	6.1	0.3	13.6	4.5	4.5	0.7	0.2	0.0			
	11	5	5.0	1.0	0.1	27.3	5.5	0.3	20.4	4.1	4.1	0.7	0.1	0.0			
	12	1	4.3	4.3	0.5	0.0	0.0	0.0	6.8	6.8	6.8	0.7	0.7	0.1			
	13	2	3.8	1.9	0.2	18.2	9.1	0.5	13.6	6.8	6.8	0.7	0.4	0.0			
	16	1	0.0	0.0	0.0	18.2	18.2	0.9	13.6	13.6	13.6	0.7	0.7	0.1			
	17	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
	18	4	5.0	1.3	0.2	27.3	6.8	0.4	20.4	5.1	5.1	1.4	0.4	0.0			
	19	5	5.0	1.0	0.1	27.3	5.5	0.3	13.6	2.7	2.7	0.7	0.1	0.0			
	20	3	2.0	0.7	0.1	18.2	6.1	0.3	20.4	6.8	6.8	0.7	0.2	0.0			
	23	1	0.0	0.0	0.0	18.2	18.2	0.9	13.6	13.6	13.6	0.0	0.0	0.0			
	24	1	0.0	0.0	0.0	9.1	9.1	0.5	6.8	6.8	6.8	0.0	0.0	0.0			
	25	2	0.0	0.0	0.0	27.3	13.7	0.7	20.4	10.2	10.2	0.0	0.0	0.0			
	26	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
	27	1	0.0	0.0	0.0	18.6	18.6	1.0	20.4	20.4	20.4	0.0	0.0	0.0			
	30	1	0.0	0.0	0.0	18.6	18.6	1.0	6.8	6.8	6.8	0.0	0.0	0.0			
*TOTAL		53	56.5		6.9	373.7		19.4	272.0		272.0	10.5		1.3	0.0		0.0
*CUM TOTAL		258	329.3		40.2	968.4		50.4	965.6		965.6	51.1		6.2	0.0		0.0

* Values denote total hours operated, lbs used, and lbs emitted for the month and year to date.

Chris Craft[®]
BOATS

OMCCC, INC.
8161 15th Street East
Sarasota, Florida 34243

FIRST WISCONSIN BANK
OF WAUSAU
WAUSAU, WISCONSIN

2234
79-1160
759

PAY

TO
THE
ORDER
OF

• Dept. of Environmental Regulation
Air Section
2600 Blair Stone Rd.
Tallahassee, Fl 32399

DATE AMOUNT
December 9, 1992 \$50.00

OMCCC, INC.

[Signature]
AUTHORIZED AGENT

[Signature]
AUTHORIZED AGENT

Chris Craft[®]
BOATS

OMCCC, INC.
8161 15th Street East
Sarasota, Florida 34243

FIRST WISCONSIN BANK
OF WAUSAU
WAUSAU, WISCONSIN

2233
79-1160
759

PAY

TO
THE
ORDER
OF

• Dept. of Enviromental Regulation
Air Section
2600 Blair Stone Rd
Tallahassee, Fl 32399

DATE AMOUNT
December 9, 1992 \$2000.00

OMCCC, INC.

[Signature]
AUTHORIZED AGENT

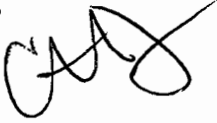
[Signature]
AUTHORIZED AGENT



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Howard Rhodes
FROM: Clair Fancy 
DATE: May 5, 1993
SUBJ: Amendment to Construction Permit: Expiration Date Extension
and Approval of Procedure for Assessing Monthly VOCs
Donzi Marine Corporation-Fiberglassing Operations
AC 41-165759

Attached for your approval and signature is a letter amending the above referenced construction permit extending the expiration date; also, Specific Conditions have been changed and added for quarterly reporting requirements and assessing monthly VOCs. There is no controversy associated with this action.

Donzi Marine Corporation is a fiberglass boat manufacturing facility, which cuts wood for forming the boat structure and laminates it with the fiberglass cloth and gelcoat. The main pollutant emissions from the operation are VOCs.

I recommend approval and signature of this amendment.

HLR/CHF/rbm

Attachments

BEST AVAILABLE COPY

P 710 058 495



Certified Mail Receipt
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1990

Sent to <i>Lawrence Tierney</i>	
Street & No. <i>Nonzi Maize</i>	
P.O., State & ZIP Code <i>Sarasota, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date <i>6-29-92</i> <i>AC 41-165759</i>	

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this
- Attach this receipt to the mailpiece, or on the back of the mailpiece next to

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

Article Number

P 710 058 495

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

7. Date of Delivery

JUL -1 1992

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

Nonzi Maize
8161 15th St. E.
Sarasota, FL 34243

5. Signature (Addressee)

6. Signature (Agent)



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 26, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Lawrence S. Tierney
Executive V.P. & Chief Operating Officer
Donzi Marine Corporation
8161 15th Street East
Sarasota, Florida 34243

Dear Mr. Tierney:

Re: Amendment to Construction Permit-Expiration Date Extension
AC 41-165759: Fiberglassing Operation

The Department has reviewed the above request contained in Mr. Lawrence S. Tierney's letter received June 3, 1992. The request is acceptable and the following will be changed and added:

1. Expiration Date

From: July 31, 1992
To: December 31, 1992

2. Attachment to be Incorporated

o Mr. Lawrence S. Tierney's letter received June 3, 1992.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

Mr. L. S. Tierney

Page 2

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

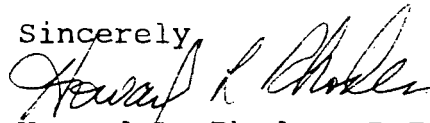
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter must be attached to the construction permit, No. AC 41-165759, and shall become a part of the permit.

Sincerely



Howard L. Rhodes, P.E.
Interim Director
Division of Air Resources
Management

Mr. L. S. Tierney
Page 3

HLR/RBM/rbm

Attachment

cc: B. Thomas, SWD
J. Harper, EPA
T. John, P.E., TTJEI
R. Evangelisti, P.E., OMC
P. Comer, Esq., DER
G. Smallridge, Esq., DER



RECEIVED
DER - MAIL ROOM
1992 JUN -3 AM 11:46

May 28, 1992

Mr. Bruce Mitchell
FEDERAL DEPARTMENT OF
ENVIRONMENTAL REGULATION [FDER]
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: DONZI MARINE CORPORATION, AC41-165759

Dear Mr. Mitchell:

The above referenced construction permit will expire on July 31, 1992 in accordance with specific condition 8, we are requesting an extension of time for the VOC/OS Construction Permit until December 31, 1992.

Donzi Marine has not operated in a "boat production" capacity for approximately the last year due to the depressed general economic conditions. During this period, intermittent repair work has been performed at the facility, however, we feel that the detailed chemical usage and other inventory/usage data required for demonstration of compliance with specific condition 4 was not adequately recorded.

After reviewing your recent comments on the subject with Tom John, P.E., we request the extension of time to target our record keeping procedures for the warranty repair work. Our goal during this extension will be to adequately demonstrate compliance with permit specific condition 4 using the repair work data rather than full boat production data, as you suggested.

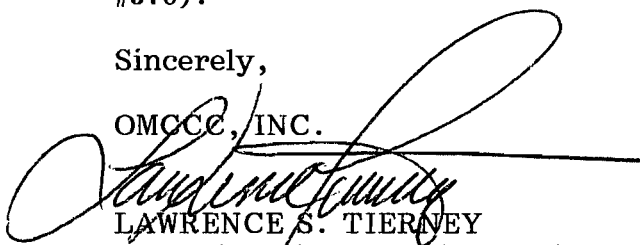
In addition, the extension would make the VOC construction expiration date coincident with the particulate permit (AC41-192558) expiration date, a further convenience for the facility.

We are enclosing a check for \$50.00, payable to the Department of Environmental Regulation, as required for the extension of time request.

We appreciate your consideration and assistance in this project. If you have any questions, please call Mr. Chris Lashley of our staff at (813) 351-4900 (Extension #570).

Sincerely,

OMCCC, INC.


LAWRENCE S. TIERNEY
Executive Vice-President and
Chief Operating Officer

1031

Attachment

OMCCC Inc. CC: R. Evangelisti [OMC]
A Subsidiary of Outboard Marine Corporation T. John [T. John Engineering]
8161 15th Street East, Sarasota, Florida 34243 J. McDonald [FDER]
813-755-7585 FAX 813-351-8053



DONZI

RECEIVED
DER - MAIL ROOM
1992 JUN -3 AM 11:46

May 28, 1992

Mr. Bruce Mitchell
FEDERAL DEPARTMENT OF
ENVIRONMENTAL REGULATION [FDER]
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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We are enclosing a check for \$50.00, payable to the Department of Environmental Regulation, as required for the extension of time request.

We appreciate your consideration and assistance in this project. If you have any

Chris Craft
BOATS

OMCCC, INC.
8161 15th Street East
Sarasota, Florida 34243

FIRST WISCONSIN BANK
OF WAUSAU
WAUSAU, WISCONSIN

2032
78-1160
758

PAY

TO
THE
ORDER
OF

Department of Environmental Regulation

DATE

June 13, 1990

AMOUNT

\$50.00

OMCCC, INC.

[Signature]
AUTHORIZED AGENT
[Signature]
AUTHORIZED AGENT





State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Howard Rhodes

FROM: *for* Clair Fancy *JKP*

DATE: June 25, 1992

SUBJ: Amendment to Construction Permit-Expiration Date Extension
Donzi Marine Corporation-Fiberglassing Operations
AC 41-165759

Attached for your approval and signature is a letter amending the above referenced construction permit extending the expiration date. There is no controversy associated with this action.

I recommend approval and signature of this amendment.

HLR/CHF/rbm

Attachment

Best Available Copy

Tom T. John Engineering, Inc. 7522 N. 40th Street Tampa FL 33604
(813) 985 7881 fax: (813) 980 3564

Mr. Bruce Mitchell
Air Section, Department of Environmental
Two Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

2 copies

re: Chris Craft, Donzi Marine Corporati

June 14, 1991

Dear Mr. Mitchell,

Notice of Intent to Issue for Chris Craft Boats and Donzi Marine Corporation was published in the Bradenton Herald on May 31, 1991. I have enclosed the originals of the proofs of publication.

If you have any questions or wish to discuss the project in more detail, please call me at (813) 985-7881.

Sincerely,

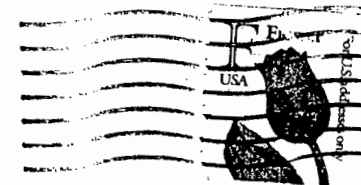
Tom T. John, P.E.

*cc: B. Mitchell
B. Thomas, SW Dist.*

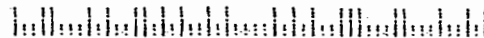
RECEIVED
JUN 17 1991
Division of Air
Resources Management

RECEIVED
JUN 14 1991

Tom T. John Engineering, Inc.
7522 40th Street
Tampa, Fl 33604



Mr. Bruce Mitchell
Department of Environmental Regulation
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Fl 32399-2400





The Bradenton Herald

102 MANATEE AVE. WEST, P.O. BOX 921
BRADENTON, FLORIDA 34206
TELEPHONE (813) 748-0411

PUBLISHED DAILY
BRADENTON, MANATEE COUNTY, FLORIDA

STATE OF FLORIDA COUNTY OF MANATEE:

Before the undersigned authority personally appeared Linda L. Rikke, who on oath says that she is the Legal Advertising Clerk and the official representative of the Publisher of The Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida, with the express, limited authority to execute this affidavit for the purpose of establishing proof of publication of the public or legal notice and advertisement in the form attached hereto; that the attached copy of advertisement, being a legal advertisement in the matter of

Notice of Intent/Donzi Marine

in the _____ Court,

was published in said newspaper in the issues of _____

5/31, '91

Affiant further says that the said The Bradenton Herald is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Bradenton, Manatee County, Florida, each day and has been entered as second class mail matter at the post office in Bradenton, in said Manatee County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and the affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this

4th day of June

A.D. 19 91

(SEAL) Notary Public

Notary Public, State of Florida at Large
My Commission Expires July 24, 1991

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of the intent to issue an after-the-fact construction permits to Donzi Marine Corporation, Post Office Box 987, Tallahassee, Florida 34270-0987, for a fiberglass boat manufacturing facility, which consists of a fiberglassing operation and a wood and fiberglass cutting and grinding operation. The proposed project will occur at the applicant's facility located at 7110 21st Street East, Sarasota, Manatee County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

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

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
5/31, '91

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

MAY 30 1991

In the Matter of
Application for Permits by:

Donzi Marine Corporation
P. O. Box 987
Tallevast, Florida 34270-0987

Division of Air
Resources Management
DER File No. AC 41-192558
AC 41-165759

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue after-the-fact air construction permits (copies attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Donzi Marine Corporation, applied on June 2, 1989, to the Department of Environmental Regulation (DER) for an after-the-fact permit for the fiberglass operations at their facility. The applicant also applied on February 11, 1991, for an after-the-fact permit for the wood and fiberglass cutting and grinding operations at their facility. The proposed project will occur at the applicant's facility located at 4110 21st Street East, Sarasota, Manatee County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits are required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permits. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO	
		ACTION DUE DATE	
1. TO: (NAME, OFFICE, LOCATION)		Initial	
<i>Ms. Cindy Phillips</i>		Date	
2.		Initial	
<i>DER - Tallahassee</i>		Date	
3.		Initial	
<i>DARM - BAR</i>		Date	
4.		Initial	
<i>Twin Towers</i>		Date	
REMARKS:		INFORMATION	
		Review & Return	
<p><i>Can you send me the application w/correspondence for application AC41-192558. I do have the application for AC41-165759</i></p> <p><i>Sent 5-31-91</i></p> <p><i>DA</i></p>		Review & File	
		Initial & Forward	
<p style="text-align: center;">RECEIVED</p> <p style="text-align: center;">MAY 30 1991</p> <p style="text-align: center;">Division of Air Resources Management</p>		DISPOSITION	
		Review & Respond	
		Prepare Response	
		For My Signature	
		For Your Signature	
		Let's Discuss	
		Set Up Meeting	
		Investigate & Report	
		Initial & Forward	
		Distribute	
		Concurrence	
		For Processing	
Initial & Return			
FROM:		DATE	<i>5-24-91</i>
<i>Jim McDonald</i>		PHONE	

Tom T. John Engineering, Inc.
(813) 985 7881

PM
5-18-91
St. Petersburg, FL

7522 N. 40th Street Tampa FL 33604
fax: (813) 980 3564

File C-67

Mr. R. Bruce Mitchell
Bureau of Air Regulation
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

re: Chris Craft Boats Particulates Permit - AC 41-189663
Donzi Marine Particulate Permit - AC 41-192558
Donzi Marine VOC/OS Permit - AC 41-165759

May 16, 1991

RECEIVED

MAY 20 1991

Dear Mr. Mitchell;


Division of Air
Resources Management

As requested in our meeting of May 15, 1991, I am enclosing a copy of the particulate application and the subsequent permit for Chris Craft Boats, Sarasota, issued through the Tampa DER office.

As we further discussed in that meeting, Donzi Marine requests that the expiration date of their construction permit (AC41-192558) be extended until December 31, 1992. This will provide the necessary time to apply for and be granted an alternative testing procedure (VE test) for the cyclone collector at that facility. Also, as we have discussed, the applicant wishes to have the requested operating hours increased to 8760 hours/yr. I am enclosing a new application page 3 reflecting that change for your use.

If you have any questions or wish to discuss the project in more detail, please call me at (813) 985-7881. Thank you for the attention and consideration you have provided.

Sincerely,



Tom T. John, P.E.

enc: as noted

cc: Chris Lashley

Robert Evangelisti, P.E.

Bill Thomas, SWD
Bruce Mitchell

} 5-22-91 RRM

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO
a. If yes, has "offset" been applied? _____
b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. NO

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. NO

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? NO

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? NO

a. If yes, for what pollutants? _____

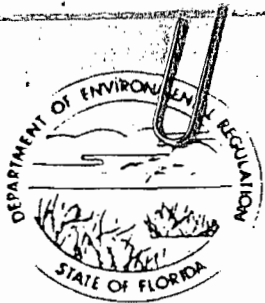
b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

RECEIVED

MAY 20 1991

Division of Air
Resources Management



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Richard Garrity, Deputy Assistant Secretary

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Emission - Particulate [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

COMPANY NAME: DONZI MARINE

COUNTY: MANATEE

Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) WOOD AND FIBERGLASS
CUTTING AND GRINDING

SOURCE LOCATION: Street 7110 21ST STREET EAST City Sarasota

UTM: East 347848 North 3033291

Latitude 27° 20' 25" N Longitude 82° 32' 36" W

APPLICANT NAME AND TITLE: C. Gordon Houser, President

APPLICANT ADDRESS: Post Office Box 987 Tallevast, Florida 34270-0987

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of DONZI MARINE CORPORATION

I certify that the statements made in this application for after-the-fact-construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: C. Gordon Houser

C. Gordon Houser, President

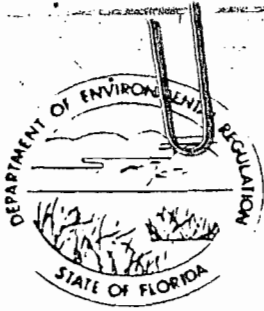
Name and Title (Please Type)

Date: 2/8/91 Telephone No. (813) 755-7585

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary
Richard Garrity, Deputy Assistant Secretary

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Emission - Particulate [] New¹ [x] Existing¹

APPLICATION TYPE: [x] Construction [] Operation [] Modification

COMPANY NAME: DONZI MARINE

COUNTY: MANATEE

Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) WOOD AND FIBERGLASS
CUTTING AND GRINDING

SOURCE LOCATION: Street 7110 21ST STREET EAST City Sarasota

UTM: East 347848

North 3033291

Latitude 27° 20' 25" N

Longitude 82° 32' 36" W

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*Attach letter of authorization

Signed: C. Gordon Houser

C. Gordon Houser, President

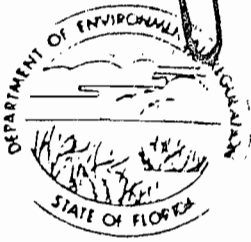
Name and Title (Please Type)

Date: 2/8/91 Telephone No. (813) 755-7585

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¹ See Florida Administrative Code Rule 17-2.100(57) and (104)



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • ~~813-425-5583~~

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Richard Garrity, Deputy Assistant Secretary

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Emission - Particulate [] New¹ [x] Existing¹

APPLICATION TYPE: [x] Construction [] Operation [] Modification

COMPANY NAME: DONZI MARINE

COUNTY: MANATEE

Identify the specific emission point source(s) addressed in this application (i.e. 1.1ma
WOOD AND FIBERGLASS CUTTING AND GRINDING)
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)

SOURCE LOCATION: Street 7110 21ST STREET EAST City Sarasota

UTM: East 347848 North 3033291

Latitude 27° 20' 25" N Longitude 82° 32' 36" W

APPLICANT NAME AND TITLE: C. Gordon Houser, President

APPLICANT ADDRESS: Post Office Box 987 Tallevast, Florida 34270-0987

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of DONZI MARINE CORPORATION
I certify that the statements made in this application for after-the-fact-construction
permit are true, correct and complete to the best of my knowledge and belief. Further,
I agree to maintain and operate the pollution control source and pollution control
facilities in such a manner as to comply with the provision of Chapter 403, Florida
Statutes, and all the rules and regulations of the department and revisions thereof. I
also understand that a permit, if granted by the department, will be non-transferable
and I will promptly notify the department upon sale or legal transfer of the permitted
establishment.

*Attach letter of authorization

Signed: C. Gordon Houser

C. Gordon Houser, President

Name and Title (Please Type)

Date: 2/8/91 Telephone No. (813) 755-7584

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have
been designed/examined by me and found to be in conformity with modern engineering
principles applicable to the treatment and disposal of pollutants characterized in the
permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)



OUTBOARD MARINE CORPORATION

RECEIVED

MAY 14 1991

Division of Air
Resources Management
May 8, 1991

100 Sea-Horse Drive
Waukegan, Illinois 60085-2195
Phone 708/689-6200
Telex 025-3891

Mr. Bruce Mitchell
Florida Department of Environmental Regulation
2600 Blainstone Rd.
Tallahassee, FL 32399-2400

Re: Donzi Marine Permit Draft Conditions

Dear Mr. Mitchell:

On March 14, 1991 the Florida Department of Environmental Regulation issued an "Intent to Issue" an Air Permit to Donzi Marine Corporation. On behalf of Donzi, OMC's comments on the draft specific conditions for AC41-192558 (VOC) and AC41-165759 (Particulates) are as follows:

Particulates:

Specific condition number 2:

The operation of particulate generating equipment is not linked to the generation of VOC compounds, as this condition implies. Requested hours of operation were 8 hrs/day, 5 days/wk, 52 wks/yr. Within that constraint, the facility should be able to operate 24 hours per day provided only 8 hours of that time involves procedures that generate particulate matter.

Specific condition number 4:

Donzi requested a 5% Visible Emission (VE) limit be accepted in lieu of Method 5 (stack test). The stack test could cost \$1500-2500, depending on the stack construction, while a VE would cost about \$100. An "alternate procedure" can be requested but Donzi would prefer to have that review in hand or (preferably) allowed in the draft conditions.

VOC Permit

Specific condition number 2:

This should state "If the facility generates VOC emissions for 9 hours per day, the production personnel will take a one hour production break"; modelling provided in the May 11, 1990 response uses 8 operating hours with a 1 hour break (9 "open" hours per day) with no ambient exceedance, and the response to the September

Bruce Mitchell
May 7, 1991
Page Two

incompleteness modelled 8 continuous hours with no exceedance. Estimates for 9 continuous hours show high values at only two locations (2322 @ -40,-50 and 2220 @ -60,-50) with second highest values below the guidelines. The facility should not be restricted to any limits other than 8 total hours per day without a break.

The Department apparently modelled the source using 5 years of meteorological data, but did not provide the output of that model for our analysis. Donzi is uncertain as to the impact of that modelling on the operating restrictions. Donzi requests the output of the DER's 5 year modeling be provided.

Specific condition number 3:

It is not clear whether chemical inventories must be made available with 24 hours' notice, or chemical inventories must be performed every 24 hours. Specific condition number 4, the material balance scheme, was originally proposed by Donzi to be calculated monthly, not daily.

Specific condition number 6:

This issue was addressed in the May 11, 1990 response to incompleteness items, and should not be made a condition of operation. Donzi is uncomfortable in committing to a plan of action without knowledge of a specific problem. Donzi requests the FL-DER provides general guidelines for responding to this type of problem.

If you have any questions, comments or concerns about this matter, please call me at 708/689-5713.

Sincerely,

Robert Evangelisti

Robert Evangelisti, P.E.
Manager,
Environmental Compliance

RE/vm

XC: R. Crawford
J. Keim
G. Houser
T. John
C. Lashley

TABLE 1

PREDICTED CONCENTRATIONS AT PLANT BOUNDARIES ($\mu\text{g}/\text{m}^3$) AT INDICATED DISTANCES (METERS EAST OR WEST) FROM NORTH-SOUTH CENTERLINE OF BUILDING

	<u>Building Center</u>										
	<u>WEST</u>					<u>EAST</u>					
	<u>Distance in Meters</u>					<u>Distance in Meters</u>					
<u>8 emitting hrs/day</u>	-100	-80	-60	-40	-20	0	20	40	60	80	100
Northern Boundary:	1461	1703	1969	1901	1919	1838	1686	1747	1578	1338	1232
Southern Boundary	1470	1638	2053	2072	1690	2039	2009	1464	1395	1445	1312
<u>9 emitting hrs/day</u>	-100	-80	-60	-40	-20	0	20	40	60	80	100
Northern Boundary:	1461	1771	2114	2117	2016	1838	1792	1747	1918	1679	1291
Southern Boundary	1470	1726	2220	2322	1774	2039	2060	1585	1425	1487	1362



OUTBOARD MARINE CORPORATION

PM
5-8-91
Waukegan, Ill

File Copy

RECEIVED

MAY 10 1991

Division of Air Resources Management
May 7, 1991

100 Sea-Horse Drive
Waukegan, Illinois 60085-2195
Phone 708/689-6200
Telex 025-3891

Mr. Bruce Mitchell
Florida Department of Environmental Regulation
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May 7, 1991
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If you have any questions, comments or concerns about this matter, please call me at 708/689-5713.

Sincerely,

Robert Evangelisti

Robert Evangelisti, P.E.
Manager,
Environmental Compliance

RE/vm

XC: R. Crawford
W. Eck
G. Houser
T. John
C. Lashley

BA/CHF
B. Thomas, SWD } 5-13-91 RAN
B. Mitchell
C. Holladay

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FROM NORTH-SOUTH CENTERLINE OF BUILDING

	<u>Building Center</u>										
	<u>WEST</u>					<u>EAST</u>					
	<u>Distance in Meters</u>					<u>Distance in Meters</u>					
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9 emitting hrs/day	-100	-80	-60	-40	-20	0	20	40	60	80	100
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Southern Boundary	1470	1726	2220	2322	1774	2039	2060	1585	1425	1487	1362

I N T E R O F F I C E M E M O R A N D U M

Date: 09-Apr-1991 11:58am GMT
From: Iris Littleton
LITTLETON_I
Dept: Office General Counsel
Tel No: 904/488-9730

TO: DUANE REVELL (REVELL,DUANE)
CC: Pat Manning (MANNING_P)
Subject: New OGC Case Assignments

TO: Duane Revell
FROM: Iris - OGC - Tallahassee

Received 3/14/91 request for an Administrative Hearing from Laura Markowitz, Dottie Devane, Kathy Younkin, Eleanor Salkin & Tony Palms against intent to issue permit AC29-181544 to MacDill Air Force Base.

Received 4/02/91 two requests for Extensions of Time from Donzi Marine Corp. concerning permits AC41-192558 and AC41-165759.

Received 3/11/91 petition re: Modification of Site Certification from City of Tallahassee, Arvah B. Hopkins Generating Station PA74-03.

Received 3/29/91 petition re: Site Certification from Orlando Utilities Commission Stanton Unit 2 PA81-14B.

cc: B. Mitchell
B. Duerr

APRIL 2, 1991

RECEIVED

APR 2 1991

BRUCE MITCHELL
BUREAU OF AIR REGULATION
DEPARTMENT OF ENVIRONMENTAL REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32349

DER-BAQM

DEAR BRUCE,

IN REFERENCE TO THE DONZI PERMITS AC41-192558 AND AC41-165759, VOC/OS AND PARTICULATES RESPECTIVELY; THERE ARE A COUPLE OF ITEMS IN THE SPECIFIC CONDITIONS THAT ARE CONTRARY OR RAISE ADDITIONAL QUESTIONS. TOM JOHN AND MYSELF HAVE REVIEWED THE PERMITS, BUT WE ARE WAITING FOR OMC CORPORATE'S REVIEW AND APPROVAL. FOR THIS REASON, I ASK THAT THE DEPARTMENT GRANT A 14 DAY EXTENSION TO THE RECEIPT DEADLINE. I EXPECT A REPLY BY 4-4-91, AND I WILL PERSONALLY EXPEDITE THE PROCESS WHEN I RECEIVE IT. I APPRECIATE YOUR CONSIDERATION OF THIS MATTER. SHOULD THERE BE ANY QUESTIONS OR COMMENTS, PLEASE CONTACT ME AT 813-351-4900.

SINCERELY,



CHRISTOPHER LASHLEY
ENVIRONMENTAL REPRESENTATIVE

cc: Candy. OGC (to take to Carol Fothman)
Bruce
Cleve
BA/CHF

} 4-2-91 AM

RECEIVED

APR 2 1991

DER BAQM

BRUCE MITCHELL
BUREAU OF AIR REGULATION
DEPARTMENT OF ENVIRONMENTAL REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA
32349

CHRIS LASHLEY
ENVIRONMENTAL REPRESENTATIVE
813-351-4900

RECEIVED**APR 2 1991****DER - BAQM**

BRUCE MITCHELL
BUREAU OF AIR REGULATION
DEPARTMENT OF ENVIRONMENTAL REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA
32349

CHRIS LASHLEY
ENVIRONMENTAL REPRESENTATIVE
813-351-4900

FROM

(TUE) 4. 2. '91 12:02 NO.2060507968 PAGE 2

APRIL 2, 1991

RECEIVED

APR 2 1991

DER-BAQM

BRUCE MITCHELL
BUREAU OF AIR REGULATION
DEPARTMENT OF ENVIRONMENTAL REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32349

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SINCERELY,



CHRISTOPHER LASHLEY
ENVIRONMENTAL REPRESENTATIVE

P 407 853 181

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

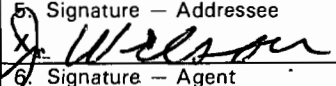
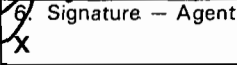
*U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to Mr. C. Gordon Houser, Donzi	
Street and No. Marine	
P. O. Box 987	
P.O. State and ZIP Code Tallevast, FL 34270-0987	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 3-14-91 Permit: AC 41-192558 AC 41-165759	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. C. Gordon Houser President and CEO Donzi Marine Corp P. O. Box 987 Tallevast, FL 34270-0987	4. Article Number P 407 853 181 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Addressee 	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent 	
7. Date of Delivery 3-19 white	

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

File Copy



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

March 14, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. Gordon Houser, President and CEO
Donzi Marine Corporation
P. O. Box 987
Tallevast, Florida 34270-0987

Dear Mr. Houser:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed after-the-fact permits for Donzi Marine Corporation's fiberglass boat manufacturing facility, located at 4110 21st Street East, Sarasota, Manatee County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/plm

Attachments

c: B. Thomas, SWD
T. T. John, P.E., TTJE, Inc.

Reading File
Bruce Mitchell } 3-14-91 AM
Clem Holladay }

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permits by:

Donzi Marine Corporation
P. O. Box 987
Tallevast, Florida 34270-0987

DER File No. AC 41-192558
AC 41-165759

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue after-the-fact air construction permits (copies attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Donzi Marine Corporation, applied on June 2, 1989, to the Department of Environmental Regulation (DER) for an after-the-fact permit for the fiberglass operations at their facility. The applicant also applied on February 11, 1991, for an after-the-fact permit for the wood and fiberglass cutting and grinding operations at their facility. The proposed project will occur at the applicant's facility located at 4110 21st Street East, Sarasota, Manatee County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits are required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permits. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

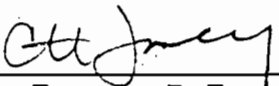
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under

Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copies furnished to:

B. Thomas, SWD
T. T. John, P.E., TTJE, Inc.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 3-14-91.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Henry Ober
Clerk

3-14-91
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue after-the-fact construction permits to Donzi Marine Corporation, Post Office Box 987, Tallevast, Florida 34270-0987, for a fiberglass boat manufacturing facility, which consists of a fiberglassing operation and a wood and fiberglass cutting and grinding operation. The proposed project will occur at the applicant's facility located at 7110 21st Street East, Sarasota, Manatee County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
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The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Donzi Marine Corporation
Broward County
South Daytona, Florida

Construction Permit Numbers
AC 41-165759
AC 41-192558

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

March 14, 1991

I. Application

A. Applicant and Address

Donzi Marine Corporation
P. O. Box 987
Tallevast, Florida 34270-0987

B. Project and Location

The applicant has applied for two after-the-fact construction permits for a fiberglass boat manufacturing facility, which includes a wood and fiberglass cutting and grinding operation, with an associated cyclone collection system, and a boat assembly line fiberglassing operation, with no associated controls other than building exhaust fans. The facility is located at 7110 21st Street East in Sarasota, Manatee County, Florida.

The UTM coordinates are Zone 17, 347.49 km East and 3,033.29 km North.

C. Source Industrial and Classification Codes

- o 3732: Boat Manufacturing Plant
- o 3-08-007-20: General Fiberglass Resin Products
Tons Coating Applied

II. Rule Applicability

The proposed project is subject to review in accordance with Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4.

The facility is located in an area designated attainment for all regulated pollutants pursuant to Part IV, F.A.C. Chapter 17-2.

The facility emits VOC (volatile organic compounds/organic solvents) and PM (particulate matter) in accordance with F.A.C. Rule 17-2.100, Definitions.

The projected potential pollutant emissions are 248.8 TPY VOC and 15.2 TPY PM. Since the facility is not on the list of Table 500-1, F.A.C. Chapter 17-2, the facility would be classified as minor in regard to PSD (Prevention of Significant Deterioration). Therefore, the potential pollutant emissions will be reviewed in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

The facility is subject to the applicable standards of F.A.C. Rules 17-2.610: General Particulate Emission Limiting Standards; 17-2.620: General Pollutant Emission Limiting Standards; 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.700: Stationary Point Source Emission Test Procedures; and 17-4.130: Plant Operations-Problems.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The pollutants that are regulated from the facility are VOC and PM. Also, the cyclone is subject to a visible emissions (VE) standard. The following table will display the applicable emissions standards and limitations:

Table 1

Source	Pollutant	Emission	Limiting Standard/Limit
Boat Assembly Line			
Fiberglassing Operation			
o Acetone	VOC	160.0 lbs/hr,	166.4 TPY
o Styrene	VOC	64.8 lbs/hr,	67.3 TPY
o Methyl Methacrylate	VOC	3.0 lbs/hr,	3.1 TPY
o Trichlorofluoro Methane	VOC	6.6 lbs/hr,	6.9 TPY
o Dichlorodifluoro Methane	VOC	2.5 lbs/hr,	2.6 TPY
o Methylene Chloride	VOC	2.4 lbs/hr,	2.5 TPY
		Total:	248.8 TPY
Wood & Fiberglass Cutting and Grinding Operation			
	PM	14.6 lbs/hr,	15.2 TPY
	VE		less than 20% opacity

Note: Annual emissions are based on 2080 hrs/yr operation (i.e., 8 hrs/day, 5 days/wk & 52 wks/yr).

