Check Sheet

Company Name: Chris Craft Boats
Permit Number: AC41-165851
PSD Number:
County: Manatee
Permit Engineer:
Others involved:

Application:

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

Intent:

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

  Attachments:

  - [ ]
  - [ ]
  - [ ]

- [ ] Correspondence with:
  - [ ] EPA
  - [ ] Park Services
  - [ ] County
  - [ ] Other
- [x] Proof of Publication
- [ ] Petitions - (Related to extensions, hearings, etc.)

Final Determination:

- [x] Final Determination
- [x] Signed Permit
- [ ] BACT Determination

Post Permit Correspondence:

- [x] Extensions
- [x] Amendments/Modifications
- [ ] Response from EPA
- [ ] Response from County
- [ ] Response from Park Services

TOM JOHN ENGINEERING, INC.

DATE: 10/7/92

TO: Bruce Mitchell

COMPANY: FDER - AIR

FAX NUMBER: 904 - 922 - 6979

PAGES SENT cover mly

COMMENTS: UTM and Lat/Long for Chris Craft & Donzi Facilities.

Chris Craft Boats	27° 23' 30" N; 82° 32' 40" W; 347215 E; 3030633 N
Chris Craft D.C.	27° 23' 59" N; 82° 32' 40" W; 347342 E; 3031772 N
Donzi	27° 20' 25" N; 82° 32' 36" W; 347848 E; 3033291 N

Need anything else?
Please call me Thursday / your convenience

TJ

TOM JOHN ENGINEERING, INC.

Environmental permitting
7522 North 40th Street
Phone (813) 985-7881

Air Toxics/Modelling
Tampa, Florida 33604
FAX (813) 980-3564

P 832 539 816

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

UNITED STATES POSTAL SERVICE

Sent to Mr. T. P. Robinson, Chris Craft Boats	
Street & No. P.O. Box 25022	
P.O., State & ZIP Code Bradenton, FL 34206	
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: 7-19-91 Permit: AC 41-165851	

PS Form **3800**, June 1990

● **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. T. P. Robinson V.P. and General Manager Chris Craft Boats 8161 Old Bradenton Road Post Office Box 25022 Bradenton, FL 34206	4. Article Number P 832 539 816 Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail ☐ Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature – Addressee X	8. Addressee's Address *(ONLY if requested and fee paid)*
6. Signature – Agent X Jim Hise	
7. Date of Delivery 7-22	

PS Form **3811**, Apr. 1989 ★U.S.G.P.O. 1989-238-815 **DOMESTIC RETURN RECEIPT**

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC 41-165851
Manatee County

Mr. T. P. Robinson, V.P. and General Manager
Chris Craft Boats
8161 Old Bradenton Road
Post Office Box 25022
Bradenton, Florida 34206

_____/

Enclosed is Permit Number AC 41-165851 for the after-the-fact permit for Chris Craft Boats's fiberglass boat manufacturing facility, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit 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

for Barry D. Andrews

C. 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 PERMIT and all copies were mailed before the close of business on 7-19-91 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.

Kari Dober (Clerk) 7-19-91 (Date)

Copies furnished to:
B. Thomas, SWD
J. Harper, EPA
T. T. John, P.E., TTJE, Inc.
R. Evangelisti, P.E., OMC

Final Determination

Chris Craft Boats
Manatee County
Tallevast, Florida

Construction Permit No.
AC 41-165851

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

June 26, 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 May 22, 1991, and available for public inspection at the Department's Southwest District office and the Department's Bureau of Air Regulation office.

There were no comments received during the public notice period. Therefore, it is recommended that the construction permit be issued as drafted.

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:
Chris Craft Boats
Post Office Box 25022
Bradenton, Florida 34206

Permit Number: AC 41-165851
Expiration Date: July 31, 1992
County: Manatee
Latitude/Longitude: 27°23'31"N
82°32'43"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, 1990 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 that produces fiberglass boats. The existing exhaust system will be upgraded to 60,000 acfm. The facility is located at 8161 Old Bradenton Road in Tallevast, Manatee County, Florida. The UTM coordinates are Zone 17, 347.215 km East and 3030.633 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 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 5, 1989.
2. Mr. J. Harry Kerns letter dated June 30, 1989.
3. Mr. C. H. Fancy's letter dated July 3, 1989.
4. Mr. Tom T. John's letter received April 6, 1990.
5. Mr. Tom T. John's letter with enclosures received April 24, 1990 (confidential).
6. Mr. William W. Deane's letter with enclosures received May 4, 1990.

Attachments Cont'd:

7. Mr. C. H. Fancy's letter dated May 23, 1990.
8. Mr. Tom T. John's letter with enclosures received August 20, 1990 (modeling output confidential).
9. Mr. C. H. Fancy's letter dated September 18, 1990.
10. Mr. T. P. Robinson's letter with enclosures received March 19, 1991.
11. Technical Evaluation and Preliminary Determination dated May 21, 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

GENERAL CONDITIONS:

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.

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.

GENERAL CONDITIONS:

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, 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.

GENERAL CONDITIONS:

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 is permitted to operate 15 hours/day, 5 days/week, and 52 weeks/year, for a total of 3,900 hours/year.

3. Volatile organic compounds/organic solvents (VOC/OS) emissions shall be verifiable on a monthly basis and shall not exceed the following:

VOC/OS	Allowable Emission Limit	
o Acetone	39.4 lbs/hr,	76.8 TPY
o Styrene	69.9 lbs/hr,	137.5 TPY
o Methyl Methacrylate	2.1 lbs/hr,	4.1 TPY
o Trichlorofluoro Methane	4.0 lbs/hr,	7.8 TPY
o Dichlorodifluoro Methane	0.009 lbs/hr,	0.018 TPY
o Toluene	2.5 lbs/hr,	4.9 TPY
o Hexane	2.5 lbs/hr	4.9 TPY
	Total:	236.0 TPY

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. An annual operating report shall be submitted to the Department's Southwest District office reporting the actual annual VOC/OS emissions by March 1 of each calendar year.

PERMITTEE:
Chris Craft Boats

Permit Number: AC 41-165851
Expiration Date: July 31, 1992

SPECIFIC CONDITIONS:

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 VOC or OS 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/OS, shall be covered when not in use.

6. Objectionable odors will not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).

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. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).

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 date of the permit (F.A.C. Rule 17-4.090).

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 while 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 18th 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

DATE: June 26, 1991

SUBJ: Approval of Construction Permit No. AC 41-165851
Chris Craft Boats

Attached for your approval and signature is an after-the-fact construction permit prepared by the Bureau of Air Regulation for the above referenced company, which is a fiberglass boat manufacturing facility. The facility is located in Tallevast, Manatee County, Florida. There were no comments received during the public notice period.

Day 90, after which this permit will be issued by default, is July 24, 1991.

I recommend your approval and signature.

CHF/BM/rbm

OMC

Chris*Craft®

August 21, 1992

Mr. Bruce Mitchell
Florida Department of Environmental Regulation
Twin Tower Office Building
2666 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Chris*Craft Boats - AC41-165851

Dear Mr. Mitchell:

My apologies to you for this late response to your letter which was sent to Mr. Tom John (copy enclosed). As you are aware, Chris Lashley has left Chris*Craft; and, I am working myself into this rather complex position.

On May 5, 1992, Mr. Tom John contacted you by mail to request a change in Specific Condition #2 which would allow us to operate in our lamination department 24 hours a day, 7 days a week, 52 weeks a year without additional pounds an hour and tons a year voc emissions.

We are trying to building the boating world's finest product and can do so as long as we can keep our work schedule more flexible and possibly create several more jobs in other areas.

Enclosed is a check for $250.00 in order to process permit modification. If you should have any questions, please do not hesitate to contact me.

Sincerely,

Michael Schenk

MS/kad

001031

Enclosures: 2
cc: D. Thomas, SW Dist.

8161 15th Street East, Sarasota, Florida 34243
813-351-4900 FAX 813-351-8974

Tom Tolin Engineering, Inc.
7522 N. 40th Street
Tampa, FL 33604
(813) 985-7881 Fax (813) 980-3564

May 5, 1992

Mr. Bruce Mitchell
FL Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Chris Craft Boats - AC41-165851

Dear Mr. Mitchell:

Currently the Chris Craft Boats facility is permitted to perform lamination and gelcoating for 15 hours per day, 5 days/week, 52 weeks/year (3,900 hours/year), with maximum VOC emissions of 236 tons per year.

Chris Craft requests that Specific Condition No. 2 be amended to allow unrestricted laminating/gelcoating (24 hours/day, 7 days/week 52 weeks/yr) for a total of 8,760 operating hours/year, subject to the existing limitations on the pounds/hour and tons/year of VOC emissions.

As you are aware, the "gel time" for styrene in the resin and gelcoat depends strongly on the temperature and humidity of the air passing over the part after it is applied. Chris Craft would like to be able to take advantage of weather conditions that will maximize the quality of the product (for example, laminating at night rather than during the day, or continuously during good weather) and help minimize the rate of organic evaporation. In addition, due to the lower production rate in the current economy, Chris Craft also requires the capability of responding quickly to a request for boat production. Unrestricted operating hours would allow completion of a production run in the optimum time, rather than having to shut down the line after five days as currently required.

Please note that Chris Craft Boats is not requesting an increase in currently permitted pounds per hour or tons per year of emissions, only flexibility of the hours of operation to best utilize those permitted values. Chris Craft does not anticipate, based on current projections, that the facility will be able to exceed the permitted chemical usages: however, Chris Craft does recognize that careful record keeping will be required to demonstrate compliance with those limits.

Thank you for your attention and consideration. If you have any questions or I can provide additional information regarding this request, please contact me at my office.

Sincerely,

Tom T. John, P.E.

TTJ:dj

August 4, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Tom T. John, P.E.
Tom John Engineering
7522 N. 40th Street
Tampa, FL 33604

Dear Mr. John:

RE: Air Construction Permit AC 41-165851
Chris Craft Boats, Manatee County
Request for Permit Modification

The Bureau of Air Regulation received your May 3, 1992, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a $250 processing fee for a permit modification; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

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

CHF/pa

cc: Bruce Mitchell

OMC Chris-Craft®

August 21, 1992

Mr. Bruce Mitchell
Florida Department of Environmental Regulation
Twin Tower Office Building
2666 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Chris*Craft Boats - AC41-165851

Dear Mr. Mitchell:

My apologies to you for this late response to your letter which was sent to Mr. Tom John (copy enclosed). As you are aware, Chris Lashley has left Chris*Craft; and, I am working myself into this rather complex position.

On May 5, 1992, Mr. Tom John contacted you by mail to request a change in Specific Condition #2 which would allow us to operate in our lamination department 24 hours a day, 7 days a week, 52 weeks a year without additional pounds an hour and tons a year voc emissions.

We are trying to building the boating world's finest product and can do so as long as we can keep our work schedule more flexible and possibly create several more jobs in other areas.

Enclosed is a check for $250.00 in order to process permit modification. If you should have any questions, please do not hesitate to contact me.

Sincerely,

Chris-Craft® BOATS
OMCCC, INC.
8161 15th Street East
Sarasota, Florida 34243

FIRST WISCONSIN BANK OF WAUSAU
WAUSAU, WISCONSIN
[redacted]
759

No. 06555

CHECK AMOUNT
********250.00

CHECK NO. 065555 DATE 08/21/92 EXACTLY **********250 DOLLARS AND 00 CENTS

TWO HUNDRED FIFTY DOLLARS AND 00 CENTS

PAY TO THE ORDER OF DEPARTMENT ENVIRONMENTAL REG
4520 OAK FAIR BLVD
TAMPA FL 33610

OMCCC, INC
AUTHORIZED AGENTS

P 710 058 518

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

UNITED STATES POSTAL SERVICE

Sent to: Tom T John	
Street & No.: Tom John Eng.	
P.O., State & ZIP Code: Tampa, Fl	
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: 8-6-92 AC 41-165851	

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 below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

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:
Tom J. John, P.E.
Tom John Engineering
7522 N. 40th St.
Tampa, Fl 33604

4a. Article Number: P 710 058 518

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) Thomas A. Taylor

PS Form **3811**, November 1990 ☆U.S. GPO: 1991—287-066 **DOMESTIC RETURN RECEIPT**

Thank you for using

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

August 4, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Tom T. John, P.E.
Tom John Engineering
7522 N. 40th Street
Tampa, FL 33604

Dear Mr. John:

RE: Air Construction Permit AC 41-165851
Chris Craft Boats, Manatee County
Request for Permit Modification

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Sincerely,

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

CHF/pa

cc: Bruce Mitchell

Tom John Engineering, Inc.

7522 N. 40th Street
Tampa, FL 33604
(813) 985-7881 Fax (813) 980-3564

May 5, 1992

Mr. Bruce Mitchell
FL Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Chris Craft Boats - AC41-165851

Dear Mr. Mitchell:

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Please note that Chris Craft Boats is not requesting an increase in currently permitted pounds per hour or tons per year of emissions, only flexibility of the hours of operation to best utilize those permitted values. Chris Craft does not anticipate, based on current projections, that the facility will be able to exceed the permitted chemical usages; however, Chris Craft does recognize that careful record keeping will be required to demonstrate compliance with those limits.

Thank you for your attention and consideration. If you have any questions or I can provide additional information regarding this request, please contact me at my office.

Sincerely,

Tom T. John, P.E.

TTJ:dj

P 832 539 841

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

UNITED STATES POSTAL SERVICE

Sent to T. P. Robinson	
Street & No. Chris Craft Boats	
P.O., State & ZIP Code Bradenton, Fl	
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 4-14-92 AC 41-165851	

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 below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

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. T. P. Robinson, VP + GM
Chris Craft Boats
8161 Old Bradenton Rd
PO Box 25022
Bradenton, Fl 34206

4a. Article Number
P 832 539 841

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

7. Date of Delivery
4/15 FORWARDED TO SARASOTA FL.

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

5. Signature (Addressee)

6. Signature (Agent)
T. Miller

PS Form **3811**, November 1990 ☆U.S. GPO: 1991—287-066 **DOMESTIC RETURN RECEIPT**

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 31, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. T. P. Robinson
V.P. & General Manager
Chris Craft Boats
8161 Old Bradenton Road
Post Office Box 25022
Bradenton, Florida 34206

Dear Mr. Robinson:

Re: Amendment to Construction Permit-Expiration Date Extension
AC 41-165851: Fiberglassing Application Operation

The Department has reviewed the above request contained in Mr. Robert D. Murry's letter received March 23, 1992. The request is acceptable and the following will be changed and added:

1. Expiration Date

From: July 31, 1992
To: July 31, 1993

2. Attachment to be Incorporated

o Mr. Robert D. Murry's letter received March 23, 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.

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 41-165851, and shall become a part of the permit.

Sincerely,

Steve Smallwood, P.E.
Director
Division of Air Resources Management

SS/BM/rbm

Attachment

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

#50.00 pd.
3-23-92
Rcpt#180751

Chris-Craft®

RECEIVED
DER - MAIL ROOM
1992 MAR 23 PM 1:33

March 19, 1992

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

RE: AC41-165851 - Chris Craft Boats

Dear Mr. Fancy:

On April 22, 1992, the Occupational Safety and Health Administration conducted an inspection of the OMC Chris Craft, Inc. boat plant located at 8161 15th Street E., Sarasota, Florida.

OSHA's concerns addressed the laminating prccess resulting in workers exposure to styrene. In response to the citation issued on October 2, 1991, it became necessary to review and possibly change some of the exhaust and intake methods used in the lamination building.

In an effort to immediately reduce the styrene to air ratio, thus improving the workers exposure levels, the ceiling exhaust fans were changed to intake fans maintaining the same CFM. While this had an immediate positive effect, it has not yet been determined if and what other changes will be necessary to come into compliance with the Permissible Exposure Limits.

Because we are continuing to address this OSHA issue, and due to its related complexity, OMCCC, Inc. requests the Department to grant a 12 month extension of the AC permit.

Although OMCCC, Inc. is permitted for 137.5 tons of styrene emissions per year, our records indicate that our actual styrene emission over the last year was 41 (+/-) tons. Because this emission is relatively low in comparison, OMCCC, Inc. feels we are not, nor will we be, negatively impacting the environment during this period while attempting to comply with both OSHA and the DER.

001631
Air Regulation

8161 15th Street East, Sarasota, Florida 34243
813-351-4900 FAX 813-351-8974

I thank you in advance for your consideration of this request. Should additional information be necessary, please contact me at (813) 351-4900.

Very truly yours,

Robert D. Murray

Robert D. Murray
Director of Manufacturing

RDM/pm
Enclosures
B. Mitchell
B. Thomas, SW Dist

U.S. Department of Labor
Occupational Safety and Health Administration

Citation and Notification of Penalty

BEST AVAILABLE COPY

.S. Department of Labor - OSHA
oom 624
00 Twiggs Street
ampa, FL 33602

3. Issuance Date	4. Inspection Number
10/02/91	106383094
5. Reporting ID 0420600	6. CSHO ID V9402
7. Optional Report No. 559	8. Page No. 7 of 13

1. Type of Violation(s)	2. Citation Number
Serious	01

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

4/22/91 - 9/25/91

11. Inspection Site:

8161 15TH street East
SARASOTA, FL 34243

9. To:

OMCCC, Inc. dba Chris Craft
and its successors
8161 15TH street East
SARASOTA, FL 34243

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of violation(s) cited below. The Citation must remain posted until the violations cited below have been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.
This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number / 13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
		11/05/91	

CFR 1910.1000(a)(3): Employee(s) were exposed to an airborne ncentration of styrene listed in Table Z-1-A (Final Rule Limits lumn) in excess of 50 ppm:

For the following alleged violations, the employees as identified were exposed to styrene at the concentrations listed. The limit for styrene is established to prevent irritation, central nervous system effects, narcotics, and/or mutagenic effects. The sample results were obtained from multiple samples with a zero increment for all unsampled periods.

1) An employee rolling out (laminating) small parts was exposed to 61.3 ppm (1.23 times the permissible limit) as an 8-hour time-weighted average; sampling period was 319 minutes on 8/9/91.

2) An employee operating a chopper gun to laminate a hull

Exemption CL + PS Code (8) Att order 10-9

Rafael Rodriguez

17. Area Director Lawrence J. Falck

18. Last Pg

Total Penalty for This Citation

Make Check or Money Order Payable to: "DOL-OSHA"

Indicate Inspection Number on Remittance

NOTICE TO EMPLOYEES — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RIGHTS AND RESPONSIBILITIES — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

ORIGINAL

U.S. Department of Labor
Occupational Safety and Health Administration

Citation and Notification of Penalty

U.S. Department of Labor - OSHA
Room 624
700 Twiggs Street
Tampa, FL 33602

BEST AVAILABLE COPY

3. Issuance Date	4. Inspection Number
10/02/91	106383094
5. Reporting ID 0420600	6. CSHO ID V9402
7. Optional Report No. 559	8. Page No. 8 of 13

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1. Type of Violation(s)	2. Citation Number
Serious	01

11. Inspection Site:
8161 15TH street East
SARASOTA, FL 34243

9. To:
OMCCC, Inc. dba Chris Craft
and its successors
8161 15TH street East
SARASOTA, FL 34243

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12. Item Number / 13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
	was exposed to 103 ppm (2.0 times the permissible limit) as an 8-hour time-weighted average; sampling period was 370 minutes on 8/13/91. 3) An employee rolling out (laminating) in ahull was exposed to 108 ppm (2.1 times the permissible limit) as an 8-hour time-weighted average; sampling period was 326 minutes on 8/13/91 4) An employee rolling out (laminating) on a deck section was exposed to 115 ppm (2.3 times the permissible limit) as an 8-hour time-weighted average; sampling period was 310 minutes on 8/13/91.	Same as #	

Rafael Rodriguez
Area Director for Lawrence J. Falck

Last Pg

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EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RIGHTS AND RESPONSIBILITIES — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

Total Penalty for This Citation

Make Check or Money Order Payable to: "DOL-OSHA"

Indicate Inspection Number on Remittance

J.S. Department of Labor
Occupational Safety and Health Administration

Citation and Notification of Penalty

S. Department of Labor - OSHA
om 624
0 Twiggs Street
mpa, FL 33602

BEST AVAILABLE COPY

3. Issuance Date	4. Inspection Number
10/02/91	106383094
5. Reporting ID 0420600	6. CSHO ID V9402
7. Optional Report No. 559	8. Page No. 9 of 13

1. Type of Violation(s)	2. Citation Number
Serious	01

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

4/22/91 - 9/25/91

11. Inspection Site:

8161 15TH street East
SARASOTA, FL 34243

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

9. To:

OMCCC, Inc. dba Chris Craft
and its successors
8161 15TH street East
SARASOTA, FL 34243

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12. Item Number / 13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
CFR 1910.1000(a)(3):	Employee(s) were exposed to an airborne centration of styrene listed in Table Z-1-A (Final Rule its column) in excess of 100 ppm: For the following alleged violations the employees as identified were exposed to styrene for the time ranges and at the concentrations listed. The limit for styrene is established to prevent irritation, central nervous system effects, narcosis, and/or mutagenic effects. The sample results were derived from individual continuous samples: 1) An employee rolling out (laminating) small parts was exposed at 130 to 140 ppm (1.3 to 1.4 times the permissible limits) for time frames of 39 to 44 minutes on 8/9/91. 2) An employee glassing-in the wood framework into a hull was exposed at 104 to 123 ppm (1.04 to 1.2 times the permissible limits) for time frames of 51 to 66 minutes on 8/12/91.	11/05/91	ADD PPNS 10/9

Area Director Lawrence J. Falck

18. Last Pg

TICE TO EMPLOYEES — The law gives an employee or representative the opportunity to object to any abatent date set for a violation if he believes the date to be easonable. The contest must be mailed to the U.S. partment of Labor Area Office at the address shown ve within 15 working days (excluding weekends and eral holidays) of the receipt by the employer of this Citaand penalty.

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Total Penalty for This Citation

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Indicate Inspection Number on Remittance

ORIGINAL

Department of Labor
tional Safety and Health Administration

on and Notification of Penalty

epartment of Labor OSHA
24
iggs Street
FL 33602

BEST AVAILABLE COPY

3. Issuance Date	4. Inspection Number
10/02/91	106383094
5. Reporting ID	6. CSHO ID
0420600	V9402
7. Optional Report No.	8. Page No.
339	10 of 13

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4/22/91 - 9/25/91

11. Inspection Site:
8161 15TH street East
SARASOTA, FL 34243

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C, Inc. dba Chris Craft
its successors
15TH street East
SOTA, FL 34243

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lumber urd, Regulation or n of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
	) An employee operating a chopper gun to laminate a hull was xposed at 111 to 269 ppm (1.1 to 2.6 times the permissible limits) or time frames of 65 to 100 minutes 8/13/91.		
	) An employee rolling out (laminating) in a hull was exposed at 06 to 420 ppm (1.06 to 4.2 times the permissible limits) for time rames of 37 to 62 minutes on 8/13/91.		
	) An employee rolling out (laminating) on a deck section was xposed at 112 to 318 ppm (1.1 to 3.2 times the permissible limits) or time frames of 20 to 85 minutes on 8/13/91.	Spr'd	
	) An employee operating a chopper gun to laminate a deck section as exposed at 139 to 178 ppm (1.3 to 1.7 times the permissible mits) for time frames of 35 to 49 minutes on 8/13/91.		

Rafael Rodriguez

ector Lawrence J. Falck

Last Pg

O EMPLOYEES — The law gives an employee or entative the opportunity to object to any abate- set for a violation if he believes the date to be ble. The contest must be mailed to the U.S. t of Labor Area Office at the address shown hin 15 working days (excluding weekends and lidays) of the receipt by the employer of this Cita- enalty.

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Total Penalty for This Citation

Make Check or Money Order Payable to "DOL-OSHA"

Indicate Inspection Number on Remittance

ORIGINAL

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 CHF

DATE: March 31, 1992

SUBJ: Amendment to Construction Permit-Expiration Date Extension
Chris Craft Boats-Fiberglassing Application Operations
AC 41-165851

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.

SS/CHF/rbm

Attachment

3-30-92

Clair,

FYI, review, edit, initial.
This has been put through 'spell-check'.

Thanks,

Ben

• Exp. Date Extension Amendment

OMC

Chris-Craft®

RECEIVED
DER - MAIL ROOM
1992 MAR 23 PM 1:33

March 19, 1992

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

RE: AC41-165851 - Chris Craft Boats

Dear Mr. Fancy:

On April 22, 1992, the Occupational Safety and Health Administration conducted an inspection of the OMC Chris Craft, Inc. boat plant located at 8161 15th Street E., Sarasota, Florida.

OSHA's concerns addressed the laminating process resulting in workers exposure to styrene. In response to the citation issued on October 2, 1991, it became necessary to review and possibly change some of the exhaust and intake methods used in the lamination building.

In an effort to immediately reduce the styrene to air ratio, thus improving the workers exposure levels, the ceiling exhaust fans were changed to intake fans maintaining the same CFM. While this had an immediate positive effect, it has not yet been determined if and what other changes will be necessary to come into compliance with the Permissible Exposure Limits.

Because we are continuing to address this OSHA issue, and due to its related complexity, OMCCC, Inc. requests the Department to grant a 12 month extension of the AC permit.

Although OMCCC, Inc. is permitted for 137.5 tons of styrene emissions per year, our records indicate that our actual styrene emission over the last year was 41 (+/-) tons. Because this emission is relatively low in comparison, OMCCC, Inc. feels we are not, nor will we be, negatively impacting the environment during this period while attempting to comply with both OSHA and the DER.

001031
Air Regulation

8161 15th Street East, Sarasota, Florida 34243
813-351-4900 FAX 813-351-8974

I thank you in advance for your consideration of this request. Should additional information be necessary, please contact me at (813) 351-4900.

Very truly yours,

Robert D. Murray
Director of Manufacturing

RDM/pm
Enclosures
B. Mitchell
B. Thomas, SW Dist

U.S. Department of Labor
Occupational Safety and Health Administration

Citation and Notification of Penalty

.S. Department of Labor - OSHA
oom 624
00 Twiggs Street
ampa, FL 33602

BEST AVAILABLE COPY

3. Issuance Date	4. Inspection Number
10/02/91	106383094
5. Reporting ID 0420600	6. CSHO ID V9402
7. Optional Report No. 559	8. Page No. 7 of 13

1. Type of Violation(s)	2. Citation Number
Serious	01

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4/22/91 - 9/25/91

11. Inspection Site:
8161 15TH street East
SARASOTA, FL 34243

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1) An employee rolling out (laminating) small parts was exposed to 61.3 ppm (1.23 times the permissible limit) as an 8-hour time-weighted average; sampling period was 319 minutes on 8/9/91.