B. Air Quality Analysis

The project has been evaluated in accordance with the procedures contained in the Department's Air Toxics Permitting Strategy (draft). The maximum hourly emissions of potential air toxics were modeled to determine the maximum predicted ambient concentrations for comparison to the no threat levels contained in the air toxics permitting strategy. The pollutants evaluated were styrene, acetone, methylene chloride, trichlorofluoromethane, dichlorofluoromethane and methyl methacrylate. Based on the highest ratio of the average air emission concentration of each pollutant to the acceptable exposure limit (Permissible Exposure Limit or PEL) of each pollutant, styrene was the principal VOC air toxic of interest. Modeling was then performed directly for styrene emissions. The maximum predicted concentrations for other pollutants were based on the ratio of their projected emissions to those of styrene. Total facility wide emissions of styrene were projected to be 8.16 grams/second or 64.8 lbs/hr. Since the facility operates 8 hours a day with an occasional 9 to 10 hour day, only 8-hour average maximum predicted styrene concentrations were generated by the modeling to be compared to the 8-hour no threat level.

The applicant used the EPA and Department-approved Industrial Source Complex Short-Term (ISCST) model with one year of meteorological data in its modeling analysis (1986 Tampa National Weather Service data). The Department extended the modeling analysis to include five years of meteorological data (1982-1986 Tampa data). The facility was modeled as a volume source. Modeling was performed using polar receptors along 36 radials spaced at 10 degree increments at distances of 75m, 100m, 150m, 200m and 250m from the facility center. Additional discrete receptors were placed along the northern and southern property boundaries at 20m intervals. Since five years of data were used in the Department's analysis, the Department compared the highest-second-high 8-hour maximum predicted concentrations to the no threat levels for each pollutant.

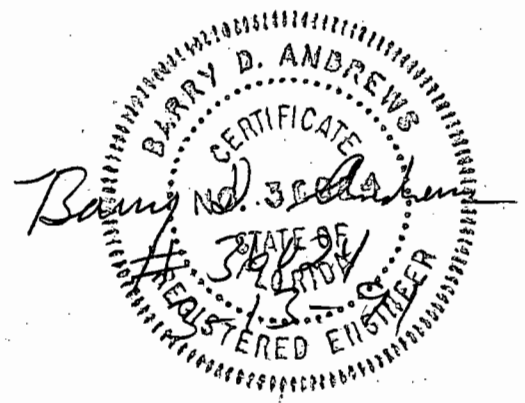
The modeling results are given in the table below and show that maximum predicted concentrations for each pollutant are less than the appropriate 8-hour no threat levels.

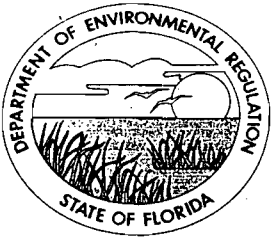
<u>Pollutant</u>	<u>Maximum Predicted Concentration ($\mu\text{g}/\text{m}^3$)</u>	<u>No Threat Levels ($\mu\text{g}/\text{m}^3$)</u>
Styrene	2,094	2,150
Acetone	5,173	35,600
Methyl Methacrylate	100	4,100
Methylene Chloride	78	1,750
Trichlorofluoro Methane	213	300*
Dichlorodifluoro Methane	80	400

* Annual average, 8-hr no-threat level would be greater

IV. Conclusion

Based on the information provided by Donzi Marine Corporation, the Department has reasonable assurance that the after-the-fact permitting action of the fiberglass boat manufacturing facility, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

**Donzi Marine Corporation
Post Office Box 987
Tallevast, Florida 34270-0987**

**Permit Number: AC 41-192558
Expiration Date: July 31, 1992
County: Manatee
Latitude/Longitude: 27°20'25"N
82°32'36"W**

**Project: Fiberglass Boat
Manufacturing: Wood & Fiber-
glass Cutting and Sanding
Operation**

This after-the-fact permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1989 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the after-the-fact permitting of a facility to produce fiberglass boats. The facility is located at 7110 21st Street East in Sarasota, Manatee County, Florida. The UTM coordinates are Zone 17, 347.85 km East and 3,033.29 km North.

The SIC is: 3732 - Boat Manufacturing Plant.
The SCC is: 3-08-007-20 General Fiberglass Resin Products
Tons Coating Applied

The source shall be constructed in accordance with the permit application, plans, documents, supplementary information, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received February 11, 1991.
2. Technical Evaluation and Preliminary Determination dated March 14, 1991.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: July 31, 1992

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 these 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 no title to land or water, does not constitute State recognition or acknowledgement 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 permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 records 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.

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 noncompliance, 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.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

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 proscribed 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 17-4.120 and 17-30.300, 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. 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

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

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 measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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.

SPECIFIC CONDITIONS:

1. The operation of this facility shall be in accordance with the capacities and specifications stated in the application and supplementary information.

2. The facility shall be allowed to operate 8 hours/day, 5 days/week, and 52 weeks/year, for a total of 2,080 hours/year. Because the facility will be open for a nine-hour day, production personnel will be required to take a one-hour per day production break (i.e., lunch hour, etc.).

3. Visible emissions from the dust collector shall be less than 20% opacity in accordance with F.A.C. Rule 17-2.610(2) and compliance shall be demonstrated using EPA Method 9 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. Alternate procedures and requirements shall be evaluated and approved in accordance with F.A.C. Rule 17-2.700(3)(d).

4. Particulate matter emissions shall not exceed 14.6 lbs/hr, 15.2 TPY. Compliance shall be demonstrated using EPA Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-192558
Expiration Date: July 31, 1992

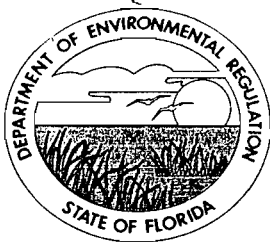
SPECIFIC CONDITIONS:

5. No air pollutants shall be discharged which cause or contribute to an objectionable odor in accordance with F.A.C. Rule 17-2.620(2).
6. The Department's Southwest district office shall be notified in writing at least 15 days in advance of the test and the test reports shall be submitted no later than 45 days after completion of the last test run in accordance with F.A.C. Rule 17-2.700.
7. Any change in the method of operation pursuant to F.A.C. Rule 17-2.100, Modification, requires an application and appropriate processing fee to be submitted to the Department's Bureau of Air Regulation.
8. The facility's operation is subject to all applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.700: Stationary Point Source Emission Test Procedures; and 17-4.130: Plant Operation-Problems.
9. The facility's operation is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR 60 (July, 1989 version).
10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
11. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed, noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1991

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

STEVE SMALLWOOD, P.E., Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
Donzi Marine Corporation
Post Office Box 987
Tallevast, Florida 34270-0987

Permit Number: AC 41-165759
Expiration Date: July 31, 1992
County: Manatee
Latitude/Longitude: 27°20'25"N
82°32'36"W

Project: Fiberglass Boat
Manufacturing: Fiberglassing
Application Operation

This after-the-fact permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1989 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the after-the-fact permitting of a facility to produce fiberglass boats. The facility is located at 7110 21st Street East in Sarasota, Manatee County, Florida. The UTM coordinates are Zone 17, 347.85 km East and 3,033.29 km North.

The SIC is: 3732 - Boat Manufacturing Plant
The SCC is: 3-08-007-20 General Fiberglass Resin Products
Tons Coating Applied

The source shall be constructed in accordance with the permit application, plans, documents, supplementary information, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received June 2, 1989.
2. Mr. C. H. Fancy's letter dated June 30, 1989.
3. Mr. Tom T. John's letter with enclosures received April 24, 1990 (confidential).
4. Mr. William W. Deane's letter with enclosures received May 4, 1990.
5. Mr. J. Harry Kern's letter dated May 23, 1990.
6. Mr. C. H. Fancy's letter dated May 23, 1990.
7. Mr. Tom T. John's letter with enclosures received August 15, 1990 (modeling output confidential).
8. Mr. C. H. Fancy's letter dated September 18, 1990.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

Attachments Cont'd:

9. Mr. C. Gordon Houser's letter with enclosures received October 17, 1990.
10. Mr. C. H. Fancy's letter dated November 15, 1990.
11. Mr. C. Gordon Houser's letter received December 21, 1990.
12. Technical Evaluation and Preliminary Determination dated March 14, 1991.

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 these 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 no title to land or water, does not constitute State recognition or acknowledgement 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 permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 records 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.

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 noncompliance, 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.

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

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 proscribed 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 17-4.120 and 17-30.300, 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. 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

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

GENERAL CONDITIONS:

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 measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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.

SPECIFIC CONDITIONS:

1. The operation of this facility shall be in accordance with the capacities and specifications stated in the application and supplementary information.

2. The facility shall be allowed to operate 8 hours/day, 5 days/week, and 52 weeks/year, for a total of 2,080 hours/year. Because the facility will be open for a nine-hour day, production personnel will be required to take a one-hour per day production break (i.e., lunch hour, etc.).

3. VOC/organic solvent emissions shall be verifiable on a 24-hour basis and shall not exceed the following:

VOC/Organic Solvent	Allowable Emissions Limit
Acetone	160.0 lbs/hr, 166.4 TPY
Styrene	64.8 lbs/hr, 67.3 TPY
Methyl Methacrylate	3.0 lbs/hr, 3.1 TPY
Trichlorofluoro Methane	6.6 lbs/hr, 6.9 TPY
Dichlorodifluoro Methane	2.5 lbs/hr, 2.6 TPY
Methylene Chloride	2.4 lbs/hr, 2.5 TPY
	Total 248.8 TPY

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

SPECIFIC CONDITIONS:

4. Compliance shall be demonstrated by applying a material balance scheme, which is to compare the beginning inventory, recycled and disposed of (shipped-out) material, and ending inventory. Annual actual emissions shall be required to be submitted to the Department's Southwest District in an annual operating report by March 31 of each calendar year.

5. In accordance with F.A.C. Rule 17-2.620(1), no person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. All vats, containers, etc., that are used for temporary and permanent storage of VOC/organic solvents, shall be covered when not in use.

6. By March 31, 1992, Donzi Marine Corporation shall submit to the Department's Southwest District a conceptual plan and potential course of action that will provide the Department with reasonable assurance that objectionable odors and toxic air pollutants in quantities that could exceed acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan should contain at a minimum, but not be limited to, various control system strategies that might be installed to reduce or eventually eliminate emissions of VOC/OS from each type of operation, associated time and cost analyses, and VOC/OS substitutes.

7. Any change in the method of operation pursuant to F.A.C. Rule 17-2.100, Modification, requires an application and appropriate processing fee to be submitted to the Department's Bureau of Air Regulation.

8. The facility's operation is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4.

9. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
Donzi Marine Corporation

Permit Number: AC 41-165759
Expiration Date: July 31, 1992

SPECIFIC CONDITIONS:

10. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed, noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1991

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

STEVE SMALLWOOD, P.E., Director
Division of Air Resources
Management



RECEIVED
DER - MAIL ROOM
1991 FEB 11 AM 11:34

February 8, 1991

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

FEB 11 1991

DER - BAQM

Re: Application for Particulate Discharge Permit
Donzi Marine Corporation

Gentlemen:

Enclosed herewith please find three (3) fully executed Application for Particulate Discharge Permit regarding the above-referenced company.

I confirm that all documents herein have original signatures and seals.

Should you have any questions please do not hesitate to contact me.

Very truly yours,

C. Gordon Houser
President and CEO

CGH:vh

Enc: as stated

cc: B. Mitchell
B. Thomas, SW Dist
R. Baum, Manatee Co.



QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

0153844250

1015M

0153844250

Date: 2/18/91

RECIPIENT'S COPY

From (Your Name) Please Print C. GORDON HOUSER		Your Phone Number (Very Important) (813) 755-7525	To (Recipient's Name) Please Print DEPARTMENT OF ENVIRONMENTAL REGULATION		Recipient's Phone Number (Very Important)
Company DONZI MARINE		Department/Floor No.	Company BUREAU OF AIR REGULATION		Department/Floor No.
Street Address 1941 WHITFIELD PARK LOOP			Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip® Codes.) 2600 BLAIR STONE ROAD		
City TALLEVAST	State FL	ZIP Required 3 4 2 4 3	City TALLAHASSEE	State FL	ZIP Required 32399-2400

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.) Particulate Discharge Permit Application				IF HOLD FOR PICK-UP, Print FEDEX Address Here	
PAYMENT 1 <input checked="" type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card 5 <input type="checkbox"/> Cash/Check				Street Address	
				City State ZIP Required	

SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)			PACKAGES	WEIGHT in Pounds Only	YOUR DECLARED VALUE	Emp. No.	Date	Federal Express Use	
Priority Overnight Service (Delivery by next business morning) <input type="checkbox"/> YOUR PACKAGING 51 <input type="checkbox"/> <input type="checkbox"/> FEDEX LETTER * 56 <input checked="" type="checkbox"/> FEDEX LETTER * <input type="checkbox"/> FEDEX PAK * 52 <input checked="" type="checkbox"/> FEDEX PAK * <input type="checkbox"/> FEDEX BOX 53 <input type="checkbox"/> FEDEX BOX <input type="checkbox"/> FEDEX TUBE 54 <input type="checkbox"/> FEDEX TUBE Economy Two-Day Service (formerly Standard Air) (Delivery by second business day) <input type="checkbox"/> ECONOMY TWO-DAY SVC. Heavyweight Service (for Extra Large or any package over 150 lbs.) <input type="checkbox"/> HEAVYWEIGHT ** 70 <input type="checkbox"/> DEFERRED HEAVYWEIGHT ** 80	1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE _____ lbs. 7 <input type="checkbox"/> OTHER SPECIAL SERVICE _____ 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> DESCRIPTION _____ 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)	1 2 3 4 5 6 7 8 9 10 11 12	1 2 3 4 5 6 7 8 9 10 11 12	Total 1 2 3 4 5 6 7 8 9 10 11 12	Total 1 2 3 4 5 6 7 8 9 10 11 12	Total 1 2 3 4 5 6 7 8 9 10 11 12	<input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: X Date/Time Received FedEx Employee Number	Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 8/90 PART #119501 FXEM12/90 FORMAT #041 041 © 1990 F.E.C. PRINTED IN U.S.A.	Release Signature: _____ Date/Time: 2/18/91 2:00 PM	FedEx Emp. No. 21017	

DONZI MARINE CORPORATION
P.O. BOX 987 TALLEVAST, FL 34270-0987

VENDOR NAME **FLORIDA DEPT. OF ENVIRONMENTAL**
VENDOR NO. **FL159** CHECK NO.: **062150**

INVOICE DATE	INVOICE NUMBER	REFERENCE	INVOICE AMOUNT	DISCOUNT AMOUNT	NET AMOUNT PAID	
02/04/91	PART. DIS. PER		500.00	0.00	500.00	
DETACH AND RETAIN THIS STATEMENT. THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED ABOVE.			62150	500.00	0.00	500.00



DONZI MARINE CORPORATION
P.O. BOX 987
TALLEVAST, FL 34270-0987

FIRST WISCONSIN NATIONAL BANK
OF BROOKFIELD
BROOKFIELD, WISCONSIN

062150 79-954
759

CHECK NO.: **62150**

CHECK DATE: **02/07/91**

DONZI

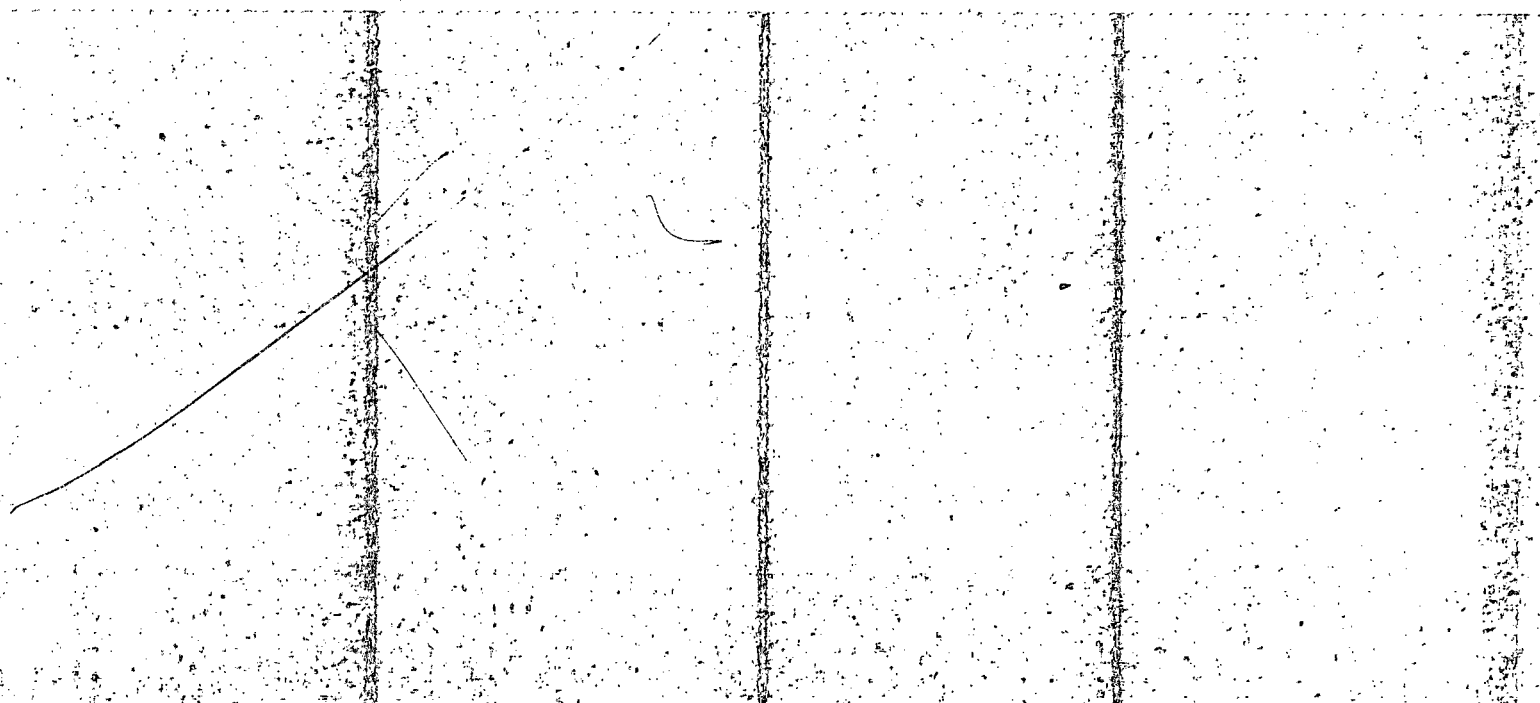
***** Five Hundred and xx/100 ***** DOLLARS \$500.00

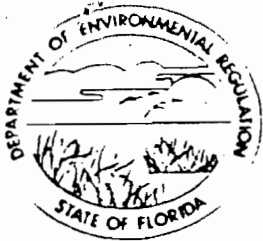
TO THE ORDER OF **FLORIDA DEPT. OF ENVIRONMENTAL
REGULATION-BUREAU OF AIR
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA**

32399-2400

DONZI MARINE CORPORATION
OPERATING ACCOUNT

[Handwritten Signature]
AUTHORIZED SIGNATURES





Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary
Richard Garrity, Deputy Assistant Secretary

\$500 pd.
2-11-91
Rept. #151244

AC 41-192558

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Emission - Particulate [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

COMPANY NAME: DONZI MARINE

COUNTY: MANATEE

Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) WOOD AND FIBERGLASS
CUTTING AND GRINDING

SOURCE LOCATION: Street 7110 21ST STREET EAST

City Sarasota

UTM: East 347848

North 3033291

Latitude 27° 20' 25" N

Longitude 82° 32' 36" W

APPLICANT NAME AND TITLE: C. Gordon Houser, President

APPLICANT ADDRESS: Post Office Box 987 Tallevast, Florida 34270-0987

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of DONZI MARINE CORPORATION

I certify that the statements made in this application for after-the-fact-construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: C. Gordon Houser

C. Gordon Houser, President

Name and Title (Please Type)

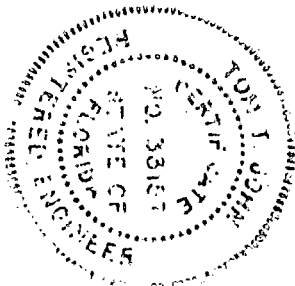
Date: 2/8/91 Telephone No. (813) 755-7585

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed Tom T. John

Tom T. John, P.E.

Name (Please Type)

Tom T. John Engineering, Inc.

Company Name (Please Type)

7522 North 40th Street, Suite H, Tampa, FL 33604

Mailing Address (Please Type)

Florida Registration No. 33157 Date: Jan. 1983 Telephone No. 813-985 7881

SECTION II: GENERAL PROJECT INFORMATION

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The facility is a fiberglass boat manufacturing operation.

During construction, wood supports and forms and fiberglass parts

are cut and shaped. Particulate emissions are controlled by

a custom designed cyclone collector.

- B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction May 1990

Completion of Construction n/a

- C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Total cost of system: approximately \$10,000

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

VOC emission permit for facility: AC41-165759

E. Requested permitted equipment operating time: hrs/day 8 ; days/wk 5 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO
a. If yes, has "offset" been applied? _____
b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. NO

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. NO

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? NO

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? NO

a. If yes, for what pollutants? _____

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.65D must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
WOOD	PARTICULATES		SEE ATTACHMENT 3	SEE ATTACHMENT 2

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
PARTICULATES	SEE ATTACHMENT 3				SEE ATTACHMENT 3		SEE ATTACH. 2

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (if applicable)	Basis for Efficiency (Section V Item 5)
Cyclone separator (custom designed)	PARTICULATE	60%	N/A	See Attach. 3

E. Fuels N/A

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other fuel contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. N/A

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Particulate solids are collected and disposed of in appropriate manner

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 20 ft. Stack Diameter: 2.4 ft.

Gas Flow Rate: 5400 ACFM ~ 5400 DSCFM Gas Exit Temperature: ambient °F.

Water Vapor Content: negligible % Velocity: approx. 20 ft/sec FPS

See also Attachment 3

SECTION IV: INCINERATOR INFORMATION N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [] Cyclone [] Wet Scrubber [] Afterburner

[] Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

All wastes generated are disposed of in accordance with relevant State and local
(if applicable) regulations

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

- 9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
- 10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

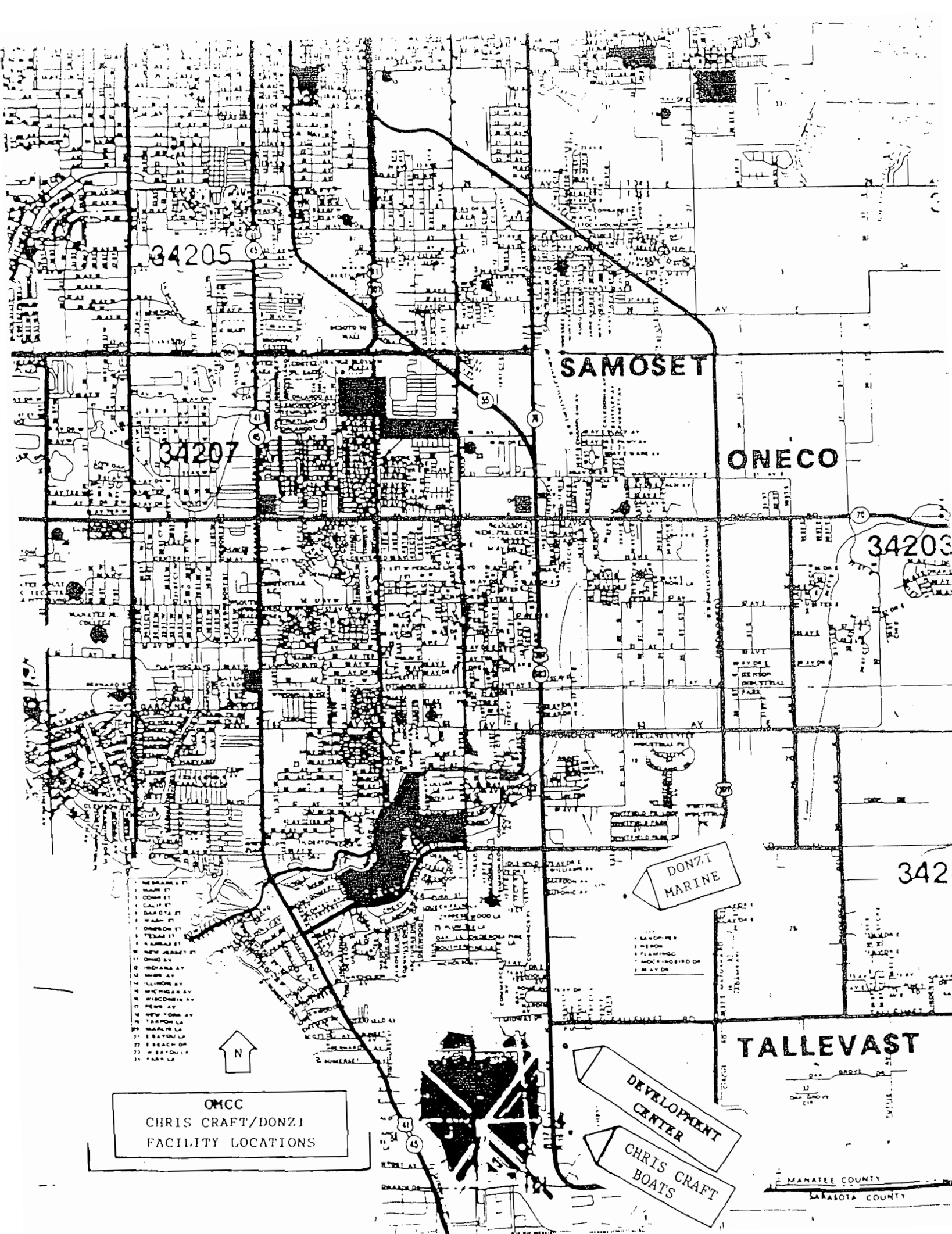
Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

ATTACHMENT 1
FACILITY LOCATION



34205

34207

34203

342

SAMOSET

ONECO

TALLEVAST

- 1 NEBASKA ST
- 2 NASH ST
- 3 COMB ST
- 4 CALIF ST
- 5 DARTON ST
- 6 WASH ST
- 7 OREGON ST
- 8 TEXAS ST
- 9 ALABAMA ST
- 10 NEW JERSEY ST
- 11 OHIO AV
- 12 INDIANA AV
- 13 MISS AV
- 14 ULLMOH AV
- 15 WINDOMER AV
- 16 PEAR AV
- 17 NEW YORK AV
- 18 TAYLOR LA
- 19 MARLOW LA
- 20 WINDOMER AV
- 21 BEACH DR
- 22 BEACH DR
- 23 BEACH DR
- 24 LAKE LA



OMCC
CHRIS CRAFT/DONZI
FACILITY LOCATIONS

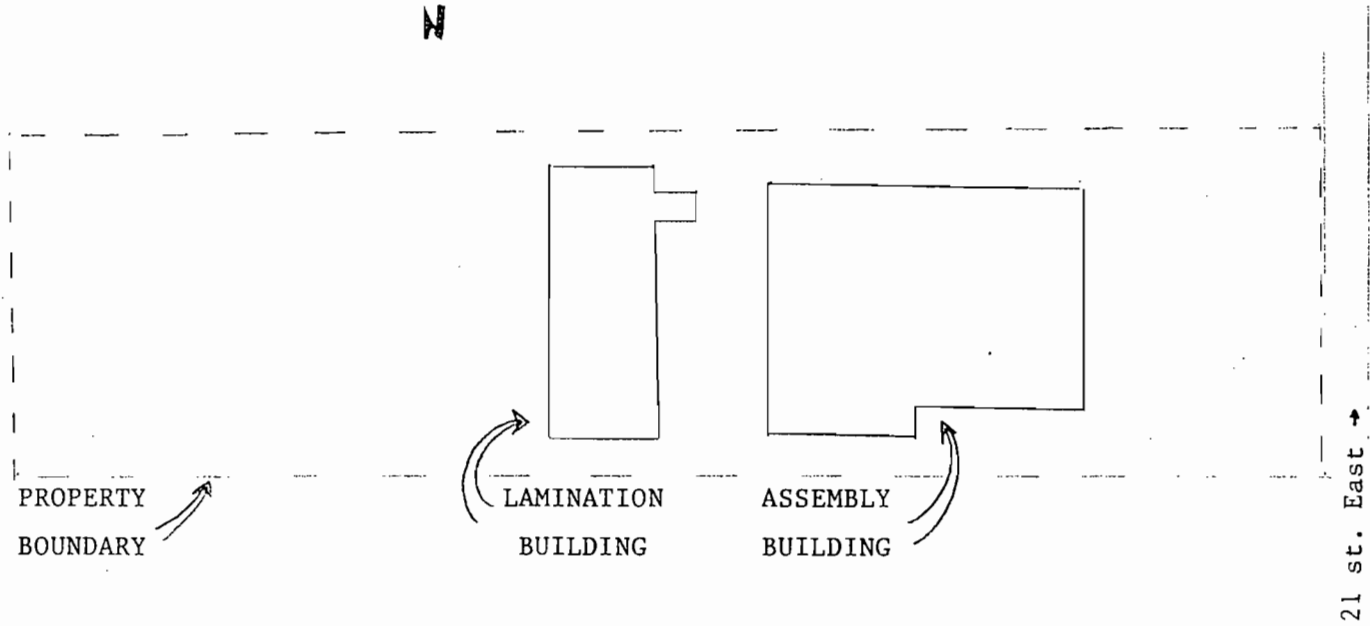
DONZI
MARINE

DEVELOPMENT
CENTER
CHRIS CRAFT
BOATS

- 1 LARGO PIER
- 2 PIER 2
- 3 PIER 3
- 4 PIER 4
- 5 PIER 5
- 6 PIER 6
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- 100 PIER 100

ATTACHMENT 2
FACILITY LAYOUT

↑
N



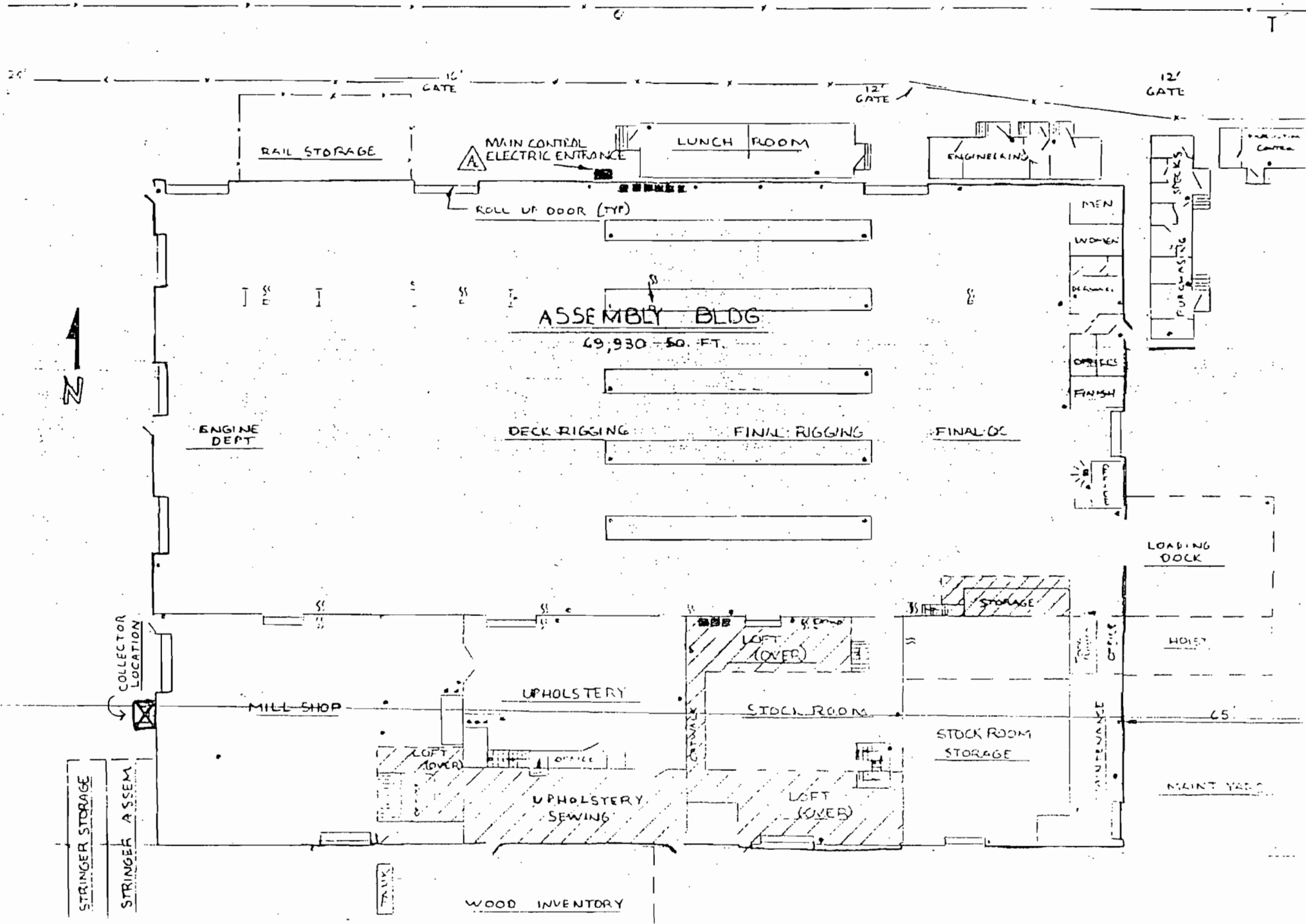
PROPERTY
BOUNDARY

LAMINATION
BUILDING

ASSEMBLY
BUILDING

21 st. East →

Best Available Copy



ATTACHMENT 3

PROCESS DESCRIPTION

COLLECTION EQUIPMENT

EMISSION ESTIMATES

TABLE 3.1
EQUIPMENT LIST

Multiplex 12" radial arm saw

Rockwell 10" table saw

19'6" Koak bandsaw

18" Whitney tablesaw

Mattison 14" rip saw

Delta 10" radial arm saw

Onsrud table router - 10 HP

Particulate sources at the facility include woodworking and fiberglass cutting, grinding and sanding. The particulates generated from the principal operations are controlled by vacuum collectors at the point of origin. A list of typical equipment available for use in the Mill Shop is presented as Table 3.1.

The collector ductwork feeds to a custom designed and installed cyclone dust collector (Larry Coleman, Southern Industrial, Tampa, FL (813) 659-1857). Vendor drawings are included at the end of this section as Figure 3.2.

Plant operating experience has shown that the particulate control system will collect approximately eleven 55-gallon drums per week of loosely packed sawdust, shavings, and fiberglass trimmings. Material from floor and equipment sweepings is also included in this total.

The approximate bulk density of this combined material is estimated by plant personnel as 12 lbs/cubic foot. The particulates collected may then be estimated as:

$$(11 \text{ drums/wk})(55 \text{ gal/drum})(\text{ft}^3/8.3 \text{ gal})(12 \text{ lb/ft}^3)(\text{wk}/40 \text{ hrs}) \\ = 21.9 \text{ lb/hr}; (21.9 \text{ lb/hr})(2080 \text{ hr/yr})(\text{ton}/2000 \text{ lb}) = 22.7 \text{ TPY}$$

Assuming a collection efficiency of 60%, the particulates generated would be:

$$(21.9 \text{ lb/hr})(100/60) = 36.5 \text{ lb/hr or } 38 \text{ TPY}$$

and the particulates emitted (with controls) would be estimated as:

$$(36.5 \text{ lb/hr})(40/100) = 14.6 \text{ lb/hr or } 15 \text{ TPY}$$

Due to the expense and complexity of conducting a stack test on such a small particulate source, the applicant requests that a 5% opacity limit be placed on the source as an indication of satisfactory particulate control.

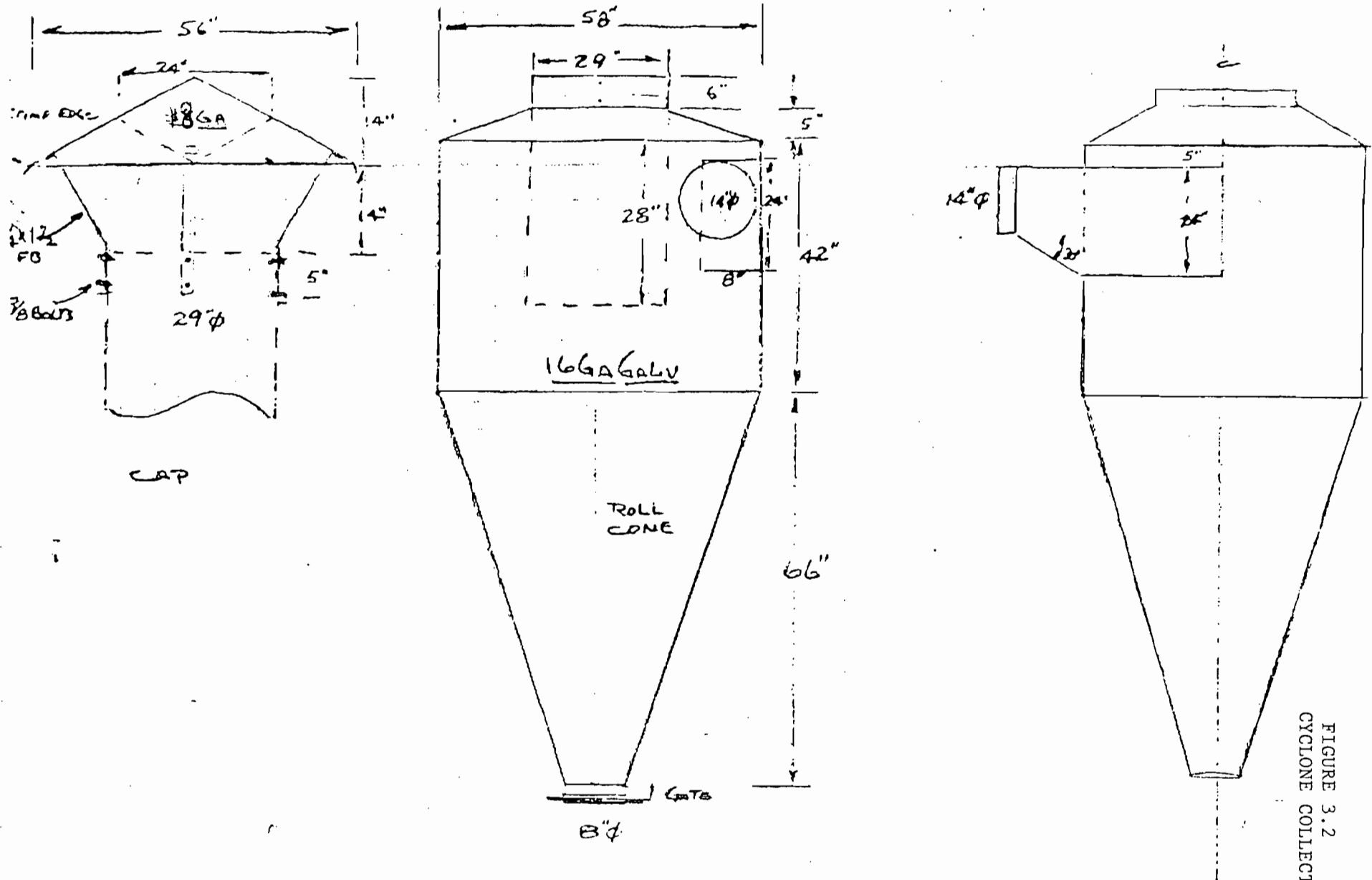
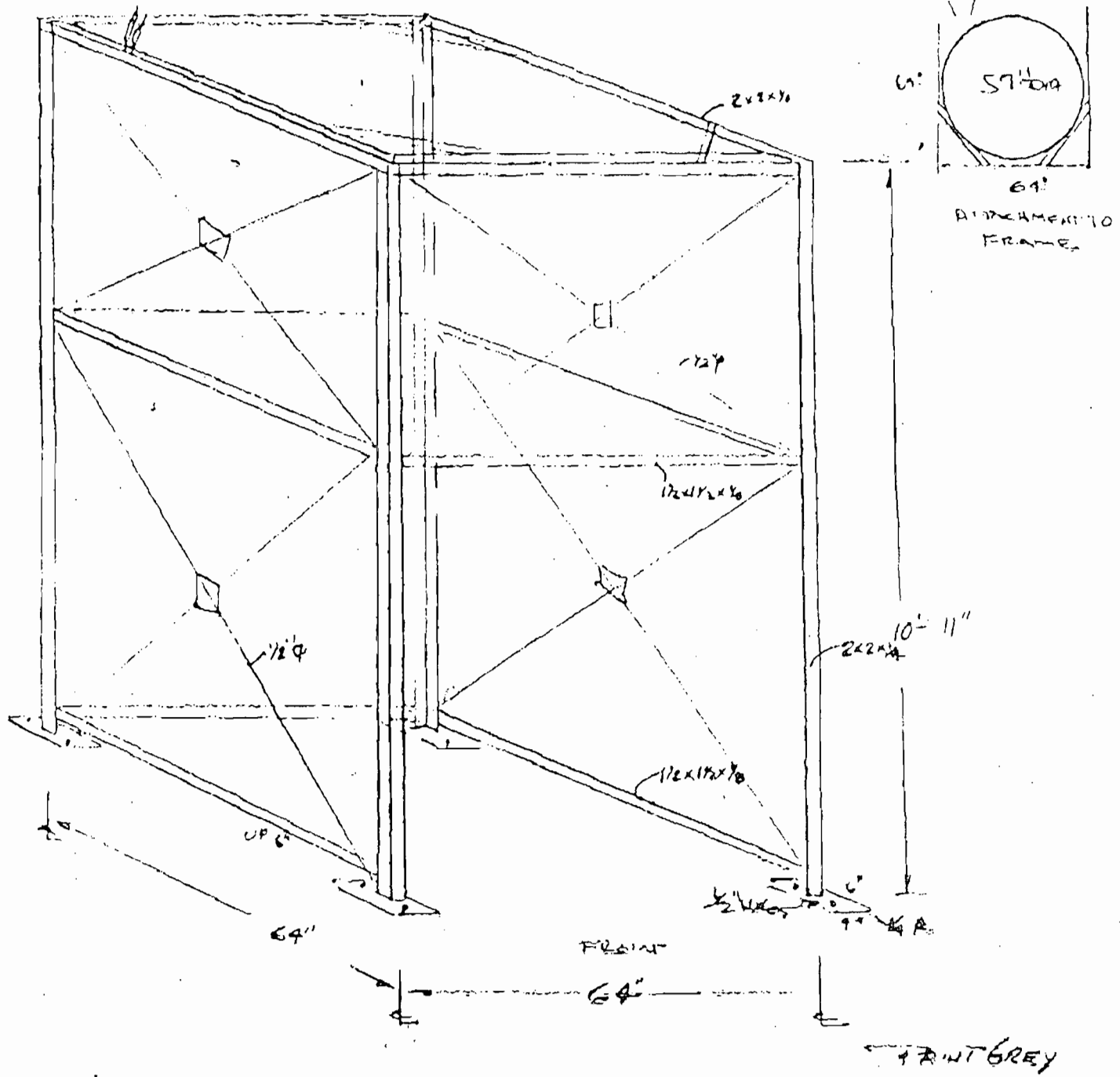


FIGURE 3.2
CYCLONE COLLECTOR

#14 CYCLONE

JLO-111

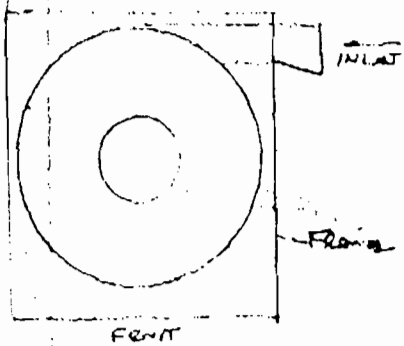
FROM DONALD BOAT CORP



HOPPER TOWER

210011

DONZI BOATWORKS





 **DONZI**

RECEIVED

DEC 21 1990

DER-BAQM

VIA FEDERAL EXPRESS

December 20, 1990

Mr. C.H. Fancy, P.E.
Fla. Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Your Letter of November 15, 1990
Donzi Marine Corporation
Completeness Review of an Application Package
AC 41-165759

Dear Mr. Fancy:

Donzi Marine does not plan to submit air quality modeling data for a 10 hour "no-gap" day, 7 day per week, 52 week per year, as requested in your November 15, 1990 letter to me. While Donzi is anxious to obtain a final VOC/OS air permit from the Department of Environmental Regulation, we do not believe your request is one we can respond to for the following reasons:

1. Current operations have, in essence, ceased.
2. Prior to this, operations were generally based on an 8 hour day with an occasional 9, or perhaps 10, hour day.

Since modeling is an imprecise science (some may even call it an "art"), we believe that continually running air quality models is not cost-effective.

We, therefore, would request that the Department issue Donzi a draft air quality permit consistent with those recently issued for other Florida Fiberglass Reinforced Plastic boat manufacturers. We believe that the Department has enough information in-house to issue Donzi a permit for an 8 hour workday. We would like to have the opportunity to review a draft permit before the Department issues a final construction permit.

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE

AIRBILL
PACKAGE
TRACKING NUMBER

9453833933

9453833933

RECIPIENT'S COPY

From (Your Name) Please Print Vivienne Hosford		Your Phone Number (Very Important) (813) 755-7585	To (Recipient's Name) Please Print MR. C. H. FANCY, P.E.		Recipient's Phone Number (Very Important)
Company ONEI MACHINE		Department/Floor No.	Company FLORIDA DEPARTMENT OF ENVIRONMENTAL REGUL		Department/Floor No.
Street Address 941 WHIFFIELD PARK LOOP			Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip® Codes) 2600 BLAIR/STONE ROAD		
City ALLEVEST	State FL	ZIP Required 34242	City TALLAHASSEE	State FL	ZIP Required 32399-2400
YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.) REF: AC 41-165759			IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address		
PAYMENT: 1 <input checked="" type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card			City		
5 <input type="checkbox"/> Cash/Check			State		
			ZIP Required		

SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)		PACKAGES	WEIGHT in Pounds Only	YOUR DECLARED VALUE	Emp. No.	Date.	Federal Express Use
<input type="checkbox"/> Priority Overnight Service (Delivery by next business morning)	<input type="checkbox"/> Standard Overnight Service (Delivery by next business afternoon)	1 <input type="checkbox"/> HOLD FOR PICK-UP (If # in Box 11)	2 <input checked="" type="checkbox"/> DELIVER WEEKDAY						<input type="checkbox"/> Cash Received
11 <input type="checkbox"/> YOUR PACKAGING	51 <input type="checkbox"/>	3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations)	4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge)						<input type="checkbox"/> Return Shipment
16 <input type="checkbox"/> FEDEX LETTER	56 <input type="checkbox"/> FEDEX LETTER*	5 <input type="checkbox"/>	6 <input type="checkbox"/> DRY ICE _____ Lbs.	Total	Total	Total			<input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold
12 <input type="checkbox"/> FEDEX PAK*	52 <input type="checkbox"/> FEDEX PAK*	7 <input type="checkbox"/> OTHER SPECIAL SERVICE _____	7 <input type="checkbox"/>						Street Address
13 <input type="checkbox"/> FEDEX BOX	53 <input type="checkbox"/> FEDEX BOX	8 <input type="checkbox"/>	9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge)						City
14 <input type="checkbox"/> FEDEX TUBE	54 <input type="checkbox"/> FEDEX TUBE	10 <input type="checkbox"/>	10 <input type="checkbox"/>						State
<input type="checkbox"/> Economy Two-Day Service (formerly Standard Air) (Delivery by second business day)	<input type="checkbox"/> Heavyweight Service (for Extra Large or any package over 150 lbs.)	11 <input type="checkbox"/>	11 <input type="checkbox"/>						Zip
30 <input type="checkbox"/> ECONOMY TWO-DAY SVC.	80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT**	12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)	12 <input type="checkbox"/>						Received By:
Delivery commitment may be later in some areas.	*Declared Value Limit \$100. **Call for delivery schedule.								Date/Time Received
									FedEx Employee Number
									REVISION DATE 8/90 PART #1199011 FPEM 1090 FORMAT #041
									041
									• 1990 F.E.C. PRINTED IN USA

Mr. C.H. Fancy, P.E.

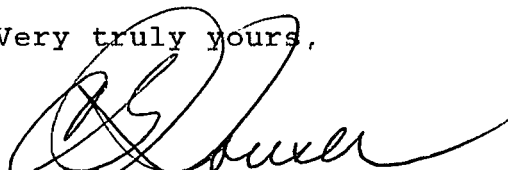
December 20, 1990

Page Two

Since the Department has the opportunity to use the permit to operate as the vehicle to issue permit limits consistent with actual operations, we request that the Department act on our application before year's end.

If you have any questions, comments, or concerns about this matter, please call Bob Evangelisti at (708) 689-5713.

Very truly yours,



C. Gordon Houser
President and CEO

CGH:vh

cc: R. Evangelisti

T. John

B. Mitchell

C. Palka

B. Thomas, *subject*

R. Bellum, *MC P 14*

P 256 396 135

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NDT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to Mr. C. Gordon Hauser, Donzi	
Street and No. Marine	
P.O. Box 987	
P.O. State and ZIP Code Tallevast, FL 34270-0987	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date	
Mailed: 11-15-90	
Permit: AC 41-165759	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. C. Gordon Hauser, President Donzi Marine Corp. 7110 21st Street, East P. O. Box 987 Tallevast, FL 34270-0987	4. Article Number P 256 396 135 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature - Addressee X <i>W. Hauser</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 11-19-90	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 15, 1990

Mr. C. Gordon Hauser, President
Donzi Marine Corporation
7110 21st Street, East
Post Office Box 987
Tallevast, Florida 34270-0987

Dear Mr. Hauser:

Re: Completeness Review of an Application Package
AC 41-165759

The Department has reviewed the supplementary material received October 17, 1990, but still finds the application package to be incomplete. Before continuing processing, please submit to the DER's Bureau of Air Regulation the following information, including all calculations, assumptions and reference material:

Mr. Holladay recalls exempting your facility from generating maximum predicted concentrations for the 24-hour time period at this particular time since your application states that your maximum operational day would only be ten hours. However, he does not recall exempting your facility from modeling a ten hour day for comparison with the 8-hour no threat level for styrene. Please remodel using a ten hour day for seven days a week and 52 weeks a year with no gaps in consecutive hours for such time periods as lunch breaks or shift changes. When this information is provided we will continue processing your permit application.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/CH/plm

c: B. Thomas, SW Dist.
T. John, P.E., FI
R. Evangelisti, OMC



 **DONZI**

October 15, 1990

Mr. Clair Fancy, P.E.
Bureau of Air Regulation
Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, FL 32349

RE - ...
OCT 17 1990
DEA ...

Re: AC41-165759 - Donzi Marine

Dear Mr. Fancy:

Donzi Marine, Robert Evangelisti, P.E., of Outboard Marine Corporation, and Tom John, P.E., engineer of record for this application, have prepared the following response to your incompleteness letter of September 18, 1990:

1. The presentation of the second-highest values in the previous response was intended to support the premise that the highest predicted values, all less than the DER 8-hour guideline value of 2150 ugm/m³ and presented in Table 1 of that submission, are isolated values and that values at those locations would be expected to have mean and most-probable values well below the maximum predicted by the model.

2. We have had several discussions with Mr. Cleve Holiday of your staff concerning the requirement to model the facility emissions which might result from occasional operation past the typical 8-hour day, 5-day week schedule. The previously submitted model predicts the ambient concentrations based on an 8-hour day, 7-day week operation, using maximum theoretical emissions. These "worst case" values, shown in Table 1 of that submission, are below the guideline value of 2150 ugm/m³. More realistic values, based on midpoint styrene content values from the MSD sheets and midpoint California Air Resources Board (CARB) emission factors, would result in predicted ambient concentrations proportionately lower.

Mr. Clair Fancy, P.E.

October 15, 1990

Page Two

Our discussions with Mr. Holiday have resulted in agreement that the possible 6-day week is already within the presented model parameters and attempting to model the random 9 or 10 hour day using the Industrial Source Complex Short Term (ISCST) would not be representative of the true operating situation, and would not be required. Conformance with the chemical usage limits set forth in the material balance scheme (being prepared by Mr. Bruce Mitchell) would, of course, be required.

3. Discussions with EPA personnel at Research Triangle Park, N.C., have confirmed the appropriateness of scaling time varying emissions from a facility using ISCST. The previously submitted data included a "zero emission" scaler for the lunch break. In practice, at lunch break, the crew disassembles the equipment, cleans and stores it. There is, therefore, no styrene emission from spray or layup of gelcoat or resin during that period. It is reasonable to assume that the majority of emissions would occur during these operations, and that the short "gel time" of 15 minutes (as presented in the previous submission) would further serve to inhibit styrene "off gassing" (volatilization of styrene monomer from the finished part). No discussion of off gassing factors for styrene was made in the recent EPA document (USEPA, May 1990. "Assessment of VOC emissions from Fiberglass Boat Manufacturing" EPA-600/2-90-019). If the emissions from finished pieces was substantial, relative to emission during spray and layup operations, it is reasonable to expect that this fact would have been discussed in that document. The applicant feels that a "no gaps" policy, which is not discussed in the DER guideline document, is, therefore, not appropriate in this case, and would not result in a significant change in ambient concentration predictions.

Mr. Clair Fancy, P.E.
October 15, 1990
Page Three

4. Although the applicant disagrees with the "no gaps" modeling policy indicated in the incompleteness letter, remodeling has been performed for 8 continuous hours of emission with no gaps. As per Mr. Holiday's direction, we have not determined the 24-hour average ambient concentration, since operation of the facility for 6 days per week or 9 hours per day, is expected to occur infrequently and will be limited by the permitted chemical usage maximums.

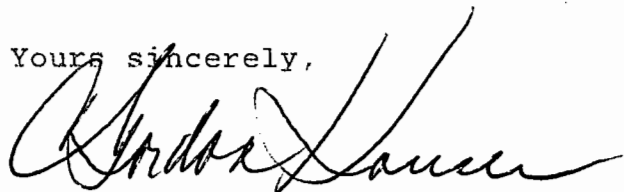
The attached table illustrates the predicted 8-hour average ambient concentrations at the property boundaries. As in all previous responses, the applicant requests that the model output itself be considered confidential and maintained in the confidential file.

The applicant believes, based on the conservative values used in the model, that the resulting predicted ambient concentrations are within the range that would be considered acceptable to the Department and allow permitting to proceed. The applicant appreciates the Department's consideration and cooperation in this matter.

If you have any comments, questions or concerns about this matter, please call Mr. Evangelisti at 708-689-5713.

We request that the Department release a "Notice of Intent to Issue" for this facility as soon as possible. The particulate application for this facility has been completed and will be submitted shortly.

Yours sincerely,



C. Gordon Houser
President and CEO

CGH:vh

cc: R. Evangelisti
T. John
R. Genth

B. Mitchell, Clive Holiday, BAR
B. Jones, SW Dist
A. Pressmyer, Manatee Co.

TABLE 1

PREDICTED CONCENTRATIONS AT PLANT BOUNDARIES ($\mu\text{g}/\text{m}^3$) AT INDICATED DISTANCES (METERS EAST OR WEST)
FROM NORTH-SOUTH CENTERLINE OF BUILDING

	<u>Building Center</u>										
	<u>WEST</u> Distance in Meters				0	<u>EAST</u> Distance in Meters					
8 emitting hrs/day	-100	-80	-60	-40	-20	0	20	40	60	80	100
Northern Boundary	1461	1703	1969	1901	1919	1838	1686	1747	1578	1338	1232
Southern Boundary	1470	1638	2053	2072	1690	2039	2009	1464	1395	1445	1312

Best Available Copy

*** VERTICAL POTENTIAL TEMPERATURE GRADIENTS ***
(DEGREES KELVIN PER METER)

STABILITY CATEGORY	WIND SPEED CATEGORY					
	1	2	3	4	5	6
A	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
B	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
C	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
D	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00	.00000E+00
E	.20000E-01	.20000E-01	.20000E-01	.20000E-01	.20000E-01	.20000E-01
F	.35000E-01	.35000E-01	.35000E-01	.35000E-01	.35000E-01	.35000E-01

RUNNING AVERAGES ARE USED. THE FOLLOWING NUMBER OF AVERAGES WILL BE RETAINED TO FIND THE SECOND-HIGHEST NON-OVERLAPPING VALUE. IF THE NON-OVERLAPPING VALUE IS NOT FOUND, THEN THE VALUE WILL BE FLAGGED WITH AN X IN THE SECOND-HIGHEST TABLE. THE ACTUAL NON-OVERLAPPING VALUE WILL BE LESS THAN THE VALUE SHOWN. INCREASE THE STORAGE ALLOCATIONS TO FIND THE ACTUAL VALUE.

2-HOUR 4, 3-HOUR 6, 4-HOUR 8, 6-HOUR 12, 8-HOUR 16, 12-HOUR 24, 24-HOUR 48

*** donzi - volume source 8.16g/

*** RANGES OF POLAR GRID SYSTEM ***
(METERS)

75.0, 100.0, 150.0, 200.0, 250.0,

*** RADIAL ANGLES OF POLAR GRID SYSTEM ***

(DEGREES)

360.0, 10.0, 20.0, 30.0, 40.0, 50.0, 60.0, 70.0, 80.0, 90.0,
100.0, 110.0, 120.0, 130.0, 140.0, 150.0, 160.0, 170.0, 180.0, 190.0,
200.0, 210.0, 220.0, 230.0, 240.0, 250.0, 260.0, 270.0, 280.0, 290.0,
300.0, 310.0, 320.0, 330.0, 340.0, 350.0,

*** X,Y COORDINATES OF DISCRETE RECEPTORS ***
(METERS)

(-100.0, 50.0), (-80.0, 50.0), (-60.0, 50.0), (-40.0, 50.0), (-20.0, 50.0),
(.0, 50.0), (20.0, 50.0), (40.0, 50.0), (60.0, 50.0), (80.0, 50.0),
(100.0, 50.0), (-100.0, -50.0), (-80.0, -50.0), (-60.0, -50.0), (-40.0, -50.0),
(-20.0, -50.0), (.0, -50.0), (20.0, -50.0), (40.0, -50.0), (60.0, -50.0),
(80.0, -50.0), (100.0, -50.0), (

*** donzi - volume source 8.16g/s

*** SOURCE DATA ***

SOURCE NUMBER	P K PART.	E E CATS.	EMISSION RATE TYPE=0,1 (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	HEIGHT (METERS)	TEMP.	EXIT VEL.	BLDG. HEIGHT (METERS)	BLDG. LENGTH (METERS)	BLDG. WIDTH (METERS)
								TYPE=0 (DEG.K)	TYPE=0 (M/SEC)			
1	1	0	.81600E+01	.0	.0	.0	9.00	3.25	16.30	.00	.00	.00

*** donzi - volume source 8.16g/s

* HIGHEST 8-HOUR RUNNING AVERAGE CONCENTRATION (MICROGRAMS PER CUBIC METER) *
 * FROM ALL SOURCES *
 * FOR THE RECEPTOR GRID *

* MAXIMUM VALUE EQUALS 2094.08600 AND OCCURRED AT (75.0, 230.0) *

DIRECTION / (DEGREES) /	RANGE (METERS)				
	75.0	100.0	150.0	200.0	250.0
350.0 /	1568.38900 (4,14)	1478.81000 (4,14)	1228.12000 (4,14)	1002.13000 (4,14)	829.02120 (4,14)
340.0 /	1683.29100(249,14)	1399.73800(249,14)	1021.59700 (334,15)	790.77330 (334,15)	625.75680 (334,15)
330.0 /	1734.09600(249,14)	1575.91200(249,14)	1313.70200(249,14)	1090.98300(249,14)	918.34660(249,14)
320.0 /	1737.72500 (286,16)	1355.51500(335,12)	1094.33100(335,12)	841.63850(335,12)	656.95840 (344,11)
310.0 /	2027.13300 (286,16)	1597.33400(335,12)	1408.17700(335,12)	1160.95900(335,12)	955.85260(335,12)
300.0 /	2077.29800 (286,16)	1600.17900(274,12)	1229.51200(274,12)	936.51370(274,12)	728.36980(274,12)
290.0 /	1932.27500 (286,15)	1472.61600 (286,15)	1043.39200(278,12)	793.27310 (353,16)	629.44580 (353,16)
280.0 /	1658.67300 (286,15)	1348.35400(257,12)	911.87200(257,12)	697.85800 (327,15)	559.42930 (327,15)
270.0 /	1925.02700(235,15)	1537.50000(235,15)	1024.26500 (34,15)	798.27650 (34,15)	686.50010 (40,11)
260.0 /	1975.18400(235,15)	1593.98700 (18,13)	1194.86100 (18,13)	872.34590 (18,13)	653.12900 (18,13)
250.0 /	2046.00800(245,16)	1641.85400(245,16)	1150.77300 (18,13)	893.54060 (18,13)	713.77920 (18,13)
240.0 /	1939.40100(245,16)	1594.41100 (350,15)	1146.43900 (21,14)	900.10900 (21,14)	724.21520 (21,14)
230.0 /	2094.08600 (293,16)	1947.02700 (361,15)	1577.91700 (361,15)	1223.01800 (361,15)	956.78370 (361,15)
220.0 /	2022.17200 (361,15)	1956.69000 (361,15)	1637.35500 (361,15)	1318.41600 (361,15)	1073.63000 (361,15)
210.0 /	1683.79700 (306,16)	1572.29200 (306,16)	1199.49600 (294,15)	931.45130 (294,15)	737.50830 (294,15)
200.0 /	1811.30500 (306,16)	1796.22200 (306,16)	1560.19000 (306,16)	1287.28300 (306,16)	1065.45400 (306,16)
190.0 /	1446.92500(236,12)	1325.42700 (306,16)	994.75920 (306,16)	813.21770(59,14)	675.99370(59,14)
180.0 /	1653.16300(236,12)	1514.66200(236,12)	1209.28400(236,12)	957.84010(236,12)	776.46560(236,12)
170.0 /	1605.58400 (289,15)	1243.95800(236,13)	865.62880(236,13)	604.20420(236,13)	446.74520(288,12)
160.0 /	1593.27900 (289,15)	1244.39700 (5,16)	1124.56500 (5,16)	949.60020 (5,16)	799.37630 (5,16)
150.0 /	1476.80100 (289,16)	1104.37900 (289,16)	870.34300(54,16)	710.38950(54,16)	594.03940(54,16)
140.0 /	1302.68800(204,16)	1015.68600(204,16)	687.07890(54,16)	484.18920(13,15)	365.65440(13,15)
130.0 /	1427.93300 (229,16)	1120.12300 (229,16)	710.82620 (229,16)	486.37790 (229,16)	364.63520 (13,16)
120.0 /	1734.74300 (229,16)	1414.49100 (229,16)	979.28060 (51,15)	759.69950 (51,15)	601.81270 (51,15)
110.0 /	1758.10400 (229,16)	1432.91600 (229,16)	949.91980(228,16)	697.20340(228,16)	528.06610(228,16)
100.0 /	1589.27400 (227,16)	1284.46300 (227,16)	924.79970(230,13)	720.00610(230,13)	575.02040(230,13)
90.0 /	1682.90900 (227,16)	1375.10800 (227,16)	923.13570 (227,16)	645.97420 (227,16)	478.48350(168,13)
80.0 /	1575.78300 (171,16)	1241.26300(163,13)	836.87600(168,13)	595.16450(161,13)	480.54280(161,13)
70.0 /	1766.67500 (171,16)	1380.54700(163,13)	923.25890(163,13)	629.99240(163,13)	449.82660(163,13)
60.0 /	1694.76500 (171,16)	1324.08700 (171,16)	951.49990 (322,15)	747.85490 (322,15)	598.77250 (322,15)
50.0 /	1637.10200(199,13)	1388.14100 (322,15)	1099.41900 (322,15)	847.20610 (322,15)	666.11540 (322,15)
40.0 /	1593.69200(170,17)	1274.15100(170,17)	867.48210(49,15)	713.76920(49,15)	591.23550(49,15)
30.0 /	1482.34400 (185,16)	1330.04400 (185,16)	1045.10700 (185,16)	826.38140 (185,16)	671.77580 (185,16)
20.0 /	1631.45500 (70,15)	1455.33700 (70,15)	1105.99500 (70,15)	881.60270(52,15)	729.09260(52,15)
10.0 /	1587.98500 (70,15)	1388.10100 (70,15)	1018.68500 (70,15)	750.29250 (70,15)	570.63360 (70,15)
360.0 /	1490.16400 (206,14)	1264.62100 (4,14)	1002.62600 (345,15)	819.77960 (345,15)	675.32680 (345,15)

HIGH
 8-HR
 SGRUPPE 1

Best Available Copy

*** donzi - volume source 8.16g/s

* HIGHEST 8-HOUR RUNNING AVERAGE CONCENTRATION (MICROGRAMS PER CUBIC METER) *
 * FROM ALL SOURCES *
 * FOR THE DISCRETE RECEPTOR POINTS *

- X -	- Y -	CON.	(DAY, PER.)	- X -	- Y -	CON.	(DAY, PER.)
-100.0	50.0	1460.983000	(276,12)	-60.0	50.0	1703.283000	(286,16)
-60.0	50.0	1968.814000	(286,16)	-40.0	50.0	1901.077000	(286,16)
-20.0	50.0	1919.015000	(249,14)	.0	50.0	1838.204000	(206,14)
20.0	50.0	1655.714000	(70,15)	40.0	50.0	1747.053000	(170,17)
60.0	50.0	1578.225000	(199,13)	80.0	50.0	1336.301000	(171,16)
100.0	50.0	1232.412000	(171,16)	-100.0	-50.0	1470.286000	(350,15)
-80.0	-50.0	1637.742000	(293,16)	-60.0	-50.0	2053.125000	(293,16)
-40.0	-50.0	2071.860000	(293,16)	-20.0	-50.0	1690.090000	(306,16)
.0	-50.0	2039.426000	(289,15)	20.0	-50.0	2008.835000	(289,15)
40.0	-50.0	1464.165000	(289,16)	60.0	-50.0	1394.869000	(229,16)
80.0	-50.0	1444.831000	(229,16)	100.0	-50.0	1312.288000	(229,16)