2) An employee operating a chopper gun to laminate a hull

EXEMPTION CL + ...(8) ... 10-9

Rafael Rodriguez

17. Area Director Lawrence J. Falck

18. Last Pg

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Total Penalty for This Citation

Make Check or Money Order Payable to: "DOL-OSHA"

Indicate Inspection Number on Remittance

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ORIGINAL

U.S. Department of Labor
Occupational Safety and Health Administration

Citation and Notification of Penalty

U.S. Department of Labor OSHA
Room 624
700 Twiggs Street
Tampa, FL 33602

3. Issuance Date	4. Inspection Number
10/02/91	106383094
5. Reporting ID	6. CSHO ID
0420800	09402
7. Optional Report No.	8. Page No.
559	8 of 13

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Serious	01

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4/22/91 - 9/25/91

11. Inspection Site:
8161 15TH street East
SARASOTA, FL 34243

9. To:
OMCCC, Inc. dba Chris Craft
and its successors
8161 15TH street East
SARASOTA, FL 34243

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of violation(s) cited below. The Citation must remain posted until the violations cited below have been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.
This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number / 13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty

was exposed to 103 ppm (2.0 times the permissible limit) as an 8-hour time-weighted average; sampling period was 370 minutes on 8/13/91.

3) An employee rolling out (laminating) in ahull was exposed to 108 ppm (2.1 times the permissible limit) as an 8-hour time-weighted average; sampling period was 326 minutes on 8/13/91

SAME AS #

4) An employee rolling out (laminating) on a deck section was exposed to 115 ppm (2.3 times the permissible limit) as an 8-hour time-weighted average; sampling period was 310 minutes on 8/13/91.

Rafael Rodriguez for

17. Area Director: Lawrence A. Falck

Last Pg

NOTICE TO EMPLOYEES — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RIGHTS AND RESPONSIBILITIES — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

Total Penalty for This Citation

Make Check or Money Order Payable to: "DOL-OSHA"

Indicate Inspection Number on Remittance

ORIGINAL

U.S. Department of Labor
Occupational Safety and Health Administration

Citation and Notification of Penalty

U.S. Department of Labor - OSHA
Room 624
700 Twiggs Street
Tampa, FL 33602

1. Type of Violation(s)	2. Citation Number
Serious	01

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

3. Issuance Date	4. Inspection Number
10/02/91	106383094
5. Reporting ID 0420600	6. CSHO ID V9402
7. Optional Report No. 559	8. Page No. 9 of 13

10. Inspection Date(s):
4/22/91 - 9/25/91

11. Inspection Site:
8161 15TH street East
SARASOTA, FL 34243

9. To:
OMCCC, Inc. dba Chris Craft
and its successors
8161 15TH street East
SARASOTA, FL 34243

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

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This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number / 13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
		11/05/91	

29 CFR 1910.1000(a)(3): Employee(s) were exposed to an airborne concentration of styrene listed in Table Z-1-A (Final Rule limits column) in excess of 100 ppm:

For the following alleged violations the employees as identified were exposed to styrene for the time ranges and at the concentrations listed. The limit for styrene is established to prevent irritation, central nervous system effects, narcosis, and/or mutagenic effects. The sample results were derived from individual continuous samples:

1) An employee rolling out (laminating) small parts was exposed at 130 to 140 ppm (1.3 to 1.4 times the permissible limits) for time frames of 39 to 44 minutes on 8/9/91.

2) An employee glassing-in the wood framework into a hull was exposed at 104 to 123 ppm (1.04 to 1.2 times the permissible limits) for time frames of 51 to 66 minutes on 8/12/91.

ADD PMS 10/9

17. Area Director: Lawrence J. Falck — Rafael Rodriguez

18. Last Pg

NOTICE TO EMPLOYEES — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RIGHTS AND RESPONSIBILITIES — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

Total Penalty for This Citation

Make Check or Money Order Payable to: "DOL-OSHA"

Indicate Inspection Number on Remittance

ORIGINAL

Department of Labor
ational Safety and Health Administration

ion and Notification of Penalty

BEST AVAILABLE COPY

Department of Labor - OSHA
624
wiggs Street
, FL 33602

3. Issuance Date	4. Inspection Number
10/02/91	106383094
5. Reporting ID	6. CSHO ID
0420800	97402
7. Optional Report No.	8. Page No.
559	10 of 13

Type of Violation(s)	2. Citation Number
Serious	01

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):
4/22/91 - 9/25/91

11. Inspection Site:
8161 15TH street East
SARASOTA, FL 34243

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested
(See enclosed Booklet)

This Section May Be Detached Before Posting

To:
CC, Inc. dba Chris Craft
its successors
1 15TH street East
ASOTA, FL 34243

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n Number ndard, Regulation or ction of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
	3) An employee operating a chopper gun to laminate a hull was exposed at 111 to 269 ppm (1.1 to 2.6 times the permissible limits) for time frames of 65 to 100 minutes 8/13/91. 4) An employee rolling out (laminating) in a hull was exposed at 106 to 420 ppm (1.06 to 4.2 times the permissible limits) for time frames of 37 to 62 minutes on 8/13/91. 5) An employee rolling out (laminating) on a deck section was exposed at 112 to 318 ppm (1.1 to 3.2 times the permissible limits) for time frames of 20 to 85 minutes on 8/13/91. 6) An employee operating a chopper gun to laminate a deck section was exposed at 139 to 178 ppm (1.3 to 1.7 times the permissible limits) for time frames of 35 to 49 minutes on 8/13/91.	Same	

Rafael Rodriguez

a Director Lawrence J. Falck

Last Pg

CE TO EMPLOYEES — The law gives an employee or presentative the opportunity to object to any abatement date set for a violation if he believes the date to be sonable. The contest must be mailed to the U.S. tment of Labor Area Office at the address shown within 15 working days (excluding weekends and al holidays) of the receipt by the employer of this Citand penalty.

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OYER RIGHTS AND RESPONSIBILITIES — The enclosed booklet outlines employer rights and responsibilities and d be read in conjunction with this notification.

Total Penalty for This Citation

Make Check or Money Order Payable to: "DOL-OSHA"

Indicate Inspection Number on Remittance

ORIGINAL

Chris-Craft BOATS

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

FIRST WISCONSIN BANK
OF WAUSAU
WAUSAU, WISCONSIN

1978
[redacted]
759

PAY TO THE ORDER OF

FLORIDA DEPARTMENT OF REGULATIONS

DATE March 20, 1992

AMOUNT $50.00

OMCCO, INC.

AUTHORIZED AGENT

AUTHORIZED AGENT

[redacted]

RE: AC41-165851 - Chris Craft Boats

Dear Mr. Fancy:

On April 22, 1992, the Occupational Safety and Health Administration conducted an inspection of the OMC Chris Craft, Inc. boat plant located at 8161 15th Street E., Sarasota, Florida.

OSHA's concerns addressed the laminating process resulting in workers exposure to styrene. In response to the citation issued on October 2, 1991, it became necessary to review and possibly change some of the exhaust and intake methods used in the lamination building.

In an effort to immediately reduce the styrene to air ratio, thus improving the workers exposure levels, the ceiling exhaust fans were changed to intake fans maintaining the same CFM. While this had an immediate positive effect, it has not yet been determined if and what other changes will be necessary to come into compliance with the Permissible Exposure Limits.

Because we are continuing to address this OSHA issue, and due to its related complexity, OMCCC, Inc. requests the Department to grant a 12 month extension of the AC permit.

Although OMCCC, Inc. is permitted for 137.5 tons of styrene emissions per year, our records indicate that our actual styrene emission over the last year was 41 (+/-) tons. Because this emission is relatively low in comparison, OMCCC, Inc. feels we are not, nor will we be, negatively impacting the environment during this period while attempting to comply with both OSHA and the DER.

001031

Air Regulation

8161 15th Street East, Sarasota, Florida 34243
813-351-4900 FAX 813-351-8974

P 617 884 168

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

UNITED STATES POSTAL SERVICE

Sent to: Tom T John, PE	
Street & No.: Tom T John Eng.	
P.O., State & ZIP Code: Tampa, Fl	
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 10-10-91	
AC 41-165851	

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. Tom T. John, P.E.
Tom T. John Engineering, Inc.
7522 N. 40th St.
Tampa, Fl 33604

4a. Article Number
P 617 884 168

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

7. Date of Delivery
10/15/91

5. Signature (Addressee)

6. Signature (Agent)

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

PS Form 3811, October 1990 ☆U.S. GPO: 1990—273-861 **DOMESTIC RETURN RECEIPT**

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

September 30, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Tom T. John, P.E.
Tom T. John Engineering, Inc.
7522 N. 40th Street
Tampa, Florida 33604

Dear Mr. John:

Re: Request for Approval of Procedure for Assessing Monthly VOCs
Chris Craft Boats: AC 41-165851

The Department has reviewed your letter received September 11, 1991, requesting approval of a procedure to assess monthly VOCs (volatile organic compounds) at the above referenced facility. After discussions between the Department's Southwest District and Bureau of Air Regulation, the proposed procedure is acceptable. Therefore, the following shall be added:

Attachment to be Incorporated:

o Mr. Tom T. John's letter received September 11, 1991.

This letter must be attached to the air construction permit, No. AC 41-165851, and shall become a part of the permit.

Sincerely,

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

SS/BM/rbm

Attachment

cc: B. Thomas, SW District
R. Evangelisti, OMC
C. Lashley, CCB

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

Mr. Bruce Mitchell
Air Permitting Engineer
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

26 August, 1991

re: Air Construction Permit AC41-165851
Chris Craft VOC

Dear Mr. Mitchell,

In the referenced construction permit, specific condition 3 and 4 set limitations on the hourly and annual chemical usage. Compliance is to be demonstrated on a monthly basis by applying a material balance scheme as noted.

The applicant proposes to comply with specific condition 3 and 4 by making physical measurements of the requested chemicals on a monthly basis. Hourly usage will then be calculated based on manhours of lamination on a daily basis. Total daily lamination manhours will be logged with notation given to number of hours of operations per shift to better represent the hourly chemical usage values calculated. The applicant recognizes that this procedure "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 can be made. Monthly reports will be summarized (i.e. the spreadsheet configuration we previously discussed) to prepare the required annual emission report.

The applicant would appreciate your opinion as to whether this proposed scheme will adequately address the requirements of specific conditions 3 and 4.

The applicant appreciates your consideration and assistance in this request. 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: Jim M° Donald, DER-SW
Robert Evangelist, OMC
Chris Lashley, Chris Craft

TTJ/mlc omc\vocdrft.wp

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 CAF

DATE: September 30, 1991

SUBJ: Amendment to Air Construction Permit No. AC 41-165851
Chris Craft Boats

For your approval and signature is a letter amendment that was prepared by the Bureau of Air Regulation approving a procedure to assess the monthly VOCs at the above referenced facility. The facility is located in Tallevast, Manatee County, Florida. There is no controversy associated with this action.

I recommend your approval and signature.

Attachment

SS/BM/rbm

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

re: Chris Craft, Donzi Marine Corporation - Public Notice

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.

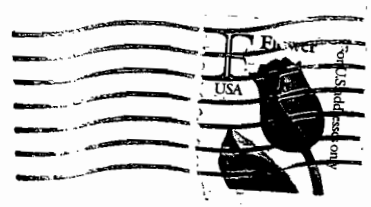
Sincerely,

Tom T. John, P.E.

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

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

TAMPA, FL 336
PM
14 JUN
1991



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/Chris Craft

_____ 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 permit to Chris Craft Boats,** Post Office Box 25022, Bradenton, Florida, 34206, for a fiberglass boat manufacturing facility. The proposed project will occur at the applicant's facility located at 8161 Old Bradenton Road, Tallevast, 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 application is 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

P 407 852 695

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. T. P. Robinson, Chris	
Street and No. Craft Boats P.O. Box 25022	
P.O., State and ZIP Code Bradenton, FL 34206	
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: 5-22-91 Permit: AC 41-165851	

PS Form 3800, June 1985

☆U.S.G.P.O. 1989-234-555

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. T. P. Robinson
V.P and General Manager
Chris Craft Boats
8161 Old Bradenton Road
P. O. Box 25022
Bradenton, FL 34206

4. Article Number
P 407 852 695

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X Doug Dickhaus

6. Signature — Agent
X

7. Date of Delivery
5-24

8. Addressee's Address *(ONLY if requested and fee paid)*

RECEIVED
MAY 2 1991
Division of Air Management

PS Form **3811**, Apr. 1989 ★U.S.G.P.O. 1989-238-815 **DOMESTIC RETURN RECEIPT**

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 21, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. T. P. Robinson
V.P. and General Manager
Chris Craft Boats
8161 Old Bradenton Road
Post Office Box 25022
Bradenton, Florida 34206

Dear Mr. Robinson:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed after-the-fact permit for Chris Craft Boats's fiberglass boat manufacturing facility, located at 8161 Old Bradenton Road, Tallevast, 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,

Barry D. Andrews

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

CHF/BM/bm

Attachments

c: B. Thomas, SWD
J. Harper, EPA
T. T. John, P.E., TTJE, Inc.
R. Evangelisti, P.E., OMC
B. Mitchell
C. Holladay
R. Bauer, P.E., Manatee Co.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Chris Craft Boats
P. O. Box 25022
Bradenton, Florida 34206

DER File No. AC 41-165851

INTENT TO ISSUE

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

The applicant, Chris Craft Boats, 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 proposed project will occur at the applicant's facility located at 8161 Old Bradenton Road, Tallevast, 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 an air construction permit is 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 Permit. 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 permit.

The Department will issue the permit 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 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for Barry D. Andrews

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 5-22-91.

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.

Kyra Tober
Clerk

5/22/91
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 an after-the-fact construction permit to Chris Craft Boats, Post Office Box 25022, Bradenton, Florida 34206, for a fiberglass boat manufacturing facility. The proposed project will occur at the applicant's facility located at 8161 Old Bradenton Road, Tallevast, 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 application is 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

Chris Craft Boats
Manatee County
Tallevast, Florida

Construction Permit Number
AC 41-165851

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

May 21, 1991

I. Application

A. Applicant and Address

Chris Craft Boats
P. O. Box 25022
Bradenton, Florida 34206

B. Project and Location

The applicant has applied for an after-the-fact construction permit for a fiberglass boat manufacturing facility with no associated controls other than building exhaust fans. The facility is located at 8161 Old Bradenton Road in Tallevast, Manatee County, Florida.

The UTM coordinates are Zone 17, 347.215 km East and 3030.633 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 application package was deemed complete on March 19, 1991.

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/OS (volatile organic compounds/organic solvents) in accordance with F.A.C. Rule 17-2.100, Definitions.

The projected potential pollutant emissions are 236.0 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 17-2.620: 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/OS. The following table will display the applicable emission standards/limitations:

Table 1

Source	Pollutant	Emission Limiting Standard/Limit
Boat Assembly Line		
Fiberglassing Operation		
o Acetone	VOC	39.4 lbs/hr, 76.8 TPY
o Styrene	VOC	69.9 lbs/hr, 137.5 TPY
o Methyl Methacrylate	VOC	2.1 lbs/hr, 4.1 TPY
o Trichlorofluoro Methane	VOC	4.0 lbs/hr, 7.8 TPY
o Dichlorodifluoro Methane	VOC	0.009 lbs/hr, 0.018 TPY
o Toluene	VOC	2.5 lbs/hr, 4.9 TPY
o Hexane	VOC	2.5 lbs/hr 4.9 TPY
		Total: 236.0 TPY

Note: Annual emissions are based on 3900 hrs/yr operation (i.e., 15 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 conservative guideline no threat levels contained in the air toxics permitting strategy. The pollutants evaluated were styrene, acetone, trichlorofluoromethane, dichlorofluoromethane, methyl methacrylate, toluene, and hexane. 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 8.89 grams/second or 69.9 lbs/hr. Since facility emissions may occur for up to 15 hours per day, both 8-hour average and 24-hour average maximum predicted styrene concentrations were generated by the modeling to be compared to the 8-hour and 24-hour no threat levels.

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 facility was modeled as a volume source plus five stack sources. Direction specific downwash parameters were used because the stacks were less than good engineering practice (GEP) stack heights. Modeling was performed using polar receptors along 36 radials spaced at 10 degree increments at distances of 75m, 100m, 125m, 150m and 200m from the facility center. Additional discrete receptors were placed along the northern and southern property boundaries at 20m intervals and along the western boundary at 20-40m intervals. Since only one year of data were used in this analysis, the Department compared the highest 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 no threat levels except for the case of the maximum predicted 24-hour styrene concentration. The styrene concentration is within 1.4% of the guideline no threat level and represents a lowered predicted impact due to the applicant's commitment to increase the exhaust flow rate of the roof fans to 60,000 acfm in order to improve dispersion.

Pollutant	Maximum Predicted Concentration ($\mu g/m^3$)			No-Threat Levels ($\mu g/m^3$)		
	8-hr	24-hr	Annual	8-hr	24-hr	Annual
Styrene	1131	523	-	2150	516	-
Acetone	592	274	-	35600	8544	-
Methyl Methacrylate	33	15	-	4100	984	-
Trichlorofluoro Methane	64	29	<29	100000	24000	300
Dichlorodifluoro Methane	0.14	0.07	-	400	96	-
Toluene	41	19	<19	3750	900	300
Hexane	41	19	-	1800	430	-

IV. Conclusion

Based on the information provided by Chris Craft Boats, 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.

Barry Andrews
#36824
5-21-96

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:
Chris Craft Boats
Post Office Box 25022
Bradenton, Florida 34206

Permit Number: AC 41-165851
Expiration Date: July 31, 1992
County: Manatee
Latitude/Longitude: 27°23'31"N
82°32'43"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, 1990 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 that produces fiberglass boats. The existing exhaust system will be upgraded to 60,000 acfm. The facility is located at 8161 Old Bradenton Road in Tallevast, Manatee County, Florida. The UTM coordinates are Zone 17, 347.215 km East and 3030.633 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 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 5, 1989.
2. Mr. J. Harry Kerns letter dated June 30, 1989.
3. Mr. C. H. Fancy's letter dated July 3, 1989.
4. Mr. Tom T. John's letter received April 6, 1990.
5. Mr. Tom T. John's letter with enclosures received April 24, 1990 (confidential).
6. Mr. William W. Deane's letter with enclosures received May 4, 1990.

Attachments Cont'd:

7. Mr. C. H. Fancy's letter dated May 23, 1990.
8. Mr. Tom T. John's letter with enclosures received August 20, 1990 (modeling output confidential).
9. Mr. C. H. Fancy's letter dated September 18, 1990.
10. Mr. T. P. Robinson's letter with enclosures received March 19, 1991.
11. Technical Evaluation and Preliminary Determination dated May 21, 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

GENERAL CONDITIONS:

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.

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.

GENERAL CONDITIONS:

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, 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.

GENERAL CONDITIONS:

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 is permitted to operate 15 hours/day, 5 days/week, and 52 weeks/year, for a total of 3,900 hours/year.

3. Volatile organic compounds/organic solvents (VOC/OS) emissions shall be verifiable on a monthly basis and shall not exceed the following:

VOC/OS	Allowable Emission Limit	
o Acetone	39.4 lbs/hr,	76.8 TPY
o Styrene	69.9 lbs/hr,	137.5 TPY
o Methyl Methacrylate	2.1 lbs/hr,	4.1 TPY
o Trichlorofluoro Methane	4.0 lbs/hr,	7.8 TPY
o Dichlorodifluoro Methane	0.009 lbs/hr,	0.018 TPY
o Toluene	2.5 lbs/hr,	4.9 TPY
o Hexane	2.5 lbs/hr	4.9 TPY
	Total:	236.0 TPY

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. An annual operating report shall be submitted to the Department's Southwest District office reporting the actual annual VOC/OS emissions by March 1 of each calendar year.

SPECIFIC CONDITIONS:

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 VOC or OS 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/OS, shall be covered when not in use.

6. Objectionable odors will not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).

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. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).

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 date of the permit (F.A.C. Rule 17-4.090).

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 while 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

Chris-Craft

March 13, 1991

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

Re: AC41-165851 - Chris Craft Boats

Dear Mr. Fancy:

Chris Craft, 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.

General Comments

Previous emission modelling for this facility has indicated ambient concentrations of styrene below the Department guideline value for 8 hours of operation of 2150 ug/m3. Since facility emissions may occur for up to 15 hours per day, the Department has required that Chris Craft meet a reduced ambient guideline number. Although Chris Craft believes, as previously discussed, that the original guideline approach (reduction based upon "40 weekly operating hours") is appropriate in this case and can be met by this facility, the Department has requested a 24 hour average value of 512 ug/m3 be met.

For reasons previously discussed with the Department, Chris Craft cannot raise the stack height of the existing stacks at the facility due to the proximity to the Sarasota airport to take advantage of additional dispersion.

Chris Craft has remodelled the emissions from the facility utilizing an increased flow rate of exhaust air from the roof fans. The new flow rate of 60,000 ACFM (a 33% increase over the current flow rate) results in a stack velocity of 10.8 m/sec. Reapportioning the styrene emissions of 8.89 gm/sec between the exhausts in the ratio of their flow rates, as was previously done for "stack and volume source" modelling submittals, and repeating the ISCST computer model results in predicted ambient concentrations at the plant northern and southern boundaries as shown in Table 1.

8161 15th Street East. Sarasota. Florida 34243
813-351-4900 FAX 813-351-8974

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

	Initial / Date
1. TO: (NAME, OFFICE, LOCATION) Ms Patty Adams / Mr. Bruce Mitchell	
2. DER - Tallahassee	
3. DARM - BAR	
4. Twin Towers	

REMARKS:

Could you please send me a copy of the 9-18-1990 incompleteness letter.

Thank You

done @ 12:53 pm / 3-29-91 RAR

RECEIVED
MAR 29 1991
DER - BAQM

INFORMATION

- [ ] Review & Return
- [ ] Review & File
- [ ] Initial & Forward
- [ ]

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: Jim McDonald

DATE 3-26-91

PHONE

OMC

Chris-Craft®

March 13, 1991

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

Re: AC41-165851 - Chris Craft Boats

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8161 15th Street East, Sarasota, Florida 34243
813-351-4900 FAX 813-351-8974

OMC

Chris-Craft®

OMCCC, INC.

8161 15th Street East
Sarasota, Florida 34243

RETURN RECEIPT REQUESTED

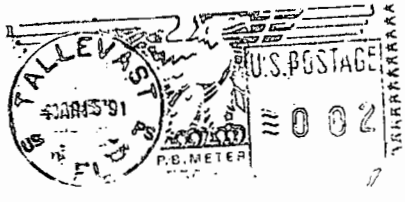
Fold at line over top of envelope to the right of the return address

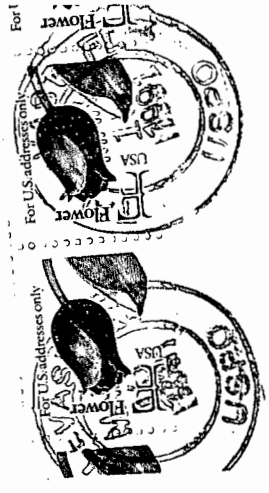
CERTIFIED

P 401 096 500

MAIL

Mr. Clair Fancy
Bureau of Air Regulation
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 23249





Also presented in Table 1 are concentration estimates along the plant western boundary. As can be seen, the modelled concentrations are all within the guideline values.

As before, Chris Craft requests that the complete model output, included but bound separately, be considered confidential and maintained in the confidential file.

Chris Craft believes that this most recent effort demonstrates a concern for and a desire to comply with Department requests, and asks that a construction permit be issued for this facility, consistent with permits issued for similar boat building facilities in the State.

When a permit is issued, Chris Craft will proceed with the necessary modifications required to increase the roof exhaust fans to the 60,000 ACFM value utilized in the modelling effort.

Specific Comments Contained in September 18, 1990 Department Letter

1. Comment:

In the response to Questions 4 and 6 it was stated that 8.89 gm/sec was the modelled emission rate. However, the total emission rate used in the attached computer modelling output is only 7.01 gm/sec. Please explain. The maximum hourly styrene emission should be used in the modelling.

Response:

As discussed with Mr. Cleve Holiday of your staff, the previous model output, utilizing 7.01 gm/sec instead of 8.89 gm/sec, was submitted in error. The correct model output, as well as a correct Table 1, is attached to this response. As in all previous responses, Chris Craft requests that the model output itself be considered confidential and maintained in the confidential file.

2. Comment:

The Department requires that all daily operational hours should be included in the modeling with no gaps in the consecutive hours for such time periods as lunch or supper breaks or shift changes. In addition, there are only two no-threat levels for styrene that the 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 these with the no-threat levels. Whatever hours you model will become a permit restriction.

Also, when only one year of meteorological data is used as input in the modelling, the highest 8-hour and 24-hour concentrations are to be compared with the no-threat levels, not the second highest.

Response:

Discussions with the EPA personnel at Research Triangle Park, NC have confirmed the appropriateness of scaling time varying emissions from a facility using the Industrial Source Complex Short Term (ISCST) air quality model. The previously submitted data included a "zero emission" scaler for the lunch break. In practice, at lunch break the crew discontinues the use of the equipment. Therefore, it could be expected that no significant styrene emissions from spray or layup of gelcoat or resin occur during that period.

In addition, Chris Craft believes that a "No-Gaps" policy, which is not discussed in previous Department incompleteness letters, is therefore not appropriate in introducing into this ongoing permit application. Chris Craft believes this would not result in a significant change in ambient concentration predictions.

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 Department 8-hour guideline value of 2150 ug/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.

The Department has been aware of Chris Craft's methodology for modelling this facility since March of 1990. The procedure, illustrated in Chris Craft's previous incompleteness response, incorporates the "40 weekly operating hours" adjustment to the ambient guideline concentration to account for facilities operating more than 40 hours per week. Use of that factor, as shown in our previous response, sets an ambient guideline number of 1147 ug/m3 for a 15-hour operating day, 5-day week. This determination was made in accordance with the Department guideline document.

Chris Craft was not notified of a proposed change in that policy and believes that requiring an ambient criteria of 512 ug/m3 for this source is inappropriate, first since the 24-hour/day, 7 day/week operating schedule which generates this criteria

is not reflective of the true operation of the facility, and second that it represents a change in emission standards while the application was being reviewed by the Department.

The "No-Gaps" modelling policy would not of itself be expected to constitute a "substantial modification" leading to "substantially different environmental impacts". Since the model is linear in concentration, the previously submitted Table 1 may be adjusted to properly reflect the emissions of 8.89 gm/sec by multiplying each table value by the ratio of 8.89:7.01. This results in values still below the 1147 ug/m3 allowed by the operative guideline document, and would indicate that submission of the correct output would not have resulted in substantially different environmental impacts. As discussed in the previous submittals, vectors between 230 degrees and 310 degrees are bounded by U.S. 301, with facility boundaries at 100 m (230 degrees) decreasing to 81 m (270 degrees) and increasing again to 100 m (310 degrees). When corrected by the emission ratio discussed, only two vectors, 270 and 200 degrees, would be expected to exceed the operative guideline value of 1147 ug/m3.