2ND HIGH
8-HR
SGROUP# 1

*** donzi - volume source 8.16g/s

* SECOND HIGHEST NON-OVERLAPPING 8-HOUR RUNNING AVERAGE CONCENTRATION (MICROGRAMS PER CUBIC METER) *
 * FROM ALL SOURCES *
 * FOR THE RECEPTOR GRID *

* MAXIMUM VALUE EQUALS 2033.46400 AND OCCURRED AT (-75.0, 230.0) *

DIRECTION /

RANGE (METERS)

BEST AVAILABLE COPY

(DEGREES) /

75.0

100.0

150.0

200.0

250.0

350.0 /	1547.55000 (232,17)	1336.26700 (232,17)	959.03270 (232,17)	695.44670 (232,17)	553.69650 (52,15)
340.0 /	1620.51800 (232,17)	1336.19800 (232,17)	996.37130 (4,15)	781.11290 (4,15)	616.04800 (4,15)
330.0 /	1518.81400 (232,17)	1229.50900 (232,17)	880.42920 (334,15)	682.80860 (234,15)	540.03610 (334,15)
320.0 /	1449.27400 (249,14)	1316.52300 (266,16)	912.01530 (344,15)	777.26250 (344,15)	656.93430 (335,15)
310.0 /	1702.56900 (236,15)	1577.50100 (266,16)	1116.63300 (172,15)	866.49210 (172,15)	697.56780 (257,15)
300.0 /	1793.96300 (276,13)	1590.94300 (266,16)	1121.06900 (276,13)	802.96820 (276,13)	638.66820 (353,15)
290.0 /	1664.82800 (276,13)	1435.80300 (276,13)	1022.75800 (353,16)	777.66700 (276,13)	605.54350 (276,13)
280.0 /	1697.08800 (257,12)	1337.25400 (286,15)	894.94080 (285,13)	658.75740 (257,12)	498.13040 (257,12)
270.0 /	1843.93400 (257,12)	1441.83900 (257,12)	1012.26500 (235,15)	791.88590 (40,15)	638.95400 (34,15)
260.0 /	1894.03100 (245,16)	1511.54800 (235,15)	1017.81300 (245,15)	744.82380 (245,15)	576.76920 (245,15)
250.0 /	1796.58300 (260,15)	1513.28100 (260,15)	1067.33900 (260,15)	777.47750 (247,12)	618.63750 (247,12)
240.0 /	1854.17700 (350,15)	1574.27600 (245,16)	1135.61300 (350,15)	825.28670 (350,15)	624.66550 (350,15)
230.0 /	2033.46400 (361,15)	1773.45300 (293,16)	1275.56800 (253,15)	940.83900 (359,15)	757.20550 (307,15)
220.0 /	1958.06100 (253,16)	1782.29400 (300,15)	1566.96600 (300,15)	1295.83400 (300,15)	1069.72500 (300,15)
210.0 /	1659.45300 (294,15)	1521.82600 (294,15)	1156.04500 (306,16)	892.37790 (301,16)	725.25710 (301,16)
200.0 /	1351.39100 (87,13)	1183.25800 (303,15)	999.93180 (59,14)	829.21580 (59,14)	699.15750 (59,14)
190.0 /	1442.86800 (306,16)	1230.54400 (236,14)	975.87130 (59,14)	721.18160 (306,16)	525.47470 (306,16)
180.0 /	1529.12500 (289,15)	1153.46700 (288,13)	827.05440 (288,13)	593.92460 (288,13)	440.47710 (288,13)
170.0 /	1469.96000 (236,14)	1159.98500 (289,15)	780.52710 (288,13)	577.35890 (288,13)	435.66820 (236,14)
160.0 /	1332.07300 (363,16)	1175.60000 (289,15)	813.23550 (25,16)	660.39140 (25,16)	542.38840 (25,16)
150.0 /	1317.28800 (169,16)	1071.50200 (54,16)	707.98410 (5,16)	509.13460 (5,16)	416.81620 (56,16)
140.0 /	1237.04700 (289,17)	976.82920 (54,16)	670.91560 (13,15)	457.43970 (54,16)	320.84290 (60,16)
130.0 /	1314.17600 (204,18)	1000.68800 (204,18)	650.38450 (13,15)	479.71660 (13,16)	355.38660 (54,16)
120.0 /	1382.90600 (51,15)	1250.55500 (51,15)	920.11720 (229,16)	714.20400 (20,14)	588.92300 (20,14)
110.0 /	1491.73700 (228,16)	1303.91000 (228,16)	924.07830 (229,16)	642.22560 (51,15)	489.94910 (51,15)
100.0 /	1492.42300 (229,16)	1198.99900 (230,13)	849.29820 (227,16)	646.85880 (335,20)	520.77060 (335,20)
90.0 /	1651.59500 (278,16)	1299.54300 (278,16)	825.89320 (278,16)	598.36950 (184,15)	475.84080 (227,16)
80.0 /	1558.63900 (278,16)	1209.60100 (278,16)	829.03850 (163,16)	593.33770 (168,17)	436.60480 (351,18)
70.0 /	1680.35100 (277,17)	1371.90800 (171,16)	859.93440 (171,16)	572.06150 (171,16)	430.59870 (211,16)
60.0 /	1580.24500 (277,16)	1235.50300 (277,16)	846.95100 (171,16)	657.66600 (58,15)	532.78340 (58,15)
50.0 /	1479.91600 (322,15)	1212.44500 (199,13)	876.45460 (1,20)	678.59330 (323,15)	540.93320 (323,15)
40.0 /	1510.43100 (199,13)	1198.74000 (322,15)	840.95230 (170,17)	607.80770 (358,15)	495.38150 (358,15)
30.0 /	1462.30300 (170,17)	1182.37600 (170,17)	939.11580 (352,16)	759.51230 (352,16)	624.50380 (352,16)
20.0 /	1442.53200 (52,15)	1330.37200 (52,15)	1083.42700 (52,15)	843.64420 (70,15)	665.02780 (70,15)
10.0 /	1480.49200 (52,15)	1253.54300 (52,15)	792.92900 (52,15)	616.61060 (249,14)	500.05910 (249,14)
360.0 /	1466.02800 (4,15)	1170.99700 (345,15)	636.62310 (232,15)	649.01830 (232,15)	520.45220 (232,15)

2ND HIGH
8-HR
SGROUPE 1

*** denzi - volume source 8.16g/s

* SECOND HIGHEST NON-OVERLAPPING 8-HOUR RUNNING AVERAGE CONCENTRATION (MICROGRAMS PER CUBIC METER) *
* FROM ALL SOURCES *
* FOR THE DISCRETE RECEPTOR POINTS *

- X -	- Y -	CON.	(DAY,PER.)	- X -	- Y -	CON.	(DAY,PER.)
-100.0	50.0	1429.22100	(274,12)	-80.0	50.0	1658.82200	(274,12)
-60.0	50.0	1663.66900	(274,12)	-40.0	50.0	1613.41900	(249,14)
-20.0	50.0	1782.21100	(232,17)	.0	50.0	1620.76600	(249,14)
20.0	50.0	1562.95200	(206,15)	40.0	50.0	1703.62500	(199,13)
60.0	50.0	1473.55900	(322,15)	80.0	50.0	1287.02300	(322,15)
100.0	50.0	1182.77600	(163,15)	-100.0	-50.0	1466.77700	(245,16)
-80.0	-50.0	1635.63000	(350,15)	-60.0	-50.0	2024.65000	(361,15)
-40.0	-50.0	1953.10500	(361,15)	-20.0	-50.0	1544.36600	(325,15)
.0	-50.0	1689.41100	(236,14)	20.0	-50.0	1544.15200	(363,16)
40.0	-50.0	1429.30400	(204,18)	60.0	-50.0	1269.90200	(204,18)
80.0	-50.0	1239.02300	(51,15)	100.0	-50.0	1216.06600	(51,15)

HIGH
24-HR
SGROUP# 1



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

FAX TRANSMITTAL LETTER

DATE: 9-19-90

TO:

NAME: Mr. Tom John

AGENCY: _____

TELEPHONE: (813) 980-3564

OF PAGES (INCLUDE COVER SHEET): 12

FROM:

NAME: Bruce Mitchell

AGENCY: DER / OARM / BAR

IF ANY PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY. PHONE NO. (904) 488-1344

SENDER'S NAME: Same as above

COMMENTS: Please give me a call - need your current phone #.
J. Jacobs

A: completeness letter AC 41-165759

B/c: " AC 41-165851

1-5: Sea Ray Boats AC 05-151435

6-8: " AC 05-165270

Tom John

7522 North 40th Street

Tampa, Florida 33604



Best Available Copy

WHILE YOU WERE OUT MESSAGE	TO	Bruce M.	DATE	9/19	TIME	9:48							
	FROM	Tom Ophn	AREA CODE		NUMBER								
	OF		EXTENSION										
	813-980-3564 Fax #												
SIGNATURE						MS							
URGENT	<input type="checkbox"/>	RETURNED CALL	<input type="checkbox"/>	CALL BACK	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>	PHONED	<input checked="" type="checkbox"/>	WANTS TO SEE YOU	<input type="checkbox"/>	WAS IN	<input type="checkbox"/>

AMPAD NO. 23-176-400 SETS NO. 23-376-200 SETS

MESSAGE CONFIRMATION

SEP-19-1990 WED 11:11

TERM ID: 00 OF 41P FEB NIGHT P-9999

TEL NO: 804-922-8375

NO.	DATE	BT. TIME	TOTAL TIME	ID	DEPT CODE	OK	RG
03	09-19	11:04	00:07:10	813 983 1191		12	00

P 256 396 193

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

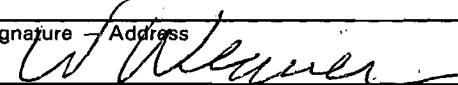
* U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to Mr. C. Gordon Houser, Donzi	
Street and No. Marine Corp. P.O. Box 987	
P.O., State and ZIP Code Tallevast, FL 34270-0987	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 9-18-90 Permit: AC 41-165759	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to: Mr. C. Gordon Houser President Donzi Marine Corporation 7110 21st Street East P. O. Box 987 Tallevast, Florida 34270-0987</p>	<p>4. Article Number P 256 396 193</p> <p>Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>.</p>
<p>5. Signature - Address X </p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent X</p>	
<p>7. Date of Delivery 9-20-90</p>	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

September 18, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. Gordon Houser, President
Donzi Marine Corporation
7110 21st Street, East
Post Office Box 987
Tallevast, Florida 34270-0987

Dear Mr. Houser:

Re: Completeness Review of an Application Package
AC 41-165759

The Department has reviewed the supplementary material received August 20, 1990, but still finds the application package to be incomplete. Before continuing processing, please submit to the DER's Bureau of Air Regulation the following information, including all calculations, assumptions and reference material:

The Department requires that all daily operational hours should be included in the modeling with no gaps in consecutive hours for such time periods as lunch breaks or shift changes. In addition, there are only two no-threat levels for styrene that modeling output must be compared to: 1) the 8-hour level of 2150/ug/m³ and, 2) the 24-hour level of 512 ug/m³. Please remodel using all of the daily hours the facility is operational and also generate concentrations for the 8-hour and 24-hour time periods to compare with these no-threat levels. Whatever hours you model at will become a permit restriction. Also, when only one year of meteorological data is used as input in the modeling, the highest 8-hour and 24-hour concentrations are to be compared with the no-threat levels, not the second highest.

Sincerely,

Benny D. Anderson
for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/CH/t

cc: B. Thomas, SW District
T. John, P.E., FI
R. Evangelisti, OMC

DONZI MARINE

Emission Rate
& Max Pred Amb Conc.

Max. Emission Rates (from Atch 4, Section III c,
May 1, 1990 Forsite Submittal)

<u>Pollutant</u>	<u>lbs/hr</u>	<u>grams/second</u>	<u>tons per year</u> <u>(based on 2080 hrs)</u>
Acetone	160	20.16	166.4
Styrene	64.75	8.16	67.3
Methyl methacrylate	3.0	0.38	3.12
Trichlorofluoro methane	6.6	0.83	6.86
Dichlorodifluoro- methane	2.48	0.31	2.58
Methylene chloride	2.42	0.30	<u>2.52</u> 244.4

Modeling Results (5 yrs Tampa Met Data, High 2nd high)
(Styrene modelled directly as volume
source, other pollutants ratio'd)

<u>Pollutant</u>	<u>Maximum Predicted Concentration (ug/m³)</u>	<u>No Threat levels (8-hr) (ug/m³)</u>
Acetone	5173	35600
Styrene	2094	2150
Methyl methacrylate	100	4100
Trichlorofluoromethane	213	300*
Dichlorofluoro- methane	80	400
Methylene chloride	78	1750

FORSITE INC.

Environmental Engineering and Management Services

P.O. Box 7473, St. Petersburg, Florida 33734
(813) 576-3637 Fax (813) 576-6121

RECEIVED

AUG 20 1990

August 15, 1990
Bureau of
Air Regulation

Mr. C. H. Fancy, P.E.
Bureau of Air Regulation
Florida Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Manatee County A.P. AC41-165759: DONZI MARINE

Dear Mr. Fancy:

As Engineer of Record for Outboard Marine Corporation (OMC), we are submitting the enclosed response to your incompleteness letter of May 23, 1990. We trust that the information provided is sufficient and satisfactory to allow permitting to proceed.

As in our earlier response, the applicant requests that the actual output of the ISCST model be held as confidential, and is providing that output in a separate binder for your confidential files.

If you have any questions or if I can provide further information, please contact me at (813) 576-3637.

Sincerely,



Tom T. John, P.E.

TJ:dmj

cc: Roger Crawford
C. Gordon Houser
W. Preismeyer
J. McDonald

FORSITE INC.
Environmental Engineering and Management Services

RECEIVED

P.O. Box 7473, St. Petersburg, Florida 33734
(813) 576-3637 Fax (813) 576-6121

AUG 20 1990

DER-BAQM

August 15, 1990

Mr. C. H. Fancy, P.E.
Bureau of Air Regulation
Florida Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Sincerely,



Tom T. John, P.E.

TJ:dmj

cc: Roger Crawford
C. Gordon Houser
W. Preismeyer
J. McDonald

Q1. In the footnote to Attachment 4, Section III:C, Airborne Contaminants Emitted, it is assumed that methylethyl ketone peroxide is totally consumed in the reaction. Please provide documentation to support this assumption.

R. The attached memo from Stephen Crane of OMC provides the requested support for the methylethyl ketone peroxide initiator being totally consumed in the styrene polymerization.

The effect of peroxide content on styrene "gel time" (the time required for catalyzed styrene to harden from a flowable liquid to a non-flowable "gel") is presented in Tables I and II of the attached manufacturer's product bulletin. Figure 1 graphically presents these results for DDM-9 catalyst, which is the material used by the facility. In the tests referred to by Mr. Crane in his memo, he determined the gel time of catalyzed resin spray applied to a flat plate and also the gel time of catalyzed resin hand applied to a flat plate. These values were compared to the "bulk gel time" of resin using the same initiator concentration. The "bulk gel time" measured the time required for an identically catalyzed resin maintained in an open, squat mixing vessel to become a gel. From these results, Mr. Crane determined that there was no variation in gel times for catalyzed resin spray applied or hand applied to a flat surface or allowed to gel in an open container. If MEKP from the mixture is emitted into the air, as is styrene, the method of application to the flat plate should result in different quantities of MEKP evaporated, as is known to happen with styrene. Since exposed surface area is clearly an important parameter in MEKP and styrene evaporation, the amount of MEKP evaporated from 100 gms of resin applied to a flat plate would clearly be much greater than that of a container open only on the top holding an equivalent volume of catalyzed resin. If the MEKP evaporates into the air, the concentration in the mixture would

OMCCC TWX

TO: T. REID CC: D. STUBBERS
FROM: SC STEPHEN CRANE B.S. ENGINEERING/MANAGEMENT
MATERIALS AND PROCESS ENGINEER OMCCC
DATE: July 7, 1990
SUBJECT: CATALYST RELEASE
FILE: CATALYST

IN REGARD TO YOUR INQUIRY CONCERNING CATALYST (MEKP) RELEASE INTO THE AIR DURING SPRAY APPLICATIONS, WE HAVE ONLY EMPIRICAL EVIDENCE OF RELEASE QUANTITIES. DURING A RECENT SET OF RESIN TRIALS, EQUAL QUANTITIES OF RESIN WERE APPLIED, ONE HAND MIXED AND HAND APPLIED, AND ONE WAS SPRAY APPLIED USING OUR STANDARD SPRAY APPLICATION EQUIPMENT. THIN FILM GEL TIMES WERE IDENTICAL. THE EXPERIMENT WAS THEN REPEATED USING LIKE QUANTITIES OF 100 GRAM MASS. THESE BULK GEL TIMES ALSO COULD BE CONSIDERED IDENTICAL WITHIN EXPERIMENTAL ERROR,

TO PUT THIS IN PERSPECTIVE, CATALYST AMOUNTS REPRESENT ON THE AVERAGE ONLY 1.25% OF THE RESIN BY WEIGHT. A LOSS OF EVEN TRACE AMOUNTS OF MEKP INTO THE ATMOSPHERE WOULD REPRESENT A MARKED VARIANCE IN REACTIVITY AS MEASURED BY GEL TIMES. SINCE NO SUCH VARIANCE IS IN EVIDENCE, IT IS OUR BELIEF AIR RELEASE OF MEKP IS NEGLIGIBLE.

sent by SCRAVE at 09:29:00 on 10 Jul 90

STANDARD MEK PEROXIDES

	LUPERSOL DDM-9	LUPERSOL DELTA-X-9	LUPERSOL DHD-9	LUPERSOL DDM-30
DESCRIPTION:	Methyl Ethyl Ketone Peroxide Solutions (C.A.S. Registry No. 1338-23-4)			
SPECIFICATIONS: Active Oxygen, %	8.8±0.1	8.8±0.1	8.8±0.1	5.5±0.05
TYPICAL PROPERTIES: Form Specific Gravity, 25/25 °C Refractive Index Viscosity, cps @: 25 °C 30 °C 35 °C Freezing Point, °C Flash Point (SETA) °F/°C S.A.D.T., * °F/°C	Clear Liquid 1.0840 1.4615 (21 °C) 14.8 11.5 9.2 Below -30 137/58 158/70 Burning	Clear Liquid 1.1471 1.4758 (25 °C) 15.8 12.8 9.7 Below -30 155/68 160/71 Burning	Clear Liquid 1.1402 1.4777 (25 °C) 16.0 12.2 9.7 Below -20 151/66 140/60 Burning	Clear Liquid 1.0286 1.4515 (20 °C) 10.2 8.3 6.9 Below -20 158/70 154/68 Mild Burning
SOLUBILITY:	Completely miscible in dimethyl phthalate, MEK, ethyl acetate; insoluble in water.			

* Self Accelerating Decomposition Temperature

APPLICATIONS

Introduction

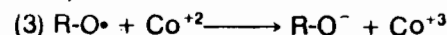
Lupersol MEK peroxides are used exclusively for the cure of promoted unsaturated polyester resins and vinyl ester resins at ambient temperatures. The function of the promoter, usually a transition metal salt such as cobalt naphthenate or octoate, is to activate decomposition of the peroxide or initiators*.



The cobaltic ion generated in (1) is reduced back to the original cobaltous form by reaction with more undissociated peroxide:



Excessive concentrations of promoters actually waste free radicals by converting them to ionic species:



Most resins are supplied prepromoted, however, if promoter (or accelerator) is required, it should be mixed thoroughly into the resin followed by the peroxide. Initiator concentrations typically run from 0.5 to 2.0% by weight based on resin; the most effective cobalt promoter range is 0.05 to 0.5% based on 6% metal content solutions (also available in 12% metal solutions). Enhanced activation is possible by adding tertiary amines such as dimethyl aniline (DMA) to "cobalted" resins.

Tables I and II illustrate the effects of varying initiator and promoter levels:

* Although often referred to as "catalyst", organic peroxides are more correctly termed polymerization initiators since the free radicals generated become chemically bonded to the crosslinked resin.

TABLE I

EFFECTS OF VARYING PEROXIDE CONCENTRATION

RESIN: Laminac 4123 with 0.12% Cobalt-6
 TEMPERATURE: 25°C

Peroxide Conc. (%)	Gel Time (Min.)		
	Lupersol DDM-9	Lupersol DHD-9	Lupersol Delta-X-9
1.0	24.0	22.0	11.2
1.25	17.5	15.8	8.3
1.5	14.7	11.8	6.7

TABLE II

EFFECTS OF VARYING PROMOTER CONCENTRATION

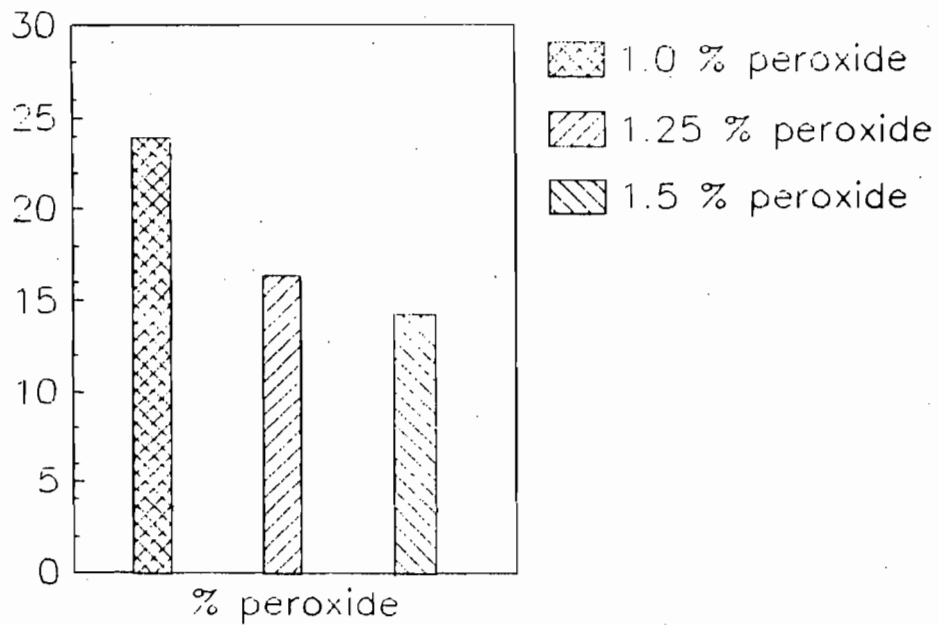
RESIN: Laminac 4123, 1% Peroxide
 TEMPERATURE: 25°C

Promoter Conc. (%)	Gel Time (Min.)		
	Lupersol DDM-9	Lupersol DHD-9	Lupersol Delta-X-9
0.10	27.0	23.5	12.7
0.12	24.0	22.0	11.2
0.15	20.7	19.9	9.3

FIGURE 1

Gel Time vs. % Peroxide

gel time, minutes



peroxide concentration

**prepared from Penwalt
Corporation data sheet**

decrease; as is shown in Figure 1, the gel time would correspondingly increase.

As Mr. Crane observes, the loss of even small amounts of MEKP into the air from the catalyzed resin would result in decreased mixture concentration and measurable differences in gel times, yet the times were constant and appeared independent of method of application or surface area covered. Thus, his conclusion is that no MEKP can be lost from the resin mix and emitted into the air when the catalyzed material is applied.

Q2. If the assumption in No. 1 above cannot be validated, please calculate the potential to emit and the property line concentrations.

R. Since gel time is a measure of initiator content, and the thin film (high surface area) gel time, either hand applied or spray applied, was equal to the bulk (low surface area) gel time, the applicant believes that the assumption that no initiator volatilizes during application is validated.

Q3. The ambient levels are calculated on the basis of a 40-hour work week. In Section II.E. of the original application, it is indicated that the production varies, but not in a seasonal fashion. Does this mean that the 40-hour work week is exceeded on occasion due to production demand? If so, the response to question No. 4 of the July 3, 1989 letter should be reevaluated and the results resubmitted. If not, it will be assumed that the facility will accept a maximum operating schedule of 8 hours per day, 5 days per week, and 52 weeks per year.

R. The scheduled work week at Donzi projects 8 hours per day, 5 days per week. VOC emissions can be expected during essentially

all of the operating day. However, some operations, e.g. wiring, hardware and engine installation, do not emit VOC compounds. The applicant requests that rather than be held to a maximum operating schedule the facility be held to a maximum usage of major VOC emitting chemicals, as verified by the previously submitted material balance scheme.

Previously submitted (and current) modelling was performed assuming emissions for 7 days per week, 52 weeks per year (2912 hrs/year). Therefore, operation of the facility for an occasional 6 day week (within the hourly and annual chemical usage constraints) should not result in a modelled ambient concentration above the DER guideline values.

To address DER's concern about the ambient impact of a 10-hour per day operation, Forsite has repeated the previously submitted model run with a 10-hour operating day (with a 1 hour lunch break) instead of the 8-hours of emissions previously used. Although the applicant wishes to have the complete model output held confidential, the results of the calculations at the northern and southern property boundaries are presented in Table 1, following. Since the previous submission did not include these boundary estimates, those values are also included in Table 1. Specific boundary receptors cover all vectors except approximately 60°-120° and 240°-300°, where plant boundaries are in excess of 100 meters (see Figure 2)

During the normal facility operating day, VOC emissions from lamination and gel coating may be expected over an approximately 8 hour period. As can be seen in the table, this emission rate results in predicted ambient concentrations below the DER guideline level of 2150 $\mu\text{g}/\text{m}^3$ along the entire northern and southern property boundaries. Predicted concentrations from the polar receptor grid

Table 1

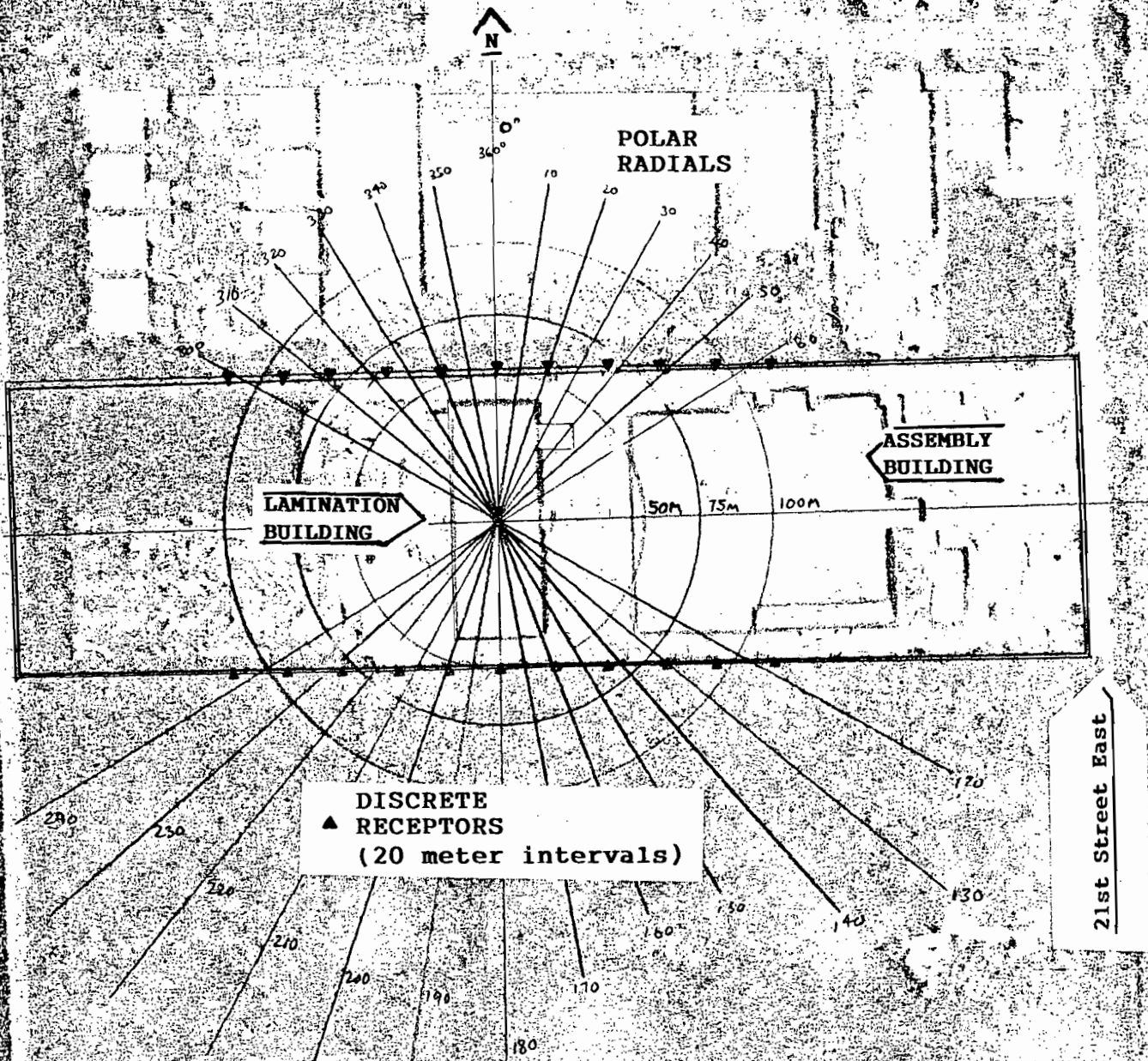
Predicted Concentrations at Plant Boundaries ($\mu\text{gm}/\text{m}^3$) at indicated distance (meters East or West) from N-S centerline of building

8 emitting hrs/day	Building Center										
	West						East				
	Distance in meters						Distance in meters				
	-100	-80	-60	-40	-20	0	20	40	60	80	100
Northern Boundary	1331	1552	1792	1734	1675	1555	1749	1650	2021	1863	1371
Southern Boundary	1467	1604	1976	2012	1683	1689	1621	1473	1333	1362	1218
9 emitting hrs/day	-----										
Northern Boundary	1461	1659	1792	1734	1687	1609	1749	1650	2021 ¹	1863	1371
Southern Boundary	1467	1604	1976 ²	2012 ³	1683	1752	1621	1473	1333	1362	1218

¹ Second highest value equals 1716

² Second highest value equals 1847

³ Second highest value equals 1857



DISCRETE
▲ RECEPTORS
(20 meter intervals)

FIGURE
2

are all less than $2101 \mu\text{g}/\text{m}^3$ at a distance of 75 meters from the building center, decreasing rapidly with distance.

Modelling for an additional hour of emissions at the same rate results in only slightly higher predicted concentrations at the plant boundaries, as shown in Table 1. The DER guideline concentration of $2150 \mu\text{g}/\text{m}^3$ for an 8-hour per day continuous emission could be reduced to $1911 \mu\text{g}/\text{m}^3$ for a facility emitting for 9 hours per day. FORSITE's second model run, assuming 9 hours per day of emission, predicts the maximum ambient values from such an operation. It should be noted that these results are being used to estimate the results of normal 8 hour emissions with possible occasional random 9 hour emissions. Thus, the use of $1911 \mu\text{g}/\text{m}^3$ as a guideline value would be extremely conservative.

As indicated in the response to Question 4, modelling has been performed using conservatively high styrene emission values.

As can be seen in Table 1, the value of $1911 \mu\text{g}/\text{m}^3$ is exceeded an estimated three times per year (for 9 hour emissions each day), once on the Northern boundary, twice on the Southern boundary. The highest, second highest values at those same locations are predicted to be well below the $1911 \mu\text{g}/\text{m}^3$ level.

The applicant believes that the maximum ambient concentrations presented for this random extended operating day are within the ranges that could be considered acceptable by the Department.

Q4. Since the requested allowable emissions of 249.1 TPY of VOC is considered a synthetic level to avoid PSD new source review, please provide the total utilization rate (i.e., gallons per year, etc.) per chemical/raw material to be used that would be acceptable as a permit restriction in order to provide the Department with reasonable assurance that the 249.1 TPY VOC is not exceeded.

FORSITE INC.

R. As previously stated, the scheduled work week at Donzi projects 8 hours per day, 5 days per week, 52 weeks per year. In general, facilities do not operate at 100% capacity factor. Down time for cleaning, equipment repair, production start-up, vacations, and other factors generally result in capacity factors of less than 90%. The boat manufacturing industry is also subject to market fluctuations. Currently, the facility in question is operating at substantially reduced production (and therefore emission) rates. Conversely when demand is high, the workday may be expanded to 10 hours for one or two days or a Saturday morning shift may be required. This happens infrequently and sporadically, and would not be expected to raise the overall capacity factor above 90%.

All estimates of VOC emissions presented in the permit application Tables II and III (Attachments 3 and 4, "based on requested usage", of our previous response) are "worst case" emission values, determined by multiplying the highest anticipated VOC content of the chemical used by the highest value in the range of the CARB estimates. The values for styrene were estimated using the upper end of the range (37%) for styrene content and midpoint emission factors.

Additionally, as indicated in our previous response to question number 3, methyl methacrylate is used as a replacement for styrene in amounts up to 5%, thus reducing the styrene content in gelcoat by up to 5%. In our Attachments 3 and 4, we present the worst case emissions of each chemical listed, including styrene and methyl methacrylate (MMA), and do not take credit for the fact that as MMA increases to the 5% value listed, the styrene emitted decreases by a corresponding amount. The sum of the emissions for (styrene in gelcoat + MMA) is estimated at 20.1 TPY, not $(20.1 + 3.12) = 23.12$ TPY, as implied in the Attachments. The potential maximum emission of styrene from the gelcoat is 20.1 TPY, and the potential maximum emission of MMA is 3.12 TPY, but they are not independent.