As discussed in our previous responses, Chris Craft believes that the application of an 8-hour TLV-based exposure value to a roadway further bounded by a (fenced) airport is inappropriate. The determination by USEPA that a public road is "ambient air" is relative to criteria pollutants, in which the highest, second highest values are used (All second highest value would be expected to be below 1147 ug/m3). For the anticipated short term exposure to the public on a heavily traveled roadway, Chris Craft believes that accepting higher values than 1147 ug/m3 are within the discretion of the Department in this specific case. These arguments were made in all our earlier responses, and elicited no dissenting responses from the Department.

Chris Craft wishes to have the permitting of this facility proceed and requests that the ambient guideline value of 1147 ug/m3 for a 15-hour per day operation be deemed acceptable to the Department in this case.

Chris Craft 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. Chris Craft appreciates the Department's consideration and cooperation in this matter.

We request that the Department release a "Notice of Intent to Issue an Air Permit" by April 30, 1991. If this is not possible, then we would like to meet with the Department, at your earliest convenience, to review our response and to determine what data, if any, would be required by the Department to issue a permit to Chris Craft.

If you have any comments, questions or concerns about this response, please contact Mr. Evangelisti at (708) 689-5713.

Sincerely,

T.P. Robinson

T.P. Robinson,
V.P. and General Manager

Enclosures: Table 1
Computer model

cc: R. Evangelisti
T. John
C. Lashley
B. Mitchell
C. Halladay
B. Thomas, SW Dist #1

TABLE 1

PREDICTED CONCENTRATIONS AT PLANT BOUNDARIES (ugm/m^3) AT INDICATED DISTANCES (METERS EAST OR WEST) FROM NORTH-SOUTH CENTERLINE OF BUILDING

Building Center

15 emitting hrs/day	WEST Distance in Meters						EAST Distance in Meters				
	-100	-80	-60	-40	-20	0	20	40	60	80	100
Northern Boundary	379	379	395	361	297	297	340	323	388	474	506
Southern Boundary	431	374	272	298	317	279	271	321	342	355	322

	Meters	Conc.
Western Boundary	-83,40	416
	-83,20	418
	-83, 0	495
	-83,40	494
	-83,80	488
	-83,120	442

RESULTS BASED ON EXHAUST FLOWS OF 60,000 ACFM

SOURCE NUMBER	---DESCRIPTION---	---LOCATION--- EAST (KM)	NORTH (KM)	EMISSION RATES (G/SEC) SO2	TSP	NO2	CO	STACK HEIGHT (M)	INSIDE DIAMETER (M)	EXIT VEL (M/SEC)	EXIT TEMPERATURE (KELVIN)	BUILDING HEIGHT (M)	BUILDING HORZ PROJ (M)	BUILDING BASE ELEV (M)
1	stk 1	-.03710	.0000000	1.2400	.00000	.00000	.00000	9.100	1.800	10.800	298.00	9.000	95.20	.0000
2	cc boats - volume	.000000	.0000000	2.6900	.00000	.00000	.00000	9.000	.0000	25.810	4.1800	.0000	.0000	.0000
3	stk 2	-.01850	.0000000	1.2400	.00000	.00000	.00000	9.100	1.800	10.800	298.00	9.000	95.20	.0000
4	stk 3	.000000	.0000000	1.2400	.00000	.00000	.00000	9.100	1.800	10.800	298.00	9.000	95.20	.0000
5	stk 4	.018500	.0000000	1.2400	.00000	.00000	.00000	9.100	1.800	10.800	298.00	9.000	95.20	.0000
6	stk 5	.037100	.0000000	1.2400	.00000	.00000	.00000	9.100	1.800	10.800	298.00	9.000	95.20	.0000

8.89

Note - for area & volume sources, temperature is vertical size; exit velocity is the horizontal size.

P 256 396 192

RECEIPT FOR CERTIFIED MAIL

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

☆U.S.G.P.O. 1989-234-555

Sent to Mr. T. P. Robinson, Chris	
Street and No. Craft Boats P. O. Box 25022	
P.O., State and ZIP Code Bradenton, FL 34206	
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 41-165851	

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. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to:
Mr. T. P. Robinson
V.P. & General Manager
Chris Craft Boats
8161 Old Bradenton Rd.
P. O. Box 25022
Bradenton, FL 34206

4. Article Number
P 256 396 192

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Address
X

6. Signature — Agent
X

7. Date of Delivery
9-24

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form 3811, Mar. 1988 ★ U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

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. T. P. Robinson
V.P. and General Manager
Chris Craft Boats
8161 Old Bradenton Road
Post Office Box 25022
Bradenton, Florida 34206

Dear Mr. Robinson:

Re: Completeness Review of an Application Package
AC 41-165851

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:

1. In the responses to questions 4 and 6 it was stated that 8.89 gm/sec was the modeled emission rate. However, the total emission rate used in the attached computer modeling output is only 7.01 gm/sec. Please explain. The maximum hourly styrene emission should be used in the modeling.

2. 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 or supper breaks or shift changes. In addition there are only two no-threat levels for styrene that the modeling output must be compared to: 1) the 8-hour level of 2150 ug/m^3 and 2) the 24-hour level of 512 ug/m^3. 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 metrorological 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 second highest.

If there are any questions, please call Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

Barry D. Andrews

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

CHF/CH/plm

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

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
Bureau of
Air Regulation

August 10, 1990

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. AC41-165851: CHRIS CRAFT BOATS

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

Tom T. John, P.E.

TJ:dmj

cc: Roger Crawford
Tom Robinson
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

ONCCC TWX

TO: T. REID CC: D. STUBBERS

FROM: STEPHEN CRANE B.S. ENGINEERING/MANAGEMENT
MATERIALS AND PROCESS ENGINEER ONCCC

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 QUATIITES 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 SCRANE at 09:29:00 on 10 Jul 90

PRODUCT BULLETIN

LUCIDOL
PENNWALT CORPORATION

1740 MILITARY ROAD, P.O. BOX 1048, BUFFALO, NEW YORK 14240
(716) 877-1740 (800) 558-5575

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	Clear Liquid	Clear Liquid	Clear Liquid	Clear Liquid
Specific Gravity, 25/25 °C	1.0840	1.1471	1.1402	1.0286
Refractive Index	1.4615 (21 °C)	1.4758 (25 °C)	1.4777 (25 °C)	1.4515 (20 °C)
Viscosity, cps @:				
25 °C	14.8	15.8	16.0	10.2
30 °C	11.5	12.8	12.2	8.3
35 °C	9.2	9.7	9.7	6.9
Freezing Point, °C	Below —30	Below —30	Below —20	Below —20
Flash Point (SETA) °F/°C	137/58	155/68	151/66	158/70
S.A.D.T.,* °F/°C	158/70	160/71	140/60	154/68
	Burning	Burning	Burning	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*.

(1) $R\text{-}O\text{-}O\text{-}H + Co^{+2} \longrightarrow R\text{-}O\bullet + OH^{-} + Co^{+3}$

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

(2) $R\text{-}O\text{-}O\text{-}H + Co^{+3} \longrightarrow ROO\bullet + H^{+} + Co^{+2}$

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

(3) $R\text{-}O\bullet + Co^{+2} \longrightarrow R\text{-}O^{-} + Co^{+3}$

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

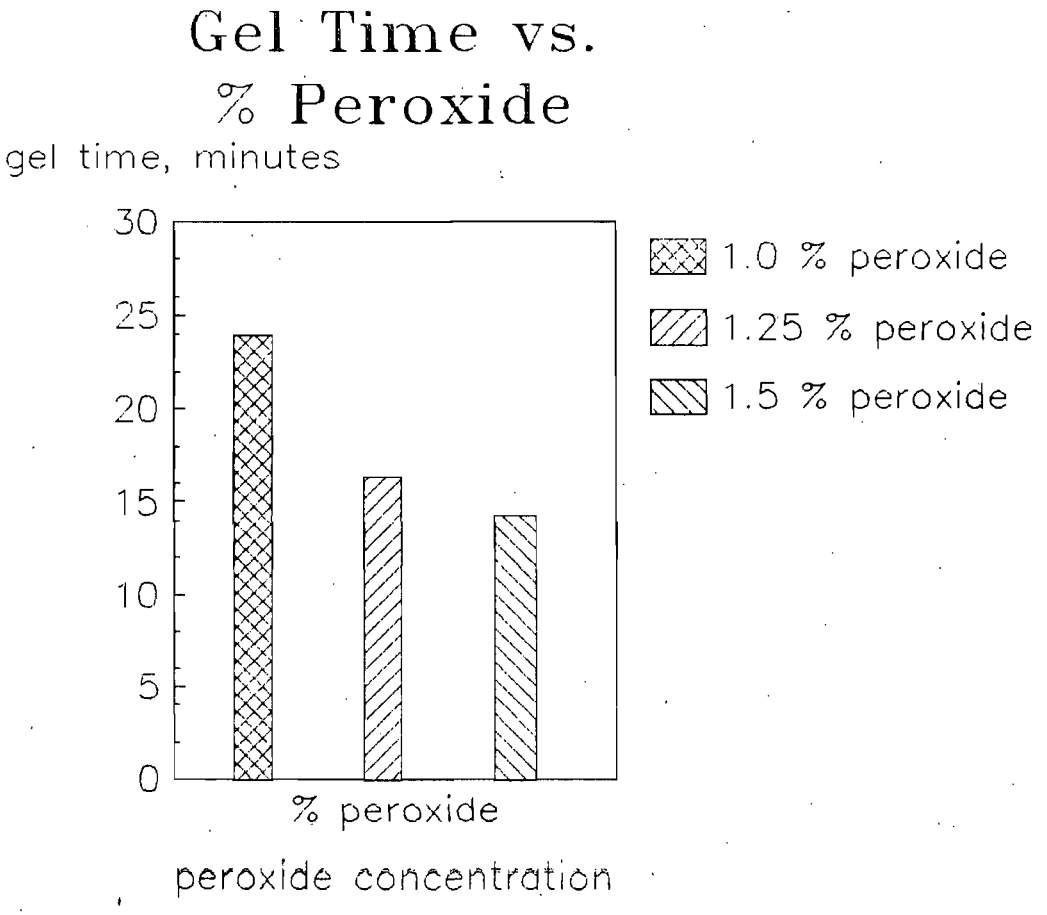
TABLE II

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



prepared from Penwalt Corporation data sheet

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 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 volatizes 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. VOC emissions can be expected from the facility 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. Plant operating hours are discussed further in the response to Question 5.

Q4. Referencing the "Current Total Styrene Emissions," which follows Attachment 4, Section III:C, Airborne Contaminants Emitted, it is requested that styrene be permitted at 132 lbs/hr, yet the modelled amount was 104 lbs/hr. Please explain the rationale with this approach. The amount of a pollutant that you desire to be permitted should be the same that is modelled.

R. New Attachments 3 and 4 are necessitated by the change in operating hours discussed in the response to Question 5. The requested usage rates for styrene monomer, resin and gelcoat as indicated in the new Attachments 3 and 4 are 3.2 lb/hr, 1020.7 lb/hr, and 118.9 lb/hr, respectively. These are the values that will be monitored by the proposed material balance scheme, and are the chemical usage values requested in the permit application.

The tabulation of airborne contaminants emitted was intended to present a maximum potential emission of <u>each</u> of the chemical species, not a typical or average estimate. For example, methyl methacrylate (MMA) is commonly substituted for styrene in gelcoat up to a fixed percent. The maximum styrene emissions from gelcoat would result if no substitution is made and the maximum MMA emissions would occur if substitution was made to the maximum amount. Both situations cannot occur at the same time, but either may occur at any one time. That is the information intended to be illustrated by the table.

When the resin, gelcoat and monomer usage values are multiplied by the highest range of styrene content and by the highest emission factor for the materials, the result is:

Styrene emitted from Resin + Gelcoat + Monomer =

(1020.7 x .4 x .13) + (118.9 x .4 x .35) + (3.2 x .5 x (.13 + .35)) = 70.5 lb/hr = 8.89 gm/sec

or

70.5 lb/hr x 3900 hrs/yr x ton/2000 lb = 137.5 TPY

The previous value of 132 lbs/hr (2080 hrs/yr) referred to in Question 4 was obtained in a similar fashion.

This amount, as discussed, represents the <u>maximum</u> potential styrene emission rate.

The actual emission value will be lower due to the substitution of methyl methacrylate (MMA) for up to 5% of the styrene in the gelcoat, or up to 4.05 TPY:

(137.5 TPY - 4.05 TPY) x 2000 lb/ton x yr/3900 hr x hr/3600 sec x 454 gm/lb = 8.63 gm/sec

Further, it is reasonable to use the midpoint of both the emission range and the styrene content rather than the maximum values in calculating the expected average styrene emissions:

(1020.7 x .35 x .11) + (118.9 x .35 x.305) + (3.2 x .5 (.11 + .305)) = 52.65 lb/hr = 102.7 TPY = 6.64 gm/sec

It is also possible to consider the low end of each of the ranges:

(1020.7 x .3 x .09) + (118.9 x .3 x .26) + (3.2 x .5 x (.09 x .26)) = 37.4 lb/hr = 4.7 gm/sec

This value is only 53% of the maximum possible styrene emission rate, and represents a plausible, minimum potential styrene emission (based on CARB emission factors). Use of this value in the emission model would substantially reduce the predicted ambient concentration.

The applicant feels that a reasonable, conservative value for use in the emission model is 6.64 gm/sec. (The previously presented 104 lbs/hr value was chosen based on the same logic). However, the modelled emission rate used in this response to Question 6 was 8.89 gm/sec.

Q5. On a weekly basis, what are the actual hours of operation for the previous two years of operation?

To address Question 5, Chris Craft Boats carefully reviewed their manpower records. When the permit application was first submitted, the facility operating day was 16 hours long, and gelcoating and lamination were assumed to occur typically for 8 hours per operating day. As indicated in the attached letter summarizing the results of the record reviews, under the ownership of OMC, gelcoating and laminating can occur over the two shift period (15 hours per day, 3900 hrs/yr). Chemical usage values on a daily and annual basis remain unchanged from the original application(since they were obtained from purchase records), but since the hours over which the emissions occurred have increased, the hourly rate of emissions have decreased correspondingly. We have prepared and included new Attachments 3 and 4 to properly reflect those changes. Note that the tons per year values remain unchanged.

Q6. In the response to question 4 of the July 3, 1989, letter, the ISCST model predicts that the highest 8-hour running average concentration would be 2,888 micrograms of styrene per cubic meter, occurring 75 meters from the center of the building and 220 degrees from North. The plant boundary at this angle is in excess of 120 meters. What is the predicted ambient concentration at the plant boundary of 220 degrees from North?

FORSITE INC.

Environmental Engineering and Management Services

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

July 2, 1990

Mr. Tim Reid
Chris Craft Boats
P.O. Box 25022
Bradenton, Florida 34206

Dear Mr. Reid:

This letter is intended to summarize our recent telephone conversation.

As requested by DER's Incompleteness Item 5, you have attempted to assemble the working hours on a weekly basis for Chris Craft Boats.

As we know, Chris Craft was purchased by OMC in February 1989. Unfortunately, prior to this date there appears to be no direct measure of the number of hours per week that the lamination and gelcoat areas were operated. The total hours worked per week are available from payroll records, and it would conceivably be possible to determine the number of individuals paid that week, and each individual's billed hours, and thereby calculate an approximate hours per week of facility operation. However, as we discussed, this would not be indicative of the hours of lamination and gelcoating per week.

Since the OMC purchase, more detailed records have been kept, and laminating/gelcoating operating hours have been developed. It appears that the lamination take place during the day shift, from 7 A.M. to 4 P.M., while during a second shift, from 5 P.M. to 2 A.M., both lamination and gelcoating have typically been performed.

It appears that the information used to prepare the original permit application was based on the previous (non-documented) Chris-Craft "best guess" operation, influenced by the lack of the specific lamination/gelcoat schedule. However, current chemical usage records show that the values used in the permit application are in fact correct (and likely conservative). This would be reasonable, in that records of chemical purchases were kept.

To summarize, the monthly chemical usage values are correct as originally provided in the application, but the lamination/gelcoat operating hours have approximately doubled.

The new data would be available for submission to DER if required, and I will inquire as to whether it will be necessary.

Please confirm in writing that my understanding of the current situation is correct.

Thank you for you assistance in this matter.

Sincerely,

Tom

Tom T. John, P.E.

TTJ:dmj

cc: OMC
File

FORSITE INC.

Requested permitted equipment operating time: hrs/day 15 ; 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.

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

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 justification for any answer of "No" that might be considered questionable.

ATTACHMENT 3

SECTION III: A

Raw Material and Chemicals Used
Based on Current Usage

CHRIS CRAFT BOATS

DESCRIPTION	CONTAMINANTS TYPE	%WT	UTILIZATION RATE-LBS/HR	RELATE TO FLOW DIAGRAM
Acetone[1]	VOC	100	42.1	See Attachment 2
Styrene Monomer	VOC	100	2.6	"
Methylethyl Ketone Peroxide	VOC	100	13.7	"
Gelcoat	VOC	30-40	95.2	"
Styrene Polyester Resin	VOC	30-40	816.5	"
Autofroth A	VOC (exempt)	46-48	2.5	"
Autofroth B	VOC (exempt)	20-25	40.2	"
Spray Adhesive	VOC	90	6.7	"

[1] 30% (average) of acetone is collected and sent off site for recovery; 70% is volatized

ATTACHMENT 3

SECTION III: A

Raw Material and Chemicals Used
Based on Requested Usage

CHRIS CRAFT BOATS

DESCRIPTION	CONTAMINANTS TYPE	%WT	UTILIZATION RATE-LBS/HR	RELATE TO FLOW DIAGRAM
Acetone[1]	VOC	100	52.7	See Attachment 2
Styrene Monomer	VOC	100	3.2	"
Methylethyl Ketone Peroxide	VOC	100	17.1	"
Gelcoat	VOC	30-40	118.9	"
Styrene Polyester Resin	VOC	30-40	1020.7	"
Autofroth A	VOC (exempt)	46-48	3.1	"
Autofroth B	VOC (exempt)	20-25	50.2	"
Spray Adhesive	VOC	90	8.3	"

[1] 30% (average) of acetone is collected and sent off site for recovery; 70% is volatized

ATTACHMENT 4

SECTION III: C

Airborne Contaminants Emitted
Based On Current Usage

CHRIS CRAFT BOATS

NAME OF CONTAMINANT	EMISSION MAXIMUM LBS/HR	EMISSION ACTUAL T/YR	ALLOWED EMISSION RATE PER RULE 17-2	ALLOWABLE EMISSION LBS/HR	POTENTIAL EMISSION LBS/YR	POTENTIAL EMISSION T/YR	RELATE TO FLOW DIAGRAM
1. Acetone	29.5	57.5	N/A	N/A			See Attachment 2
2. Styrene resin[1]	42.5	82.8	N/A	N/A			"
gelcoat[2]	13.3	25.98	N/A	N/A			"
monomer[3]	.92	1.2	N/A	N/A			"
3. Methylethyl Ketone Peroxide	0	0	N/A	N/A			"
4. Autofroth A Dichloro-difluoromethane[5]	.007	.0146	N/A	N/A			"
Isocyanate	0	0	N/A	N/A			"
5. Autofroth B Trichloro-fluoromethane[6]	3.2	6.26	N/A	N/A			"

NAME OF CONTAMINANT	EMISSION MAXIMUM LBS/HR	EMISSION ACTUAL T/YR	ALLOWED EMISSION RATE PER RULE 17-2	ALLOWABLE EMISSION LBS/HR	POTENTIAL EMISSION LBS/YR	POTENTIAL EMISSION T/YR	RELATE TO FLOW DIAGRAM
6. Methyl Methacrylate[2] (5% wt. in gelcoat)	1.7	3.25	N/A	N/A			"
7. Spray Adhesive toluene	2.02	3.89	N/A	N/A			"
acetone	2.02	3.89	N/A	N/A			"
hexane	2.02	3.89	N/A	N/A			"

ATTACHMENT 4

SECTION III: C

Airborne Contaminants Emitted
Based On Requested Usage

CHRIS CRAFT BOATS

NAME OF CONTAMINANT	EMISSION MAXIMUM LBS/HR	EMISSION ACTUAL T/YR	ALLOWED EMISSION RATE PER RULE 17-2	ALLOWABLE EMISSION LBS/HR	POTENTIAL EMISSION LBS/YR	POTENTIAL EMISSION T/YR	RELATE TO FLOW DIAGRAM
1. Acetone	36.9	71.9	N/A	N/A			See Attachment 2
2. Styrene resin[1]	53.1	103.5	N/A	N/A			"
gelcoat[2]	16.7	32.47	N/A	N/A			"
monomer[3]	.07	1.49	N/A	N/A			"
3. Methylethyl Ketone Peroxide	0	0	N/A	N/A			"
4. Autofroth A Dichloro-difluoromethane[5]	.009	.018	N/A	N/A			"
Isocyanate	0	0	N/A	N/A			"
5. Autofroth B Trichloro-fluoromethane[6]	4	7.83	N/A	N/A			"

NAME OF CONTAMINANT	EMISSION MAXIMUM LBS/HR	EMISSION ACTUAL T/YR	ALLOWED EMISSION RATE PER RULE 17-2	ALLOWABLE EMISSION LBS/HR	POTENTIAL EMISSION LBS/YR	POTENTIAL EMISSION T/YR	RELATE TO FLOW DIAGRAM
6. Methyl Methacrylate[2] (5% wt. in gelcoat)	2.1	4.05	N/A	N/A			"
7. Spray Adhesive toluene	2.5	4.93	N/A	N/A			"
acetone	2.5	4.93	N/A	N/A			"
hexane	2.5	4.93	N/A	N/A			"

Q7. Referencing No. 6 above, if the predicted ambient concentration of the plant boundary at 220° from North exceeds the AAC value of 2150 micrograms per cubic meter, what steps will be taken to reduce the facility's ambient impact to acceptable levels?

R. Previously submitted and current modeling was performed assuming emissions for 7 days per week, 52 weeks per 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 modeled ambient concentration above the values acceptable under the DER guidelines.

To address DER's concern about the ambient impact of an extended work day and because the standard work day has been changed, Forsite has repeated the modelling run with emissions occurring over a 15-hour operating day (with 1 hour lunch break). Although the applicant wishes to have the complete model output held confidential, the results of the calculations are illustrated in Table 1. Concentrations along the Northern and Southern boundaries were estimated at 20 meter intervals for a distance of 100 meters east and west of the building center, as shown in Figure 2.

Two runs were made, one for a 15 hour emission, and one for a 16 hour emission. As can be seen in Figure 2, angles between approximately 40° and 230° from North have plant property

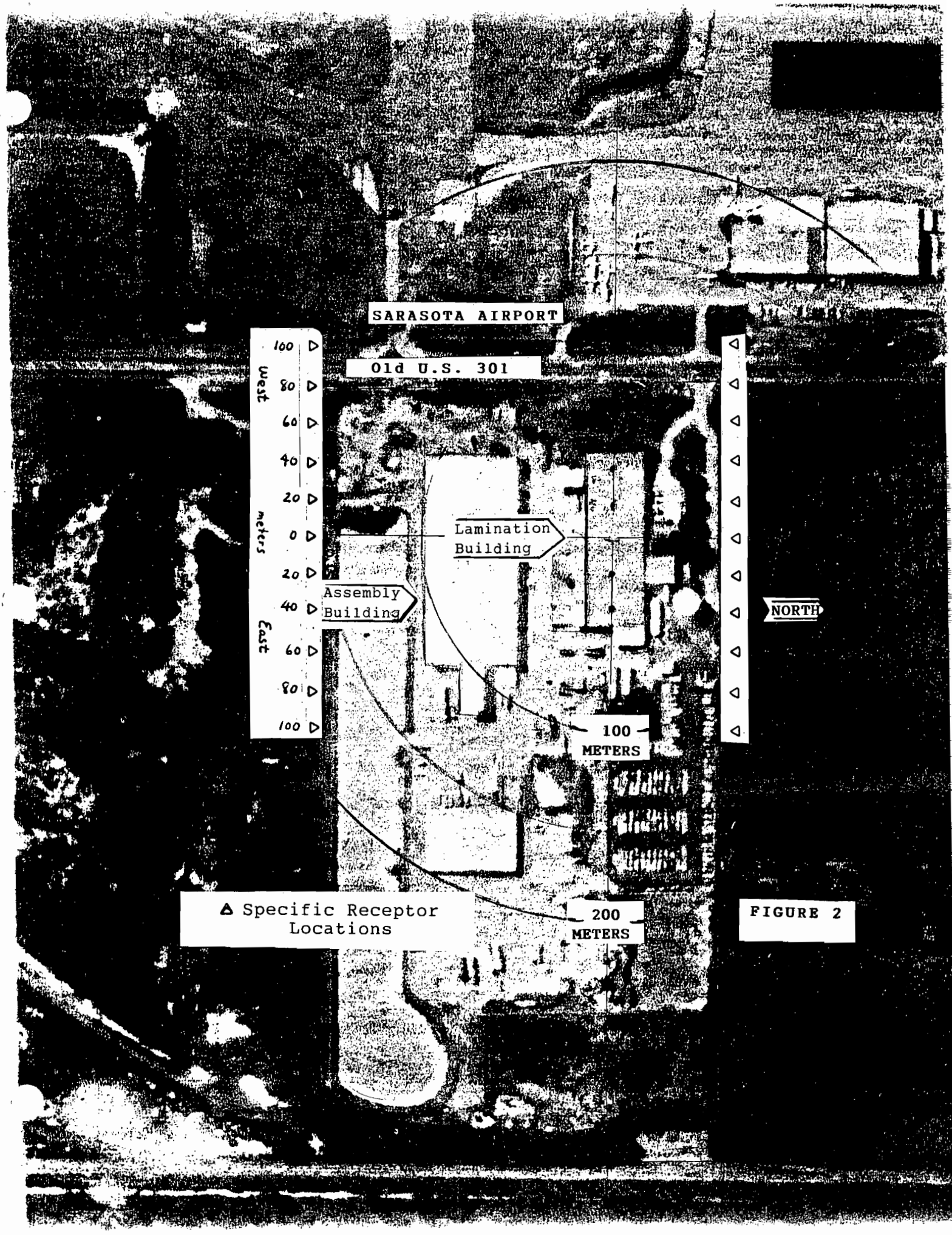


FIGURE 2

boundaries in excess of 100 meters. The maximum ambient concentration predicted by the model is less than the DER guideline level of 1147 $\mu gm/m^3$ (15 hours of operation) for all but two vectors, 270° (1175) and 90° (1195). The predicted value at 270° is approximately 4% above the guideline value, and the second highest values at these locations are 919 and 836 $\mu gm/m^3$, respectively.

As can be seen in Figure 2, the property boundary at 90° is in excess of 200 m, and the predicted concentration along that vector would clearly drop below the guideline value at the eastern boundary. The boundary at 270° is 80 meters; however, as discussed in our previous submittal, the plant is bordered on the west by Old U.S. 301 and by the Sarasota Airport.

The applicant believes, considering the use of worst case styrene emission values in the model, that a single predicted value above the DER guideline value along this vector (with second highest values well below the guideline values) are within the ranges that would be considered acceptable by the Department.

Continuous emissions for 16 hours per day would result in a guideline allowable ambient concentration of 1075 $\mu gm/m^3$. Model predictions for this scenario show these values are exceeded only at 90° and 270°, having the same highest and second highest values

Table 1

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

	West Distance in meters					Building Center		East Distance in meters			
15 emitting hrs/day	-100	-80	-60	-40	-20	0	20	40	60	80	100
Northern Boundary	792	737	697	609	529	578	530	542	600	722	785
Southern Boundary	572	586	512	477	485	576	488	426	437	465	476
16 emitting hrs/day	—	—	—	—	—	—	—	—	—	—	—
Northern Boundary	792	737	697	619	529	578	531	542	606	722	785
Southern Boundary	572	586	512	477	485	476	488	426	487	465	485

as the 15 hour run. The same analysis may be made of the two vectors for the 16 hour run as the 15, and the applicant believes that these conservative results would be acceptable by the Department.

Q8. Based on the requested allowable emissions of 236.0 TPY of VOC, 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 236.0 TPY VOC is not exceeded.

R. As previously stated, the scheduled work week at Chris Craft boats projects 16 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 by 1 hour per day for one or two days or a Saturday morning shift may be required. This happens infrequently and sporadically, and would

Based on the TPY estimates generated by the use of reasonable mid-point 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 236 TPY VOC limit will not be exceeded.

Q9. 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 emissions and still provide for the production of a quality product.

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 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 emission estimates. 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 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 32.5 TPY, not (32.5 + 4.05) = 36.55 TPY, as implied in the Attachments. The potential maximum emission of styrene in the gelcoat is 32.5 TPY, and the potential maximum emission of MMA is 4.05 TPY.

The VOC emissions that result from allowing the styrene/MMA substitution, and from utilizing midpoint VOC content and CARB emission values, as presented in Table 2, following, are estimated at 191 TPY.

As illustrated, when operating at a 90% capacity factor, the estimated facility emissions would be 172 TPY.

Table 2

Compound	Use (lb/hr)	%VOC	"Midpoint" Emission Factor	Emission (lb/hr)
Acetone	52.7	100	.7[1]	36.89
Styrene Monomer	3.2	100	.11, .305 (CARB)	.664
Resin (Styrene)	1020.7	35	.11 (CARB)	39.27
Gelcoat (Styrene-MMA)	118.9	35	.305 (CARB)	12.69
Autofroth A	3.1	47	.0208	0.03
Autofroth B	50.2	22.5	.065	.73
Spray Adhesive	8.3	90	1.0	7.47

[1] Based on material balance calculations (purchase records and waste manifests)

Total VOC emissions: 97.7 lb/hr x 3900 hrs/yr x ton/2000 lb = 191 TPY

At 90% capacity factor: 172 TPY

P 052 482 269

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. R. P. Robinson, Chris Craft Boats	
Street and No. P. O. Box 25022	
P.O., State and ZIP Code ~~Fallcrest~~ Bradenton, FL 34206	
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 41-165851	

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. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to:

Mr. T. P. Robinson
V.P. and General Manager
Chris Craft Boats
8161 Old Bradenton Road
P. O. Box 25022
Bradenton, FL 34206

4. Article Number
P 052 482 269

Type of Service:
- ☐ Registered
- ☐ Insured
- ☒ Certified
- ☐ COD
- ☐ Express Mail
- ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Address
X

6. Signature — Agent
X

7. Date of Delivery
5-25-90

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1988 ★ U.S.G.P.O. 1988-212-865 **DOMESTIC RETURN RECEIPT**

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. T. P. Robinson
V.P. and General Manager
Chris Craft Boats
8161 Old Bradenton Road
Post Office Box 25022
Bradenton, Florida 34206

Dear Mr. Robinson:

Re: Completeness Review of an Application Package
AC 41-165851

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.

4. Referencing the "Current Total Styrene Emissions," which follows Attachment 4, Section III:C, Airborne Contaminants Emitted, it is requested that styrene be permitted at 132 lbs/hr, yet the modelled amount was 104 lbs/hr. Please

explain the rationale with this approach. The amount of a pollutant that you desire to be permitted should be the same that is modelled.

5. On a weekly basis, what are the actual hours of operation for the previous two years of operation?

6. In the response to question 4 of the July 3, 1989, letter, the ISCST model predicts that the highest 8-hour running average concentration would be 2,888 micrograms of styrene per cubic meter, occurring 75 meters from the center of the building and 220 degrees from North. The plant boundary at this angle is in excess of 120 meters. What is the predicted ambient concentration at the plant boundary of 220° from North?

7. Referencing No. 6 above, if the predicted ambient concentration of the plant boundary at 220° from North exceeds the AAC value of 2150 micrograms per cubic meter, what steps will be taken to reduce the facility's ambient impact to acceptable levels?

8. Based on the requested allowable emissions of 236.0 TPY of VOC, 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 236.0 TPY VOC is not exceeded.

9. 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
Reading File
B. Mitchell
J. Glunn
BAR/CHF

5-23-90 RBR

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

May 1, 1990

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

Re: AC 41-165851

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 relevent 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

Best Available Copy

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL PACKAGE TRACKING NUMBER 7433224492

217M 7433224492

Date 5-3-90

RECIPIENT'S COPY

1 From (Your Name) Please Print: T Jones | Your Phone Number (Very Important): (813) 57[illegible]

Company: RSITE ENVIRONMENTAL | Department/Floor No.:

Street Address: 52 9TH STREET S STE 100

City: T PETERSBURG | State: FL | ZIP Required: 33707

2 To (Recipient's Name) Please Print: [illegible] | Recipient's Phone Number (Very Important): [illegible]

Company: [illegible] | Department/Floor No.:

Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip® Codes.): [illegible]

City: Tallahassee | State: FL | ZIP Required: 32[illegible]

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)

H IF HOLD FOR PICK-UP, Print FEDEX Address Here
Street Address:
City: State: ZIP Required:

3 PAYMENT 1 ☐ Bill Sender 2 ☐ Bill Recipient's FedEx Acct. No. 3 ☐ Bill 3rd Party FedEx Acct. No. 4 ☐ Bill Credit Card 5 ☐ Cash

4 SERVICES (Check only one box)

Priority Overnight Service (Delivery by next business morning†)		Standard Overnight Service (Delivery by next business afternoon†)	
11	YOUR PACKAGING	51	
16	FEDEX LETTER *	56	FEDEX LETTER *
12	FEDEX PAK *	52	FEDEX PAK *
13	FEDEX BOX	53	FEDEX BOX
14	FEDEX TUBE	54	FEDEX TUBE
Economy Service (formerly Standard Air) (Delivery by second business day†)		Heavyweight Service (for Extra Large or any package over 150 lbs.)	
30	ECONOMY SERVICE	70	HEAVYWEIGHT **
		80	DEFERRED HEAVYWEIGHT **

†Delivery commitment may be later in some areas. *Declared Value Limit $100. **Call for delivery schedule.

DELIVERY AND SPECIAL HANDLING

1 ☐ HOLD FOR PICK-UP (Fill in Box H)
2 ☒ DELIVER WEEKDAY
3 ☐ DELIVER SATURDAY (Extra charge) (Not available to all locations)
4 ☐ DANGEROUS GOODS (Extra charge) (CSS not available for Dangerous Goods Shipments)
5 ☐ CONSTANT SURVEILLANCE SVC. (CSS) (Extra charge) (Release Signature Not Applicable)
6 ☐ DRY ICE ____ Lbs
7 ☐ OTHER SPECIAL SERVICE
8 ☐
9 ☐ SATURDAY PICK-UP (Extra charge)
10 ☐
11 ☐ DESCRIPTION
12 ☐ HOLIDAY DELIVERY (If offered) (Extra charge)

	PACKAGES	WEIGHT In Pounds Only	YOUR DECLARED VALUE	OVER SIZE
Total	Total	Total		

DIM SHIPMENT (Heavyweight Services Only) ☐ ____ lbs.

Received At: 1 ☐ Regular Stop 2 ☐ On-Call Stop 3 ☐ Drop Box 4 ☐ B.S.C. 5 ☐ Station

FedEx Emp. No. Date/Time

Emp. No. Date

☐ Cash Received ☐ Return Shipment ☐ Third Party ☐ Chg. To Del. ☐ Chg. To Hold

Street Address

City State Zip

Received By: X

Date/Time Received FedEx Employee Number

5 Release Signature

Federal Express Use
Base Charges
Declared Value Charge
Other 1
Other 2
Total Charges

REVISION DATE 11/89
PART #119501 FXEM 4/90
FORMAT #014

014

RESPONSE TO DER INCOMPLETENESS LETTERS FOR AIR PERMITS

CHRIS CRAFT BOATS, TALLEVAST, FLORIDA
AC 41-165851

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. AC41-165851

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 saisfactory 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 competetors 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, pleast contact me at (813) 576-3637.

Sincerely,

Tom T. John

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.
(Filled in by DER)

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Fugative Air emission (VOC) [ ] New[1] [x] Existing[1]

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

COMPANY NAME: OMCCC INCORPORATED dba Chris Craft Boats 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: T.P. Robinson, Vice President/General Manager

APPLICANT ADDRESS: Post Office Box 25022 Bradenton, FL 34206

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of OMCC Incorporated dba Chris Craft Boats

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

*Attach letter of authorization

Signed: T.P. Robinson

T.P. Robinson, Vice President/General Manager
Name and Title (Please Type)

Date: 3-17-90 Telephone No. ____

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 ha been designed/examined by me and found to be in conformity with modern engineeri principles applicable to the treatment and disposal of pollutants characterized in t permit application. There is reasonable assurance, in my professional judgment, th

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

Northwest District 160 Governmental Center Pensacola, Florida 32501-5794 904-436-8300
Northeast District 3426 Bills Rd. Jacksonville, Florida 32207 904-798-4200
Central District 3319 Maguire Blvd. Suite 232 Orlando, Florida 32803-3767 407-894-7555
Southwest District 4520 Oak Fair Blvd. Tampa, Florida 33610-7347 813-623-5561
South District 2269 Bay St. Fort Myers, Florida 33901-2898 813-332-2687
Southeast District 1900 S. Congress Ave., Suite A West Palm Beach, Florida 33406 407-964-9988

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, imron 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

OMCCC dba Chris Craft Boats
Response To Incompleteness Questions, AC 41-165851

1. In Attachment 3, provide justification to support the "30%" recovery of acetone.

R. The 30% recovery of acetone specified in the permit application was 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 the 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 manifests (and therefore production rates), the applicant requests that the attachment itself and its calculations be considered confidential] ; however, the applicant at this time wishes to claim no more than 30% 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 Isocyante 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/m3
TLV/STEL	100 ppm	425 mg/m3
OSHA PEL	50 ppm	215 mg/m3
OSHA PEL Ceiling	100 ppm	425 mg/m3
OSHA 5 min./3 hr. peak	600 ppm	2550 mg/m3

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: 300'
Building width: 103'
Building height at highest point: 30'

Requested styrene emission rate for permitting:
13.15 grams per second

Exhaust fans:

Number	Diameter	ACFM	Location
8	30"	12,000	On South Wall
5	72"	45,000	On Roof
4	24"	8,900	On East 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.

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, 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 provides specific information directly related to production rate of several components and method of production. The applicant requests these two responses, as well as the supporting documentation (specifically the letter from Mr. Tim Reid confirming these two items), 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 lower end of the range rather than the maximum. Note, however, that midpoint values from the emission factor range, which would more accurately represent true operating conditions, were used in estimating the grams per second emission rates used in the ISCST model.

OMCCC dba Chris Craft Boats
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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 2888 micrograms per cubic meter, occurring at 75 meters from the center of the building and 220 degrees from North. The plant boundary at this angle is in excess of 120 meters. The 75-meter plant boundary occurs only at 270 degrees, and the predicted value there is below the Maximum Acceptable Concentration. The only vectors having plant boundaries less than 150 meters are (approximately) 220 degrees to 310 degrees.

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. The entire western boundary of the facility boarders U.S. Route 301, with the Sarasota Airport directly across the road. The vectors from approximately 210 degrees through 330 degrees therefore represent areas in which it would be unlikely for any long-term exposure to the public.

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 8160 Old Bradenton Road 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, 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 provides specific information directly related to production rate of several components and method of production. The applicant requests these two responses, as well as the supporting documentation (specifically the letter from Mr. Tim Reid confirming these two items), 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 lower end of the range rather than the maximum. Note, however, that midpoint values from the emission factor range, which would more accurately represent true operating conditions, were used in estimating the grams per second emission rates used in the ISCST model.

Attachment 3
Section III: A
Raw Materical and Chemicals Used
Based on Current Usage
CHRIS CRAFT BOATS,

Description	Contaminants Type	%Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
Acetone[1]	VOC	100	79	See Attachment 2
Styrene Monomer	VOC	100	4.8	"
Methylethyl Ketone Peroxide	VOC	100	25.64	"
Gelcoat	VOC	30-40	178.42	"
Styrene Polyester Resin	VOC	30-40	1531.01	"
Autofroth A	VOC-exempt	46-48	4.63	"
Autofroth B	VOC-exempt	20-25	75.29	"
Spray Adhesive	VOC	90	12.47	"

[1] 30% (average) of acetone is collected and sent offsite for recovery; 70% is volatilized.

Attachment 3
Section III: A
Raw Materical and Chemicals Used
Based on Requested Usage
CHRIS CRAFT BOATS

Description	Contaminants Type	%Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
Acetone[1]	VOC	100	98.75	See Attachment 2
Styrene Monomer	VOC	100	6	"
Methylethyl Ketone Peroxide	VOC	100	32.05	"
Gelcoat	VOC	30-40	223.03	"
Styrene Polyester Resin	VOC	30-40	1913.76	"
Autofroth A	VOC-exempt	46-48	5.79	"
Autofroth B	VOC-exempt	20-25	94.11	"
Spray Adhesive	VOC	90	15.59	"

[1] 30% (average) of acetone is collected and sent offsite for recovery; 70% is volatilized.

Attachment 4
Section III: C
Airborne Contaminants Emitted
Based On Current Usage
CHRIS CRAFT BOATS

Name of Contaminant	Emission Maximum lbs/hr	Emission Actual T/yr	Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission lbs/yr	Potential Emission T/yr	Relate to Flow Diagram
1. acetone	55.3	57.5	N/A	N/A			See attachment 2
2. styrene - resin[1]	79.61	82.8	N/A	N/A			"
gelcoat[2]	24.98	25.98	N/A	N/A			"
monomer[3]	1.15	1.2	N/A	N/A			"
3. methylethyl ketone peroxide[4]	0	0	N/A	N/A			"
4. Autofroth A dichloro-difluoromethane[5]	.014	.0146	N/A	N/A			"
isocyanate	0	0	N/A	N/A			"
5. Autofroth B trichloro-fluoromethane[6]	6.02	6.26	N/A	N/A			"
6. methyl methacrylate[2] (5% wt. in gelcoat)	3.12	3.25	N/A	N/A			"
7. spray adhesive							"
toluene	3.79	3.89	N/A	N/A			"
acetone	3.79	3.89	N/A	N/A			"
hexane	3.79	3.89	N/A	N/A			"

Attachment 4
Section III: C
Airborne Contaminants Emitted
Based On Requested Usage
CHRIS CRAFT BOATS,

Name of Contaminant	Emission Maximum lbs/hr	Emission Actual T/yr	Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission lbs/yr	Potential Emission T/yr	Relate to Flow Diagram
1. acetone	69.1	71.9	N/A	N/A			See attachment 2
2. styrene - resin[1]	99.5	103.5	N/A	N/A			"
gelcoat[2]	31.22	32.47	N/A	N/A			"
monomer[3]	1.44	1.49	N/A	N/A			"
3. methylethyl ketone peroxide[4]	0	0	N/A	N/A			"
4. Autofroth A dichloro-difluoromethane[5]	.0175	.018	N/A	N/A			"
isocyanate	0	0	N/A	N/A			"
5. Autofroth B trichloro-fluoromethane[6]	7.5	7.83	N/A	N/A			"
6. methyl methacrylate[2] (5% wt. in gelcoat)	3.9	4.05	N/A	N/A			"
7. spray adhesive							"
toluene	4.74	4.93	N/A	N/A			"
acetone	4.74	4.93	N/A	N/A			"
hexane	4.74	4.93	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 thinning agent for the resin and gelcoat
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 Usage) - Styrene

1. Resin contribution

   1531.01 lbs/hr x 0.4 lbs styrene/lb resin x .13 lb emitted/lb used = 79.61 lbs/hr

   79.61 lbs/hr x 2080 hrs/yr x ton/2000 lbs = 82.8 TPY

2. Gelcoat contribution

   178.42 lbs/hr x 0.4 lbs styrene/lb gelcoat x 0.35 lbs emitted/lb used = 24.98 lbs/hr

   24.98 lbs/hr x 2080 hrs/yr x ton/2000 lbs = 25.98 TPY

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

   resin: 4.8 lbs/hr x 0.5 x 0.13 lbs emitted/lb used = 0.31 lbs/hr
   gelcoat: 4.8 lbs/hr x 0.5 x 0.35 lbs emitted/lb used = 0.84 lbs/hr

Current Total Styrene Emissions:

(79.61 + 24.98 + 1.15) = 105.7 lb/hr or 110 TPY

Current Total Facility VOC emissions: 189 TPY

Requested Total Styrene Emissions: 132 lb/hr or 137 TPY

Requested Total Facility VOC Emissions: 236 TPY

Styrene Emissions For Modelling:

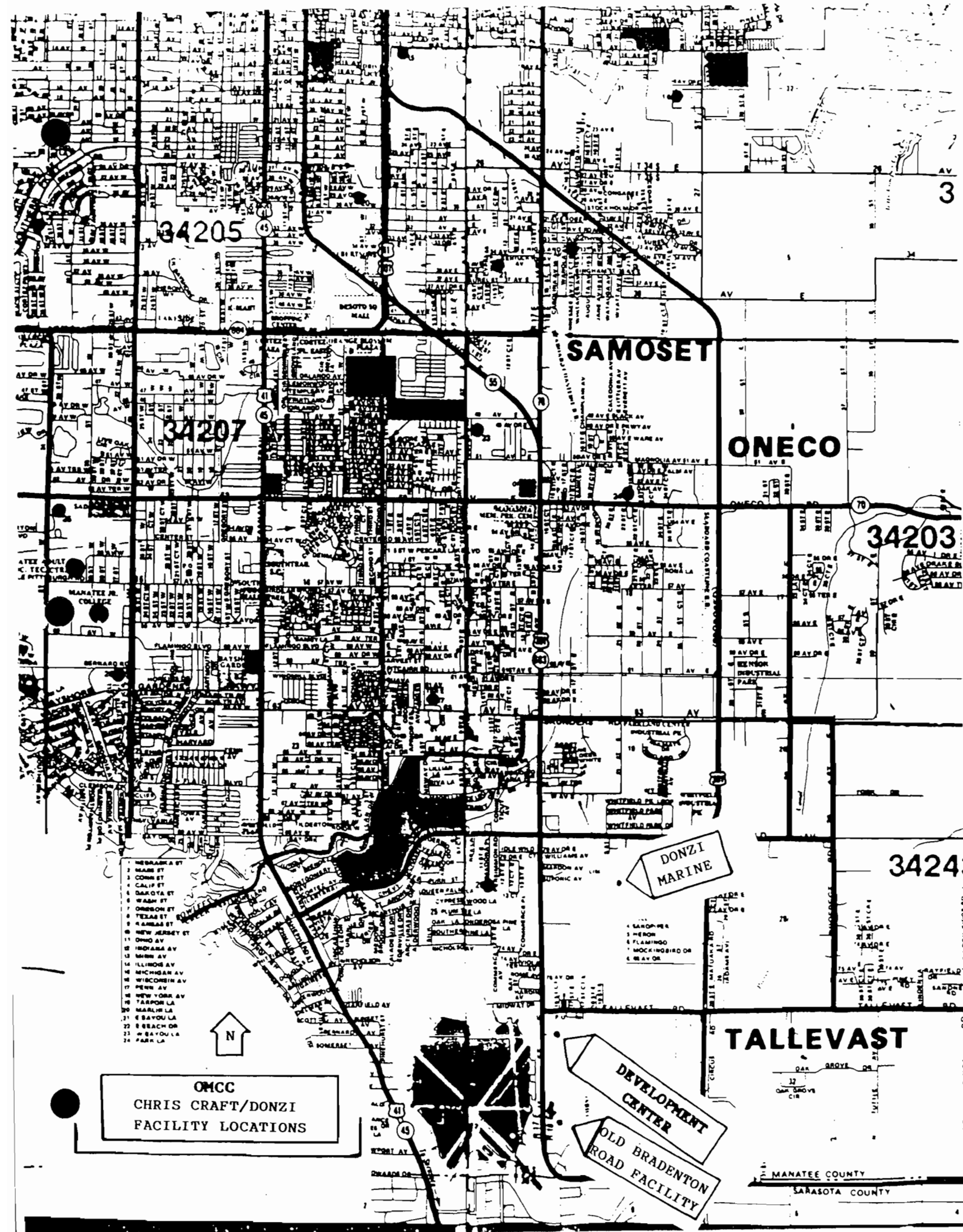
(1913.76 x .37 x .11) + (223 x .37 x .305) + (6 x .5 x (.11 + .305)) = 104 lb/hr

104 lb/hr x hr/3600 sec x 454 gm/lb = 13.15 gm/sec

ATTACHMENT 1

FACILITY LOCATION

Best Available Copy



ATTACHMENT 2

FACILITY LAYOUT

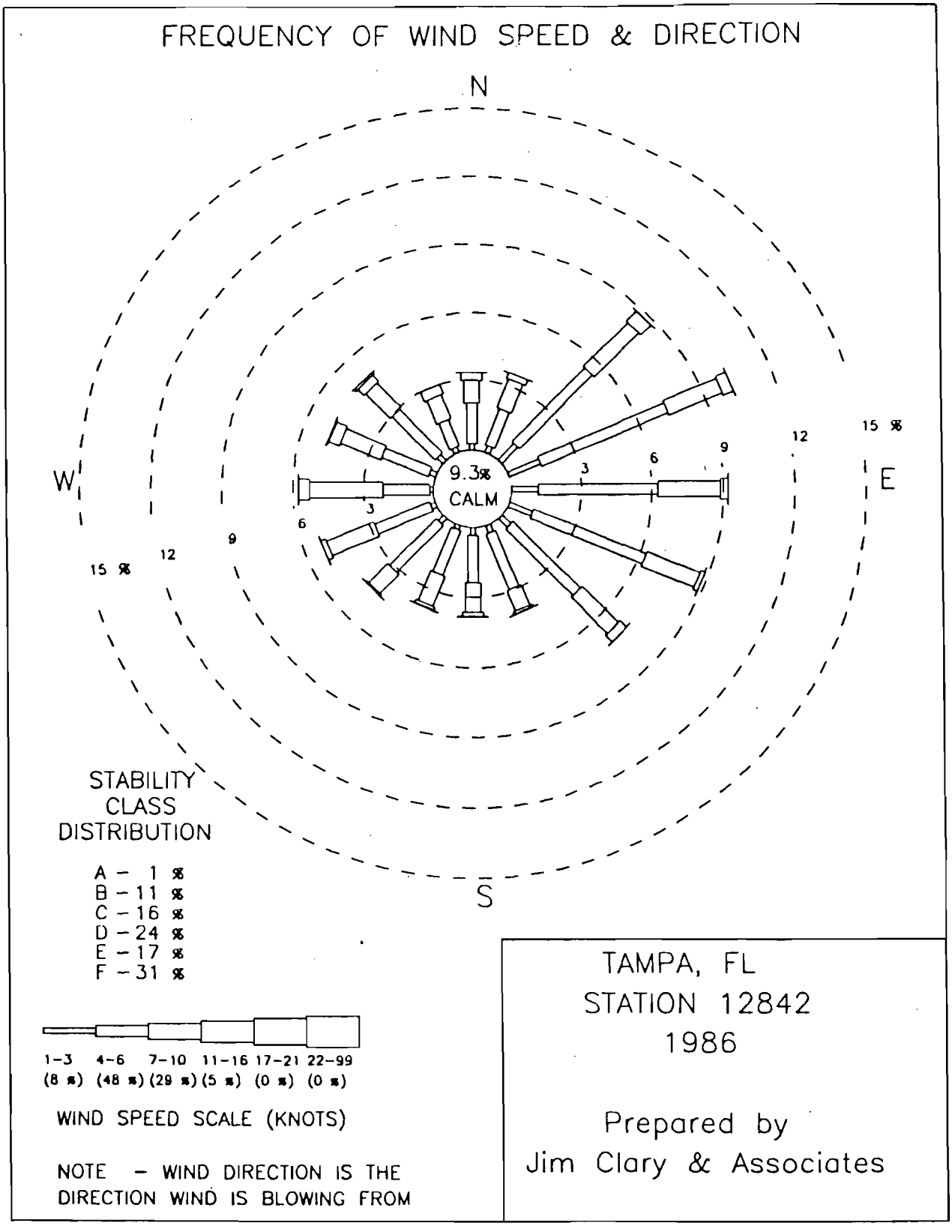
U.S. Highway 301
N
parking
engineering
lamination
spray booth
spray booth
waxing, prep and stripping
parking
Hazardous area
parking
cabinet shop
mill shop
maintenance
carpeting area
assembly
warehouse
no chemical storage
parking