FORSITE INC.

The VOC emissions that result from allowing the styrene/MMA substitution, and from utilizing midpoint VOC content and CARB emission values, are presented in Table 2, following.

At a 90% capacity factor, the estimated emissions would be 213.5 TPY.

Based on the TPY estimates generated by the use of reasonable midpoint ranges for VOC content and emission factors, and a conservative 90% capacity factor, the applicant believes that the previously requested chemical usages, verified by the previously submitted material balance scheme, provides the Department with assurance that the 249.1 TPY VOC limit will not be exceeded.

Q5. There have been some success reported to the Department of acetone substitutes and there was no mention that a substitute has been evaluated by this facility. Has a substitute for acetone been evaluated by this facility? If not, then this should be done and the results provided to the Department.

R. As stated in our earlier response to Question 5, this facility is currently participating in an investigation to identify alternative manufacturing methods, materials and chemicals that have the potential to reduce the overall VOC/OS emissions at the facility. The use of an acetone substitute is among those options.

As you indicate in your letter, there appear to be instances of limited success with this category of chemical; however, the results of those tests have not been consistent enough or resulted in a product of sufficient quality to make widespread replacement of acetone a viable option at this point. The facility will continue to be involved in the industry-wide search for and evaluation of suitable alternatives that will reduce VOC/OS emissions and still provide for the production of a quality product.

FORSITE INC.

Table 2

<u>Compound</u>	<u>Use (lb/hr)</u>	<u>%VOC</u>	<u>Emission Factor</u>	<u>Emission (lb/hr)</u>
Acetone	270.6	100	.6 ¹	162.36
Styrene Monomer	2.7	100	.11, .305	.56
Resin (Styrene)	1100	35	.11 (CARB)	42.35
Gelcoat (Styrene-MMA)	171.38	35	.305 (CARB)	18.3
Autofroth A	82.5	47	.0223	0.89
Autofroth B	82.5	22.5	.065	1.21
Methylene Chloride	2.42	100	100	2.42

¹ based on material balance calculations (purchase records and waste manifests)

Total VOC emissions: 228.1 lb/hr = 237.2 TPY

At 90% capacity factor: 205.3 = 213.5 TPY

P 052 482 268

RECEIPT FOR CERTIFIED MAIL

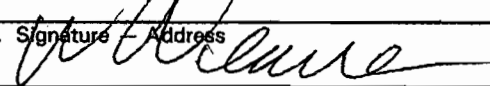
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Mr. C. Gordon Houser, Donzi	
Street and No. Marine	
P.O. Box 987	
P.O., State and ZIP Code Tallevast, FL 34270-0987	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 5-23-90 Permit: AC 41-165759	

PS Form 3800, June 1985

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to: Mr. C. Gordon Houser President Donzi Marine Corporation 7110 21st Street East P. O. Box 987 Tallevast, FL 34270-0987</p>	<p>4. Article Number P 052 482 268</p> <p>Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
<p>5. Signature - Address X </p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent X</p>	
<p>7. Date of Delivery 5-25-90</p>	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

May 23, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. Gordon Houser
President
Donzi Marine Corporation
7110 21st Street East
Post Office Box 987
Tallevast, Florida 34270-0987

Dear Mr. Houser:

Re: Completeness Review of an Application Package
AC 41-165759

The Department has reviewed the supplementary material received April 24 and May 4, 1990, and the application package is deemed incomplete. Therefore, please submit to the DER's Bureau of Air Regulation the following information, including all calculations, assumptions and reference material, and the status will, again, be ascertained:

1. In the footnote to Attachment 4, Section III:C, Airborne Contaminants Emitted, it is assumed that methylethyl ketone peroxide is totally consumed in the reaction. Please provide documentation to support this assumption.
2. If the assumption in No. 1 above cannot be validated, please calculate the potential to emit and the property line concentrations.
3. The ambient levels are calculated on the basis of a 40-hour work week. In Section II.E. of the original application, it is indicated that the production varies, but not in a seasonal fashion. Does this mean that the 40-hour work week is exceeded on occasion due to production demand? If so, the response to question No. 4 of the July 3, 1989 letter should be reevaluated and the results resubmitted. If not, it will be assumed that the facility will accept a maximum operating schedule of 8 hours per day, 5 days per week, and 52 weeks per year.

Mr. C. Gordon Houser
Page Two
May 23, 1990

4. Since the requested allowable emissions of 249.1 TPY of VOC is considered a synthetic level to avoid PSD new source review, please provide the total utilization rate (i.e., gallons per year, etc.) per chemical/raw material to be used that would be acceptable as a permit restriction in order to provide the Department with reasonable assurance that the 249.1 TPY VOC is not exceeded.
5. There have been some success reported to the Department of acetone substitutes and there was no mention that a substitute has been evaluated by this facility. Has a substitute for acetone been evaluated by this facility? If not, then this should be done and the results provided to the Department.

If there are any questions, please call Bruce Mitchell or John Glunn at (904)488-1344 or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/t

cc: B. Thomas, SW District
T. John, P.E., FI
W. Priesmeyer, Manatee County

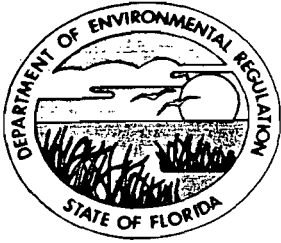
Ready File

J. Glunn

B. Mitchell

BA/CHF

} 5-23-90 RAM



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Dr. Richard Garrity, Deputy Assistant Secretary

May 23, 1990

Mr. Donald Thornburg
Vice President Engineering
OMCCC Inc.
dba Chris Craft Development Center
Post Office Box 25022
Bradenton, FL 34026

Dear Mr. Thornburg:

Re: Manatee County - AP
AC41-165812

On April 24, 1990, we received your response regarding the after-the-fact air pollution construction application for a fiberglass boat manufacturing plant designated the Development Center in Manatee County. After reviewing the response and in order to continue processing the application, the Department will need the following additional information pursuant to Subsection 17-4.070(1), F.A.C.:

1. Your response to Item No. 9 of our incompleteness letter dated June 30, 1989 did not adequately demonstrate a 24-hour verification capability of material usage. Therefore, re-submit a proposed material balance scheme. Note - The Department intends to cap your daily (24-hour) emissions to 10 times the hourly rates listed on Attachment No. 4. Please explain, if you disagree with this approach.
2. Your response to Item No. 3 of our incompleteness letter dated June 30, 1989 indicated methyl methacrylate is not included on Attachment No. 3 since it is one of the components making up the 30-40% gelcoat. Therefore, submit the following:
 - A. Show how the value 3.5 lbs./hour for gelcoat on Attachment No. 4 was derived.
 - B. Show how the value 0.42 lbs./hour for methyl methacrylate on Attachment No. 4 was derived.
 - C. Explain why the 0.42 lbs./hour value for methyl methacrylate is not already included in the 3.5 lbs./hour value for gelcoat as indicated in your response.

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. Bruce Mitchell, DER
2. Tallahassee
- 3.
- 4.

Remarks:

F.Y.I.

RECEIVED

MAY 29 1990

DER - BAQM

From

Jim McDonald

Date

5/23/90

Phone

Mr. Donald Thornburg
Vice President Engineering
Bradenton, FL 34026

Page Two

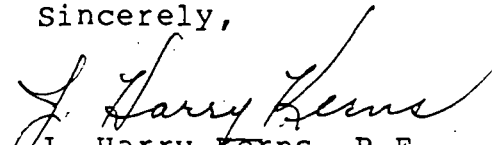
3. In the response to Item No. 4 relative to ambient concentrations of toxic pollutants, the facility's property boundaries were discussed in relative terms but no specific dimensions were given. Submit a diagram showing distances in meters from the facility's emission point(s) to the property boundaries.

4. Your model inputs were for a volume source. Submit an explanation justifying why a volume source model was run when emissions are vented through two vents each at 24,000 ACFM.

"NOTICE: Pursuant to the provisions of Section 120.600, F.S. and Rule 17-12.070(5), F.A.C., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department will issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered question will be submitted. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available. Or for operating permits, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

If you have any questions, please call Mr. Jim McDonald or Mr. Matt McCann of my staff at (813) 623-5561 extension 421 and 408, respectively.

Sincerely,


J. Harry Kerns, P.E.
District Air Engineer

JHK/jmq

cc: MCPHU
Tom John, P.E.
Bruce Mitchell, DER - Tallahassee ✓

FORSITE INC.

Environmental Consulting & Services
P.O. Box 7473, St. Petersburg, Florida 33734
(813) 895-1933

RECEIVED

MAY 4 1990

DER-BAQM

May 1, 1990

Mr. Bruce Mitchell
Bureau of Air Quality
Dept. Of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: AC 41-165759

Dear Mr. Mitchell:

In conversation with our office on April 27, 1990, you indicated your desire for four non-confidential responses and one confidential response to the incompleteness letters for the above-referenced facility. Please consider the response package previously submitted, which contains all relevant information, to be the applicant's confidential file.

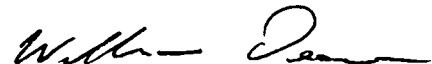
Enclosed you will find four copies of a non-confidential version of that response package. These copies have been prepared for the public files, and have had sections and information which the applicant feels is confidential in nature; based on disclosure of production rates, details of specific operations, company manifests, or internal company information; deleted from them.

Copies of the non-confidential response package have also been sent to the DER Southwest District Office, and to the Manatee Public Health Unit, supplementing the previously transmitted confidential file.

If you have additional questions or if we can be of additional help, please do not hesitate to call Tom John of our staff at 813-576-3637.

Thank you for your continuing cooperation and attention to this matter.

Sincerely,



William W. Deane
General Counsel

**RESPONSE TO DER INCOMPLETENESS LETTERS
FOR AIR PERMITS**

**DONZI MARINE, BRADENTON, FLORIDA
AC 41-165759**

Prepared For

OUTBOARD MARINE CORPORATION

Waukegan, Illinois

FORSITE INC.

Environmental Engineering and Management Services

P.O. Box 7473, St. Petersburg, Florida 33734
(813) 576-3637 Fax (813) 576-6121

April 20, 1990

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Dept. Of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Manatee County A.P. AC41-165759

Dear Mr. Fancy:

As Engineer of Record for Outboard Marine Corporation (OMC), we are submitting the enclosed response to your incompleteness request. We trust that the information provided is sufficient and satisfactory to allow permitting to proceed.

These responses provide proprietary information drawn from plant records, operating and chemical processing/handling techniques, unpublished reports and company research. This information would be of value to competitors to the Company. Due to the nature of that information, the Company requests that these responses be considered CONFIDENTIAL in nature, be stamped as such, and be maintained in a secure Confidential File at your offices.

On May 1, 1990, Donzi Marine (AC41-165759) and Chris Craft Boats (AC41-165851), both of which are owned by OMC, will exchange locations. Donzi will begin operations at the former Chris Craft facility (Facility 18, 7110 21st Street East, Sarasota Florida) and Chris Craft will operate from the site previously occupied by Donzi (8161 Old Bradenton Road, Tallevast, Florida).

Since this is not a change in ownership, and construction permits have not been issued, the applicant requests that the applications be changed to indicate correct building locations and dimensions. Usage rates of chemicals will remain unchanged for each application. Therefore, in addition to the responses to the incompleteness letter, we have also enclosed new application pages and attachments, as appropriate, which should be substituted into the original application.

If you have any questions or I can provide further information, please contact me at (813) 576-3637.

Sincerely,



Tom T. John, P.E.



Florida Department of Environmental Regulation
 Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form #	_____
Form Title	_____
Effective Date	_____
DER Application No.	_____ (Filed in by DER)

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Fugative Air Emission (VOC) [] New¹ [] Existing¹
 APPLICATION TYPE: [] Construction [] Operation [] Modification
 COMPANY NAME: DONZI MARINE CORPORATION COUNTY: Manatee
 Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) multiple building vents
 SOURCE LOCATION: Street Facility 18, 7110 21st Street East City Sarasota
 UTM: East 347848 North 3033291
 Latitude _____° _____' _____"N Longitude _____° _____' _____"W
 APPLICANT NAME AND TITLE: C. Gordon Houser, President
 APPLICANT ADDRESS: Post Office Box 987 Tallevast, Florida 34270-0987

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Donzi Marine Corporation

I certify that the statements made in this application for a after-the-fact construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization.

Signed: *C. Gordon Houser*
C. Gordon Houser, President
 Name and Title (Please Type)
 Date: 4-17-90 Telephone No. (813) 755-7585

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed Tom T. John

Tom T. John, P.E.

Name (Please Type)

Forsite Incorporated

Company Name (Please Type)

P.O. Box 7473 St. Petersburg Florida 33734

Mailing Address (Please Type)

Florida Registration No. 33157 Date: 4-18-90 Telephone No. (813) 576-3637

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The facility is a fiberglass boat manufacturing plant which processes glass reinforced polyester resin. The manufacturing process also includes the use of other volatile organic chemicals such as acetone, methylethyl ketone peroxide, gelcoat resin coating, iron and other paint, adhesive, and polyester resin.

B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)
N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
N/A

Donzi Marine
Response To Incompleteness Questions, AC 41-165759

1. In Attachment 3, provide justification to support the "50%" recovery of acetone.
 - R. The 50% recovery of acetone specified in the permit application is derived from a short term material balance of acetone around the facility. A re-evaluation of that data over a 12 month period (which was not previously available) indicates variable recovery percentages. Attachment A sets forth data showing the quantities of acetone received at the facility over a 12 month period. The supporting documents showing the quantities of used acetone removed from the facility over the same period of time are also included as is the calculation deriving actual recovery. [Since Attachment A presents specific information about chemical purchases, inventories and manifest (and therefore production rates), the applicant requests that the attachment itself and its calculations be considered confidential]; the applicant at this time wishes to claim only 40% recovery due to the variability of the recovery process, including seasonal temperature related effects.

2. In Attachment 3, Autofroth A and B contain ranges of VOC percentages. Please describe the reason for variability and how each is derived.
 - R. The variability of the VOC percentages in Autofroth A and B are as a result of their manufacturing process as confirmed to us by Mr. Bill Andrews of Olin Chemical Company. The 46-48% VOC number for Autofroth A is derived by summation of its components of 40-45% Polymeric Isocyanate and 6-8% Fluorocarbon. Only 1.6-3% Fluorocarbon is actually emitted, the remainder being consumed by reaction. This fact was also confirmed by Mr. Andrews.

3. Attachment 4 references the contaminant methyl methacrylate, which is not reflected in Attachment 3. If this is an error of omission, please amend Attachment 3. If the omission was intended so, please explain.
 - R. Attachment 3 does not specifically reference methyl methacrylate because of the nature of the attachment. This attachment is intended to show the raw materials and chemicals used at the facility. Methyl methacrylate is not a raw material or chemical but a component of the Gelcoat.

As such, it is indirectly included in this attachment by being one of the components making up the 30-40% VOC content figure referenced in this attachment. Methyl methacrylate is sometimes used by the gelcoat manufacturers as a substitute for styrene in amounts from 1-5% (wt.). Since methyl methacrylate is a relatively small percentage of the total VOC and has OSHA TLV and PEL values that are twice that of styrene, we chose to reference the VOC's as "styrene", which would provide a conservative basis.

4. Because the pollutant emissions from the facility's operations are defined as volatile organic compounds/organic solvents (VOC/OS) and are toxic in nature, a toxic screening is required to establish the pollutants' concentrations at the property lines or where the public has access, whichever is closest. Guidance can be obtained by call Mr. John Glunn and Mr. Tom Rogers at (904) 448-1344.

- R. Three VOC compounds (acetone, methyl methacrylate, and styrene) are or may be present in facility air emissions. Although none of these chemicals are considered particularly "toxic" under the Federal OSHA PEL Regulations adopted in 1989, they are regulated for workplace exposures. Acceptable 8 hour (TWA) permissible exposure limits for the three above named compounds are 1,800 mg/m³, 410 mg/m³, and 215 mg/m³, respectively. Comparing the three compounds on the basis of an equivalent exposure index (EEI), which we define as the average air emission concentration (AEC) for the facility divided by the acceptable exposure limit (PEL), we find EEI's of 0.04, 0.004, and 0.36 for acetone, methyl methacrylate, and styrene respectively. Since styrene has a substantially higher EEL than the other compounds, we concluded that only styrene needs to be considered in the screening analysis. Sample calculations demonstrating "EEI" are presented in Attachment F.

The following table presents the "acceptable ambient concentration" for styrene using the DER guidelines.

DER Styrene Exposure Limits

The compound is Category "A", moderate toxicity: DER guideline safety factor = 100

ACGIH TLV/TWA	50 ppm-215 mg/m ³
TLV/STEL	100 ppm-425 mg/m ³
OSHA PEL	50 ppm-215 mg/m ³
OSHA PEL Ceiling	100 ppm-425 mg/m ³
OSHA 5 min./3 hr. peak	600 ppm-2550 mg/m ³

Acceptable Ambient Concentration(AAC) =
TLV x (40/weekly op. hrs)/safety factor = AAC, mg/m3

For 40 hours/week operation:

AAC = (215)(40/40)/100 = 2.15 mg/m3 = 2150 ugm/m3

Acceptable ambient levels calculated using:

TLV/TWA: 2150 ugm/m3
STEL: 4300 ugm/m3
PEL: 2150 ugm/m3
PEL/Ceiling: 4300 ugm/m3
5 min/3 hr peak: 25800 ugm/m3

Building dimensions, emission rates, and exhaust systems are as follows:

Building length: 270'
Building width: 140'
Building height at highest point: 30'

Requested emission rate of styrene for permitting:
8.16 grams per second

Exhaust fans:

Number	Diameter	ACFM	Location
1	48"	18,400	North Wall
1	48"	18,400	West Wall
12	42"	15,600	West Wall

The building is oriented with the length dimension perpendicular to the East-West direction.

The facility was modelled as a volume source using the Industrial Source Complex-Short Term (ISCST) model (Cleary and Associates). Direction specific building dimensions were calculated and provided as model input. Meteorological data used for the model was for the Tampa Bay Area, 1986. Copies of the wind speed and direction plots for the years 1982-1986 are provided as Attachment B. It can be seen that there is no substantial variation in the meteorological data over that five year interval, and it was assumed that 1986 was an acceptably representative year.

Results of the ISCST model runs are shown as Attachment C. [Attachment C is a computer printout of a copywrite protected program. General program input parameters and the maximum concentration predicted are presented in the text of the response. The applicant therefore requests that the specific model output and predictions themselves be held confidential].

The ISCST model predicts that the highest 8-hour running average concentration would be 2046 micrograms per cubic meter, occurring at 75 meters from the center of the building and 250 degrees from North. This location is on plant property, and is less than the Maximum Acceptable Concentration for styrene.

Attachment D is a photocopy of a section of a 1987 aerial photograph obtained from the Manatee County Property Appraisers office. The photo illustrates the facility, its plant boundary and the location of the nearest neighbors. It should be noted that the distance to the nearest neighbor is substantially farther than the plant boundary and the distance to the nearest residential area is quite substantial. In fact, access to the plant boundary from off site is difficult or impossible for many of the 36, 10 degree increments modelled in ISC.

Based on this information it is reasonable to allow a greater radius than the plant boundary actual limitations when determining acceptable ambient criteria and the locations of maximum impact.

Because of the conservative nature of the ISCST model, the conservative assumptions made in parameter estimation, and the site-specific considerations presented, we believe that the emissions from the facility are in satisfactory compliance with the intent of the DER air toxic guidelines.

5. Since the VOC/OS used in the operations at your facility are odorous in nature when released into the atmosphere, submit a conceptual plan and potential course of action that will provide the Department with reasonable assurance that objectionable odors will not be discharged and detectable off the facility's property boundary or where the public has access, whichever is closest, and in accordance with F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan should contain, but not be limited to, various control system strategies/options that might be retrofitted/installed to reduce or eventually eliminate emissions of VOC/OC from each type of operation, associated time and cost analyses, and VOC/OS substitutes.

- R. This facility has been in operation for a number of years, and the management of the facility is not aware of any odor-related complaints from the general public.

It is impossible at this time to commit to a definite course of remediation should an odor complaint arise sometime in the future. Without knowing the nature of the hypothetical complaint it is impossible to know whether it arises out of a particular manufacturing step or from the overall operation or whether it occurs at a particular time of the day or throughout the day. These along with many other factors could have a profound effect upon the course of action taken should an odor complaint arise. We have provided herein a list of possible options that could be considered for implementation. These lists are not meant to be all inclusive or mutually exclusive nor do they preclude options which may be developed in the future or commit the company to any course of action

Odor Complaint Options

This facility is currently participating in an investigation to identify alternative manufacturing methods, including alternative materials or chemical components that would have the potential to reduce VOC/OS emissions at the facility. End of stack control options were evaluated in 1988 by Radian Corporation in a LAER determination study for Javelin Boats in Murfreesboro, Tennessee. That study concluded that add-on control equipment (carbon adsorption and incineration) were not feasible. That conclusion was accepted by both Tennessee and USEPA Region IV and a permit to construct was issued. We are not aware of any technological changes that would alter that conclusion. In addition we believe that the physical layout of the Donzi Marine facility is much less favorable than that considered in the Javelin LAER study.

Techniques which could be considered as "odor control options" include:

- A. Modification of manufacturing production cycles.
 - B. Modification of plant ducting and ventilation systems.
 - C. Modification of manufacturing methods or materials, including chemical components.
6. At the end of each working shift and close of business, what are the procedures for storing and discarding unused materials of VOC/OS, whether it be bulk or individual work stations (i.e., pails, buckets, etc.), and address each VOC/OS used?

- R. Acetone is dispensed by an attendant from a controlled station at the beginning of the shift. At the end of the shift all used acetone is recovered into a 55 gallon drum which is normally closed and locked by the attendant.
7. Describe the in-house procedures and practices used to minimize the release of VOC/OS emissions.
- R. During operating hours the acetone that was dispensed by the attendant is kept in spring loaded, gasket topped closed containers. They remain closed at all times unless material is being dispensed. In areas where acetone is used to clean hand tools it is kept in buckets with the lids closed at all times except when tools are being placed in or removed from the acetone.
8. If there are any other sources of pollutant emissions at your facility, please submit an application package, which includes a processing fee. Such sources include woodworking shop operations that emit particulate matter and visible emissions.
- R. [The applicant has provided for informational purposes the approximate particulate emission estimates. Since particulate emission applications are being prepared which will provide public information relative to this question, the applicant requests that the specifics of this paragraph be held confidential.]

As requested, we are currently preparing an application package for a construction permit for particulate emission source for this facility. This application, along with the processing fee, will be submitted under separate cover as soon as it is completed.

9. Since a material balance scheme (MBS) will be imposed to assess the VOC/OS emissions from the facility, submit a proposed MBS detailing the process and documentation that will be utilized to quantify the VOC/OS emissions into the atmosphere; and, there must be a 24-hour verification capability. The proposed MBS should include, but not be limited to, purchasing/receiving, inventory frequency and capabilities, and recycling/reclaiming.
- R. The material balance scheme to be used to demonstrate emission compliance will be based upon quantities of raw materials used. The quantity of each of the chemicals used having components which result in VOC emissions can be tracked using invoices and consumption records. These

chemicals are shown in Attachment 3. We propose to update this report on a monthly basis and include a year-to-date running total of potential emissions. The calculations will be the same as those used to develop Attachment 4 and the emission factors and sample calculations are shown there. The raw material invoices and the consumption records (based upon tank level readings) will be maintained on file at the facility. These records will be available to support the accuracy and authenticity of the input to the spreadsheet report and the methods can be used for the 24 hour verification capability. [Attachments A and E utilize as a basis specific information about chemical purchases, inventories, and consumption records, and manifests. This information is directly related to production history and market estimates, and as such the applicant wishes to have the specific format and content of the attachments held confidential].

10. The styrene emission factors used in Attachment 4 only represent spray lay-up for both resin and gel coat applications. Does this facility use any hand lay-up of either resin or gel coat? If yes, the potential emissions may need to be recalculated and the appropriate sections of the application amended. Please explain the actual production steps used at this facility where styrene emissions are generated.

R. This facility does use hand lay-up of styrene emitting chemical in addition to spray operations. The higher emission factors usually associated with hand lay-up were not used in our calculations of potential emissions, however, for three reasons. [The first two items in the applicant's response to question 10 provide specific information directly related to production rate of several components and the method of production. The applicant requests these two responses, as well as the supporting documentation be held confidential]. Finally, in calculating the potential styrene emissions for the facility the emission factors used in Attachment 4 were the maximums of the ranges given (see footnotes 1 and 2 of Attachment 4). There was no credit taken for the fact the actual emissions factor would most likely be at the midpoint or possibly the lower end of the range rather than the maximum. Note, however, that midpoint emission factor ranges, which would more accurately represent true operating conditions, were used in estimating the grams per second emission rates used in the ISCST model, and that these midpoint values were used in estimating the total requested facility emissions.

Attachment 3
Section III: A
Raw Material and Chemicals Used
Based on Current Usage
DONZI MARINE CORPORATION

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	%Wt		
Acetone ¹	VOC	100	246	See Attachment 2
Styrene Monomer	VOC	100	2.45	"
Methylethyl Ketone Peroxide	VOC	100	20	"
Gelcoat	VOC	30-40	155.8	"
Styrene Polyester Resin	VOC	30-40	1000	"
Autofroth A	VOC-exempt	46-48	75	"
Autofroth B	VOC-exempt	20-25	75	"
Spray Adhesive	non-VOC		652.08	"
Methylene Chloride	VOC-exempt	100	2.2	"

¹ 40% (average) of acetone is collected and processed for recovery; 60% is volatilized.

Attachment 3
 Section III: A
 Raw Material and Chemicals Used
 Based on Requested Usage
 DONZI MARINE CORPORATION

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	%Wt		
Acetone ¹	VOC	100	270.6	See Attachment 2
Styrene Monomer	VOC	100	2.7	"
Methylethyl Ketone Peroxide	VOC	100	22	"
Gelcoat	VOC	30-40	171.38	"
Styrene Polyester Resin	VOC	30-40	1100	"
Autofroth A	VOC-exempt	46-48	82.5	"
Autofroth B	VOC-exempt	20-25	82.5	"
Spray Adhesive	non-VOC		717.3	"
Methylene Chloride	VOC-exempt	100	2.42	"

¹ 40% (average) of acetone is collected and processed for recovery; 60% is volatilized.

Attachment 4
Section III: C
Airborne Contaminants Emitted
Based on Current Usage
DONZI MARINE CORPORATION

Name of Contaminant	Emission		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
1. acetone	147.6	153.5	N/A	N/A			See attachment 2
2. styrene resin ¹	52	54.08	N/A	N/A			"
gelcoat ²	21.8	22.68	N/A	N/A			"
monomer ³	0.58	0.61	N/A	N/A			"
3. methylethyl ketone peroxide ⁴	0	0	N/A	N/A			"
4. Autofroth A dichlorodifluoromethane ⁵	2.25	2.34	N/A	N/A			"
isocyanate ⁴	0	0	N/A	N/A			"
5. Autofroth B Trichlorofluoromethane ⁶	6	6.24	N/A	N/A			"
6. methyl methacrylate ² (5% wt. in gelcoat)	2.73	2.83	N/A	N/A			"
7. methylene chloride ⁷	2.2	2.28	N/A	N/A			"

Attachment 4
Section III: C
Airborne Contaminants Emitted
Based on Requested Usage
DONZI MARINE CORPORATION

*52 Wk X 40 hrs
2080 hrs*

Name of Contaminant	Emission		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
1. acetone	<u>160</u>	<u>166.7</u>	N/A	N/A			See attachment 2
2. styrene - resin ¹	<u>44.77</u>	<u>46.56</u>	N/A	N/A			"
gelcoat ²	<u>19.34</u>	<u>20.1</u>	N/A	N/A			"
monomer ³	<u>0.638</u>	<u>0.66</u>	N/A	N/A			"
3. methylethyl ketone peroxide ⁴	<u>0</u>	<u>67.32</u>	N/A	N/A			"
4. Autofroth A dichlorodifluoromethane ⁵	<u>2.475</u>	<u>2.57</u>	N/A	N/A			"
isocyanate ⁴	<u>0</u>	<u>0</u>	N/A	N/A			"
5. Autofroth B Trichlorofluoromethane ⁶	<u>6.6</u>	<u>6.86</u>	N/A	N/A			"
6. methyl methacrylate ² (5% wt. in gelcoat)	<u>3.0</u>	<u>3.12</u>	N/A	N/A			"
7. methylene chloride ⁷	<u>2.42</u>	<u>2.52</u>	N/A	N/A			"

Note: Most probable styrene emission factors and midpoint styrene contents used.

Notes:

1. California Air Resources Board (CARB) value of 0.09 to 0.13; value of 0.13 used
2. CARB value of 0.26 to 0.35; value of 0.35 used
3. Styrene monomer is used as thinning agent for the gelcoat and resin
4. Chemical is totally consumed in the polymeric reaction and will not be an emission constituent
5. Bill Andrews, Olin Chemical; 1.16 - 3% (wt) freon emitted - VOC-exempt under 17-2.650(1)(d), F.A.C.
6. Bill Andrews, Olin Chemical; 5 - 8% (wt) freon emitted - VOC-exempt under 17-2.650(1)(d), F.A.C.
7. Methylene chloride is VOC-exempt under 17-2.650(1)(d), F.A.C.