ATTACHMENT A

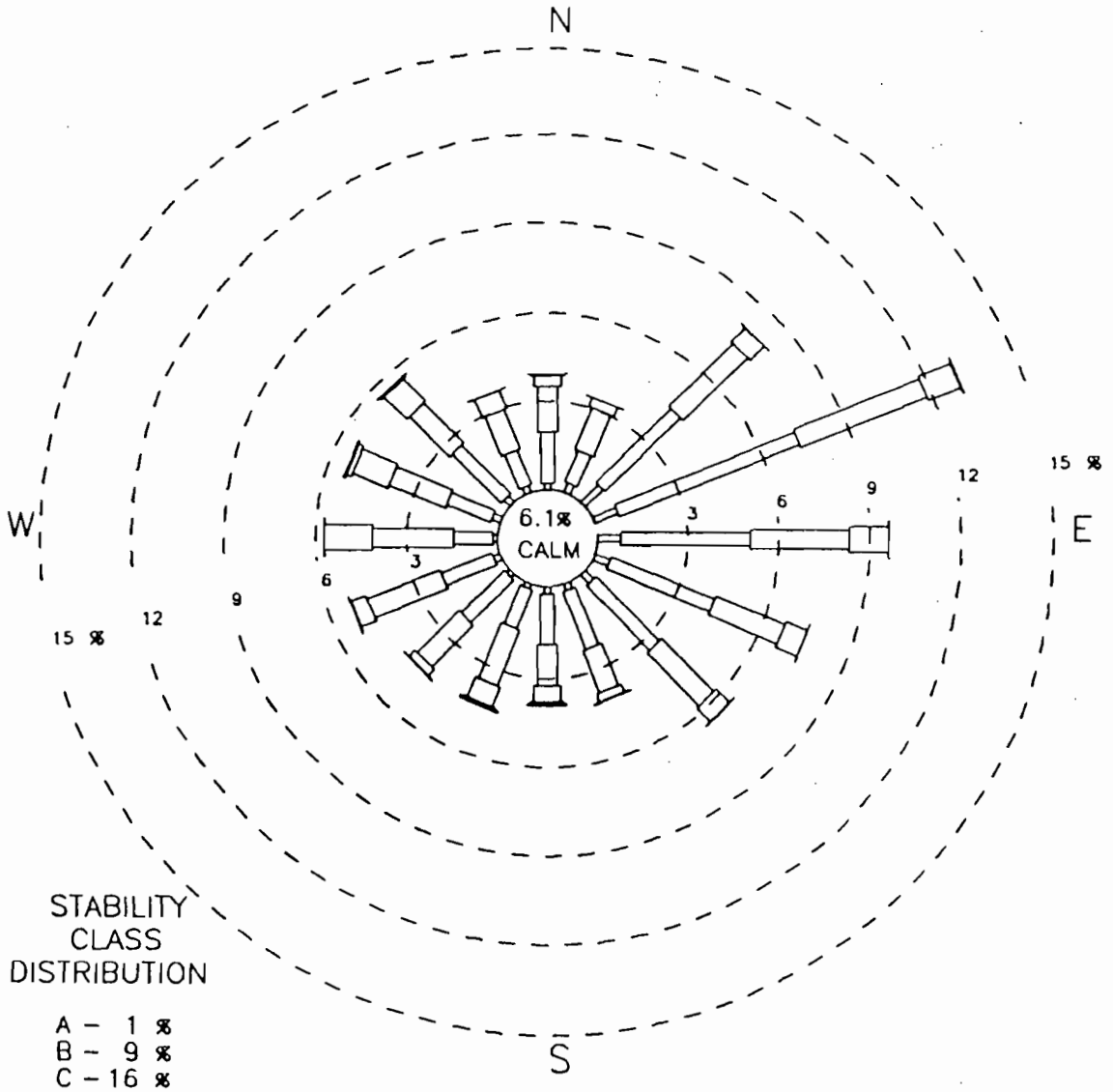
ACETONE PURCHASE AND RECOVERY

ATTACHMENT B

WIND ROSE PLOTS FOR TAMPA BAY, 1982-1986

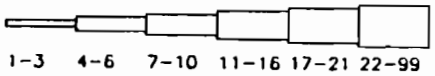

FREQUENCY OF WIND SPEED & DIRECTION
N
W
E
S
15 %
12
9
6
3
9.3%
CALM
STABILITY
CLASS
DISTRIBUTION
A - 1 %
B - 11 %
C - 16 %
D - 24 %
E - 17 %
F - 31 %
1-3 4-6 7-10 11-16 17-21 22-99
(8 %) (48 %) (29 %) (5 %) (0 %) (0 %)
WIND SPEED SCALE (KNOTS)
NOTE - WIND DIRECTION IS THE
DIRECTION WIND IS BLOWING FROM
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 %



1–3 (6 %) 4–6 (39 %) 7–10 (36 %) 11–16 (12 %) 17–21 (1 %) 22–99 (0 %)

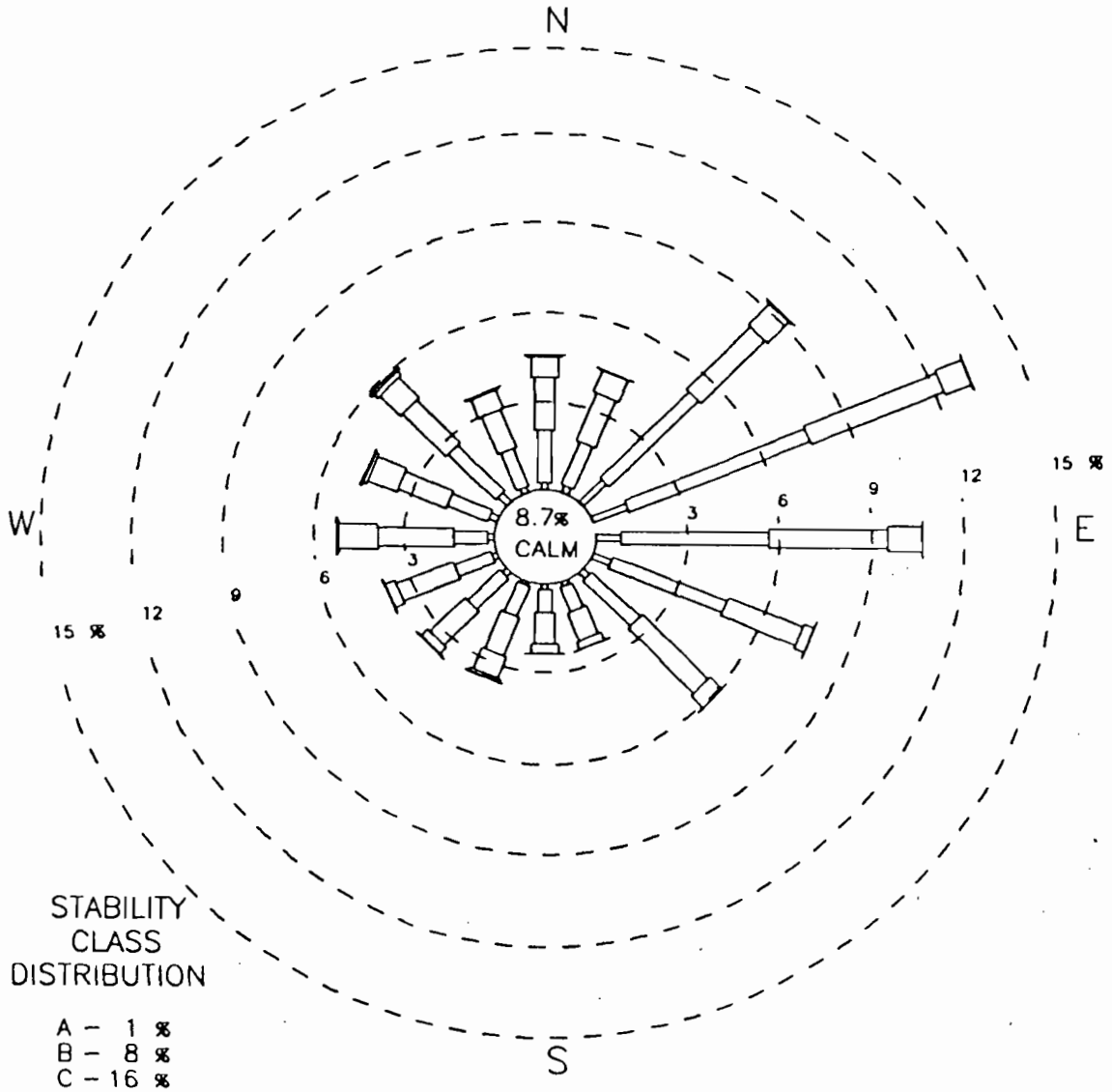
WIND SPEED SCALE (KNOTS)

NOTE – WIND DIRECTION IS THE DIRECTION WIND IS BLOWING FROM

TAMPA, FL
STATION 12842
1985

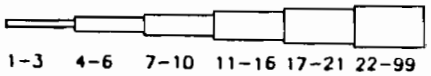
Prepared by
Jim Clary & Associates

FREQUENCY OF WIND SPEED & DIRECTION



STABILITY CLASS DISTRIBUTION

A – 1 %
B – 8 %
C – 16 %
D – 31 %
E – 17 %
F – 27 %



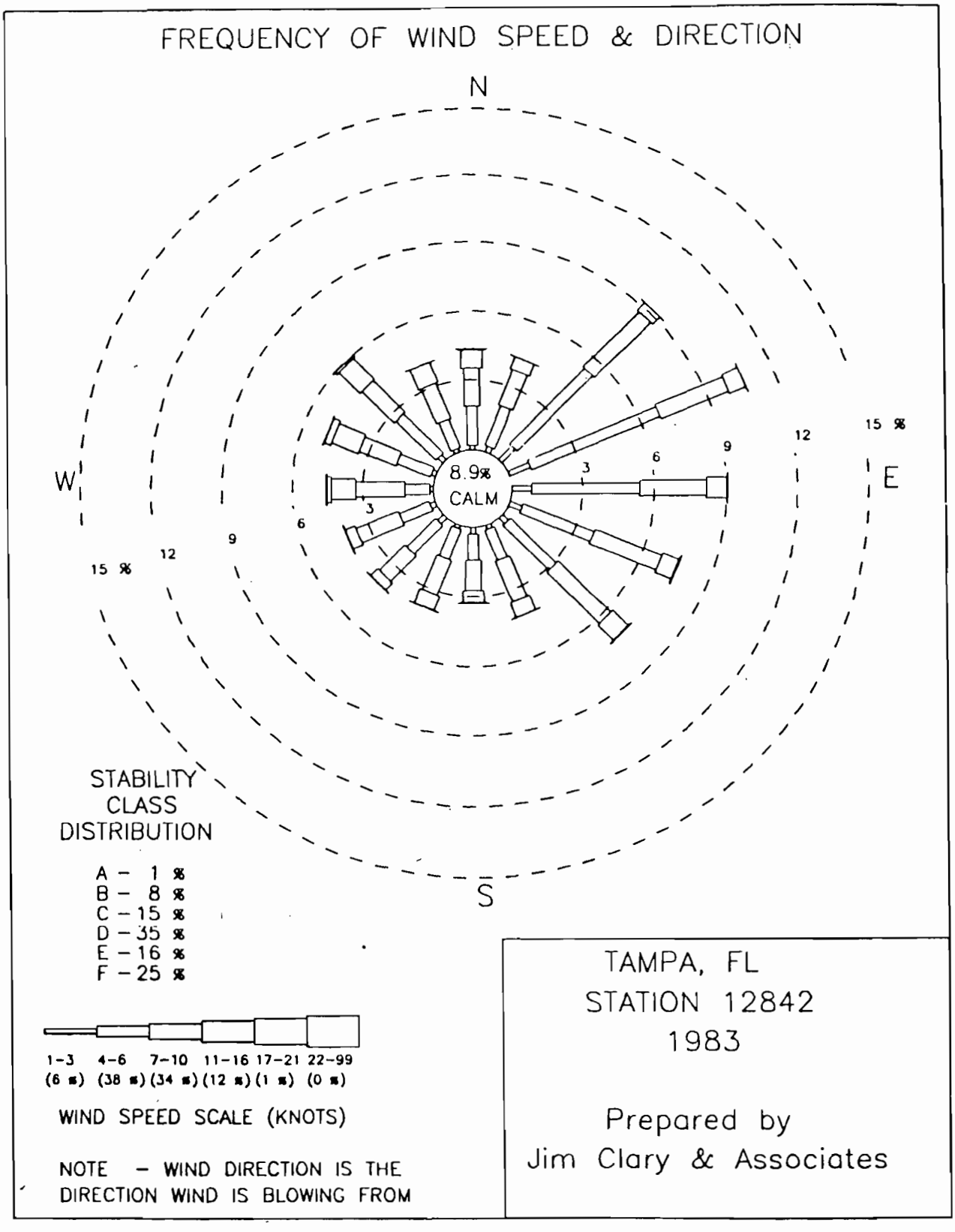
1-3 (7 %) 4-6 (37 %) 7-10 (36 %) 11-16 (11 %) 17-21 (1 %) 22-99 (0 %)

WIND SPEED SCALE (KNOTS)

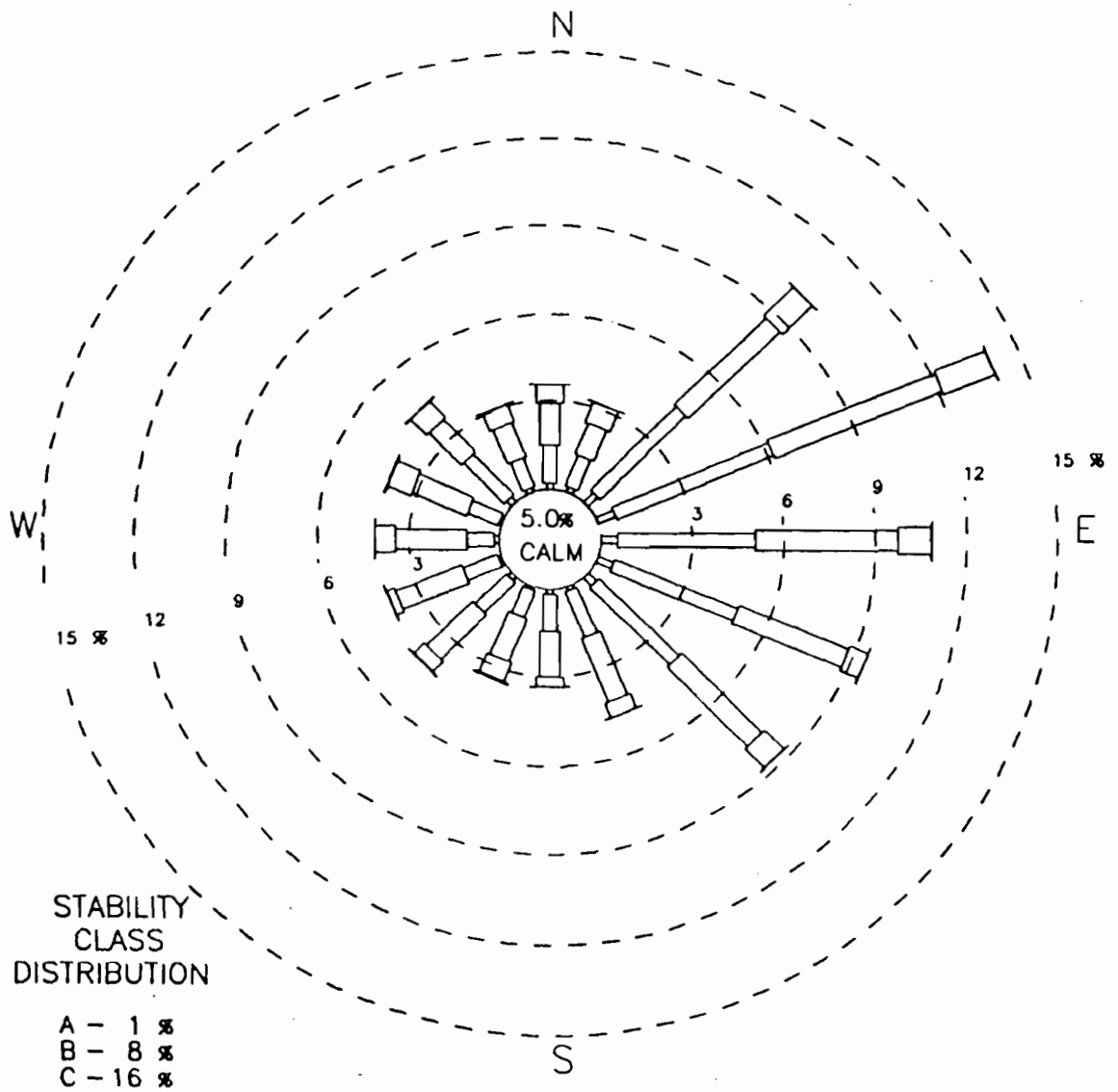
NOTE – WIND DIRECTION IS THE DIRECTION WIND IS BLOWING FROM

TAMPA, FL
STATION 12842
1984

Prepared by
Jim Clary & Associates


FREQUENCY OF WIND SPEED & DIRECTION
N
E
S
W
15 %
12
9
6
3
8.9%
CALM
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 %) (38 %) (34 %) (12 %) (1 %) (0 %)
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 %

1–3	4–6	7–10	11–16	17–21	22–99
(4 %)	(36 %)	(42 %)	(12 %)	(0 %)	(0 %)

WIND SPEED SCALE (KNOTS)

NOTE – WIND DIRECTION IS THE DIRECTION WIND IS BLOWING FROM

TAMPA, FL
STATION 12842
1982

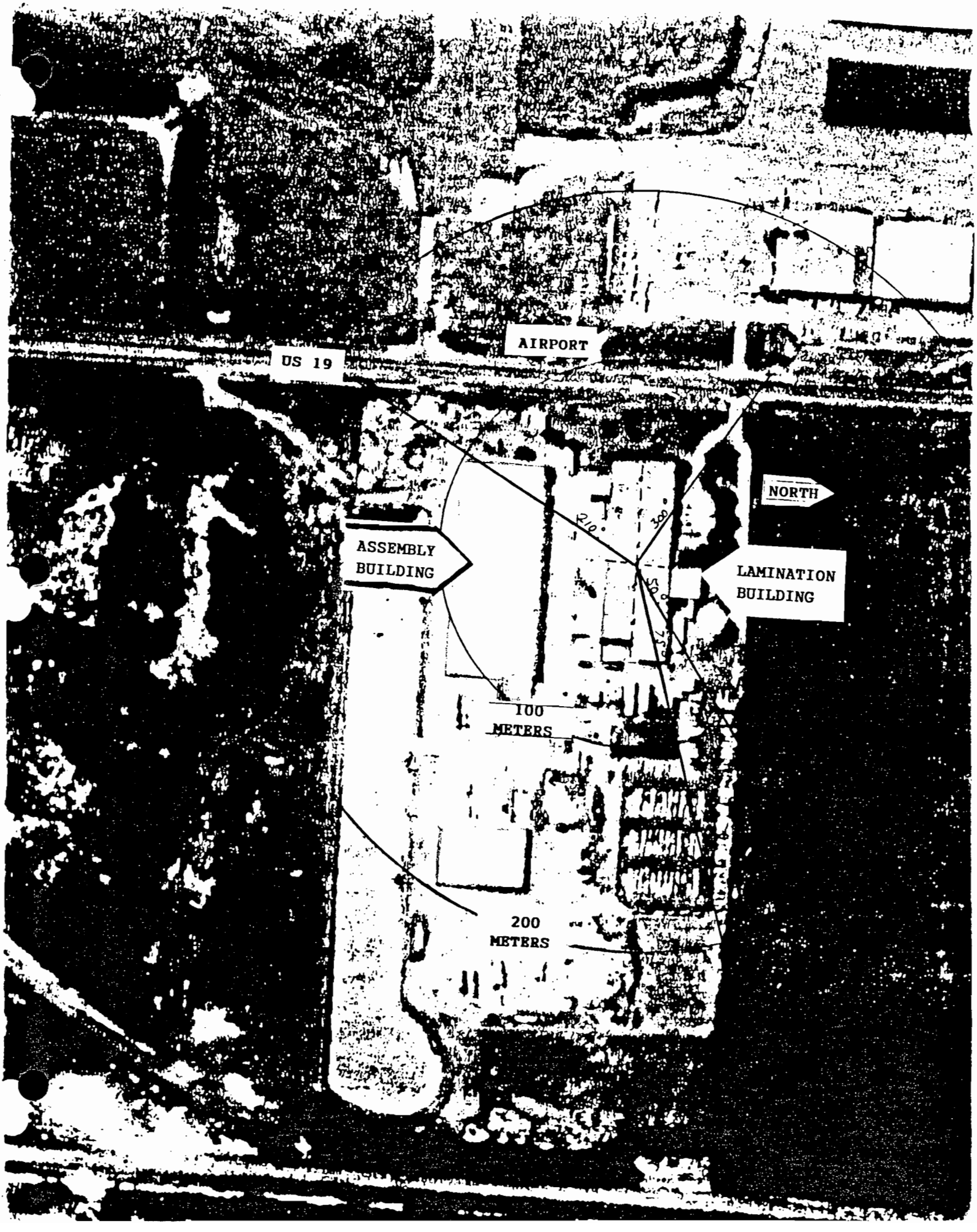
Prepared by
Jim Clary & Associates

ATTACHMENT C

ISCST MODEL OUTPUT

ATTACHMENT D

AERIAL PHOTO OF FACILITY



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;

	TWA mg/m^3	STEL mg/m^3
Acetone	1800	2400
Methyl metharcylate	410	—
Styrene	215	425

2. Estimated Air Concentrations (avg.) by Facility

Donzi	Chris Craft Boats	Development Center
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 gel coat)
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

styrene	methyl methacrylate	acetone
$\frac{13.15 \text{ gms/sec}}{169.13 \text{ m}^3/\text{sec}} = 0.078$	$\frac{0.3 \text{ gms/sec}}{169.13 \text{ m}^3/\text{sec}} = 0.0018$	$\frac{12.45 \text{ gms/sec}}{169.13} = 0.08$

5. EEI ≡ 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.

Fed. Exp.: # 7295816393 File Copy

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 AC41-165851

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 John

Tom T. John, P.E.

cc: J.R. Crawford, OMC
W. Priesmeyer, Manatee Co.
T. Robinson, ChrisCraft
Bill Thomas - SW Dist.
Bruce Mitchell
CHF / JP / BT
4-11-90 APR

P 938 762 609

RECEIPT FOR CERTIFIED MAIL

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

Sent to T.P. Robinson, VP & GM	
Street and No. Chris Craft Boats 7110 21st Street East	
P.O. State and ZIP Code P.O. Box 25022 Bradenton, FL 34206	
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: 7/3/89 AC 410165851	

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. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to: T.P. Robinson, VP & GM Chris Craft Boats 7110 21st Street East P.O. Box 25022 Bradenton, FL 34206	4. Article Number P 938 762 609 Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail ☐ Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Address X	8. Addressee's Address *(ONLY if requested and fee paid)*
6. Signature — Agent X Lee Rob	
7. Date of Delivery 7-6-89	

PS Form **3811**, Mar. 1988 * U.S.G.P.O. 1988-212-885 **DOMESTIC RETURN RECEIPT**

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

July 3, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. T. P. Robinson, V.P. and
General Manager
Chris Craft Boats
7110 21st Street East
Post Office Box 25022
Bradenton, Florida 34206

Dear Mr. Robinson:

Re: Completeness Review of an Application Package
AC 41-165851

The Department has reviewed the above referenced application package received June 5, 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 "30%" 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

7-3-89

~~RHF~~

FYI. Return to
Patty for filing.
Thanks,

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.

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

Sincerely,

for 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
Reading File
Bruce Mitchell
CHF/BT
7-3-89

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

June 30, 1989

Mr. William J. Meyers
Director of Research & Development
OMCCC Incorporated d/b/a
Chris Craft Boats
Post Office Box 25022
Bradenton, FL 34206

Dear Mr. Meyers:

Re: Manatee County - AP
AC41-165812

On June 5, 1989, we received your air pollution application for the after-the-fact construction of a fiberglass boat manufacturing plant designated the Development Center in Manatee County. 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. In Attachment 3, provide justification to support the "25%" 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 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 shops that emit particulate matter and visible emissions.

9. Submit an explanation of a material balance scheme and an example of the recordkeeping forms you intend to use to document material usage and VOC/OS emissions, realizing verification shall be determined on a 24-hour basis.

10. The styrene emission factors used in Attachment 4, only represent spray layup for both resin and gelcoat application. Does this facility use any hand layup of either resin or gelcoat? If yes, be aware potential emission calculations may need to be recalculated along with amending the appropriate sections of the application. Explain the actual production steps used at this facility where styrene emissions are generated.

Upon receipt of the above requested information processing of your application will continue. If you have any questions, please call Mr. Jim McDonald or Mr. Matt McCann of my staff at (813) 623-5561.

A copy of your response shall also be sent to the Manatee County Public Health Unit.

Sincerely,

J. Harry Kerns

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

JHK/jmq

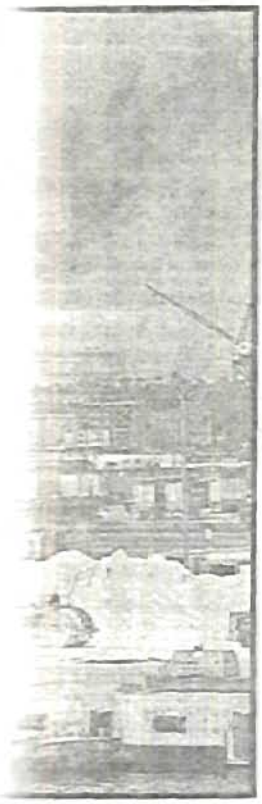
cc: MCPHU
Tom John, P.E.
Bruce Mitchell, DER - Tallahassee ✓

continued. That, frankly, tered the discussions be- and Scotty's," said Al attorney for the Flori- chain.

ar as Scotty's is con- s long as the suits are

two of which sit on Scotty's board, could not be reached. Diego Y. DuMonceau and A.M. Dopchie, top GIB executives, are Scotty's board members.

See SCOTTY'S, Page 7D



by BONNIE JO MOUNT

this summer at a

e deal

these questions an- making this sort of said Roy Wilcox, the e chairman and the onent of the operating

ew involved see any nge in the authority's two new board mem- hard supporters of the of the year. e critics say, it could

e SEVERAL, Page 7D

OMC mulls Tampa plant

By CLAY ZEIGLER
Tribune Business Writer

TAMPA — Outboard Marine Corp. is considering building a boat manufacturing plant in Hillsborough County, officials said Friday.

In a letter to Tampa Mayor Sandy Freedman, Robert Rohrlack Jr. of the Tampa Committee of 100 said OMC Yacht Manufacturers is considering locating a 125,000-square-foot factory south of the Port of Tampa.

The plant would open with 300 employees, the letter said, and would grow to employ more than 400.

Wayne Jones, Outboard Marine Corp.'s vice president of strategic planning and investor relations, confirmed Tampa is being considered as a plant site but said details are not yet firm.

"We're looking for a plant site, but that's about the extent of it," Jones said.

Asked whether there are other contenders for the plant, Jones said, "We've narrowed it to a short list. We're looking at other places."

Asked about the details in

See OMC, Page 7D

hares are being ... by Raymond James & Associates
t. Petersburg.
net proceeds to the company, estimated at about $5.35 mil-
l be used primarily to finance the development of additional
nts, the company said.

...e Cross contemplates changes

...Cross and Blue Shield is talking with American Express and
...about creating a membership card that could be used na-
...and about possibly taking over its health-care claims pro-

...scussions regarding a unified computer system signal the
...empt to stem growing defections of large corporations,
...opting for a single carrier to handle their claims.
...lly, an employer with workers in various states often must
...rately in most cases with each of the regional Blue Cross or
...ld plans. Although Blue Cross and Blue Shield membership
...e honored by each of the other regional plans, companies
...reasingly sought the consistency and single policies afforded
...al carriers, such as Prudential or Cigna.

...altar Financial sues regulators

...RLY HILLS, Calif. — Gibraltar Financial Corp. has sued
...egulators, demanding the return of about $11 million that
...pany, parent of Gibraltar Savings and Loan Association,
... is owed.
...suit filed Thursday, the Beverly Hills-based holding compa-
...s that federal regulators have tried to destroy Gibraltar
... by using an unwarranted scheme to take control of its two
...s. Regulators seized the thrifts — including its operations in
...a Bay area — in late March, citing Gibraltar' continuing
... losses.
...uit names the Federal Home Loan Bank Board, Federal
...d Loan Insurance Corp. and the Federal Deposit Insurance
...efendants.

...ire of America, bank board reach pact

...ALO, N.Y. — Empire of American Federal Savings Bank,
... offices throughout the Tampa Bay area, said Friday that it
...ed into an agreement with the Federal Home Loan Bank
...reduce its exposure to interest rate and credit risk.
...e of America said the agreement mostly formalizes actions
... taken and announced by the thrift's board.
...tions include: withdrawal from lending for commercial,
...n and acquisition and development; sale of much of the
...A credit card portfolio; and continuing the thrift's on-going
...tion program.

...B Texas to issue $300 million in notes

...S — NCNB Texas National Bank said Friday that it in-
...ue $300 million of its subordinated capital note obligations
...e approval of regulators.
...ering will be underwritten and sold to the public by Ste-
...and Merrill Lunch Capital Markets, the company said.

...ntial-Bache reorganizes unit

...ORK — Prudential-Bache Securities Inc. said Friday that
...anized its investment banking activities to improve its
...clients, changing the lines of reporting for many of its
...without dismissing any.

...r Realty sells restaurant

...DO — Developer Major Realty Corp. has sold off its Or-
...t restaurant, the Bavarian Bierhaus, for $2 million, the
...aid Friday. Major had operated the Bierhaus, which
...ugust 1986, for just over two years but took control only
...riginal tenant abandoned the lease.

...ction

...WATER — Martin W. Gladysz is executive vice president
...or Fortune Savings Bank, while Nancy J. Weaver is vice
...f marketing and human resources. A story in Friday's
...e incorrect titles.

— A Tribune Staff, Wire Report

been building stores more aggressively over the past seven years," Mead said.

"But, Scotty's was conservative. It didn't want to make a mistake. . . By trying not to make a mistake, they made a mistake."

About 6.15 million square feet of new retail space was added in Florida by the building supply industry from 1982 through 1987, according to figures compiled by Scotty's. Its stores accounted for only 1.17 million square feet.

The analysts speculated that GIB will remodel and improve the chain by expanding store space and increasing product lines.

"They'll take a hit in earnings for two or three years," Mead said. "But in the longer term, it'll pay."

Scotty's earned $3.37 million on sales of $149.1 million for the quarter ended in April.

Clothes hanger maker to move HQ to Pinellas

■ From Page 1D

Pinellas Economic Development Corp., said the company made its decision to relocate its headquarters to Palm Harbor without its direct help.

"Although I haven't talked with them, I understand the decision was based on the good quality of life we have down here," Haley said.

"Their move here is important to the county because when you get a headquarters, you get the top executives," Haley said. "They decide on corporate involvement in the community, such as charities, without having to consult with people back home."

The company's current headquarters is in Birmingham, Mich., a suburb of Detroit.

OMC may build boat plant in Hillsborough

■ From Page 1D

Rohrlack's letter, Jones said. "We haven't settled on a plant site, the models (of boats to be built there), the employment. That's all premature."

The purpose of Rohrlack's letter was to thank the mayor for agreeing to attend a dinner for OMC officials set for Wednesday.

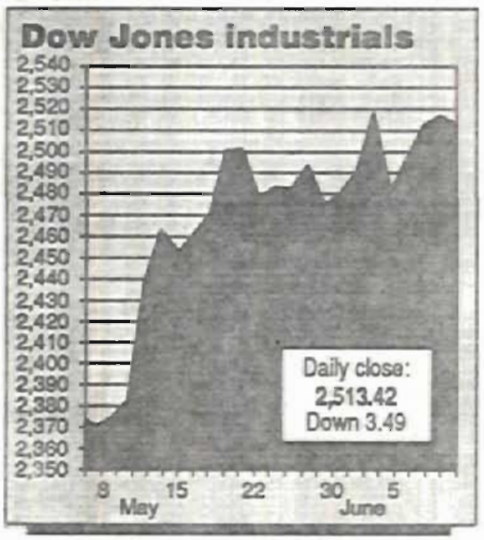
OMC, which is based in Waukegan, Ill., owns 10 boat companies, including two of the three large players in the Sarasota area. OMC acquired Murray Chris-Craft in February. OMC also owns Donzi Marine Corp. of Tallevast, which it acquired last year. Donzi is also building a plant in Sebring.

THE TAMPA TRIBUNE

Saturday, June 10, 1989

Business & Fin

DAILY TICKER



Tribune graphics

Scotty's agrees to buy

By FRANK RUIZ
Tribune Business Writer

TAMPA — Scotty's Inc. said Friday it has agreed to a sweetened buyout offer worth about $138.42 million from a Belgian company which already owns 42.4 percent of the Winter Haven building-supplies retailer.

GIB Group, Belgium's leading retailer, has offered to buy the remaining 8.45 million shares of Scotty's common stock for $16.50 a share — a boost of $1.50 a share, or about $13.42 million more than GIB offered in April.

News of the agreement sent Scotty's stock price up $1 a share to close at $16.25 on the New York Stock Exchange.

Analysts called the merger a "fair offer" and speculated it probably would go through, despite three shareholder lawsuits which seek to halt the buyout.

A GIB buyout would make Scotty's a private company, allowing its new owners "to do the types of things that need to be done" to bring the chain up to pa competitors, said Mic Mead, an analyst with Stringfellow, a Richmond curities firm.

"I don't know what GI ning," he said. "But Scott ing to be part of a very tailing organization. I thi through a period of chan

Shearson Lehman Ha a New York securities h has been hired to handle out offering.

Wall Street slips on inflation news

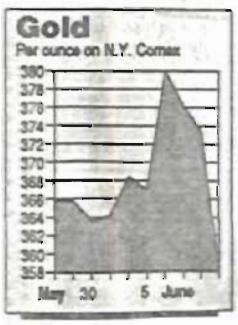
A Tribune Staff, Wire Report

NEW YORK — Wall Street slipped, but the dollar and Treasury bond prices surged, after the Labor Department said wholesale inflation was much higher than expected in May.

The Dow Jones industrial average fell 3.49 points to 2,513.42. For the week, the index was off 4.41 points.

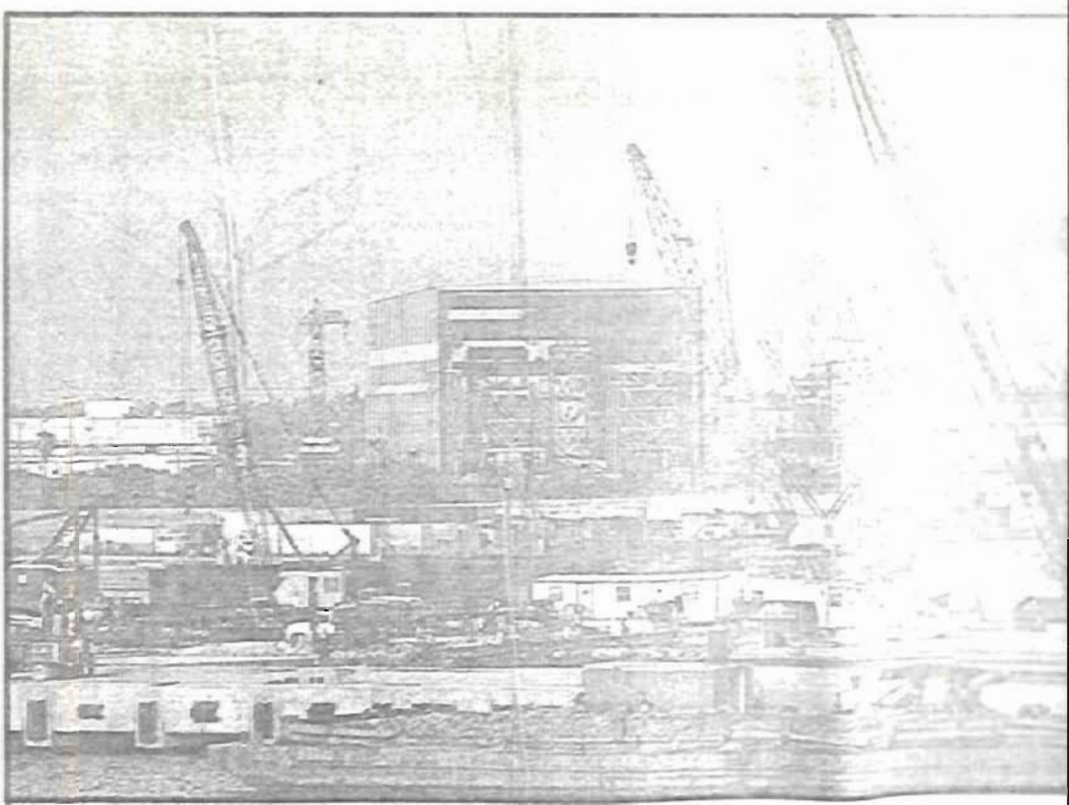
Traders said the Labor Department's report of a 0.9 percent jump in May's producer price index — twice as high as expected — unnerved stock investors because it suggested that interest rates are unlikely to ease further.

Much of Friday's activity in the bond and dollar markets was attributed to heavy trading by Japanese investors, who reportedly bought $1 billion or more in long-term notes.



The dollar rose to 2.0110 West German marks from 1.9695 Thursday, and jumped to 146.65 Japanese yen from 143.12.

As a result, the benchmark 30-year Treasury bond shot up nearly 2 points



Construction continues on a new wharf at the Port of Tampa which will handle general cargo. The Tampa Port Authority expects it cost of $6.8 million.

Operating port plan not a

By CLAY ZEIGLER
Tribune Business Writer

prise?

Today, there are other debates

AC 41-165812

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: Fugative Air Emission (VOC) [ ] New[1] [X] Existing[1]

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

COMPANY NAME: OMCCC Incorporated dba Chris Craft Boats 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 7921 Old Bradenton Road Development Center City Sarasota

UTM: East 347342 North 3031772

Latitude ____° ____' ____"N Longitude ____° ____' ____"W

APPLICANT NAME AND TITLE: William J. Meyers, Director Research and Development

APPLICANT ADDRESS: Post Office Box 25022 Bradenton, Florida 34206

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of OMCCC Incorporated dba Chris Craft Boats

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: William J. Meyers

William J. Meyers, Director Research and Dev.
Name and Title (Please Type)

Date: 6/02/89 Telephone No. (813) 747-4140

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, imron 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 Deterioriation" (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 justification 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[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	

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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)

E. Fuels

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.

Waste acetone, other liquids and solids are collected and disposed of in the appropriate manner.

(See Attachment 5)

M. 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: _____ FP

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: _____ FP

*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

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

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 _____( ) SO^{2*} _____ 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.

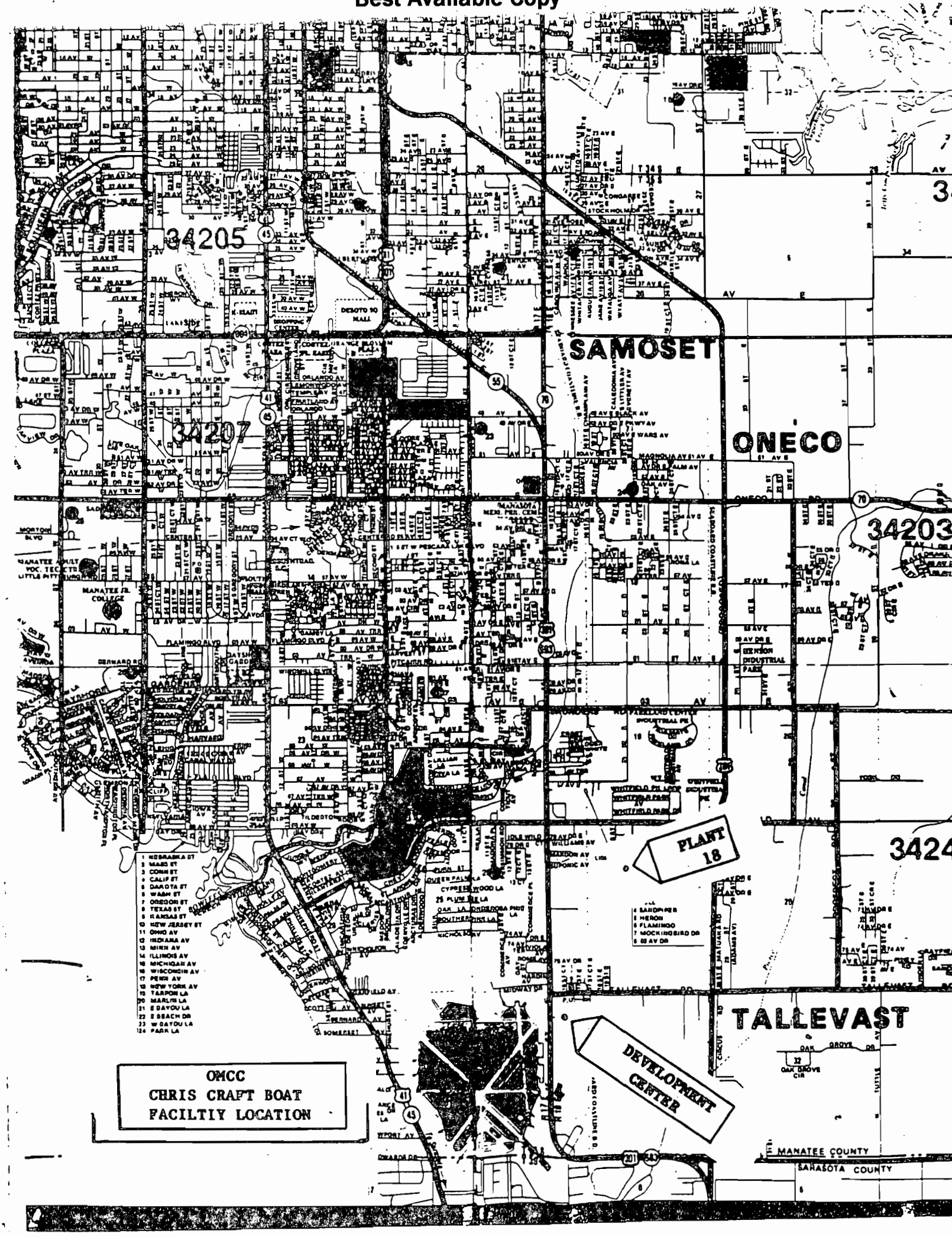
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

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

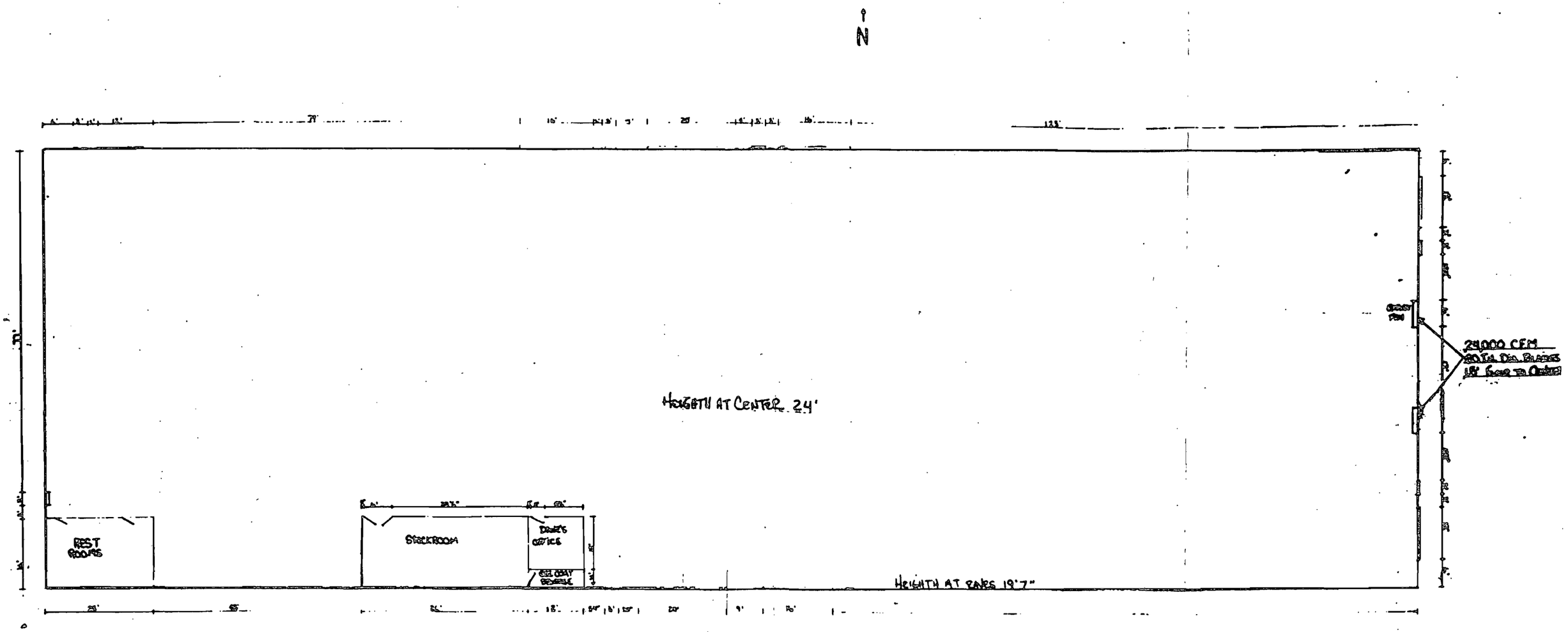
FACILITY LOCATION

Best Available Copy



ATTACHMENT 2

FACILITY LAYOUT



SHOP LAYOUT

CHRIS CRAFT BOATS
DEVELOPMENT CENTER
7921 BRADENTON ROAD
SARASOTA FLORIDA 34243

ATTACHMENT 3

MATERIALS USAGE

Attachment 3
Section III: A
Raw Materical and Chemicals Used
Based on Current Usage
CHRIS CRAFT BOATS, DEVELOPMENT CENTER

Description	Contaminants Type	%Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
Acetone[1]	VOC	100	56.7	See Attachment 2
Styrene Monomer	VOC	100	0.48	"
Methylethyl Ketone Peroxide	VOC	100	4.14	"
Gelcoat	VOC	30	19.23	"
Styrene Polyester Resin	VOC	30-40	187.5	"
Autofroth A	VOC-exempt	46-48	0.49	"
Autofroth B	VOC-exempt	20-25	0.48	"
Methylene Chloride	VOC-exempt	100	0.58	"
Spray Adhesive	VOC	90	0.648	"

[1] 25% (average) of acetone used is collected and sent offsite for recovery; 75% is volatilized.

Attachment 3
Section III: A
Raw Material and Chemicals Used
Based on Requested Usage
CHRIS CRAFT BOATS, DEVELOPMENT CENTER

Description	Contaminants Type	%Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
Acetone[1]	VOC	100	70.87	See Attachment 2
Styrene Monomer	VOC	100	0.6	"
Methylethyl Ketone Peroxide	VOC	100	5.18	"
Gelcoat	VOC	30	24.04	"
Styrene Polyester Resin	VOC	30-40	234.38	"
Autofroth A	VOC-exempt	46-48	0.61	"
Autofroth B	VOC-exempt	20-25	0.60	"
Methylene Chloride	VOC-exempt	100	0.725	"
Spray Adhesive	VOC	90	0.81	"

[1] 25% (average) of acetone used is collected and sent offsite for recovery; 75% 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
CHRIS CRAFT BOATS, DEVELOPMENT CENTER

Name of Contaminant	Emission Maximum lbs/hr	Emission Actual T/yr	Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission lbs/yr	Potential Emission T/yr	Relate to Flow Diagram
1. acetone	42.5	44.2	N/A	N/A			See attachment 2
2. styrene - resin[1]	9.75	10.14	N/A	N/A			"
gelcoat2	2.02	2.1	N/A	N/A			"
monomer[3]	0.115	0.12	N/A	N/A			"
3. methylethyl ketone peroxide[4]	0	0	N/A	N/A			"
4. Autofroth A dichloro-difluoromethane[5]	0.24	0.247	N/A	N/A			"
isocyanate[4]	0	0	N/A	N/A			"
5. Autofroth B trichloro-fluoromethane[6]	0.12	0.124	N/A	N/A			"
6. methylene chloride[7]	0.58	.60	N/A	N/A			"
7. methyl methacrylate[2]	.34	.35	N/A	N/A			
8. spray adhesive toluene	.216	.225	N/A	N/A			"
acetone	.216	.225	N/A	N/A			"
hexane	.216	.225	N/A	N/A			"

Attachment 4
Section III: C
Airborne Contaminants Emitted
Based on Requested Usage
CHRIS CRAFT BOATS, DEVELOPMENT CENTER

Name of Contaminant	Emission Maximum lbs/hr	Emission Actual T/yr	Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission lbs/yr	Potential Emission T/yr	Relate to Flow Diagram
1. acetone	53.12	55.25	N/A	N/A			See attachment 2
2. styrene - resin[1]	12.19	12.67	N/A	N/A			"
gelcoat2	2.52	2.63	N/A	N/A			"
monomer[3]	0.144	0.150	N/A	N/A			"
3. methylethyl ketone peroxide[4]	0	0	N/A	N/A			"
4. Autofroth A dichloro-difluoromethane[5]	0.30	0.31	N/A	N/A			"
isocyanate[4]	0	0	N/A	N/A			"
5. Autofroth B trichloro-fluoromethane[6]	0.15	0.156	N/A	N/A			"
6. methylene chloride[7]	0.73	.75	N/A	N/A			"
7. methyl methacrylate[2]	.42	.44	N/A	N/A			
8. spray adhesive toluene	.27	.28	N/A	N/A			"
acetone	.27	.28	N/A	N/A			"
hexane	.27	.28	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. Stryene 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. Methlyene chloride is VOC-exempt under 17-2.650(1)(d), F.A.C.

Sample Calculations (Current Usages) - Styrene

1. Resin contribution

   187.5 lbs/hr x 0.4 lbs styrene/lb resin x .13 lb emitted/lb used = 9.75 lbs/hr

   9.75 lbs/hr x 2080 hrs/yr x ton/2000 lbs = 10.14 TPY

2. Gelcoat contribution

   19.23 lbs/hr x 0.3 lbs styrene/lb gelcoat x 0.35 lbs emitted/lb used = 2.02 lbs/hr

   2.02 lbs/hr x 2080 hrs/yr x ton/2000 lbs = 2.1 TPY

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

   resin: 0.48 lbs/hr x 0.5 x 0.13 lbs emitted/lb used = 0.031 lb/hr
   gelcoat: 0.48 lbs/hr x 0.5 x 0.35 lbs emitted/lb used = 0.084 lbs/hr

Current Total Styrene Emissions:

(9.75 + 2.02 + 0.115) = 11.88 lb/hr or 12.36 TPY

Current Total Facility VOC emissions: 58.55 TPY

Requested Total Styrene Emissions: 15.45 lb/hr or 16.07 TPY

Requested Total Facility VOC Emissions: 73.2 TPY

ATTACHMENT 5

EXHAUST VENT DATA
AND
AIR TOXICS REVIEW INFORMATION

The lamination building is detailed in Attachment 2, and is the source of the VOC emissions. The building is 100 ft. by 300 ft. by 20 ft. high. Ventilation is achieved by two 24,000 ACFM exhaust fans on the east wall, 15 feet above the floor 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

Chris Craft — Contact Adhesive

MATERIAL SAFETY DATA SHEET

03/16/89

DataLogiX Formula Systems Inc.

SECTION I - PRODUCT INDENTIFICATION

Manufacturer: DELTA LABORATORIES INC.
P.O. BOX 2258
CR 326 ZUBER,(NEAR OCALA)
OCALA FL 32678

Information Phone: 904 629 8101
Emergency Phone: 904 629 8101

Product Class: CONTACT ADHESIVE
Trade Name : SPRAY CONTACT ADHESIVE
Product Code : 90C000206
C.A.S. Number:

Hazard Ratings: Health - 2
none -> extreme Fire - 3
0 ---> 4 Reactivity - 0

SECTION II - HAZARDOUS INGREDIENTS

Ingredients	CAS #	Weight %	Exposure Limits		Vapor Pr. mm Hg
TOLUENE**	108-88-3	20-50	100.	ppm	24.
ACETONE**	67-64-1	20-50	750.	ppm	186.
HEXANE	110-54-3	20-50	50.	ppm	140.

SECTION III - PHYSICAL DATA

Boiling Range: 131 - 232 Deg. F
Evap. Rate: Faster than n-Butyl Acetate
Volatiles volume: 90.7 %
Appearance:

Vapor Density: Heavier than Air.
Liquid Density: Lighter than Water.
Wgt per gallon: 6.55 Pounds.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flammability Class: 1B Flash Point: -20 F tcc LEL : 1.

-EXTINGUISHING MEDIA:

THE NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) CLASSIFIES BURNING LIQUIDS AS CLASS B FIRES. THEREFORE, ANY APPROVED CLASS B FIRE EXTINGUISHER OR EXTINGUISHING AGENT MAY BE USED FOR FIREFIGHTING PURPOSES. FOR EXAMPLE: DRY CHEMICAL, FOAM, CARBON DIOXIDE.