Sample Calculations (Current Usages) - Styrene

1. Resin contribution

$$1000 \text{ lbs/hr} \times 0.4 \text{ lbs styrene/lb resin} \times .13 \text{ lb emitted/lb used} = 52 \text{ lbs/hr}$$

$$52 \text{ lbs/hr} \times 2080 \text{ hrs/yr} \times \text{ton}/2000 \text{ lbs} = 54 \text{ TPY}$$

2. Gelcoat contribution

$$155.8 \text{ lbs/hr} \times 0.4 \text{ lbs styrene/lb gelcoat} \times 0.35 \text{ lbs emitted/lb used} = 21.8 \text{ lbs/hr}$$

$$21.8 \text{ lbs/hr} \times 2080 \text{ hrs/yr} \times \text{ton}/2000 \text{ lbs} = 22.6 \text{ TPY}$$

3. Monomer contribution: assume 50% to resin dilution, 50% to gelcoat dilution

$$\text{resin: } 2.45 \text{ lbs/hr} \times 0.5 \times 0.13 \text{ lbs emitted/lb used} = 0.16 \text{ lb/hr}$$

$$\text{gelcoat: } 2.45 \text{ lbs/hr} \times 0.5 \times 0.35 \text{ lbs emitted/lb used} = 0.43 \text{ lbs/hr}$$

Current Total Styrene Emissions:

$$(52 + 21.8 + 0.6) = 74.4 \text{ lb/hr or } 77.4 \text{ TPY}$$

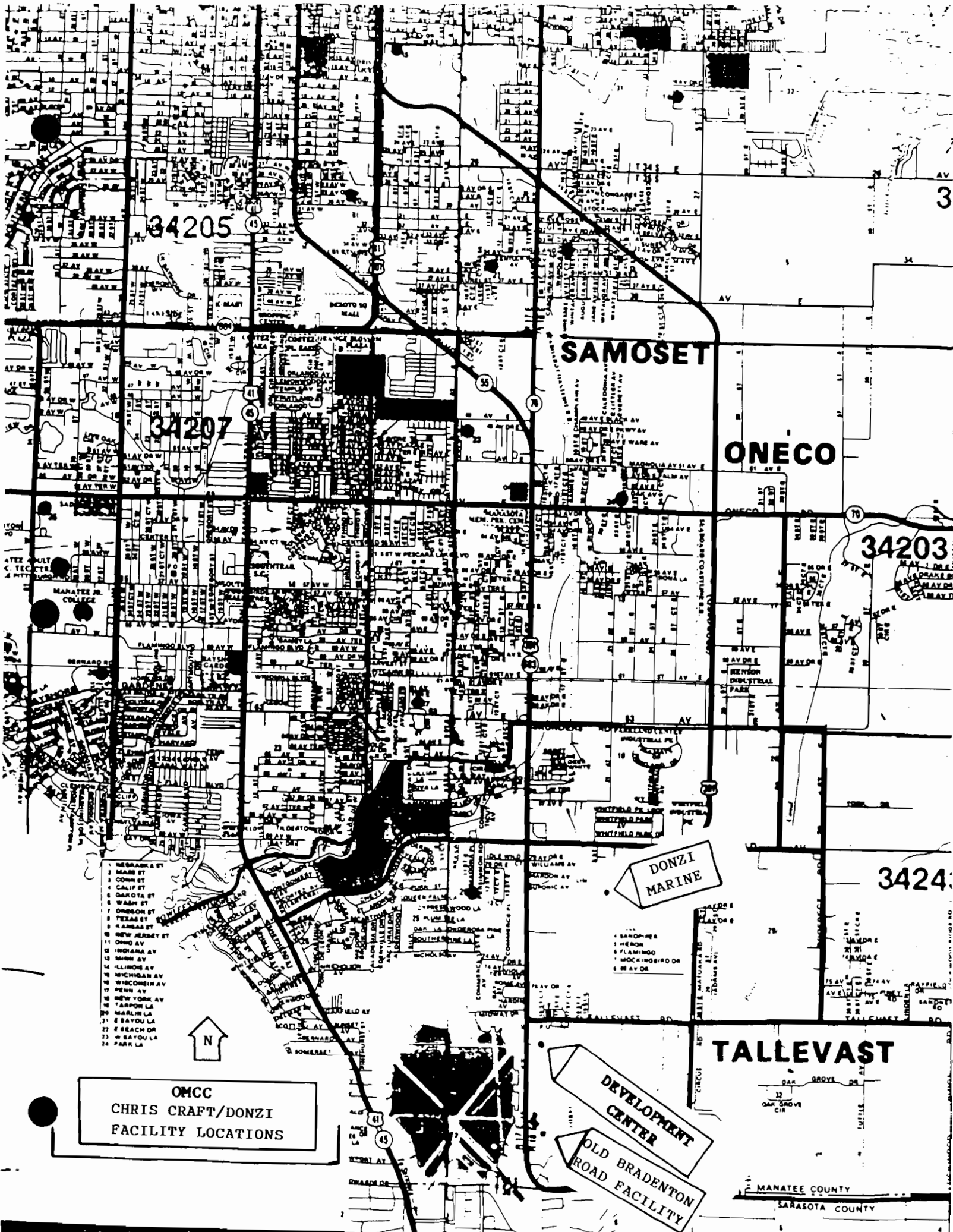
Current Total Facility VOC emissions: 244.6 TPY

Styrene emission rate for modelling:

$$(1100 \times .37 \times .11) + (171.4 \times .37 \times .305) + (0.6 \times .5 \times (.11 + .305)) =$$

$$64.67 \text{ lb/hr} = 8.16 \text{ gms/sec}$$

ATTACHMENT 1
FACILITY LOCATION



34205

34207

34203

3424

SAMOSET

ONECO

DONZI MARINE

TALLEVAST

- 1 HERBACHA ST
- 2 NEASE ST
- 3 CORN ST
- 4 CALIF ST
- 5 DAROTA ST
- 6 WASH ST
- 7 OGDON ST
- 8 TEXAS ST
- 9 KANSAS ST
- 10 NEW JERSEY ST
- 11 OHIO AV
- 12 INDIANA AV
- 13 MISS AV
- 14 ILLINOIS AV
- 15 MICHIGAN AV
- 16 WISCONSIN AV
- 17 PENN AV
- 18 NEW YORK AV
- 19 TARKON LA
- 20 MARLIN LA
- 21 E BAYOU LA
- 22 E BEACH DR
- 23 E BAYOU LA
- 24 PARK LA

OMCC
CHRIS CRAFT/DONZI
FACILITY LOCATIONS



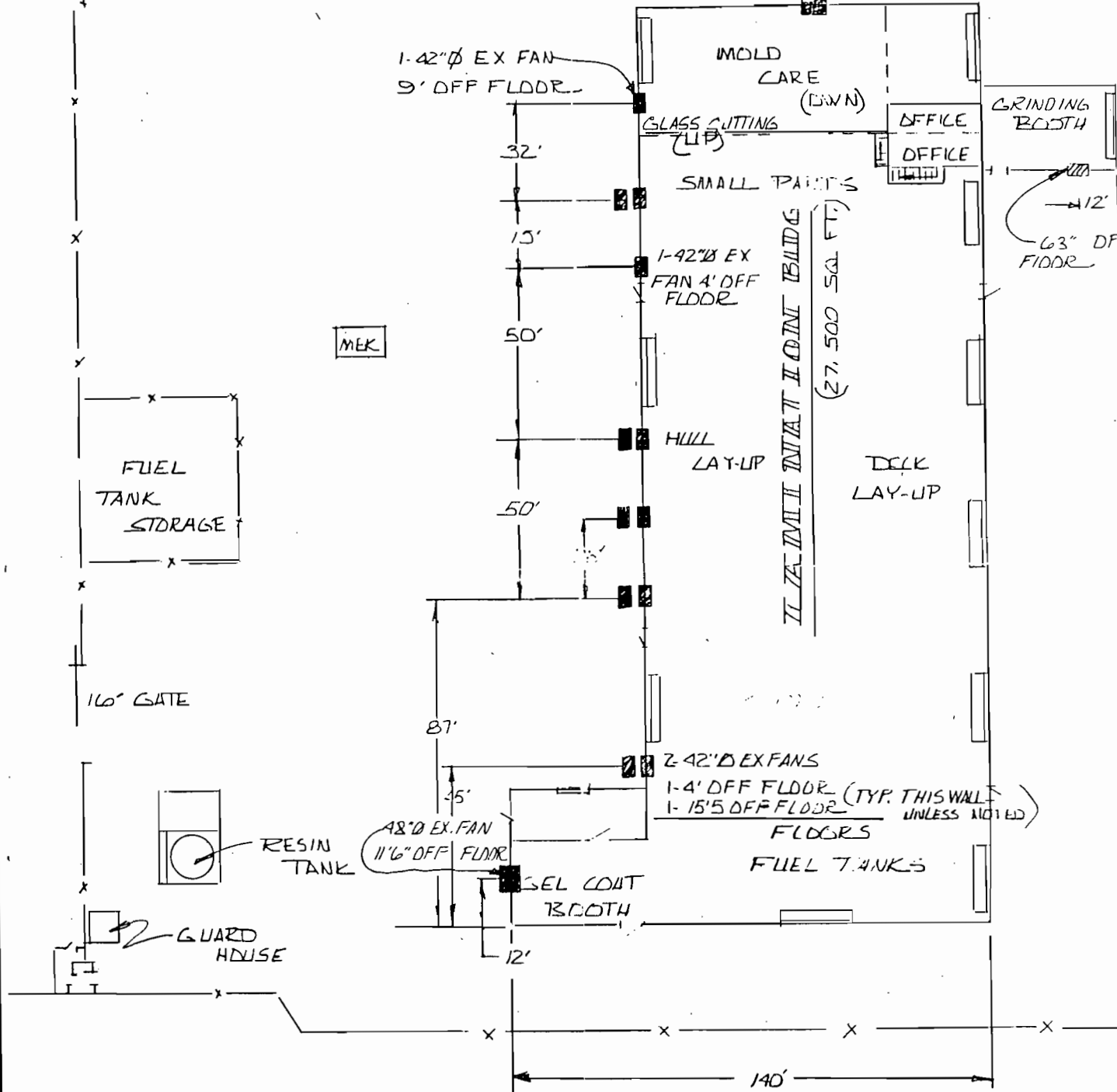
DEVELOPMENT
CENTER

OLD BRADENTON
ROAD FACILITY

MANATEE COUNTY
SARASOTA COUNTY

ATTACHMENT 2
FACILITY LAYOUT

1-42" L
LOCATED
CUTTING AL
4'6" DFF CL
DR 19'2"



TOTAL CFM OF EXHAUST
IN TERMINAL BLDG
AREA

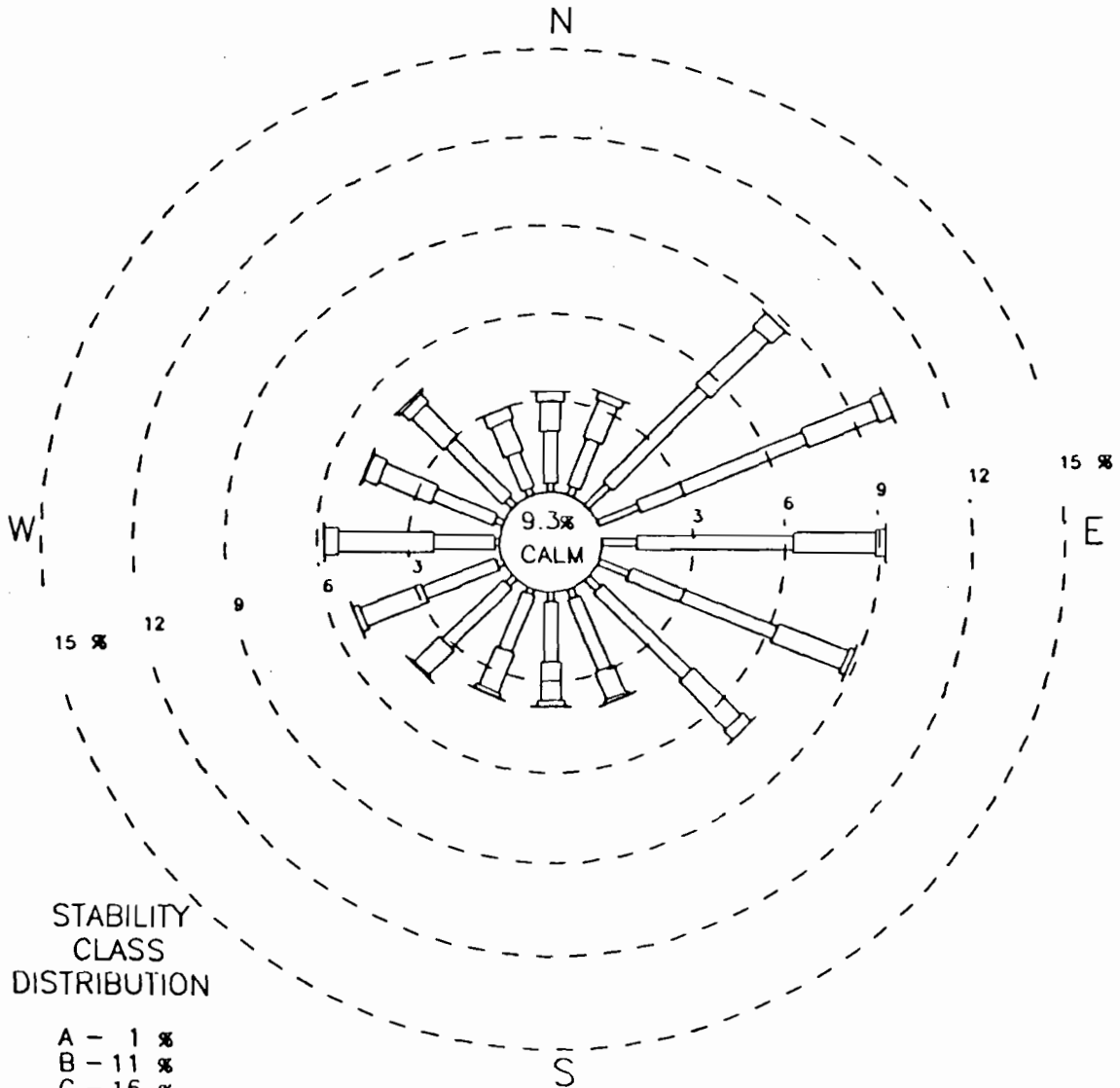
231,550 CFM

ATTACHMENT A
ACETONE PURCHASE AND RECOVERY

ATTACHMENT B

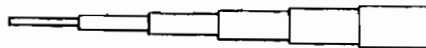
**WIND ROSE PLOTS FOR
TAMPA BAY, 1982-1986**

FREQUENCY OF WIND SPEED & DIRECTION



STABILITY CLASS DISTRIBUTION

- A - 1 %
- B - 11 %
- C - 16 %
- D - 24 %
- E - 17 %
- F - 31 %



1-3 4-6 7-10 11-16 17-21 22-99
 (8 m) (48 m) (29 m) (5 m) (0 m) (0 m)

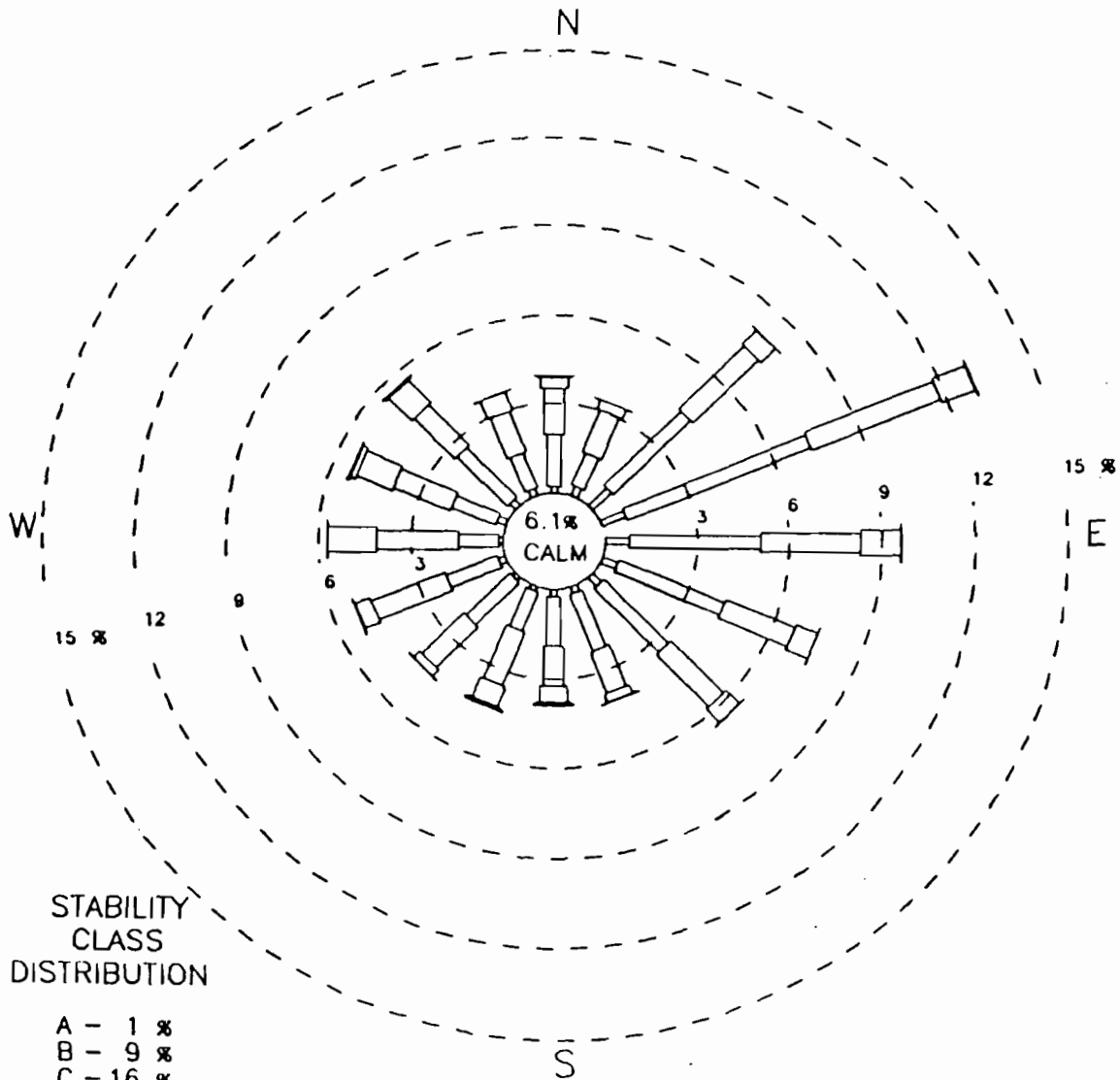
WIND SPEED SCALE (KNOTS)

NOTE - WIND DIRECTION IS THE DIRECTION WIND IS BLOWING FROM

TAMPA, FL
 STATION 12842
 1986

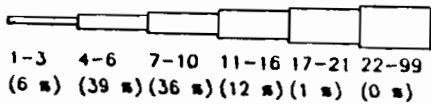
Prepared by
 Jim Clary & Associates

FREQUENCY OF WIND SPEED & DIRECTION



STABILITY CLASS DISTRIBUTION

- A - 1 %
- B - 9 %
- C - 16 %
- D - 30 %
- E - 18 %
- F - 26 %



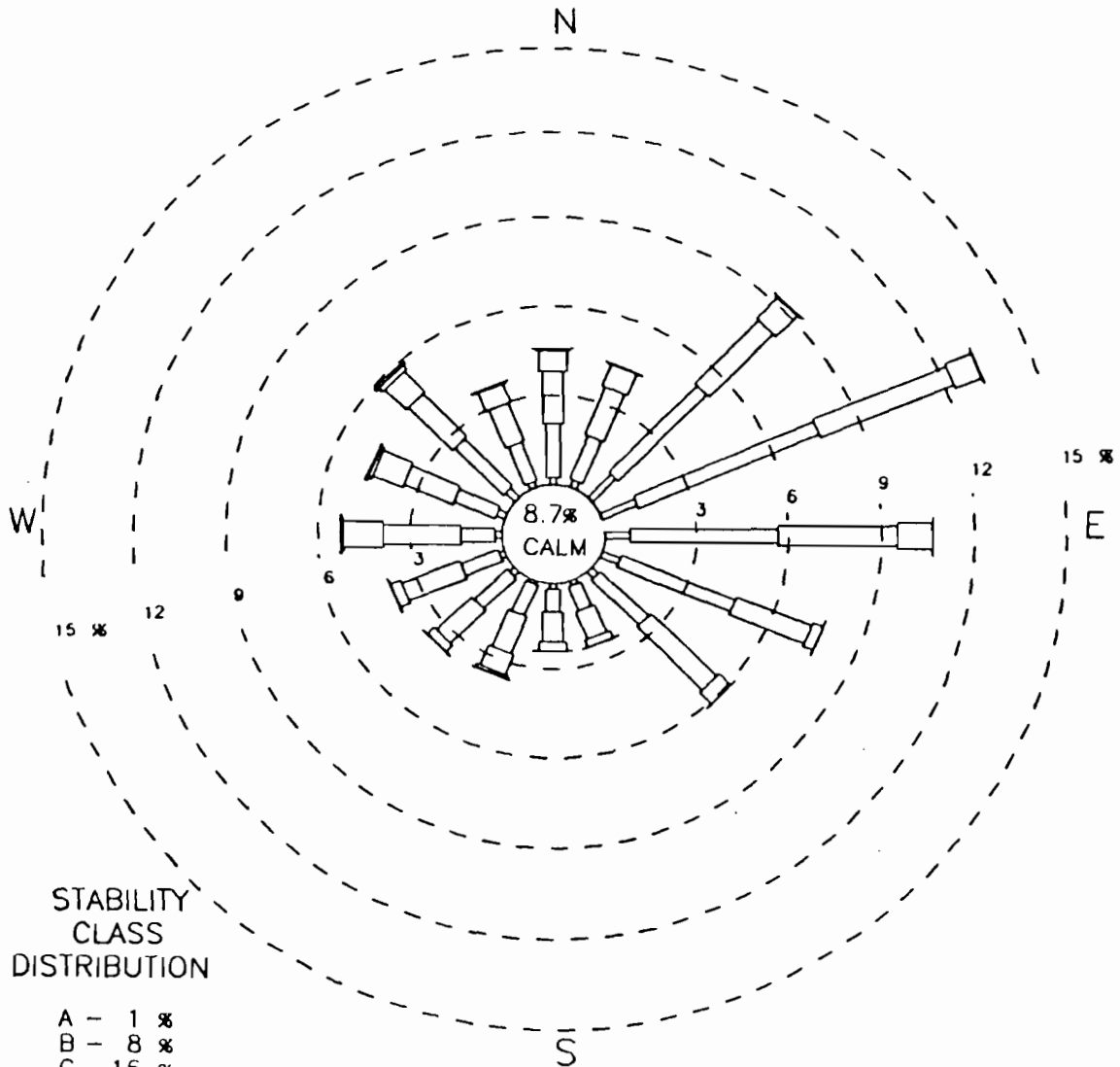
WIND SPEED SCALE (KNOTS)

NOTE - WIND DIRECTION IS THE DIRECTION WIND IS BLOWING FROM

TAMPA, FL
STATION 12842
1985

Prepared by
Jim Clary & Associates

FREQUENCY OF WIND SPEED & DIRECTION



STABILITY CLASS DISTRIBUTION

- A - 1 %
- B - 8 %
- C - 16 %
- D - 31 %
- E - 17 %
- F - 27 %



1-3 4-6 7-10 11-16 17-21 22-99
 (7 #) (37 #) (36 #) (11 #) (1 #) (0 #)

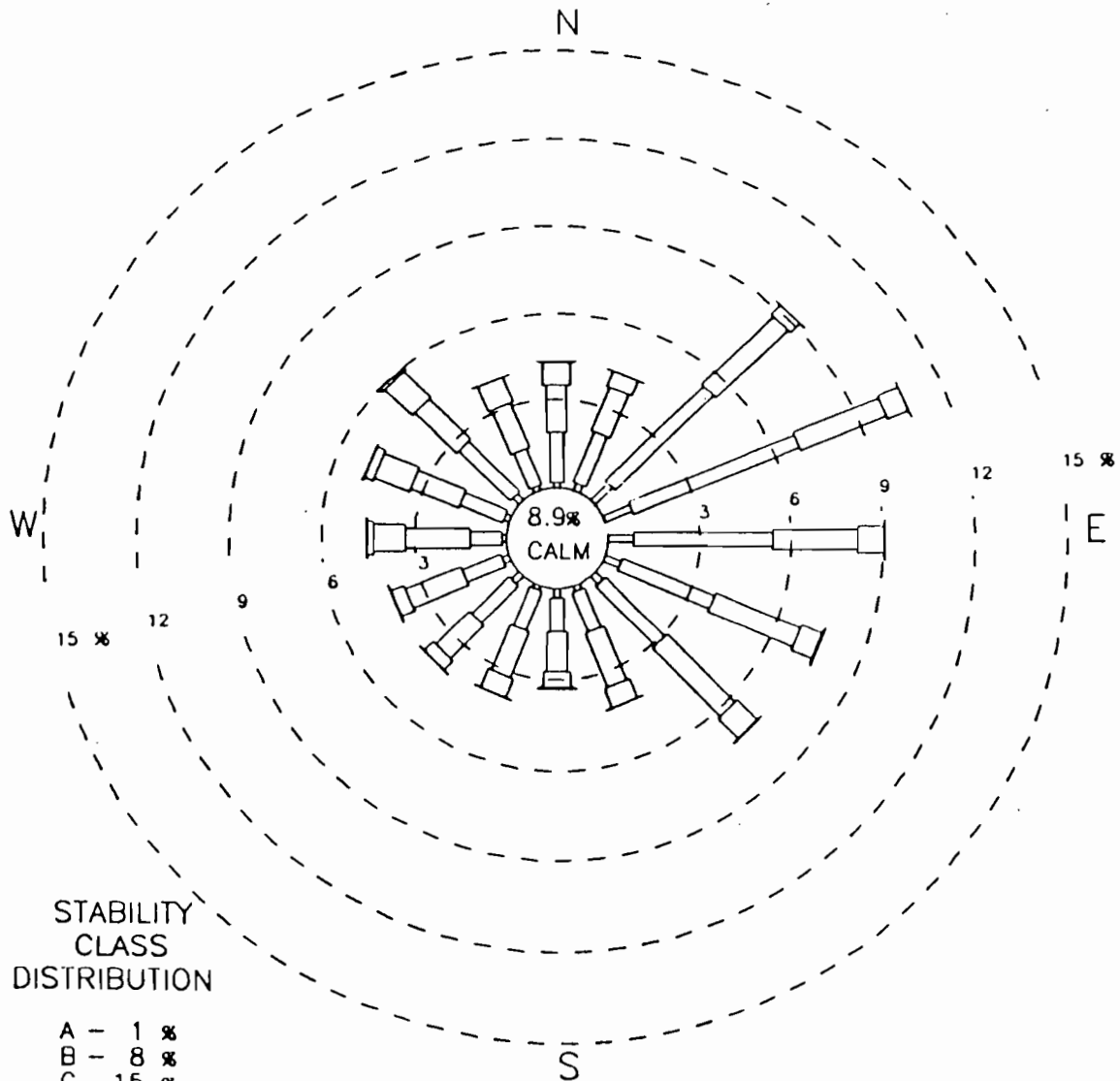
WIND SPEED SCALE (KNOTS)

NOTE - WIND DIRECTION IS THE DIRECTION WIND IS BLOWING FROM

TAMPA, FL
 STATION 12842
 1984

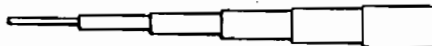
Prepared by
 Jim Clary & Associates

FREQUENCY OF WIND SPEED & DIRECTION



STABILITY CLASS DISTRIBUTION

- A - 1 %
- B - 8 %
- C - 15 %
- D - 35 %
- E - 16 %
- F - 25 %



1-3 4-6 7-10 11-16 17-21 22-99
 (6 m) (38 m) (34 m) (12 m) (1 m) (0 m)

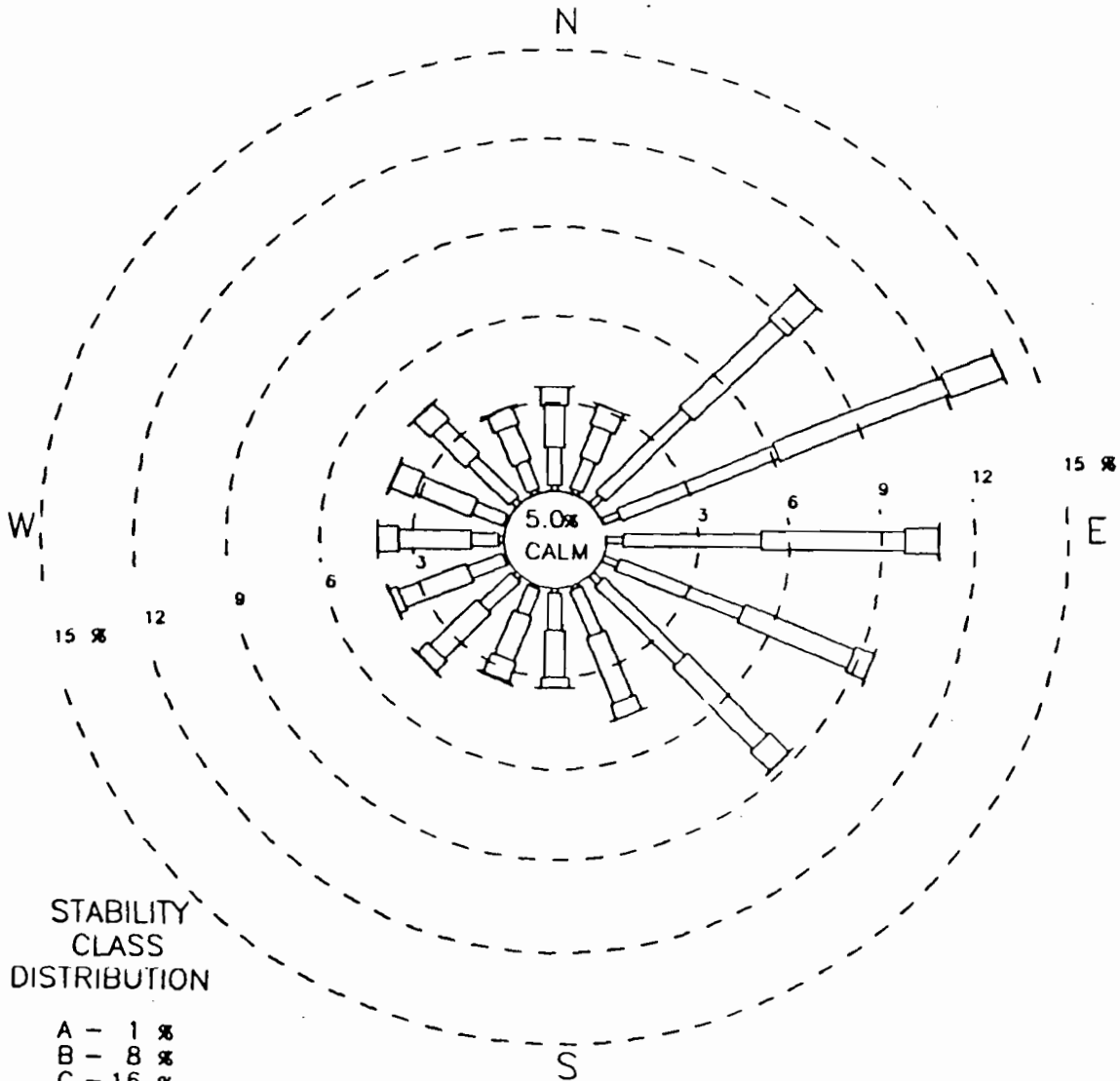
WIND SPEED SCALE (KNOTS)

NOTE - WIND DIRECTION IS THE DIRECTION WIND IS BLOWING FROM

TAMPA, FL
 STATION 12842
 1983

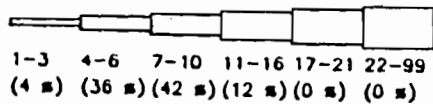
Prepared by
 Jim Clary & Associates

FREQUENCY OF WIND SPEED & DIRECTION



STABILITY CLASS DISTRIBUTION

- A - 1 %
- B - 8 %
- C - 16 %
- D - 34 %
- E - 19 %
- F - 22 %



WIND SPEED SCALE (KNOTS)

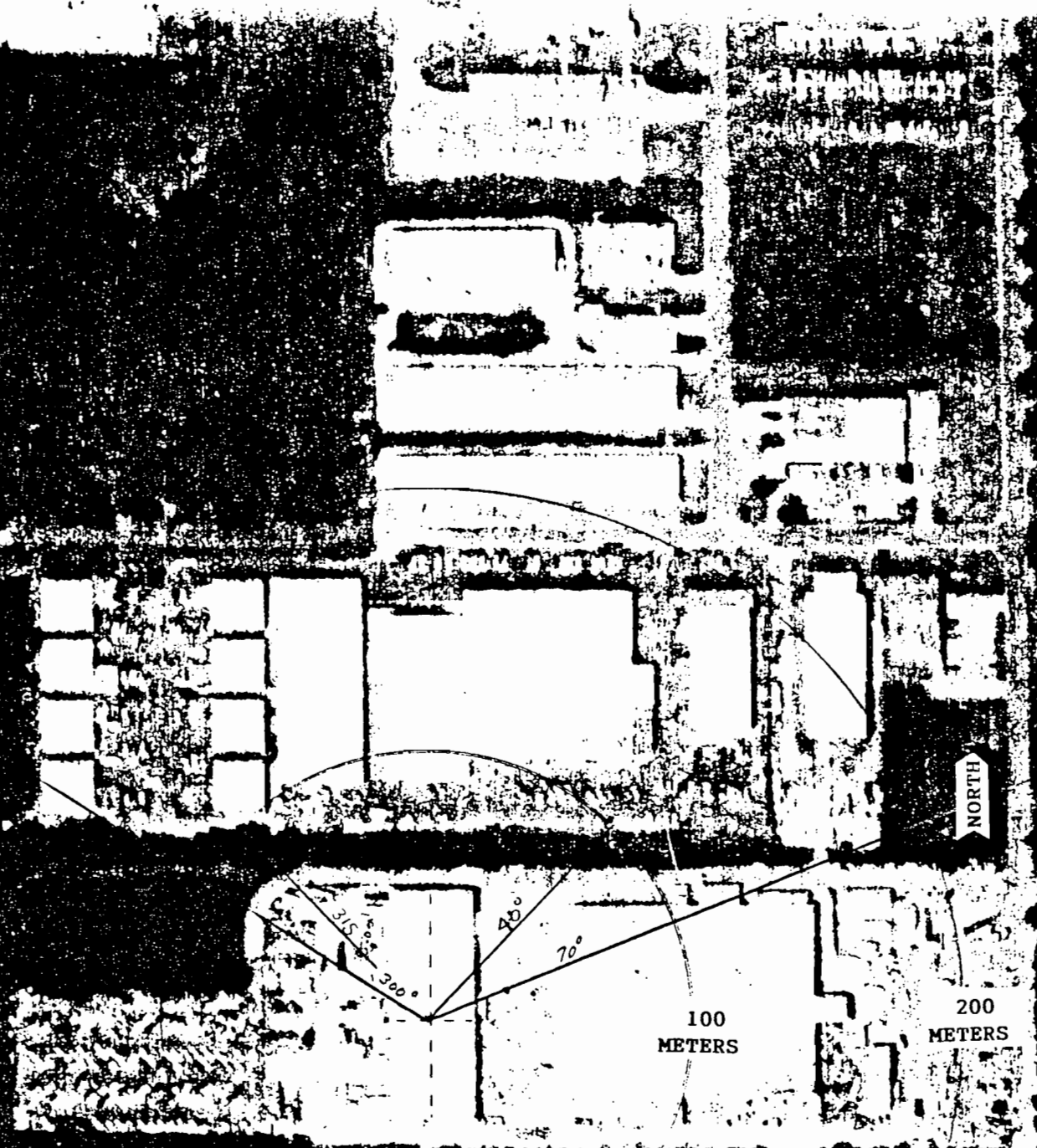
NOTE - WIND DIRECTION IS THE DIRECTION WIND IS BLOWING FROM

TAMPA, FL
STATION 12842
1982

Prepared by
Jim Clary & Associates

ATTACHMENT C
ISCST MODEL OUTPUT

ATTACHMENT D
AERIAL PHOTO OF FACILITY



Lamination
Building

Assembly
Building

21st Street East

ATTACHMENT E
MATERIAL BALANCE SCHEME

ATTACHMENT F
EEI CALCULATIONAL SCHEME

Calculation of EEI using most probable emission rates for Styrene

1. OSHA PEL as adopted, F.R., June 19, 1989;

	<u>TWA mg/m³</u>	<u>STEL mg/m³</u>
Acetone	1800	2400
Methyl methacrylate	410	—
Styrene	215	425

2. Estimated Air Concentrations (avg.) by Facility

<u>Donzi</u>	<u>Chris Craft Boats</u>	<u>Development Center</u>
231,500 scfm	358,320 scfm	48,000 scfm
109.27 m ³ /sec	169.13 m ³ /sec	22.66 m ³ /sec

3. Most Probable Emissions

	styrene	acetone	methyl methacrylate (@ 5% in gelcoat)
example: Chris Craft Boats	13.15 gms/sec	12.4 gms/sec	0.3 gms/sec

4. Concentration in Exiting Air

example: Chris Craft Boats

<u>styrene</u>	<u>methyl methacrylate</u>	<u>acetone</u>
$\frac{13.15 \text{ gms/sec}}{169.13 \text{ m}^3/\text{sec}} = 0.078$	$\frac{0.3 \text{ gms/sec}}{169.13 \text{ m}^3/\text{sec}} = 0.0018$	$\frac{12.45 \text{ gms/sec}}{169.13} = 0.0736$

5. EEI \equiv Concentration in Exiting Air / OSHA PEL TWA; thus, the values are:

Styrene = 0.36 ; methyl methacrylate = 0.0044 ; acetone = 0.04

Styrene has a higher index by at least one order of magnitude; consequently modelling of styrene is selected. The same order would be observed for Donzi and Chris Craft Development Center.