-SPECIAL FIREFIGHTING 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 BUILDUP AND POSSIBLE AUTOIGNITION OR EXPLOSION WHEN EXPOSED TO EXTREME HEAT

-UNUSUAL FIRE & EXPLOSION HAZARDS:

*** EXTREMELY FLAMMABLE *** KEEP CONTAINERS TIGHTLY CLOSED. MATERIAL IS HIGHLY VOLATILE AND READILY GIVES OFF VAPORS WHICH MAY TRAVEL ALONG THE GROUND OR BE MOVED BY VENTILATION AND CAUSE FLASH FIRES OR BE IGNITED EXPLOSIVELY BY PILOT LIGHTS, OTHER FLAMES, SPARKS, HEATERS, SMOKING, ELECTRIC MOTORS, OR OTHER SOURCES OF IGNITION AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT. CLOSED CONTAINERS MAY EXPLODE WHEN EXPOSED TO EXTREME HEAT. DO NOT APPLY TO HOT SURFACES. NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE PRODUCT (EVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY. DURING EMERGENCY CONDITIONS OVEREXPOSURE TO DECOMPOSITION MAY CAUSE A HEALTH HAZARD. SYMPTOMS MAY NOT BE IMMEDIATELY APPARENT. OBTAIN MEDICAL ATTENTION.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA (cont.)

-UNUSUAL FIRE & EXPLOSION HAZARDS: (cont.)

SECTION V - HEALTH HAZARD DATA

-PERMISSIBLE EXPOSURE LEVEL:

**

ANY ITEM IN SECTION II MARKED WITH ** IS A TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF SARA TITLE III AND OF 40 CFR 372.

****

EXPOSURE LIMITS LISTED IN SECTION II ARE EXPRESSED AS TLV UNLESS NOTED HERE.
TOLUENE OSHA PEL=200ppm, TLV=100ppm ACGIH TWA
ACETONE OSHA PEL=750ppm, ACGIH TLV=750ppm TWA
HEXANE OSHA PEL=500ppm, TLV=50ppm ACGIH TWA

-EFFECTS OF OVEREXPOSURE:

---EYES--- CAN CAUSE SEVERE IRRITATION, REDNESS, TEARING, AND BLURRED VISION.

---SKIN---PROLONGED OR REPEATED CONTACT CAN CAUSE MODERATE IRRITATION, DEFATTING, AND DERMATITIS. REPEATED CONTACT MAY CAUSE SENSITIZATION.

---BREATHING---EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL AND RESPIRATORY IRRITATION, DIZZINESS, WEAKNESS, FATIGUE, NAUSEA, HEADACHE, POSSIBLE UNCONSCIOUSNESS, AND EVEN ASPHYXIATION.

---SWALLOWING---CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, AND DIARRHEA. ASPIRATION OF MATERIAL INTO THE LUNGS CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.

OVEREXPOSURE TO TOLUENE MAY CAUSE LIVER DAMAGE & KIDNEY DAMAGE, CENTRAL NERVOUS SYSTEM DEPRESSION (IN HIGH CONCENTRATIONS), AND BRAIN CELL DAMAGE FROM LONG TERM INHALATION OF VAPORS.
OVEREXPOSURE TO ACETONE MAY CAUSE EYE, SKIN, AND RESPIRATORY TRACT IRRITATION, WITH POSSIBLE EYE TISSUE INJURY IF NOT REMOVED PROMPTLY. INHALATION OF VAPORS MAY CAUSE HEADACHES, DIZZINESS, AND CENTRAL NERVOUS SYSTEM DEPRESSION.
OVEREXPOSURE TO HEXANE MAY CAUSE MODERATE SKIN & EYE IRRITATION, RESPIRATORY TRACT IRRITATION, AND CENTRAL NERVOUS SYSTEM DEPRESSION (IN HIGH VAPOR CONCENTRATIONS).

-FIRST AID:

-IF IN EYES--FLUSH WITH LARGE AMOUNTS OF WATER, LIFTING THE UPPER AND LOWER LIDS OCCASIONALLY, GET MEDICAL ATTENTION.

-IF ON SKIN---THOROUGHLY WASH EXPOSED AREA WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE RE-USE.

--IF BREATHED---IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED, GIVE ARTIFICIAL RESPIRATION. KEEP PERSON WARM, QUIET, AND GET MEDICAL ATTENTION.

-IF SWALLOWED---DO NOT INDUCE VOMITING. KEEP PERRSON WARM, QUIET, AND GET MEDICAL ATTENTION. ASPIRATION OF MATERIAL INTO THE LUNGS DUE TO VOMITING CAN CAUSE PNEUMONITIS WHICH CAN BE FATAL.

SECTION VI - REACTIVITY DATA

STABLITY: [ ] Unstable [x] Stable
HAZARDOUS POLYMERIZATION: [ ] May occur [x] Will not occur

-INCOMPATIBILITY:

STRONG OXIDIZING AGENTS; SULFURIC ACID. AMINES, ALKANOLAMINES, OXYGEN, HALOGENS, ALDEHYDES, AMMONIA, AND CHLORINATED COMPOUNDS.

-CONDITIONS TO AVOID:

HIGH TEMPERATURE OR HEAT OR OPEN FLAMES.

-HAZARDOUS DECOMPOSITION PRODUCTS:

THERMAL DECOMPOSITION MAY PRODUCE CARBON MONOXIDE, CARBON DIOXIDE, CHLORINE COMPOUNDS, AND TOXIC FUMES.

SECTION VII - SPILL OR LEAK PROCEEDURES

-STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

REMOVE ALL SOURCES OF IGNITION (FLAMES, HOT SURFACES, PILOT LIGHTS, AND ELECTRIC, STATIC, OR FRICTIONAL SPARKS). AVOID BREATHING VAPORS. VENTILATE AREA. REMOVE WITH INERT ABSORBENT AND NON-SPARKING TOOLS. PERSONS NOT WEARING PROTECTIVE EQUIPMENT SHOULD BE EXCLUDED FROM AREA OF SPILL UNTIL CLEAN-UP HAS BEEN COMPLETED.

-WASTE DISPOSAL METHOD:

DISPOSE IN ACCORDANCE WITH LOCAL, STATE, AND FEDERAL LAW REGULATIONS. INCINERATE IN APPROVED FACILITY. DO NOT INCINERATE CLOSED CONTAINERS.

SECTION VIII - SPECIAL PROTECTION INFORMATION:

-RESPIRATORY PROTECTION:

IF THE 'TLV' OF THE PRODUCT OR ANY COMPONENT IS EXCEEDED, A NIOSH/MESA JOINTLY APPROVED SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACE PIECE OPERATED IN PRESSURE DEMAND OR OTHER POSITIVE PRESSURE MODE IS ADVISED; HOWEVER, OSHA REGULATIONS ALSO PERMIT OTHER NIOSH/MESA RESPIRATORS UNDER SPECIFIC CONDITIONS. AREAS OF STORAGE AND USE SHOULD BE SURVEYED BY A QUALIFIED INDUSTRIAL HYGIENIST TO ASSURE ADEQUACY OF RESPIRATORY PROTECTION, VENTILATION, AND OTHER PROTECTIVE EQUIPMENT.

-VENTILATION:

PROVIDE GENERAL DILUTION OR LOCAL EXHAUST VENTILATION IN VOLUME AND PATTERN TO KEEP TLV OF ALL HAZARDOUS INGREDIENTS IN SECTION II BELOW ACCEPTABLE LIMIT; LEL IN SECTION II BELOW STATED LIMIT.

-PROTECTIVE GLOVES:

REQUIRED FOR PROLONGED OR REPEATED CONTACT.

-EYE PROTECTION:

USE SAFETY EYEWEAR DESIGNED TO PROTECT AGAINST SPLASH OF LIQUID.

-OTHER PROTECTIVE EQUIPMENT:

WEAR IMPERVIOUS CLOTHING AND BOOTS TO PREVENT REPEATED OR PROLONGED SKIN CONTACT.

SECTION IX - SPECIAL PRECAUTIONS

-PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

KEEP AWAY FROM HEAT, SPARKS, FIRE, AND ALL IGNITION SOURCES. DO NOT LEAVE CONTAINER OPEN. DO NOT STORE ABOVE 100 DEGREES F. STORE IN BUILDINGS DESIGNED AND PROTECTED FOR STORAGE OF NFPA CLASS I FLAMMABLE LIQUIDS. USE IN AREAS DESIGNED AND PROTECTED FOR USE OF CLASS I FLAMMABLE LIQUIDS.

-OTHER PRECAUTIONS:

USE ONLY WITH ADEQUATE VENTILATION. AVOID PROLONGED OR REPEATED BREATHING OF VAPOR. AVOID CONTACT WITH EYES OR SKIN. DO NOT TAKE INTERNALLY. CONTAINERS SHOULD BE GROUNDED WHEN POURING. AVOID FREE FALL OF LIQUID IN EXCESS OF A FEW INCHES. STORE, DISPENSE AND USE IN ACCORDANCE WITH NFPA STANDARDS FOR CLASS I FLAMMABLE LIQUIDS. CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPTIED. SINCE EMPTIED CONTAINERS RETAIN PRODUCT RESIDUES (VAPOR, LIQUID, AND/OR SOLID), ALL HAZARD PRECAUTIONS GIVEN IN THIS DATA SHEET MUST BE OBSERVED. THE CONSUMER PRODUCT SAFETY COMMISSION HAS BANNED THIS PRODUCT FOR CONSUMER USE BECAUSE OF FLAMMABILITY HAZARDS. IT MAY NOT BE SUPPLIED TO CONSUMERS, AND MAY NOT BE PACKAGED IN CONTAINERS SUITABLE FOR CONSUMER OR HOUSEHOLD USE. *** FOR INDUSTRIAL USE ONLY. NOT FOR HOUSEHOLD USE. ***
NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY BE HARMFUL OR FATAL.

THE INFORMATION ACCUMULATED HEREIN IS BELIEVED TO BE ACCURATE, BUT IS NOT WARRANTED TO BE. RECIPIENTS ARE ADVISED TO CONFIRM IN ADVANCE OF NEED THAT THE INFORMATION IS CURRENT, APPLICABLE AND SUITABLE FOR THEIR CIRCUMSTANCES.

OCEAN℠ Network
EMERGENCY PHONE 1-800-OLIN-911

SAFETY DATA

FOAMCRAFT, INC.
P. O. BOX 15246
SARASOTA, FLA. 33579
813 - 366-9393

SECTION I - IDENTIFICATION

2-19-87 B Garrett

CHEMICAL NAME & SYNONYMS AUTOFROTH® A Side	LABEL 2	A602 Series
CHEMICAL FAMILY Isocyanate	FORMULA Proprietary mixture	TRADE NAME AUTOFROTH® P
DESCRIPTION Dark liquid		CAS NO. Not assigned/mixture

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE

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.

PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
EYES Goggles GLOVES Required OTHER Coveralls and boots	Local exhaust as required to keep airborne concentrations below TLV.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	OSHA PEL	LD50	LC50	SIGNIFICANT EFFECTS
Polymeric Isocyanate wt% = 101-68-1 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 (76-89%) 1.6%-3% low 2x4x6 ft vertical 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	UPPER
			ND	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.

INHALATION Remove victim to fresh air, call a physician

PRODUCT CODE 980337 CHEMICAL NAME AUTOFROTH® P

SECTION VI - TOXICOLOGY (PRODUCT)

ACUTE ORAL LD 50
> 5 g/kg (rats)
ACUTE DERMAL LD 50
> 2 g/kg
ACUTE INHALATION LC 50
Not known

CARCINOGENICITY Not known to be carcinogenic
MUTAGENICITY Not known to be mutagenic
EYE IRRITATION Irritant
PRIMARY SKIN IRRITATION
Irritant

PRINCIPAL ROUTES OF ABSORPTION
Inhalation, dermal

EFFECTS OF ACUTE EXPOSURE Irritation to eyes, skin and mucous membrane. May cause allergic sensitization characterized by labored breathing.

EFFECTS OF CHRONIC EXPOSURE
May cause allergic sensitization of skin and respiratory tract.

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. 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.

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.

D.O.T. Dichlorodifluoromethane, mixture, non-flammable gas, UN 1028 (for cargo tank transport)

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 x UNSTABLE AT____C ____ F		HAZARDOUS POLYMERIZATION	MAY OCCUR x
			WILL NOT OCCUR

CONDITIONS TO AVOID
Water and incompatible materials in a closed system.
INCOMPATIBILITY(MATERIAL TO AVOID)
Acids, bases and alcohols and hydrochloric acid.
HAZARDOUS DECOMPOSITION PRODUCTS
Carbon monoxide, oxides of nitrogen, cyanides

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) 789-5438

S.C. 3499

Olin CORPORATION
120 Long Ridge Road, Stamford, Connecticut 06904
OCEAN℠ Network
EMER ONE 1-800-OLIN-911

OCEAN℠ Network
EMERGENCY PHONE 1-800-OLIN-911

SAFETY DATA

FOAMCRAFT, INC.
P. O. BOX 15246
SARASOTA, FLA. 33579
813 - 366-9393

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	VENTILATION REQUIREMENTS
EYES Goggles GLOVES Not required OTHER Coveralls and boots	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 wt% R11 20-25 R12 3-8%	1,000 ppm	No data	TCLO human 50,000 ppm/30 min	Eye effects, irritation
Amine catalyst	None established	No data	No data	Irritation

1.9 density
3½ min froth

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 392°F COC METHOD	OSHA CLASSIFICATION Slightly combustible liquid	FLAMMABLE EXPLOSIVE LIMIT	LOWER	UPPER
			ND	ND

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.

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 x UNSTABLE AT____C ____ F

HAZARDOUS POLYMERIZATION	MAY OCCUR
	WILL NOT OCCUR x

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(H2O=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
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
OCEAN℠ Network
EMERGENCY PHONE 1-800-OLIN-911

MATERIAL SAFETY DATA SHEET

Stelcoat — 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

TAILEVAST FL 34270

CUSTOMER NUMBER: 533890
DATE PRINTED: 12/14/88
COMPLEX: 300

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 #: 000080-62-6 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.-LE

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).

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

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

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

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.

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

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 (NIOSHI/MSHA APPROVED) DURNG 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.

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

CHEMICAL NAME	CAS NUMBER	% BY WEIGHT	SARA TITLE III SECTION 311 AND 312 HAZARD CATAGORIES
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)

DISCLAIMER AND LIMITATION OF LIABILITY

TO THE BEST OF OUR KNOWLEDGE, THE INFORMATION CONTAINED HEREIN IS ACCURATE. TO THE EXTENT ALLOWED BY LAW, THIS STATEMENT IS MADE IN LIEU OF ANY OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING BUT NOT LIMITED TO ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND IS IN LIEU OF ANY OTHER OBLIGATIONS OR LIABILITY ON THE PART OF COOK PAINT AND VARNISH COMPANY.

COOK PAINT AND VARNISH COMPANY WILL NOT BE LIABLE FOR ANY INCIDENTAL OR CONSEQUENTIAL DAMAGES. FINAL DETERMINATION OF THE SUITABILITY OF THE MATERIAL FOR THE USE CONTEMPLATED, THE MANNER OF USE, AND WHETHER THE SUGGESTED USE INFRINGES ANY PATENT IS THE SOLE RESPONSIBILITY OF THE BUYER.

APPLICATION TRACKING SYSTEM 06/08/89

APPL NO:165812
APPL RECVD:06/05/89 TYPE CODE:AC SUBCODE:1C LAST UPDATE:06/07/89
DER OFFICE RECVD:TPA DER OFFICE TRANSFER TO:___ APPLICATION COMPLETE:00/00/00
DER PROCESSOR: ~~THOMAS~~ Mc Donald
APPL STATUS:AC DATE:06/05/89 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUED/GENERAL)
RELIEF:__ (SSAC/EXEMPTIONS/VARIANCE)
(Y/N) N MANUAL TRACKING DISTRICT:40 COUNTY:41
(Y/N) DNR REVIEW REQD? LAT/LONG:__.__.__/__.__.__
(Y/N) N PUBLIC NOTICE REQD? BASIN-SEGMENT:__.___
(Y/N) N GOV BODY LOCAL APPROVAL REQD? COE #:_____
(Y/N) Y LETTER OF INTENT REQD? _ (I/ISSUE D/DENY) ALT#:___-_____

PROJECT SOURCE NAME:MULTIPLE BUILDING VENTS
STREET:7921 OLD BRADENTON RD. CITY:SARASOTA
STATE:FL ZIP:_____ PHONE:___-___-____
APPLICATION NAME:CHRIS CRAFT BOATS
STREET:P.O. BOX 25022 CITY:BRADENTON
STATE:FL ZIP:34206 PHONE:___-___-____
AGENT NAME:STONE & WEBSTER ENGINEERING CORP.
STREET:10002 PRINCESS PALM AVE #200 CITY:TAMPA
STATE:FL ZIP:33619 PHONE:813-622-7676
FEE #1-DATE PAID:06/05/89 AMOUNT PAID:C100C RECEIPT NUMBER:00138534

B DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE - - - __/__/__
C DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - - - __/__/__--__/__/__
D DATE DER REQ. COMMENTS FROM GOV. BODY FOR LOCAL APP. -. __/__/__
E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - __/__/__--__/__/__
E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - __/__/__--__/__/__
E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - __/__/__--__/__/__
E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - __/__/__--__/__/__
E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - __/__/__--__/__/__
E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - __/__/__--__/__/__
F DATE GOVERNING BODY REQUESTED SURVEY RESULTS/REPORTS - - __/__/__
G DATE FIELD REPORT WAS REQ--REC - - - - - - - - - - - - - __/__/__--__/__/__
H DATE DNR REVIEW WAS COMPLETED - - - - - - - - - - - - - __/__/__

I DATE APPLICATION WAS COMPLETE - - - - - - - - - - - - - - 00/00/00
J DATE GOVERNING BODY PROVIDED COMMENTS OR OBJECTIONS - - __/__/__
K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - - __/__/__--__/__/__
L DATE PUBLIC NOTICE WAS SENT TO APPLICANT - - - - - - - - __/__/__
M DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED - - __/__/__
N WAIVER DATE BEGIN--END (DAY 90) - - - - - - - - - - - - __/__/__--__/__/__

COMMENTS:

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No 138534

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Chris Crafts Boats Date 6/5/85

Address PO Box 2562 Bradenton Dollars $ 100.00

Applicant Name & Address Same

Source of Revenue Multiple Bldg Permits

Revenue Code 1031 Application Number AC41-165812

AC609

By Cherie King

STREET
STATE
ZIP

Chris-Craft®

May 31, 1989

Mr. William Thomas
Air Permitting
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

On behalf of the OMCCC Incorporated dba Chris Craft Boats facility, we are submitting four sets, with original seals and signatures, of applications for an air permit. A check in the amount of $2,500, payable to the Department of Environmental Regulation, is also enclosed.

Please address copies of correspondence relevent 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,

T. P. Robinson

T. P. Robinson
Vice President/General Manager

TPR/pm
Enclosures

OMCCC, Inc.
A Subsidiary of Outboard Marine Corporation
P.O. Box 25022, Bradenton, Florida 34206
(813) 747-4140 TELEX 402876 FAX (813) 747-5309

CHRIS - CRAFT BOATS
OUTBOARD MARINE CORPORATION
P. O. BOX 25022
BRADENTON, FL 34206

FIRST WISCONSIN • BROOKFIELD
FIRST WISCONSIN NATIONAL BANK OF BROOKFIELD
BROOKFIELD, WISCONSIN 53005

630

[redacted]
759

PAY

TO THE ORDER OF Florida Dept. of Environmental Regulation

DATE June 2, 1989

AMOUNT $2,500.00

OUTBOARD MARINE CORPORATION

C. B. [illegible]

[redacted]

CHRIS-CRAFT BOATS
OUTBOARD MARINE CORP.

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM TWCP-3 V-3

DATE	INVOICE NO.	DESCRIPTION	AMOUNT	DEDUCTIONS		NET AMOUNT
				PARTICULARS	AMOUNT	
0/89	ck. req		2,500.00			2,500.00

-3

RECEIVED
JUN 6 1989
DER - BAQM

CHRIS - CRAFT BOATS
OUTBOARD MARINE CORPORATION
P. O. BOX 25022
BRADENTON, FL 34206

FIRST WISCONSIN • BROOKFIELD
FIRST WISCONSIN NATIONAL BANK OF BROOKFIELD
BROOKFIELD, WISCONSIN 53005

630

[redacted]
759

PAY

TO THE ORDER OF Florida Dept. of Environmental Regulation

DATE June 2, 1989

AMOUNT $2,500.00

OUTBOARD MARINE CORPORATION

C. B. Voigt

[redacted]

Department of Environmental Regulation
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OUTBOARD MARINE CORP.

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DELUXE - FORM TWCP-3 V-3

DATE	INVOICE NO.	DESCRIPTION	AMOUNT	DEDUCTIONS		NET AMOUNT
				PARTICULARS	AMOUNT	
5/30/89	ck. req		2,500.00			2,500.00

V-3

Chris-Craft®

May 31, 1989

Mr. William Thomas
Air Permitting
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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OMCCC, Inc.
A Subsidiary of Outboard Marine Corporation
P.O. Box 25022, Bradenton, Florida 34206
(813) 747-4140 TELEX 402876 FAX (813) 747-5309

$2500 pd.
6-5-89
Receipt #117655

AC41-165851

Florida Department of Environmental Regulation

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Fugative Air Emission (VOC) [ ] New[1] [X] Existing[1]

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

COMPANY NAME: OMCCC Incorporated dba Chris Craft Boats 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 Steet E. City Sarasota

UTM: East 347848 North 3033291

Latitude ___° ___' ___"N Longitude ___° ___' ___"W

APPLICANT NAME AND TITLE: T.P. Robinson, Vice President/General Manager

APPLICANT ADDRESS: Post Office Box 25022 Bradenton, FL 34206

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of OMCCC Incorporated dba Chris Craft Boats

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: T.P. Robinson

T. P. Robinson, Vice President/General Manager
Name and Title (Please Type)

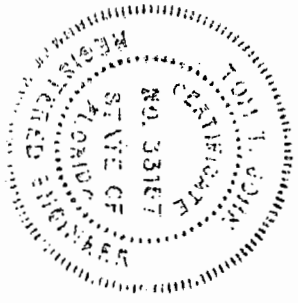
Date: 5-31-89 Telephone No. (813) 747-4140

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, imron 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 Deterioriation" (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 justification 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[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	

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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.

Acetone typically is distilled and recycled; waste acetone, other liquids and solids are collected and disposed of in the appropriate manner.

(See Attachment 5)

M. 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: _____ FPS

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) _____

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

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

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 _____ ( ) SO^{2}* _____ 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.

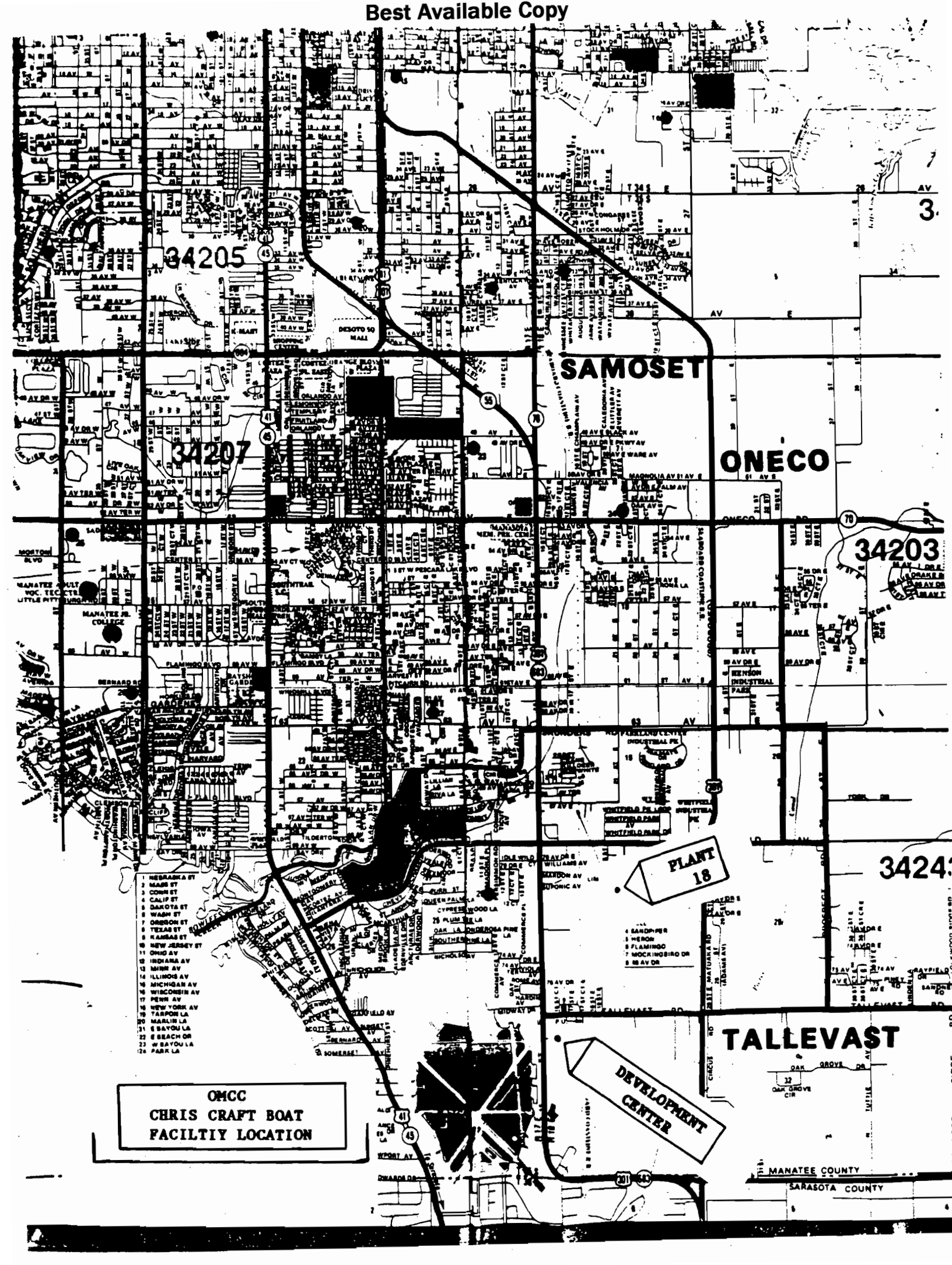
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

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

Best Available Copy



ATTACHMENT 2

FACILITY LAYOUT

■ — 42"ϕ EX. FAN = 13,600 CFM
■ — 72"ϕ EX. FAN = 67,200 CFM
■ — 48"ϕ EX FAN = 18,400 CFM
▨ — 30"ϕ EX FAN = 7,550 CFM

1-48" EX FAN LOCATED IN UPPER CUTTING AREA - OPEN TO LAM. 4'6" OFF CUTTING ROOM FLOOR OR 19'2" OFF LAM. FLOOR

1-42"ϕ EX FAN 9' OFF FLOOR

MOLD CARE (DWN)

GLASS CUTTING (UP)

OFFICE

OFFICE

GRINDING BOOTH

12'

63" OFF FLOOR

SMALL PARTS

32'

13'

1-42"ϕ EX FAN 4' OFF FLOOR

50'

MEK

HULL LAY-UP

DECK LAY-UP

LAMINATION BLDG (27,500 SQ FT)

50'

25'

87'

2-42"ϕ EX FANS

1-4' OFF FLOOR (TYP. THIS WALL UNLESS NOTED)

1-15'5 OFF FLOOR

FLOORS

FUEL TANKS

48"ϕ EX. FAN 11'6" OFF FLOOR

GEL COAT BOOTH

12'

140'

FUEL TANK STORAGE

16' GATE

RESIN TANK

GUARD HOUSE

TOTAL CFM OF EXHAUST IN LAMINATION AREA

231,550 CFM

225'

42"ϕ EX. FAN 3'5" TO ℄ OF FAN

42"ϕ EX FAN 13'5" TO ℄ OF FAN OFF FLOOR

105'

50'

12'

122'

MILL

42"ϕ EX. FAN 14' TO ℄ OF FAN

42"ϕ EX. FAN 17' TO ℄ OF FAN.