FORSITE INC.

Environmental Consulting & Services

P.O. Box 7473, St. Petersburg, Florida 33734
(813) 895-1933

RECEIVED
APR 06 1990
DER-BAQM

April 4, 1990

Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Manatee County-AP AC41-165759

Dear Mr. Fancy,

I am the engineer of record for the above referenced application. On behalf of OMCCC Incorporated, I wish to advise you by this letter that the requested responses to your incompleteness request of 6-30-89 have been prepared and are being reviewed.

We anticipate submitting the response package to your office by April 20, 1990.

Thank you for your attention and cooperation in this matter.

Sincerely,



Tom T. John, P.E.

cc: J.R. Crawford, OMC
W. Priesmeyer, Manatee Co.
G. Hauser, Donzi

Bill Thomas - SW Dist. }
Bruce Mitchell } 4-11-90 RAN
CHF/JP/BT }

BEST AVAILABLE COPY

		QUESTIONS? CALL 800-238-5355 TOLL FREE		AIRBILL PACKAGE TRACKING NUMBER 729581			
88M 7295816393		RECIPIENT'S COPY					
From (Your Name) Please Print Tom T. John		Your Phone Number (Very Important) (813) 321-2637		To (Recipient's Name) Please Print C.H. Fancy, P.E. (rec'd)			
Company FORSITE ENVIRONMENTAL		Department/Floor No.		Company Everett Air Conditioning Maintenance			
Street Address 8855 9TH STREET N STE 100		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Codes.) 2000 Black Stone Rd					
City ST PETERSBURG		State FL		City Tallahassee			
ZIP Required 33708		State FL		ZIP Required 32309			
YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)				IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address City State ZIP Required			
PAYMENT <input type="checkbox"/> Bill Sender <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card		City State ZIP Required 32309-2400					
4 SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING		PACKAGES WEIGHT YOUR DECLARED VALUE OVER SIZE			
Priority Overnight Service (Delivery by next business morning) <input type="checkbox"/> YOUR PACKAGING <input type="checkbox"/> FEDEX LETTER <input type="checkbox"/> FEDEX PAK <input type="checkbox"/> FEDEX BOX <input type="checkbox"/> FEDEX TUBE Economy Service (formerly Standard Air) (Delivery by second business day) <input type="checkbox"/> ECONOMY SERVICE		Standard Overnight Service (Delivery by next business afternoon) <input type="checkbox"/> FEDEX LETTER <input type="checkbox"/> FEDEX PAK <input type="checkbox"/> FEDEX BOX <input type="checkbox"/> FEDEX TUBE Heavyweight Service (for Extra Large or any package over 150 lbs.) <input type="checkbox"/> HEAVYWEIGHT <input type="checkbox"/> DEFERRED HEAVYWEIGHT		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box #) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) (CSS not available for Dangerous Goods Shipments) 5 <input type="checkbox"/> CONSTANT SURVEILLANCE SVC. (CSS) (Extra charge) (Release Signature Not Applicable) 6 <input type="checkbox"/> DRY ICE Lbs. 7 <input checked="" type="checkbox"/> OTHER SPECIAL SERVICE 8 _____ 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 _____ 11 _____ 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		Emp. No. _____ Date _____ <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del <input type="checkbox"/> Chg. To Hold Street Address _____ City _____ State _____ Zip _____ Received By _____ Date/Time Received _____ FedEx Employee Number _____ Received At <input type="checkbox"/> Regular Stop <input checked="" type="checkbox"/> Drop Box <input type="checkbox"/> B.S.C. <input checked="" type="checkbox"/> On-Call Stop <input type="checkbox"/> Station FedEx Emp. No. 2621	
† Delivery commitment may be later in some areas.		* Declared Value Limit \$100. ** Call for delivery schedule.		Federal Express Use Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 11/89 PART #119501 FXEM 3/90 FORMAT #014 014 © 1989 F E C PRINTED IN U.S.A.			

P 938 762 608

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

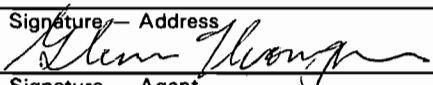
PS Form 3800, June 1985

Sent to Mr. C. Gordon Houser, Donzi	
Street and No. P.O. Box 987	Marine
P.O., State and ZIP Code Tallevast, FL 34270-0987	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Mailed: 6-30-89 Permit: AC 41-165759	

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. C. Gordon Houser; President Donzi Marine Corporation 3161 Old Bradenton Rd. P.O. Box 987 Tallevast, FL 34270-0987	4. Article Number P 938 762 608 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .	
5. Signature - Address X 	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 7-5-89	

File Copy



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

June 30, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. Gordon Houser, President
Donzi Marine Corporation
8161 Old Bradenton Road
P. O. Box 987
Tallevast, Florida 34270-0987

Dear Mr. Houser:

Re: Completeness Review of an Application Package
AC 41-165759

The Department has reviewed the above referenced application package received June 2, 1989, and it is deemed incomplete. Therefore, please submit to the DER's Bureau of Air Quality Management the following information, including all calculations, assumptions and reference material, and the status will, again, be ascertained:

1. In Attachment 3, provide justification to support the "50%" recovery of acetone.
2. In Attachment 3, Autofroth A and B contain ranges of VOC percentages. Please describe the reason for variability and how each is derived.
3. Attachment 4 references the contaminant methyl methacrylate, which is not reflected in Attachment 3. If this is an error of omission, please amend Attachment 3. If the omission was intended so, please explain.
4. Because the pollutant emissions from the facility's operations are defined as volatile organic compounds/organic solvents (VOC/OS) and are toxic in nature, a toxic screening is required to establish the pollutants concentrations at the property lines or where the public has access, whichever is closest. Guidance can be obtained by calling Mr. John Glunn and Mr. Tom Rogers at (904)488-1344.
5. Since the VOC/OS used in the operations at your facility are odorous in nature when released into the atmosphere, submit a conceptual plan and potential course of action that will

Mr. C. Gordon Houser
Page Two
June 30, 1989

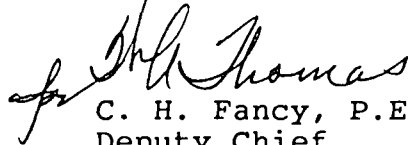
provide the Department with reasonable assurance that objectionable odors will not be discharged and detectable off of the facility's property boundary or where the public has access, whichever is closest, and in accordance with F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan should contain, but not be limited to, various control system strategies/options that might be retrofitted/installed to reduce or eventually eliminate emissions of VOC/OS from each type of operation, associated time and cost analyses, and VOC/OS substitutes.

6. At the end of each working shift and close of business, what are the procedures for storing and discarding unused materials of VOC/OS, whether it be bulk or individual work stations (i.e., pails, buckets, etc.), and address each VOC/OS used?
7. Describe the in-house procedures and practices used to minimize the release of VOC/OS emissions.
8. If there are any other sources of pollutant emissions at your facility, please submit an application package, which includes a processing fee. Such sources include woodworking shop operations that emit particulate matter and visible emissions.
9. Since a material balance scheme (MBS) will be imposed to assess the VOC/OS emissions from the facility, submit a proposed MBS detailing the process and documentation that will be utilized to quantify the VOC/OS emissions into the atmosphere; and, there must be a 24-hour verification capability. The proposed MBS should include, but not be limited to, purchasing/receiving, inventory frequency and capabilities, and recycling/reclaiming.
10. The styrene emission factors used in Attachment 4 only represent spray lay-up for both resin and gel coat applications. Does this facility use any hand lay-up of either resin or gel coat? If yes, the potential emissions may need to be recalculated and the appropriate sections of the application amended. Please explain the actual production steps used at this facility where styrene emissions are generated.

Mr. C. Gordon Houser
Page Three
June 30, 1989

If there are any questions, please call Bruce Mitchell at
(904)488-1344 or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BM/t

cc: H. Kerns, SW District
W. Priesmeyer, Manatee Co.
B. Hewitt, Esq., DER
T. John, P.E., S & WEC

Ready File }
Bruce } 6-30-89 am
CHF/BT }

file copy



RECEIVED
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1989 JUN -2 PM 2:14

DONZI

C. Gordon Houser
President

May 31, 1989

Mr. William Thomas
Department of Environmental Regulation
Air Permitting
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

On behalf of the Donzi Marine Corporation facility in Tallevast, Florida, we are herewith submitting four (4) sets, with original seals and signatures, of applications for an air permit. A check in the amount of \$2500.00, payable to the Department of Environmental Regulation, is also enclosed.

Please address copies of correspondence relative to this application to:

Mr. Tom John, P.E.
Stone & Webster Engineering Corporation
10002 Princess Palm Avenue, Suite 200
Tampa, Florida 33619

Mr. John is the engineer of record for this application.

Thank you for your assistance.

Very truly yours,

CGH/ajc

encl.

*copied: B. Mitchell
B. Thomas*

FEDERAL EXPRESS

AIRBILL

USE THIS AIRBILL FOR DOMESTIC SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII.
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QUESTIONS? CALL 800-238-5355 TOLL FREE.

PACKAGE TRACKING NUMBER

2766547755

9027M

2766547755

RECIPIENT'S COPY

Date XBX 6/1/89		To (Recipient's Name) Please Print Mr. William Thomas	
From (Your Name) Please Print C. Gordon Houser, President-ajc		Recipient's Phone Number (Very Important)	
Your Phone Number (Very Important) 813-335-9355		Company DEPT. OF ENVIRONMENTAL REGULATION	
Company UNZI MARINE		Department/Floor No.	
Street Address 161 BRADENTON RD		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 2600 Blair Stone Road / Air Permitti	
City BRASOTA		City Tallahassee	
State FL		State FL	
ZIP Required 34243		ZIP Required 32399	

3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)		IF HOLD FOR PICK-UP, Print FEDEX Address Here	
PAYMENT <input checked="" type="checkbox"/> Bill Sender <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card <input type="checkbox"/> Cash		Street Address	
City		City	
State		State	
ZIP Required		ZIP Required	

4 SERVICES		DELIVERY AND SPECIAL HANDLING		PACKAGES	WEIGHT IN POUNDS ONLY	YOUR DECLARED VALUE	OVER SIZE	Emp. No.	Date	Federal Express Use	
1 <input type="checkbox"/> PRIORITY 1 Overnight Delivery	6 <input type="checkbox"/> OVERNIGHT LETTER SM	1 <input checked="" type="checkbox"/> HOLD FOR PICK-UP (Fill in Box 1)								<input type="checkbox"/> Cash Received	Base Charges
2 <input checked="" type="checkbox"/> COURIER-PAK OVERNIGHT ENVELOPE SM	7 <input type="checkbox"/>	2 <input checked="" type="checkbox"/> DELIVER WEEKDAY								<input type="checkbox"/> Return Shipment	Declared Value Charge
3 <input type="checkbox"/> OVERNIGHT BOX	8 <input type="checkbox"/>	3 DELIVER SATURDAY (Extra charge) <input type="checkbox"/>								<input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold	Other 1
4 <input type="checkbox"/> OVERNIGHT TUBE	9 <input type="checkbox"/>	4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge)								Street Address	Other 2
5 <input type="checkbox"/> STANDARD AIR Delivery not later than second business day	10 <input type="checkbox"/>	5 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Release Signature Not Applicable)	Total	Total	Total					City State Zip	Total Charges
		6 <input type="checkbox"/> DRY ICE Lbs.								Received By:	
		7 <input type="checkbox"/> OTHER SPECIAL SERVICE								X	
		8 <input type="checkbox"/>								Date/Time Received FedEx Employee Number	
		9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge)									
		10 <input type="checkbox"/>									
		11 <input type="checkbox"/>									
		12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)									
*Declared Value Limit \$100.		FEDEX Corp. Employee No.		Date/Time for FEDEX Use		5		Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.		PART #111800 REVISION DATE 10/88 PRINTED IN U.S.A. FXEM	
		Release Signature								009 PH03.1/88 © 1988 F.E.C.	



DONZI MARINE CORPORATION
 P.O. BOX 987
 TALLEVAST, FL 34270-0987

FIRST WISCONSIN NATIONAL BANK
 OF BROOKFIELD
 BROOKFIELD, WISCONSIN

79-954
 759

CHECK NO.: 046065
 046065

CHECK DATE.: 6/01/89

DOLLARS \$2,500.00

DONZI ***** TWO THOUSAND FIVE HUNDRED and xx/100 *****

TO THE DEPT. OF ENVIRONMENTAL REGULATION
 ORDER OF AIR PERMITTING
 OF 2600 BLAIR STONE ROAD
 TALLAHASSEE, FL 32399-2400

DONZI MARINE CORPORATION
 OPERATING ACCOUNT

Katherine M. ...
Joseph ...
 AUTHORIZED SIGNATURES

|| [REDACTED] || || [REDACTED] || || [REDACTED] ||

Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

On behalf of the Donzi Marine Corporation facility in Tallevast, Florida, we are herewith submitting four (4) sets, with original seals and signatures, of applications for an air permit. A check in the amount of \$2500.00, payable to the Department of Environmental Regulation, is also enclosed.

Please address copies of correspondence relative to this application to:

Mr. Tom John, P.E.
 Stone & Webster Engineering Corporation
 10002 Princess Palm Avenue, Suite 200
 Tampa, Florida 33619

Mr. John is the engineer of record for this application.

Thank you for your assistance.

Very truly yours,

CGH

CGH/ajc
 encl

1031

DONZI MARINE CORPORATION

BOX 987 TALLEVAST, FL 34270-0987

VENDOR NAME DEPT. OF ENVIRONMENTAL REGULATION

VENDOR NO. DE103

CHECK NO.: 046065

VOICE DATE	INVOICE NUMBER	REFERENCE	INVOICE AMOUNT	DISCOUNT AMOUNT	NET AMOUNT PAID
-01-89	CK REQ 1946	AIR PERMITTING	APPLICATION		2,500.00
FACH AND RETAIN THIS STATEMENT. E ATTACHED CHECK IS IN PAYMENT ITEMS DESCRIBED ABOVE.			046065		



DONZI MARINE CORPORATION

P.O. BOX 987
TALLEVAST, FL 34270-0987

FIRST WISCONSIN NATIONAL BANK
OF BROOKFIELD
BROOKFIELD, WISCONSIN

79-954
759

CHECK NO.: ⁰⁴⁶⁰⁶⁵046065

CHECK DATE.: 6/01/89

DOLLARS \$2,500.00

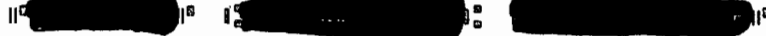
DONZI

***** TWO THOUSAND FIVE HUNDRED and xx/100 *****

DONZI MARINE CORPORATION
OPERATING ACCOUNT

TO THE DEPT. OF ENVIRONMENTAL REGULATION
ORDER AIR PERMITTING
OF 2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399-2400

Katherine Moran
Joseph A. Reina
AUTHORIZED SIGNATURES



DONZI MARINE CORPORATION

PO. BOX 987 TALLEVAST, FL 34270-0987

VENDOR NAME DEPT. OF ENVIRONMENTAL REGULATION
VENDOR NO. DE103 CHECK NO.: 046065

INVOICE DATE	INVOICE NUMBER	REFERENCE	INVOICE AMOUNT	DISCOUNT AMOUNT	NET AMOUNT PAID
6-01-89	CK REQ 1946	AIR PERMITTING	APPLICATION		2,500.00
DETACH AND RETAIN THIS STATEMENT. THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED ABOVE.			046065		



AC 41-165759

#2,500 pd.
6-2-89
Permit # 117624

Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Richard Garrity, Deputy Assistant Secretary

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Fugative Air Emission (VOC) [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

COMPANY NAME: Donzi Marine Corporation COUNTY: Manatee

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) multiple building vents

SOURCE LOCATION: Street 8161 Old Bradenton Road City Tallevast

UTM: East 347215 North 3030633

Latitude ___ ° ___ ' ___ "N Longitude ___ ° ___ ' ___ "W

APPLICANT NAME AND TITLE: C. Gordon Houser, President

APPLICANT ADDRESS: Post Office Box 987 Tallevast, Florida 34270-0987

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Donzi Marine Corporation

I certify that the statements made in this application for an after-the-fact construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: C. Gordon Houser

C. Gordon Houser, President
Name and Title (Please Type)

Date: 5-31-89 Telephone No. (813) 355-9355

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

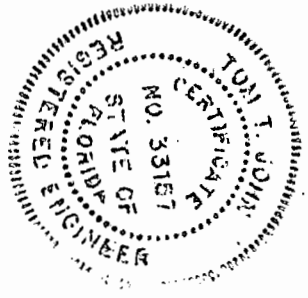
the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed Tom T. John

Tom T. John, P.E.
Name (Please Type)

Stone & Webster Engineering Corporation
Company Name (Please Type)

10002 Princess Palm Avenue, Suite 200
Tampa, Florida 33619
Mailing Address (Please Type)



Florida Registration No. 33157 Date: 31 May 1989 Telephone No. (813) 622-7676

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The facility is a fiberglass boat manufacturing plant which processes glass reinforced polyester resin. The manufacturing process also includes the use of other volatile organic chemicals such as acetone, methylethyl ketone peroxide, gelcoat resin coating, iron and other paint, adhesive, and polyester resin.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s); (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

N/A

E. Requested permitted equipment operating time: hrs/day 8 ; days/wk 5 ; wks/yr 52 ;
 if power plant, hrs/yr N/A ; if seasonal, describe: Production varies somewhat
throughout the year, but not necessarily in a seasonal fashion. To ensure compliance
with the to-be-permitted values, the applicant proposes to maintain a monthly record
of the usages of those chemicals emitting pollutants under this permit. See Attachment 3.

F. If this is a new source or major modification, answer the following questions.
 (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
 - a. If yes, has "offset" been applied? No
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? N/A
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
 If yes, see Section VI. No
3. Does the State "Prevention of Significant Deterioration" (PSD)
 requirement apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
 apply to this source? No
5. Do "National Emission Standards for Hazardous Air Pollutants"
 (NESHAP) apply to this source? No

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
 to this source? No
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
 any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
 cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

See attachment No. 3

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

B. Process Rate, if applicable: (See Section V, Item 1) N/A

1. Total Process Input Rate (lbs/hr): _____
2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

See attachment No. 4

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4) N/A

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels N/A

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. N/A

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Solvent acetone is typically recycled. Still bottoms, spent liquids, and waste solids are disposed of in appropriate manner.

(See Attachment 5)

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: _____ ft. Stack Diameter: _____ ft
Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F
Water Vapor Content: _____ % Velocity: _____ FPM

SECTION IV: INCINERATOR INFORMATION

N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lb/hr)							

Description of Waste _____

Total Weight Incinerated (lb/hr) _____ Design Capacity (lb/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

N/A

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

All effluents are disposed of in accordance with appropriate regulations.

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

N/A

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

- C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

- D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

- 5. Useful Life:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft. b. Diameter: ft.
- c. Flow Rate: ACFM d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- | | |
|-----------------------------|--------------------------|
| a. Control Device: | b. Operating Principles: |
| c. Efficiency: ¹ | d. Capital Cost: |
| e. Useful Life: | f. Operating Cost: |
| g. Energy: ² | h. Maintenance Cost: |
- i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- | | |
|-----------------------------|--------------------------|
| a. Control Device: | b. Operating Principles: |
| c. Efficiency: ¹ | d. Capital Costs: |
| e. Useful Life: | f. Operating Cost: |
| g. Energy: ² | h. Maintenance Cost: |
- i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- | | |
|----------------------|-----------------------------|
| 1. Control Device: | 2. Efficiency: ¹ |
| 3. Capital Cost: | 4. Useful Life: |
| 5. Operating Cost: | 6. Energy: ² |
| 7. Maintenance Cost: | 8. Manufacturer: |
- 9. Other locations where employed on similar processes:
- | | |
|----------------------|------------|
| a. (1) Company: | |
| (2) Mailing Address: | |
| (3) City: | (4) State: |

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- (5) Environmental Manager:
- (6) Telephone No.:
- (7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

- b. (1) Company:
- (2) Mailing Address:
- (3) City: (4) State:
- (5) Environmental Manager:
- (6) Telephone No.:
- (7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data N/A

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? Yes No
- b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO ²	_____	grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 1
FACILITY LOCATION

34205

34207

34203

34243

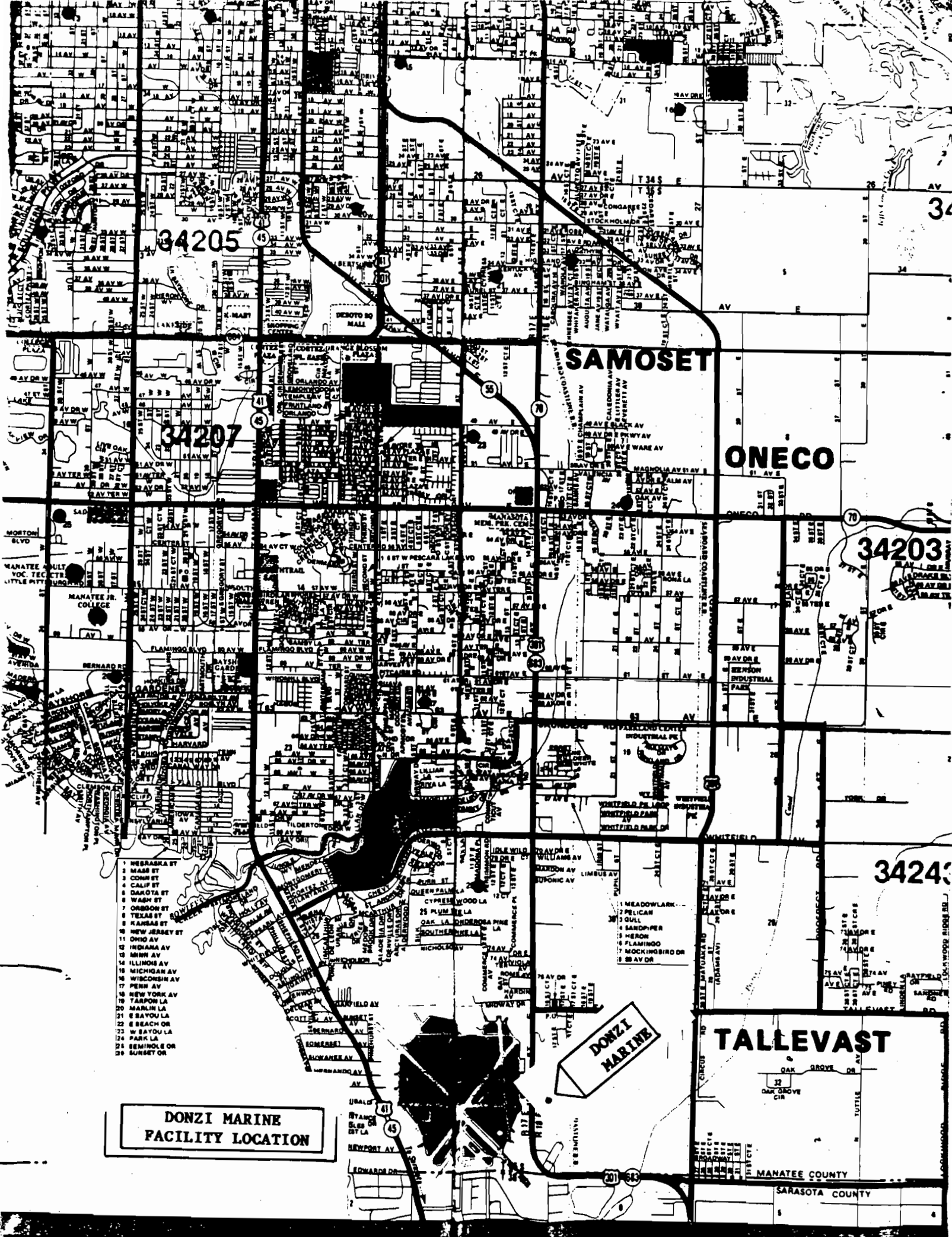
SAMOSET

ONECO

TALLEVAST

DONZI MARINE FACILITY LOCATION

DONZI MARINE



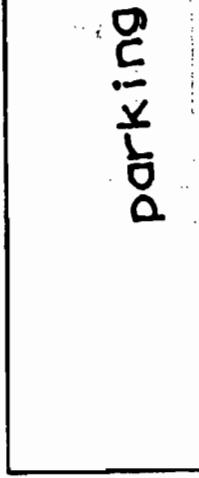
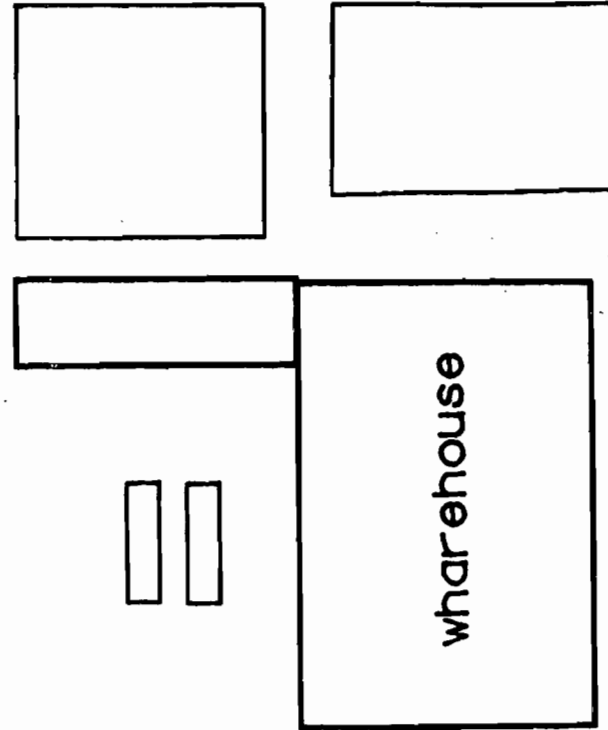
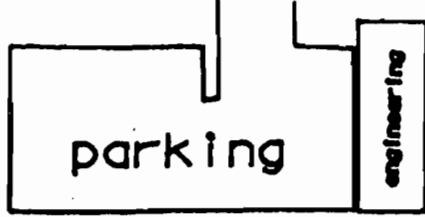
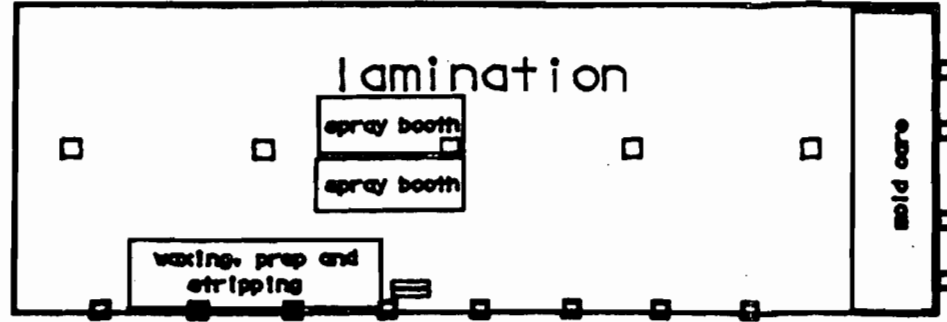
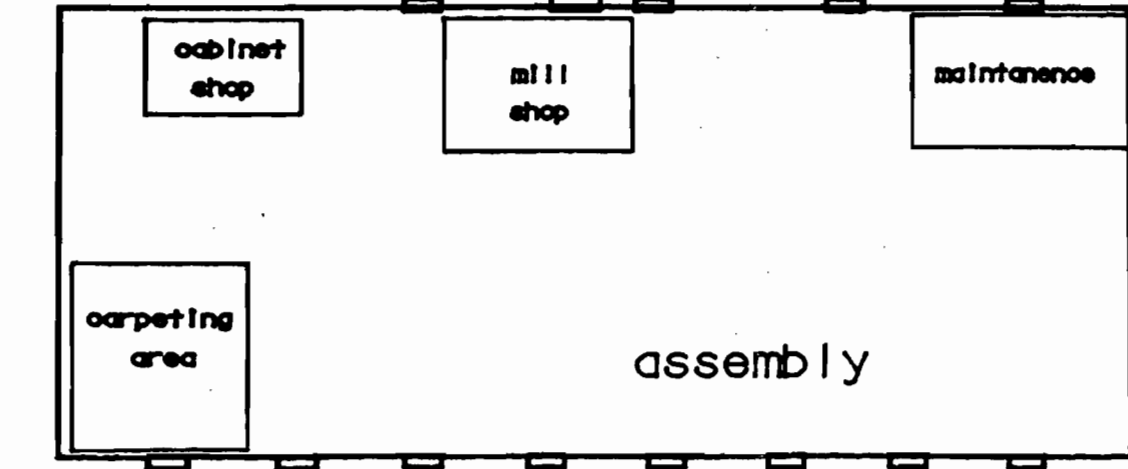
- 1 NEBRASKA ST
- 2 MASS ST
- 3 CONNETT ST
- 4 CALIF ST
- 5 DAKOTA ST
- 6 WASH ST
- 7 OHIO ST
- 8 TEXAS ST
- 9 KANSAS ST
- 10 NEW JERSEY ST
- 11 OHIO AV
- 12 INDIANA AV
- 13 ILLINOIS AV
- 14 MICHIGAN AV
- 15 WISCONSIN AV
- 16 PENN AV
- 17 NEW YORK AV
- 18 TAYLOR LA
- 19 MARLIN LA
- 20 E SAVOULA
- 21 E BEACH DR
- 22 W SAVOULA
- 23 PARK LA
- 24 SEMINOLE DR
- 25 SUNSET DR

MANATEE COUNTY
SARASOTA COUNTY

ATTACHMENT 2
FACILITY LAYOUT

U.S. Highway 301

parking



ATTACHMENT 3
MATERIALS USAGE

Attachment 3
Section III: A
Raw Material and Chemicals Used
Based on Current Usage
DONZI MARINE CORPORATION

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	%Wt		
Acetone ¹	VOC	100	246	See Attachment 2
Styrene Monomer	VOC	100	2.45	"
Methylethyl Ketone Peroxide	VOC	100	20	"
Gelcoat	VOC	30	155.8	"
Styrene Polyester Resin	VOC	30-40	1000	"
Autofroth A	VOC-exempt	46-48	75	"
Autofroth B	VOC-exempt	20-25	75	"
Spray Adhesive	non-VOC		652.08	"
Methylene Chloride	VOC-exempt	100	2.2	"

¹ 50% (average) of acetone is collected and processed for recovery; 50% is volatilized.

Attachment 3
Section III: A
Raw Material and Chemicals Used
Based on Requested Usage
DONZI MARINE CORPORATION

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	%Wt		
Acetone ¹	VOC	100	270.6	See Attachment 2
Styrene Monomer	VOC	100	2.7	"
Methylethyl Ketone Peroxide	VOC	100	22	"
Gelcoat	VOC	30	171.38	"
Styrene Polyester Resin	VOC	30-40	1100	"
Autofroth A	VOC-exempt	46-48	82.5	"
Autofroth B	VOC-exempt	20-25	82.5	"
Spray Adhesive	non-VOC		717.3	"
Methylene Chloride	VOC-exempt	100	2.42	"

¹ 50% (average) of acetone is collected and processed for recovery; 50% is volatilized.

Current annual and hourly emissions estimates for this application were developed from monthly and longer-term material usage information. The facility currently operates on an eight hour per day, five day per week cycle. Due to production fluctuations, occasional ten hour days or six day weeks are noted. Not all phases of the boat building result in VOC emissions, but the current operation is well represented by the average values developed. Market projections anticipate a modest increase in demand, which will result in operating hours and chemical usages (and corresponding emissions) above the current levels. The applicant therefore requests permitting at these higher levels (see Attachments 3 and 4, "Based on Requested Usage"). To ensure that the facility will not exceed (requested) permitted values or the corresponding maximum yearly VOC emissions, the applicant proposes to maintain a monthly record and a year-to-date running total of the usage of chemicals having components which result in VOC emissions. These records will be made available for DER and EPA inspection upon request.

ATTACHMENT 4
CONTAMINANTS EMITTED

Attachment 4
 Section III: C
 Airborne Contaminants Emitted
 Based on Current Usage
 DONZI MARINE CORPORATION

Name of Contaminant	Emission		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
1. acetone	123	127.9	N/A	N/A			See attachment 2
2. styrene - resin ¹	52	54.08	N/A	N/A			"
gelcoat ²	16.36	17.01	N/A	N/A			"
monomer ³	0.58	0.61	N/A	N/A			"
3. methylethyl ketone peroxide ⁴	0	0	N/A	N/A			"
4. Autofroth A dichlorodifluoromethane ⁵	2.25	2.34	N/A	N/A			"
isocyanate ⁴	0	0	N/A	N/A			"
5. Autofroth B Trichlorofluoromethane ⁶	6	6.24	N/A	N/A			"
6. methyl methacrylate ² (5% wt. in gelcoat)	2.73	2.83	N/A	N/A			"
7. methylene chloride ⁷	2.2	2.28	N/A	N/A			"

Attachment 4
Section III: C
Airborne Contaminants Emitted
Based on Requested Usage
DONZI MARINE CORPORATION

Name of Contaminant	Emission		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
1. acetone	135.3	140.7	N/A	N/A			See attachment 2
2. styrene resin ¹	57.2	59.5	N/A	N/A			"
gelcoat ²	18	18.72	N/A	N/A			"
monomer ³	0.638	0.66	N/A	N/A			"
3. methylethyl ketone peroxide ⁴	0	0	N/A	N/A			"
4. Autofroth A dichlorodifluoromethane ⁵	2.475	2.57	N/A	N/A			"
isocyanate ⁴	0	0	N/A	N/A			"
5. Autofroth B Trichlorofluoromethane ⁶	6.6	6.86	N/A	N/A			"
6. methyl methacrylate ² (5% wt. in gelcoat)	3.0	3.12	N/A	N/A			"
7. methylene chloride ⁷	2.42	2.52	N/A	N/A			"

Notes:

1. California Air Resources Board (CARB) value of 0.09 to 0.13; value of 0.13 used
2. CARB value of 0.26 to 0.35; value of 0.35 used
3. Styrene monomer is used as a thinning agent for the gelcoat and resin
4. Chemical is totally consumed in the polymeric reaction and will not be an emission constituent
5. Bill Andrews, Olin Chemical; 1.16 - 3% (wt) freon emitted - VOC-exempt under 17-2.650(1)(d), F.A.C.
6. Bill Andrews, Olin Chemical; 5 - 8% (wt) freon emitted - VOC-exempt under 17-2.650(1)(d), F.A.C.
7. Methylene chloride is VOC-exempt under 17-2.650(1)(d), F.A.C.

Sample Calculations (Current Usages) - Styrene

1. Resin contribution

$$1000 \text{ lbs/hr} \times 0.4 \text{ lbs styrene/lb resin} \times .13 \text{ lb emitted/lb used} = 52 \text{ lbs/hr}$$

$$52 \text{ lbs/hr} \times 2080 \text{ hrs/yr} \times \text{ton}/2000 \text{ lbs} = 54.07 \text{ TPY}$$

2. Gelcoat contribution

$$155.8 \text{ lbs/hr} \times 0.3 \text{ lbs styrene/lb gelcoat} \times 0.35 \text{ lbs emitted/lb used} = 16.36 \text{ lbs/hr}$$

$$16.36 \text{ lbs/hr} \times 2080 \text{ hrs/yr} \times \text{ton}/2000 \text{ lbs} = 17.01 \text{ TPY}$$

3. Monomer contribution: assume 50% to resin dilution, 50% to gelcoat dilution

$$\text{Resin: } 2.45 \text{ lbs/hr} \times 0.5 \times 0.13 \text{ lb emitted/lb used} = 0.159 \text{ lb/hr}$$

$$\text{Gelcoat: } 2.45 \text{ lbs/hr} \times 0.5 \times 0.35 \text{ lbs emitted/lb used} = 0.429 \text{ lb/hr}$$

Current Total Styrene Emissions:

$$(52 + 16.36 + 0.59) = 68.95 \text{ lb/hr or } 71.7 \text{ TPY}$$

Current Total Facility VOC Emissions: 213.3 TPY

Requested Total Styrene Emissions: 75.84 lb/hr or 78.87 TPY

Requested Total Facility VOC Emissions: 234.65 TPY

ATTACHMENT 5

EXHAUST VENT DATA

AND

AIR TOXICS REVIEW INFORMATION

The lamination building detailed in Attachment 2, is the source of the VOC emissions. The building is 103 ft. by 300 ft. by 20 ft. high. Ventilation is achieved by eight 30" (12,190 ACFM) exhaust fans on the south wall, two 72" (45,000 ACFM) roof exhaust fans, and four 24" (8950 ACFM) exhaust fans along the east wall, which provide sufficient air turnover to maintain the styrene concentration within the lamination building to below 50 ppm (average).

Due to the building exhaust configuration and the difficulty with assigning justifiable parameters, current air emission models that might be used for air toxics screening for styrene are inappropriate. The assumptions made in utilizing the models preclude any reasonable assurance being drawn from the results. Additionally, the facility has been in operation for some time and has had no nuisance odor complaints. Since styrene is detected by its characteristic odor at levels below the acceptable threshold, the applicant contends that no danger exists to the health and welfare of the general population. The applicant proposes that an after-the-fact construction permit be issued for a period of six months, during which time additional emissions information and permitting precedents will be gathered, and air emissions models will be reviewed for applicability. Prior to the expiration of the construction permit, the applicant proposes to present these findings to DER and to demonstrate in mutually acceptable terms that the "reasonable assurance" criteria will be met, and the facility will not present a danger to the health and welfare of the population.

ATTACHMENT 6

MATERIAL SAFETY DATA SHEETS

Best Available Copy



OCEANSM Network
EMERGENCY PHONE: 1-800-OLIN-011

SAFETY DATA

FOAMCRAFT, INC.

P. O. BOX 15246
SARASOTA, FLA. 33579
813 - 366-9393

SECTION I - IDENTIFICATION **2-19-87** *J. J. Smith*

CHEMICAL NAME & SYNONYMS AUTOFROTHER A Side		LABEL 2	A602 series
CHEMICAL FAMILY Isocyanate	FORMULA Proprietary mixture	TRADE NAME AUTOFROTHER P	
DESCRIPTION Dark liquid		CAS NO. Not assigned/mixture	

SECTION II - NORMAL HANDLING PROCEDURES

<p>PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE</p> <p>Avoid contact with eyes, skin or clothing. Do not take internally. Upon contact with skin or eyes, wash off with water. Avoid breathing mist or vapor. Store in a cool, dry, well-ventilated place away from all sources of ignition.</p>	
<p>PROTECTIVE EQUIPMENT</p> <p>EYES Goggles</p> <p>GLOVES Required</p> <p>OTHER Coveralls and boots</p>	<p>VENTILATION REQUIREMENTS</p> <p>Local exhaust as required to keep airborne concentrations below TLV.</p>

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	OSHA PEL	LD50	LC50	SIGNIFICANT EFFECTS
Polymeric Isocyanate wt% = 14-68-1 40-45%	0.02 ppm	No data	No data	Skin, eye and mucous membrane irritation
Halogenated phosphorus containing plasticizer	None established	No data	No data	No data
Fluorocarbon - wt% R-12 (16-8%) 1.6% = 3% base 2x4x6+8 verticle panels	1,000 ppm	No data	TCLO (human) 200,000 ppm/30 min	Eye effects, irritation

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 365°F COC METHOD	OSHA CLASSIFICATION Slightly combustible liquid	FLAMMABLE EXPLOSIVE LIMIT	LOWER ND	UPPER ND
EXTINGUISHING MEDIA Carbon dioxide, foam, dry chemical, water				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved positive pressure self-contained breathing apparatus when any material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE Isocyanate 0.02 ppm ceiling, fluorocarbon 1,000 ppm (ACGIH 1983)
SYMPTOMS OF OVER EXPOSURE Irritation to eyes, skin and mucous membranes, labored breathing.
EMERGENCY FIRST-AID PROCEDURES
SKIN Flush with water for 15 minutes, call a physician.
EYES Flush with water for 15 minutes, call a physician.
INGESTION Drink large quantities of water. Do not induce vomiting. Call a physician.

Best Available Copy

PRODUCT CODE 980337

CHEMICAL NAME AUTOFROTH® P

SECTION VI - TOXICOLOGY (PRODUCT)

<p>ACUTE ORAL LD 50 > 5 g/kg (rats)</p> <p>ACUTE DERMAL LD 50 > 2 g/kg</p> <p>ACUTE INHALATION LC 50 Not known</p>	<p>CARCINOGENICITY Not known to be carcinogenic</p> <p>MUTAGENICITY Not known to be mutagenic</p> <p>EYE IRRITATION Irritant</p> <p>PRIMARY SKIN IRRITATION Irritant</p>
<p>PRINCIPAL ROUTES OF ABSORPTION Inhalation, dermal</p>	
<p>EFFECTS OF ACUTE EXPOSURE Irritation to eyes, skin and mucous membrane. May cause allergic sensitization characterized by labored breathing.</p>	
<p>EFFECTS OF CHRONIC EXPOSURE May cause allergic sensitization of skin and respiratory tract.</p>	

SECTION VII - SPILL AND LEAKAGE PROCEDURES (CONTROL PROCEDURES)

<p>ACTION FOR MATERIAL RELEASE OR SPILL Wear NIOSH/MSHA approved self-contained breathing apparatus. Follow OSHA regulations for respirator use (See 29 CFR 1910.134). Wear goggles, coveralls, impervious gloves and boots. Apply absorbent material, such as sawdust, shovel up and place in an approved DOT container. Add an equal amount of neutralizing solution (90-95% water, 5-10% ammonia) to the container. Clean any remaining material with additional neutralizing solution and add this to the container. Isolate and do not seal for 24 hours. Ammonia vapors and heat may be generated until solution is neutralized. Wash all contaminated clothing before reuse. In the event of a large spill use the emergency telephone number shown on the front of this sheet.</p>
<p>TRANSPORTATION EMERGENCY, CONTACT CHEMTREC 800-424-9300</p>
<p>WASTE DISPOSAL METHOD Dispose of contaminated product, empty containers and materials used in cleaning up spills or leaks in a manner approved for this material. Consult appropriate Federal, State and local regulatory agencies to ascertain proper disposal procedures.</p> <p style="margin-left: 40px;">D.O.T. Dichlorodifluoromethane, mixture, non-flammable gas, UN 1028 (for cargo tank transport)</p>

SECTION VIII - SHIPPING DATA

D.O.T.	Compressed gas, N.O.S., non-flammable UN 1956 (for cylinders and portable tanks)
--------	--

SECTION IX - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/>	UNSTABLE <input type="checkbox"/>	AT <input type="checkbox"/> C <input type="checkbox"/>	F <input type="checkbox"/>	HAZARDOUS POLYMERIZATION <input type="checkbox"/>	MAY OCCUR <input checked="" type="checkbox"/>	WILL NOT OCCUR <input type="checkbox"/>
<p>CONDITIONS TO AVOID Water and incompatible materials in a closed system.</p> <p>INCOMPATIBILITY (MATERIAL TO AVOID) Acids, bases and alcohols and hydrochloric acid.</p> <p>HAZARDOUS DECOMPOSITION PRODUCTS Carbon monoxide, oxides of nitrogen, cyanides</p>						


SECTION X - PHYSICAL DATA

MELTING POINT No data	VAPOR PRESSURE No data	VOLATILES No data
BOILING POINT No data	SOLUBILITY IN WATER Reactive	EVAPORATION RATE No data
SPECIFIC GRAVITY (H2O=1) 1.25	PH No data	VAPOR DENSITY (AIR=1) No data

INFORMATION: FURNISHED TO 47841001 FURNISHED BY DATE JANUARY 27, 1986

ATTN: DEPT HANDLING MATL SAFETY DATA SHEETS
FOAM CRAFT INC
6235 S MCINTOSH RD
SARASOTA FL 33583

Department of Environmental Hygiene and Toxicology
(203) 789-5436


olin CORPORATION
 120 Long Ridge Road, Stamford, Connecticut 06904
 OCEANSM Network
 ONE 1-800-OLIN-911

S.C. 3449

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS AUTOFROTH [®] Component B		LABEL 6
CHEMICAL FAMILY Polyol resin	FORMULA Proprietary mixture	TRADE NAME AUTOFROTH [®]
DESCRIPTION AUTOFROTH [®] Component B		CAS NO. Not assigned/mixture

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin or on clothing. Do not take internally. Avoid breathing mist or vapor. Store in a cool, dry, well-ventilated place. Upon contact with skin or eyes, wash off with water.	
PROTECTIVE EQUIPMENT EYES Goggles GLOVES Not required OTHER Coveralls and boots	VENTILATION REQUIREMENTS Local mechanical exhaust ventilation recommended to minimize exposure and to keep concentrations of fluorocarbon below OSHA PEL.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	OSHA PEL	LD50	LC50	SIGNIFICANT EFFECTS
Fluorocarbon <i>23</i> <i>R11 20-25</i> <i>R12 5-82</i>	1,000 ppm	No data	TCLD human 50,000 ppm/30 min	Eye effects, irritation
Amine catalyst <i>1.9 density</i> <i>3 1/2 mi Froth</i>	None established	No data	No data	Irritation

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 392°F COC METHOD	OSHA CLASSIFICATION Slightly combustible liquid	FLAMMABLE EXPLOSIVE LIMIT	LOWER NO	UPPER NO
EXTINGUISHING MEDIA CO ₂ , foam, dry chemical, water				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved positive pressure self-contained breathing apparatus when any material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE None established
SYMPTOMS OF OVER EXPOSURE Eye and mucous membrane irritation, may cause cardiac arrhythmia
EMERGENCY FIRST-AID PROCEDURES
SKIN Flush with water. Washing any substance off skin is a good safety practice.
EYES Flush with water for 15 minutes, call a physician.
INGESTION Drink water to dilute.

Best Available Copy

SECTION VI - TOXICOLOGY (PRODUCT)

ACUTE ORAL LD 50 >10 g/kg (rats) ACUTE DERMAL LD 50 > 2 g/kg ACUTE INHALATION LC 50 >200 mg/l for 1 hr	CARCINOGENICITY Not known to be carcinogenic MUTAGENICITY Not known to be mutagenic EYE IRRITATION Irritant PRIMARY SKIN IRRITATION Not an irritant
PRINCIPAL ROUTES OF ABSORPTION Inhalation, skin contact	
EFFECTS OF ACUTE EXPOSURE Eye and mucous membrane irritation, cardiac arrhythmia.	
EFFECTS OF CHRONIC EXPOSURE None expected at industrial use levels	

SECTION VII - SPILL AND LEAKAGE PROCEDURES (CONTROL PROCEDURES)

ACTION FOR MATERIAL RELEASE OR SPILL Wear NIOSH/MSHA approved self-contained breathing apparatus. Follow OSHA regulations for respirator use (see 29 CFR 1910.134). Wear goggles, coveralls, impervious gloves and boots. Wash all contaminated clothing before reuse. Add dry absorbent, shovel or sweep up. Place in an appropriate container and seal. In the event of a large spill, call the emergency telephone number shown on the front of this sheet.
TRANSPORTATION EMERGENCY, CONTACT CHEMTREC 800-424-9300
WASTE DISPOSAL METHOD Dispose of contaminated product, empty containers and materials used in cleaning up spills or leaks in a manner approved for this material. Consult appropriate Federal, State and local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - SHIPPING DATA

D.O.T.	Not regulated
--------	---------------

SECTION IX - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/> UNSTABLE AT <input type="checkbox"/> C <input type="checkbox"/> F	HAZARDOUS POLYMERIZATION	MAY OCCUR WILL NOT OCCUR <input checked="" type="checkbox"/>
CONDITIONS TO AVOID Extreme heat INCOMPATIBILITY (MATERIAL TO AVOID) Strong oxidizers HAZARDOUS DECOMPOSITION PRODUCTS Carbon monoxide, nitrogen oxides, aldehydes		

SECTION X - PHYSICAL DATA

MELTING POINT No data	VAPOR PRESSURE No data	VOLATILES No data
BOILING POINT No data	SOLUBILITY IN WATER No data	EVAPORATION RATE No data
SPECIFIC GRAVITY (H ₂ O=1) 1.13-1.20	PH No data	VAPOR DENSITY (AIR=1) No data

INFORMATION: FURNISHED TO 47841001 FURNISHED BY DATE JANUARY 27, 1986

ATTN: DEPT HANDLING MATL SAFETY DATA SHEETS
 FDAM CRAFT INC
 6235 S MCINTOSH RD
 SARASOTA FL 33583

Department of Environmental Hygiene and Toxicology
 (203) 789-5436

Ulin CORPORATION
 120 Long Ridge Road, Stamford, Connecticut 06904
 OCEANSM Network
 EMERGENCY PHONE 1-800-ULIN-0111

Helcoat - SECTION I - MANUFACTURERS INFORMATION

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW
 NAME : COOK PAINT AND VARNISH COMPANY DATE OF MSDS: 10/20/87
 ADDRESS: P.O. BOX 419389 KANSAS CITY, MO 64141-6389 EMERGENCY TELEPHONE: 816-391-6000
 INFORMATION TELEPHONE: 816-391-6003

ATTN: SAFETY AND HEALTH OFFICER
 DONZI MARINE CORP
 PO BOX 987

CUSTOMER NUMBER: 533890
 DATE PRINTED: 12/14/88
 COMPLEX: 300

TAILEVAST FL 34270

SECTION II - HAZARDOUS INGREDIENTS

STYRENE MONOMER

CAS #: NOT ASSIGNED WT. %: 30.000 VAPOR PRESSURE: 4.5
 (MMHG/DEG F)

EXPOSURE LIMIT:

ACGIH TLV/TWA: 50 PPM (SKIN) (215 MG/CU.M.)
 ACGIH TLV/STEL: 100 PPM (SKIN) (425 MG/CU.M.)
 OSHA PEL: 100 PPM (425 MG/CU.M.)
 OSHA PEL/CEILING: 200 PPM (850 MG/CU.M.)
 OTHER: OSHA: 600 PPM/5 MIN/3 HR PEAK

TALC (HYDROUS MAGNESIUM SILICATE)

CAS #: 014807-96-6 WT. %: 10.000 VAPOR PRESSURE: N/A
 (MMHG/DEG F)

EXPOSURE LIMIT:

ACGIH TLV/TWA: 2 MG/M3 RESPIRABLE DUST
 OSHA PEL: 20 M PPCF

SILICA, AMORPHOUS

CAS #: 007631-86-9 WT. %: 5.000 VAPOR PRESSURE: N/A
 (MMHG/DEG F)

EXPOSURE LIMIT:

ACGIH TLV/TWA: 10MG/CU.M. TOTAL DUST
 OSHA PEL: 20M PPCF AS DUST

METHYL METHACRYLATE

CAS #: 000090-62-6 WT. %: 5.000 VAPOR PRESSURE: 29.0
 (MMHG/DEG F)

EXPOSURE LIMIT:

ACGIH TLV/TWA: 100 PPM (410 MG/CU.M.)
 OSHA PEL: 100 PPM (410 MG/CU.M.)

LEAD CHROMATE COMPOUND

CAS #: 001344-37-2 WT. %: LESS THAN 1 VAPOR PRESSURE: N/A
 (MMHG/DEG F)

EXPOSURE LIMIT:

ACGIH TLV/TWA: 0.05 MG/CU.M.-CHROMIUM, 0.15 MG/CU.M.-LEAD
 OSHA PEL: 0.1 MG/CU.M.-CHROMATE (CEILING), 0.05 MG/CU.M.-LEAD

MAXIMUM VOC NOT CONSUMED DURING CURING IS 40 GRAM/LITER (OR 230 GRAMS/SQUARE METER OF SURFACE AREA OPEN TO AIR). MAXIMUM VOC OF UNCATALYZED RESINS AND GEL COATS IS 600 GRAMS/LITER.

THIS MATERIAL CONTAINS INGREDIENTS COVERED BY THE CALIFORNIA "SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986" (PROPOSITION 65).

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SECTION III - HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE TO PRODUCT, PRIMARY ROUTES OF ENTRY ARE:

EYE CONTACT: IRRITATION. SYMPTOMS ARE TEARING, REDNESS AND DISCOMFORT.

SKIN CONTACT: IRRITATION. CAN CAUSE DEFATTING OF SKIN WHICH MAY LEAD TO DERMATITIS.

INHALATION: IRRITATION TO NOSE AND THROAT. EXTENDED OR REPEATED EXPOSURE TO CONCENTRATIONS ABOVE THE RECOMMENDED EXPOSURE LIMITS MAY CAUSE BRAIN OR NERVOUS SYSTEM DEPRESSION, CAUSING DIZZINESS, HEADACHE OR NAUSEA AND IF CONTINUED INDEFINITELY, LOSS OF CONSCIOUSNESS, LIVER AND KIDNEY DAMAGE. OVEREXPOSURE MAY RESULT IN TOXIC LEVELS OF LEAD IN THE BODY.

REPORTS HAVE ASSOCIATED REPEATED OR PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE.

INGESTION: MAY CAUSE MOUTH, THROAT, ESOPHAGUS AND STOMACH IRRITATION, NAUSEA, VOMITING AND DIARRHEA. HARMFUL IF SWALLOWED. MAY RESULT IN TOXIC LEVELS OF LEAD IN THE BODY.

MEDICAL CONDITIONS THAT MAY BE AGGRAVATED BY EXPOSURE TO THIS PRODUCT: PREEXISTING EYE, SKIN, LIVER, KIDNEY AND RESPIRATORY DISORDERS.

EMERGENCY AND FIRST AID PROCEDURES:

IN CASE OF EYE CONTACT, FLUSH IMMEDIATELY WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION; FOR SKIN, WASH THOROUGHLY WITH SOAP AND WATER. IF AFFECTED BY INHALATION OF VAPORS OR SPRAY MIST, REMOVE TO FRESH AIR. IF SWALLOWED, GET MEDICAL ATTENTION IMMEDIATELY.

OTHER HEALTH HAZARDS:

THE INTERNATIONAL AGENCY FOR RESEARCH ON CANCER (IARC) HAS RECLASSIFIED STYRENE AS GROUP 2B "POSSIBLY CARCINOGENIC TO HUMANS". THIS NEW CLASSIFICATION IS NOT BASED ON NEW HEALTH DATA RELATING TO EITHER HUMANS OR ANIMALS, BUT ON A CHANGE IN THE IARC CLASSIFICATION SYSTEM. THE STYRENE INFORMATION AND RESEARCH CENTER DOES NOT AGREE WITH THE RECLASSIFICATION AND HAS PUBLISHED THE FOLLOWING STATEMENT. "RECENTLY PUBLISHED STUDIES TRACING 50,000 WORKERS EXPOSED TO HIGH OCCUPATIONAL LEVELS OF STYRENE OVER A PERIOD OF 45 YEARS SHOWED NO ASSOCIATION BETWEEN STYRENE AND CANCER, NO INCREASE IN CANCER AMONG STYRENE WORKERS (AS OPPOSED TO THE AVERAGE AMONG ALL WORKERS), AND NO INCREASE IN MORTALITY RELATED TO STYRENE."

LEAD CHROMATE IS A HEXAVALENT CHROMATE COMPOUND WHICH ARE LISTED BY THE INTERNATIONAL AGENCY FOR RESEARCH ON CANCER (IARC) AS HUMAN CARCINOGENS (GROUP I) AND BY THE NATIONAL TOXICITY PROGRAM (NTP) AS HUMAN CARCINOGENS (CLASS A). EXPOSURE AT EXCESSIVE LEVELS TO SPRAY MISTS AND DUSTS FROM PRODUCTS CONTAINING LEAD CHROMATE MAY CREATE RISK OF RESPIRATORY CANCER. RISK OF CANCER DEPENDS ON DURATION AND LEVEL OF EXPOSURE. LEAD CHROMATE IS A HEXAVALENT CHROMIUM COMPOUND INCLUDED ON THE LIST OF CARCINOGENS PUBLISHED BY THE GOVERNOR OF CALIFORNIA UNDER THE CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986.

OVEREXPOSURE BY INHALATION OF MISTS AND DUSTS FROM PRODUCTS CONTAINING LEAD CAN CAUSE BIRTH DEFECTS AND DAMAGE TO KIDNEYS, BLOOD, REPRODUCTIVE SYSTEM AND NERVOUS SYSTEM. "SYMPTOMS OF OVEREXPOSURE TO LEAD INCLUDE A METALLIC TASTE, LOSS OF APPETITE, INDIGESTION, NAUSEA, VOMITING, CONSTIPATION, ABDOMINAL CRAMPS AND WEAKNESS. SEE OSHA LEAD STANDARD 29CFR 1910.1025 FOR FURTHER INFORMATION ON HARMFUL EFFECTS OF OVEREXPOSURE TO AIRBORNE LEAD." LEAD IS INCLUDED ON THE LIST OF CHEMICALS, KNOWN TO CAUSE REPRODUCTIVE TOXICITY, PUBLISHED BY THE GOVERNOR OF CALIFORNIA UNDER THE CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986.

MATERIAL SAFETY DATA SHEET

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SECTION IV - PHYSICAL DATA

BOILING POINT, DEG. F. 212

VAPOR DENSITY IS HEAVIER THAN AIR

WEIGHT PER GALLON: 10.27

EVAPORATION RATE IS SLOWER THAN ETHER

PERCENT VOLATILE BY VOLUME: 45.861

SECTION V - FIRE AND EXPLOSION HAZARD DATA

OSHA FLAMMABILITY CLASSIFICATION: FLAMMABLE LIQUID CLASS IC

FLASH POINT SETA CLOSED CUP, DEG F: 82

DOT HAZARD CLASS: RED-LABEL, FLAMMABLE LIQUID LEL: 1.10

EXTINGUISHING MEDIA: FOAM, CARBON DIOXIDE, DRY CHEMICAL, WATER FOG.

UNUSUAL FIRE AND EXPLOSION HAZARDS:

IF POLYMERIZATION TAKES PLACE IN A CONTAINER, THERE IS POSSIBILITY OF VIOLENT RUPTURE OF THE CONTAINER. STYRENE VAPORS ARE UNINHIBITED AND MAY FORM POLYMERS IN VENTS OR FLAME ARRESTORS OF STORAGE TANKS RESULTING IN STOPPAGE OF VENTS. VAPORS MAY CAUSE FLASH FIRE. KEEP CONTAINERS TIGHTLY CLOSED AND ISOLATE FROM HEAT, ELECTRICAL EQUIPMENT, SPARKS AND FLAME. NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE PRODUCT (EVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY.

SPECIAL FIRE FIGHTING PROCEDURES:

FULL PROTECTIVE EQUIPMENT INCLUDING SELF-CONTAINED BREATHING APPARATUS SHOULD BE USED. WATER SPRAY MAY BE INEFFECTIVE. IF WATER IS USED, FOG NOZZLES ARE PREFERABLE. WATER MAY BE USED TO COOL CLOSED CONTAINERS TO PREVENT PRESSURE BUILD-UP AND POSSIBLE AUTO-IGNITION OR EXPLOSION WHEN EXPOSED TO EXTREME HEAT

SECTION VI - REACTIVITY DATA

STABILITY: STABLE HAZARDOUS POLYMERIZATION: MAY OCCUR.

CONDITIONS TO AVOID:

ELEVATED TEMPERATURES. IMPROPER ADDITION OF PROMOTER AND/OR CATALYST. AVOID DIRECT CONTACT OF MEKP CATALYST WITH ACCELERATOR. IF AN ACCELERATOR SUCH AS COBALT DRIER IS TO BE ADDED, MIX THIS ACCELERATOR WITH BASE MATERIAL BEFORE ADDING CATALYST.

INCOMPATIBILITY (MATERIALS TO AVOID):

OXIDIZERS, PEROXIDES, STRONG ACIDS, ALUMINUM CHLORIDE AND VINYL POLYMERS.

HAZARDOUS DECOMPOSITION PRODUCTS:

THERMAL DECOMPOSITION OR COMBUSTION CAN PRODUCE FUMES CONTAINING ORGANIC ACIDS, CARBON DIOXIDE AND CARBON MONOXIDE.

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

REMOVE ALL SOURCES OF IGNITION (FLAMES, HOT SURFACES, AND ELECTRICAL, STATIC, OR FRICTIONAL SPARKS). AVOID BREATHING VAPORS. VENTILATE AREA. CONTAIN AND REMOVE WITH INERT ABSORBENT AND NON-SPARKING TOOLS.

WASTE DISPOSAL METHOD:

DISPOSE OF IN ACCORDANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS. DO NOT INCINERATE CLOSED CONTAINERS. INCINERATE IN APPROVED FACILITY.

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SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION:

DO NOT BREATHE OR INGEST VAPORS, SPRAY MIST OR DUST WHILE APPLYING, SANDING, GRINDING, OR SAWING CURED PRODUCT. WEAR AN APPROPRIATE, PROPERLY FITTED RESPIRATOR (NIOSH/MSHA APPROVED) DURING APPLICATION AND OTHER USE OF THIS PRODUCT UNTIL ALL VAPORS, MISTS, AND DUSTS ARE EXHAUSTED, UNLESS AIR MONITORING DEMONSTRATES VAPOR AND MIST AND DUST LEVELS ARE BELOW APPLICABLE LIMITS. FOLLOW RESPIRATOR MANUFACTURER'S DIRECTIONS FOR RESPIRATOR USE. OBSERVE OSHA STANDARD 29CFR 1910.134. IF MONITORING RESULTS SHOW PEL FOR LEAD IS EXCEEDED, REFER TO OSHA STANDARD 29CFR 1910.1025.

VENTILATION:

PROVIDE GENERAL CLEAN AIR DILUTION OR LOCAL EXHAUST VENTILATION IN VOLUME AND PATTERN TO KEEP THE AIR CONTAMINANT CONCENTRATION BELOW THE LOWER EXPLOSION LIMIT AND BELOW CURRENT APPLICABLE EXPOSURE LIMITS IN THE MIXING, APPLICATION AND CURING AREAS; AND TO REMOVE DECOMPOSITION PRODUCT DURING WELDING AND FLAME CUTTING ON SURFACES COATED WITH THIS PRODUCT. IN CONFINED AREAS, USE ONLY WITH FORCED VENTILATION ADEQUATE TO KEEP VAPOR CONCENTRATION BELOW 20% OF LOWER EXPLOSION LIMITS. REFER TO OSHA STANDARDS 29CFR 1910.94, 1910.107, 1910.108.

NOTE: HEAVY SOLVENT VAPORS SHOULD BE REMOVED FROM LOWER LEVELS OF THE WORK AREA AND ALL IGNITION SOURCES (NONEXPLOSION-PROOF MOTORS, ETC.) SHOULD BE ELIMINATED.

PROTECTIVE GLOVES: USE SOLVENT IMPERMEABLE GLOVES TO AVOID CONTACT WITH PRODUCT

EYE PROTECTION:

DO NOT GET IN EYES. USE SAFETY EYEWEAR WITH SPLASH GUARDS OR SIDE SHIELDS, CHEMICAL GOGGLES, FACE SHIELDS.

OTHER PROTECTIVE EQUIPMENT:

AVOID CONTACT WITH SKIN. USE PROTECTIVE CLOTHING. PREVENT CONTACT WITH CONTAMINATED CLOTHING. WASH CONTAMINATED CLOTHING, INCLUDING SHOES, BEFORE REUSE.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

DO NOT STORE ABOVE 120 DEG. F. STORE LARGE QUANTITIES IN BUILDINGS DESIGNED TO COMPLY WITH OSHA 1910.106. KEEP AWAY FROM HEAT, SPARKS AND FLAME. KEEP CONTAINERS CLOSED WHEN NOT IN USE AND UPRIGHT TO PREVENT LEAKAGE.

OTHER PRECAUTIONS:

CONTAINERS SHOULD BE GROUNDED WHEN POURING. DO NOT TAKE INTERNALLY. CONTAINS LEAD. DO NOT BREATHE VAPORS, SPRAY MIST OR DUST FROM SANDING OPERATION DO NOT USE ON TOYS, FURNITURE OR SURFACES OF OTHER ARTICLES WHICH MIGHT BE CHEWED BY CHILDREN. WASH HANDS THOROUGHLY AFTER USING AND BEFORE SMOKING OR EATING. EMPTIED CONTAINERS MAY RETAIN HAZARDOUS RESIDUE AND EXPLOSIVE VAPORS KEEP AWAY FROM HEAT, SPARKS AND FLAMES. DO NOT CUT, PUNCTURE OR WELD ON OR NEAR EMPTIED CONTAINERS. FOLLOW ALL HAZARD PRECAUTIONS GIVEN IN THIS DATA SHEET UNTIL CONTAINER IS THOROUGHLY CLEANED OR DESTROYED. IF THIS PRODUCT IS BLENDED WITH OTHER COMPONENTS SUCH AS THINNERS, CONVERTER, COLORANTS, CATALYSTS PRIOR TO USE, READ ALL WARNING LABELS. ANY MIXTURE OF COMPONENTS WILL HAVE HAZARDS OF ALL COMPONENTS. FOLLOW ALL PRECAUTIONS. IF SPRAYING THIS MATERIAL, KEEP SPRAY BOOTHS CLEAN. AVOID BUILD-UP OF SPRAY DUST OR OVERSPRAY IN BOOTHS OR DUCTS.

KEEP OUT OF REACH OF CHILDREN

FOR INDUSTRIAL USE ONLY

SECTION X - SARA TITLE III INFORMATION

THIS PRODUCT CONTAINS THE FOLLOWING TOXIC CHEMICALS SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF SARA TITLE III EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT OF 1986 AND OF 40 CFR PART 372.

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CHEMICAL NAME	CAS NUMBER	% BY WEIGHT	SARA TITLE III SECTION 311 AND 312 HAZARD CATEGORIES
STYRENE MONOMER	000100-42-5	26.7590	IMMEDIATE (ACUTE) DELAYED (CHRONIC) FIRE HAZARD REACTIVE
METHYL METHACRYLATE	000080-62-6	3.9880	IMMEDIATE (ACUTE) FIRE HAZARD REACTIVE
LEAD CHROMATE COMPOUND	001344-37-2	0.6260	IMMEDIATE (ACUTE) DELAYED (CHRONIC)

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