36'6"

16'6"

STRINGER ASSBY.

LOFT OVER

32'

18'

42"ϕ EX FAN VENTS OUT ROOF

12' UPH. SEWING (UP)

42"ϕ EX. FAN - OUT ROOF WOOD INVENTORY

120'

54'

33'

MEN

WOMEN

LOBBY

OFFICES

FINISH

42"ϕ EX FANS LOCATED 13'5" OFF FLOOR TO ℄ OF FAN

80'6"

ASSEMBLY BLDG (69,930 SQ FT)

ENGINE DEPT

FINISH

72"ϕ CEILING EX FAN.

95'

STORAGE

LOFT OVER

CATWALK

STOCK ROOM

21'

25'

STORAGE

16'6" LOFT OVER

MAINTENANCE

OFFICE

2-42"ϕ EX FANS VENT OUT ROOF

315'

TOTAL CFM OF EXHAUST IN ASSEMBLY BLDG.

321,600 CFM

ATTACHMENT 3

MATERIALS USAGE

Attachment 3
Section III: A
Raw Materical and Chemicals Used
Based on Current Usage
CHRIS CRAFT BOATS, PLANT 18

Description	Contaminants Type	%Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
Acetone[1]	VOC	100	79	See Attachment 2
Styrene Monomer	VOC	100	4.8	"
Methylethyl Ketone Peroxide	VOC	100	25.64	"
Gelcoat	VOC	30	178.42	"
Styrene Polyester Resin	VOC	30-40	1531.01	"
Autofroth A	VOC-exempt	46-48	4.63	"
Autofroth B	VOC-exempt	20-25	75.29	"
Spray Adhesive	VOC	90	12.47	"

[1] 30% (average) of acetone is collected and sent offsite for recovery; 70% is volatilized.

Attachment 3
Section III: A
Raw Materical and Chemicals Used
Based on Requested Usage
CHRIS CRAFT BOATS, PLANT 18

Description	Contaminants Type	%Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
Acetone[1]	VOC	100	98.75	See Attachment 2
Styrene Monomer	VOC	100	6	"
Methylethyl Ketone Peroxide	VOC	100	32.05	"
Gelcoat	VOC	30	223.03	"
Styrene Polyester Resin	VOC	30-40	1913.76	"
Autofroth A	VOC-exempt	46-48	5.79	"
Autofroth B	VOC-exempt	20-25	94.11	"
Spray Adhesive	VOC	90	15.59	"

[1] 30% (average) of acetone is collected and sent offsite for recovery; 70% 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
CHRIS CRAFT BOATS, PLANT 18

Name of Contaminant	Emission Maximum lbs/hr	Emission Actual T/yr	Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission lbs/yr	Potential Emission T/yr	Relate to Flow Diagram
1. acetone	55.3	57.5	N/A	N/A			See attachment 2
2. styrene - resin[1]	59.7	62.1	N/A	N/A			"
gelcoat[2]	18.73	19.5	N/A	N/A			"
monomer[3]	1.15	1.2	N/A	N/A			"
3. methylethyl ketone peroxide[4]	0	0	N/A	N/A			"
4. Autofroth A dichloro-difluoromethane[5]	.014	.0146	N/A	N/A			"
isocyanate	0	0	N/A	N/A			"
5. Autofroth B trichloro-fluoromethane[6]	6.02	6.26	N/A	N/A			"
6. methyl methacrylate[2] (5% wt. in gelcoat)	3.12	3.25	N/A	N/A			"
7. spray adhesive							"
toluene	3.79	3.89	N/A	N/A			"
acetone	3.79	3.89	N/A	N/A			"
hexane	3.79	3.89	N/A	N/A			"

Attachment 4
Section III: C
Airborne Contaminants Emitted
Based On Requested Usage
CHRIS CRAFT BOATS, PLANT 18

Name of Contaminant	Emission Maximum lbs/hr	Emission Actual T/yr	Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission lbs/yr	Potential Emission T/yr	Relate to Flow Diagram
1. acetone	69.1	71.9	N/A	N/A			See attachment 2
2. styrene - resin[1]	74.6	77.6	N/A	N/A			"
gelcoat[2]	23.4	24.3	N/A	N/A			"
monomer[3]	1.44	1.49	N/A	N/A			"
3. methylethyl ketone peroxide[4]	0	0	N/A	N/A			"
4. Autofroth A dichloro-difluoromethane[5]	.0175	.018	N/A	N/A			"
isocyanate	0	0	N/A	N/A			"
5. Autofroth B trichloro-fluoromethane[6]	7.5	7.83	N/A	N/A			"
6. methyl methacrylate[2] (5% wt. in gelcoat)	3.9	4.05	N/A	N/A			"
7. spray adhesive							"
toluene	4.74	4.93	N/A	N/A			"
acetone	4.74	4.93	N/A	N/A			"
hexane	4.74	4.93	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 thinning agent for the resin and gelcoat
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 Usage) - Styrene

1. Resin contribution

   1531.01 lbs/hr x 0.4 lbs styrene/lb resin x .13 lb emitted/lb used = 79.61 lbs/hr

   79.61 lbs/hr x 2080 hrs/yr x ton/2000 lbs = 82.8 TPY

2. Gelcoat contribution

   178.42 lbs/hr x 0.3 lbs styrene/lb gelcoat x 0.35 lbs emitted/lb used = 18.73 lbs/hr

   18.73 lbs/hr x 2080 hrs/yr x ton/2000 lbs = 19.48 TPY

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

   resin: 4.8 lbs/hr x 0.5 x 0.13 lbs emitted/lb used = 0.31 lbs/hr
   gelcoat: 4.8 lbs/hr x 0.5 x 0.35 lbs emitted/lb used = 0.84 lbs/hr

Current Total Styrene Emissions:

(79.61 + 18.73 + 1.15) = 99.49 lb/hr or 103.48 TPY

Current Total Facility VOC emissions: 170.4 TPY

Requested Total Styrene Emissions: 80.18 lb/hr or 83.39 TPY

Requested Total Facility VOC Emissions: 202 TPY

ATTACHMENT 5

EXHAUST VENT DATA
AND
MODEL INPUT PARAMETERS

The lamination building detailed in Attachment 2, is the source of the VOC emissions. The building is 140 ft. by 234 ft. by 20 ft. high. Ventilation is achieved by a 48" (18,400 ACFM) exhaust fan on the north wall, 19 feet 2 inches above the floor, twelve 42" (15,600 ACFM) exhaust fans, and one 48" (18,400 ACFM) exhaust fan along the west wall, located as shown in Attachment 2. These fans are located typically at 4 feet and 15 feet above the floor, and 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

Chris Craft — Contact Adhesive

MATERIAL SAFETY DATA SHEET

03/16/99

DataLogiX Formula Systems Inc.

SECTION I - PRODUCT INDENTIFICATION

Manufacturer: DELTA LABORATORIES INC.
P.O. BOX 2258
CR 326 ZUBER,(NEAR OCALA)
OCALA FL 32678

Information Phone: 904 629 8101
Emergency Phone: 904 629 8101

Product Class: CONTACT ADHESIVE
Trade Name : SPRAY CONTACT ADHESIVE
Product Code : 90C000206
C.A.S. Number:

Hazard Ratings: none -> extreme
0 ---> 4

Health - 2
Fire - 3
Reactivity - 0

SECTION II - HAZARDOUS INGREDIENTS

Ingredients	CAS #	Weight %	Exposure Limits		Vapor Pr. mm Hg
TOLUENE**	108-88-3	20-50	100.	ppm	24.
ACETONE**	67-64-1	20-50	750.	ppm	186.
HEXANE	110-54-3	20-50	50.	ppm	140.

SECTION III - PHYSICAL DATA

Boiling Range: 131 - 232 Deg. F
Evap. Rate: Faster than n-Butyl Acetate
Volatiles volume: 90.7 %
Appearance:

Vapor Density: Heavier than Air.
Liquid Density: Lighter than Water.
Wgt per gallon: 6.55 Pounds.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flammability Class: 1B Flash Point: -20 F tcc LEL : 1.

-EXTINGUISHING MEDIA:

THE NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) CLASSIFIES BURNING LIQUIDS AS CLASS B FIRES. THEREFORE, ANY APPROVED CLASS B FIRE EXTINGUISHER OR EXTINGUISHING AGENT MAY BE USED FOR FIREFIGHTING PURPOSES. FOR EXAMPLE: DRY CHEMICAL, FOAM, CARBON DIOXIDE.

-SPECIAL FIREFIGHTING 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 BUILDUP AND POSSIBLE AUTOIGNITION OR EXPLOSION WHEN EXPOSED TO EXTREME HEAT

-UNUSUAL FIRE & EXPLOSION HAZARDS:

*** EXTREMELY FLAMMABLE *** KEEP CONTAINERS TIGHTLY CLOSED. MATERIAL IS HIGHLY VOLATILE AND READILY GIVES OFF VAPORS WHICH MAY TRAVEL ALONG THE GROUND OR BE MOVED BY VENTILATION AND CAUSE FLASH FIRES OR BE IGNITED EXPLOSIVELY BY PILOT LIGHTS, OTHER FLAMES, SPARKS, HEATERS, SMOKING, ELECTRIC MOTORS, OR OTHER SOURCES OF IGNITION AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT. CLOSED CONTAINERS MAY EXPLODE WHEN EXPOSED TO EXTREME HEAT. DO NOT APPLY TO HOT SURFACES. NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE PRODUCT (EVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY. DURING EMERGENCY CONDITIONS OVEREXPOSURE TO DECOMPOSITION MAY CAUSE A HEALTH HAZARD. SYMPTOMS MAY NOT BE IMMEDIATELY APPARENT. OBTAIN MEDICAL ATTENTION.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA (cont.)

-UNUSUAL FIRE & EXPLOSION HAZARDS: (cont.)

SECTION V - HEALTH HAZARD DATA

-PERMISSIBLE EXPOSURE LEVEL:

**

ANY ITEM IN SECTION II MARKED WITH ** IS A TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF SARA TITLE III AND OF 40 CFR 372.

****

EXPOSURE LIMITS LISTED IN SECTION II ARE EXPRESSED AS TLV UNLESS NOTED HERE.

TOLUENE OSHA PEL=200ppm, TLV=100ppm ACGIH TWA
ACETONE OSHA PEL=750ppm, ACGIH TLV=750ppm TWA
HEXANE OSHA PEL=500ppm, TLV=50ppm ACGIH TWA

-EFFECTS OF OVEREXPOSURE:

---EYES--- CAN CAUSE SEVERE IRRITATION, REDNESS, TEARING, AND BLURRED VISION.

---SKIN---PROLONGED OR REPEATED CONTACT CAN CAUSE MODERATE IRRITATION, DEFATTING, AND DERMATITIS. REPEATED CONTACT MAY CAUSE SENSITIZATION.

---BREATHING---EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL AND RESPIRATORY IRRITATION, DIZZINESS, WEAKNESS, FATIGUE, NAUSEA, HEADACHE, POSSIBLE UNCONSCIOUSNESS, AND EVEN ASPHYXIATION.

---SWALLOWING---CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, AND DIARRHEA. ASPIRATION OF MATERIAL INTO THE LUNGS CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.

OVEREXPOSURE TO TOLUENE MAY CAUSE LIVER DAMAGE & KIDNEY DAMAGE, CENTRAL NERVOUS SYSTEM DEPRESSION (IN HIGH CONCENTRATIONS), AND BRAIN CELL DAMAGE FROM LONG TERM INHALATION OF VAPORS.
OVEREXPOSURE TO ACETONE MAY CAUSE EYE, SKIN, AND RESPIRATORY TRACT IRRITATION, WITH POSSIBLE EYE TISSUE INJURY IF NOT REMOVED PROMPTLY. INHALATION OF VAPORS MAY CAUSE HEADACHES, DIZZINESS, AND CENTRAL NERVOUS SYSTEM DEPRESSION.
OVEREXPOSURE TO HEXANE MAY CAUSE MODERATE SKIN & EYE IRRITATION, RESPIRATORY TRACT IRRITATION, AND CENTRAL NERVOUS SYSTEM DEPRESSION (IN HIGH VAPOR CONCENTRATIONS).

-FIRST AID:

-IF IN EYES--FLUSH WITH LARGE AMOUNTS OF WATER, LIFTING THE UPPER AND LOWER LIDS OCCASIONALLY. GET MEDICAL ATTENTION.

-IF ON SKIN--THOROUGHLY WASH EXPOSED AREA WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE RE-USE.

--IF BREATHED---IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED, GIVE ARTIFICIAL RESPIRATION. KEEP PERSON WARM, QUIET, AND GET MEDICAL ATTENTION.

-IF SWALLOWED---DO NOT INDUCE VOMITING. KEEP PERRSON WARM, QUIET, AND GET MEDICAL ATTENTION. ASPIRATION OF MATERIAL INTO THE LUNGS DUE TO VOMITING CAN CAUSE PNEUMONITIS WHICH CAN BE FATAL.

SECTION VI - REACTIVITY DATA

STABLITY: [ ] Unstable [x] Stable
HAZARDOUS POLYMERIZATION: [ ] May occur [x] Will not occur

-INCOMPATIBILITY:

STRONG OXIDIZING AGENTS, SULFURIC ACID.
AMINES, ALKANOLAMINES, OXYGEN, HALOGENS, ALDEHYDES, AMMONIA, AND CHLORINATED COMPOUNDS.

-CONDITIONS TO AVOID:

HIGH TEMPERATURE OR HEAT OR OPEN FLAMES.

-HAZARDOUS DECOMPOSITION PRODUCTS:

THERMAL DECOMPOSITION MAY PRODUCE CARBON MONOXIDE, CARBON DIOXIDE, CHLORINE COMPOUNDS, AND TOXIC FUMES.

SECTION VII - SPILL OR LEAK PROCEEDURES

-STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

REMOVE ALL SOURCES OF IGNITION (FLAMES, HOT SURFACES, PILOT LIGHTS, AND ELECTRIC, STATIC, OR FRICTIONAL SPARKS). AVOID BREATHING VAPORS. VENTILATE AREA. REMOVE WITH INERT ABSORBENT AND NON-SPARKING TOOLS. PERSONS NOT WEARING PROTECTIVE EQUIPMENT SHOULD BE EXCLUDED FROM AREA OF SPILL UNTIL CLEAN-UP HAS BEEN COMPLETED.

-WASTE DISPOSAL METHOD:

DISPOSE IN ACCORDANCE WITH LOCAL, STATE, AND FEDERAL LAW REGULATIONS. INCINERATE IN APPROVED FACILITY. DO NOT INCINERATE CLOSED CONTAINERS.

SECTION VIII - SPECIAL PROTECTION INFORMATION:

-RESPIRATORY PROTECTION:

IF THE 'TLV' OF THE PRODUCT OR ANY COMPONENT IS EXCEEDED, A NIOSH/MESA JOINTLY APPROVED SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACE PIECE OPERATED IN PRESSURE DEMAND OR OTHER POSITIVE PRESSURE MODE IS ADVISED; HOWEVER, OSHA REGULATIONS ALSO PERMIT OTHER NIOSH/MESA RESPIRATORS UNDER SPECIFIC CONDITIONS. AREAS OF STORAGE AND USE SHOULD BE SURVEYED BY A QUALIFIED INDUSTRIAL HYGIENIST TO ASSURE ADEQUACY OF RESPIRATORY PROTECTION, VENTILATION, AND OTHER PROTECTIVE EQUIPMENT.

-VENTILATION:

PROVIDE GENERAL DILUTION OR LOCAL EXHAUST VENTILATION IN VOLUME AND PATTERN TO KEEP TLV OF ALL HAZARDOUS INGREDIENTS IN SECTION II BELOW ACCEPTABLE LIMIT; LEL IN SECTION II BELOW STATED LIMIT.

-PROTECTIVE GLOVES:

REQUIRED FOR PROLONGED OR REPEATED CONTACT.

-EYE PROTECTION:

USE SAFETY EYEWEAR DESIGNED TO PROTECT AGAINST SPLASH OF LIQUID.

-OTHER PROTECTIVE EQUIPMENT:

WEAR IMPERVIOUS CLOTHING AND BOOTS TO PREVENT REPEATED OR PROLONGED SKIN CONTACT.

SECTION IX - SPECIAL PRECAUTIONS

-PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

KEEP AWAY FROM HEAT, SPARKS, FIRE, AND ALL IGNITION SOURCES. DO NOT LEAVE CONTAINER OPEN. DO NOT STORE ABOVE 100 DEGREES F. STORE IN BUILDINGS DESIGNED AND PROTECTED FOR STORAGE OF NFPA CLASS I FLAMMABLE LIQUIDS. USE IN AREAS DESIGNED AND PROTECTED FOR USE OF CLASS I FLAMMABLE LIQUIDS.

-OTHER PRECAUTIONS:

USE ONLY WITH ADEQUATE VENTILATION. AVOID PROLONGED OR REPEATED BREATHING OF VAPOR. AVOID CONTACT WITH EYES OR SKIN. DO NOT TAKE INTERNALLY. CONTAINERS SHOULD BE GROUNDED WHEN POURING. AVOID FREE FALL OF LIQUID IN EXCESS OF A FEW INCHES. STORE, DISPENSE AND USE IN ACCORDANCE WITH NFPA STANDARDS FOR CLASS I FLAMMABLE LIQUIDS. CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPTIED. SINCE EMPTIED CONTAINERS RETAIN PRODUCT RESIDUES (VAPOR, LIQUID, AND/OR SOLID), ALL HAZARD PRECAUTIONS GIVEN IN THIS DATA SHEET MUST BE OBSERVED. THE CONSUMER PRODUCT SAFETY COMMISSION HAS BANNED THIS PRODUCT FOR CONSUMER USE BECAUSE OF FLAMMABILITY HAZARDS. IT MAY NOT BE SUPPLIED TO CONSUMERS, AND MAY NOT BE PACKAGED IN CONTAINERS SUITABLE FOR CONSUMER OR HOUSEHOLD USE.
*** FOR INDUSTRIAL USE ONLY. NOT FOR HOUSEHOLD USE. ***
NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY BE HARMFUL OR FATAL.

THE INFORMATION ACCUMULATED HEREIN IS BELIEVED TO BE ACCURATE, BUT IS NOT WARRANTED TO BE. RECIPIENTS ARE ADVISED TO CONFIRM IN ADVANCE OF NEED THAT THE INFORMATION IS CURRENT, APPLICABLE AND SUITABLE FOR THEIR CIRCUMSTANCES.

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OCEAN[SM] Network
EMERGENCY PHONE 1 800 OLIN 911

MATERIAL SAFETY DATA

FOAMCRAFT, INC.
P. O. BOX 15246
SARASOTA, FLA. 33579
813 - 366-9393

SECTION I - IDENTIFICATION

2-19-87 B Genest

CHEMICAL NAME & SYNONYMS AUTOFROTH® A Side	LABEL 2	A602 Series
CHEMICAL FAMILY Isocyanate	FORMULA Proprietary mixture	TRADE NAME AUTOFROTH® P
DESCRIPTION Dark liquid		CAS NO. Not assigned/mixture

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE

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.

PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
EYES Goggles GLOVES Required OTHER Coveralls and boots	Local exhaust as required to keep airborne concentrations below TLV.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	OSHA PEL	LD50	LC50	SIGNIFICANT EFFECTS
Polymeric Isocyanate wt% = 101-68-1 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 - (6-8%) 1.6%-3% low	1,000 ppm	No data	TCLO (human) 200,000 ppm/30 min	Eye effects, irritation

2x4x6 ft vertical panels

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 365°F COC METHOD	OSHA CLASSIFICATION Slightly combustible liquid	FLAMMABLE EXPLOSIVE LIMIT	LOWER	UPPER
			ND	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.

INHALATION Remove victim to fresh air, call a physician.

PRODUCT CODE 980337 CHEMICAL NAME AUTOFROTH® P

SECTION VI - TOXICOLOGY (PRODUCT)

ACUTE ORAL LD 50
> 5 g/kg (rats)
ACUTE DERMAL LD 50
> 2 g/kg
ACUTE INHALATION LC 50
Not known

CARCINOGENICITY Not known to be carcinogenic
MUTAGENICITY Not known to be mutagenic
EYE IRRITATION Irritant
PRIMARY SKIN IRRITATION
Irritant

PRINCIPAL ROUTES OF ABSORPTION
Inhalation, dermal

EFFECTS OF ACUTE EXPOSURE Irritation to eyes, skin and mucous membrane. May cause allergic sensitization characterized by labored breathing.

EFFECTS OF CHRONIC EXPOSURE
May cause allergic sensitization of skin and respiratory tract.

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. 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.

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.

D.O.T. Dichlorodifluoromethane, mixture, non-flammable gas, UN 1028 (for cargo tank transport)

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 X UNSTABLE AT ____C ____ F	HAZARDOUS POLYMERIZATION	MAY OCCUR X
		WILL NOT OCCUR

CONDITIONS TO AVOID
Water and incompatible materials in a closed system.
INCOMPATIBILITY(MATERIAL TO AVOID)
Acids, bases and alcohols and hydrochloric acid.
HAZARDOUS DECOMPOSITION PRODUCTS
Carbon monoxide, oxides of nitrogen, cyanides

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) 789-5438
Olin CORPORATION
120 Long Ridge Road, Stamford, Connecticut 06904
OCEAN℠ Network
EMER ONE 1-800-OLIN-911

Olin

OCEAN℠ Network
EMERGENCY PHONE 1-800-OLIN-911

MATERIAL SAFETY DATA

FOAMCRAFT, INC.
P. O. BOX 15246
SARASOTA, FLA. 33579
813 - 366-9393

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	VENTILATION REQUIREMENTS
EYES Goggles GLOVES Not required OTHER Coveralls and boots	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 ~~R11~~ ~~R12~~	1,000 ppm	No data	TCLO human 50,000 ppm/30 min	Eye effects, irritation
Amine catalyst	None established	No data	No data	Irritation

1.9 density
3½ min Froth

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 392°F COC METHOD	OSHA CLASSIFICATION Slightly combustible liquid	FLAMMABLE EXPLOSIVE LIMIT	LOWER	UPPER
			ND	ND

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.

PRODUCT CODE 981072 CHEMICAL NAME AUTOFROTH®

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 X UNSTABLE AT____C ____ F

HAZARDOUS POLYMERIZATION	MAY OCCUR
	WILL NOT OCCUR X

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(H20=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
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
OCEAN℠ Network
EMERGENCY PHONE 1-800-OLIN-911

MATERIAL SAFETY DATA SHEET

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

TAILEVAST FL 34270

CUSTOMER NUMBER: 533890
DATE PRINTED: 12/14/88
COMPLEX: 300

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 #: 000080-62-6 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.-L

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).

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

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

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

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.

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

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 (NIOSHI/MSHA APPROVED) DURNG 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.

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

CHEMICAL NAME	CAS NUMBER	% BY WEIGHT	SARA TITLE III SECTION 311 AND 312 HAZARD CATAGORIES
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)

DISCLAIMER AND LIMITATION OF LIABILITY

TO THE BEST OF OUR KNOWLEDGE, THE INFORMATION CONTAINED HEREIN IS ACCURATE. TO THE EXTENT ALLOWED BY LAW, THIS STATEMENT IS MADE IN LIEU OF ANY OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING BUT NOT LIMITED TO ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND IS IN LIEU OF ANY OTHER OBLIGATIONS OR LIABILITY ON THE PART OF COOK PAINT AND VARNISH COMPANY.

COOK PAINT AND VARNISH COMPANY WILL NOT BE LIABLE FOR ANY INCIDENTAL OR CONSEQUENTIAL DAMAGES. FINAL DETERMINATION OF THE SUITABILITY OF THE MATERIAL FOR THE USE CONTEMPLATED, THE MANNER OF USE, AND WHETHER THE SUGGESTED USE INFRINGES ANY PATENT IS THE SOLE RESPONSIBILITY OF THE BUYER.

$5,500 pd
6-5-89
Recpt# 117625

AC 41-165851

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

RECEIVED
JUN 6 1989
DER - BAQM

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Fugative Air Emission (VOC) [ ] New[1] [X] Existing[1]

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

COMPANY NAME: OMCCC Incorporated dba Chris Craft Boats 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 Steet E. City Sarasota

UTM: East 347848 North 3033291

Latitude ____° ____' ____"N Longitude ____° ____' ____"W

APPLICANT NAME AND TITLE: T.P. Robinson, Vice President/General Manager

APPLICANT ADDRESS: Post Office Box 25022 Bradenton, FL 34206

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of OMCCC Incorporated dba Chris Craft Boats

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.

Bill Mugers
David Collett
→9130

*Attach letter of authorization

Signed: T. P. Robinson

T. P. Robinson, Vice President/General Manager
Name and Title (Please Type)

30,000 sq'
75 S
TA West

Date: 5-31-89 Telephone No. (813) 747-4140

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)

DER Form 17-1.202(1)
Effective October 31, 1982

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, imron 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 Deterioriation" (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 justification 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[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	

[1]See Section V, Item 2.

[2]Reference 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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, 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.

Acetone typically is distilled and recycled; waste acetone, other liquids and solids are collected and disposed of in the 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: _____ FPS

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) _____

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

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

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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Explain method of determining efficiency.
[2]Energy 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:

[1]Applicant 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 _____ ( ) SO^{2}* _____ 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.

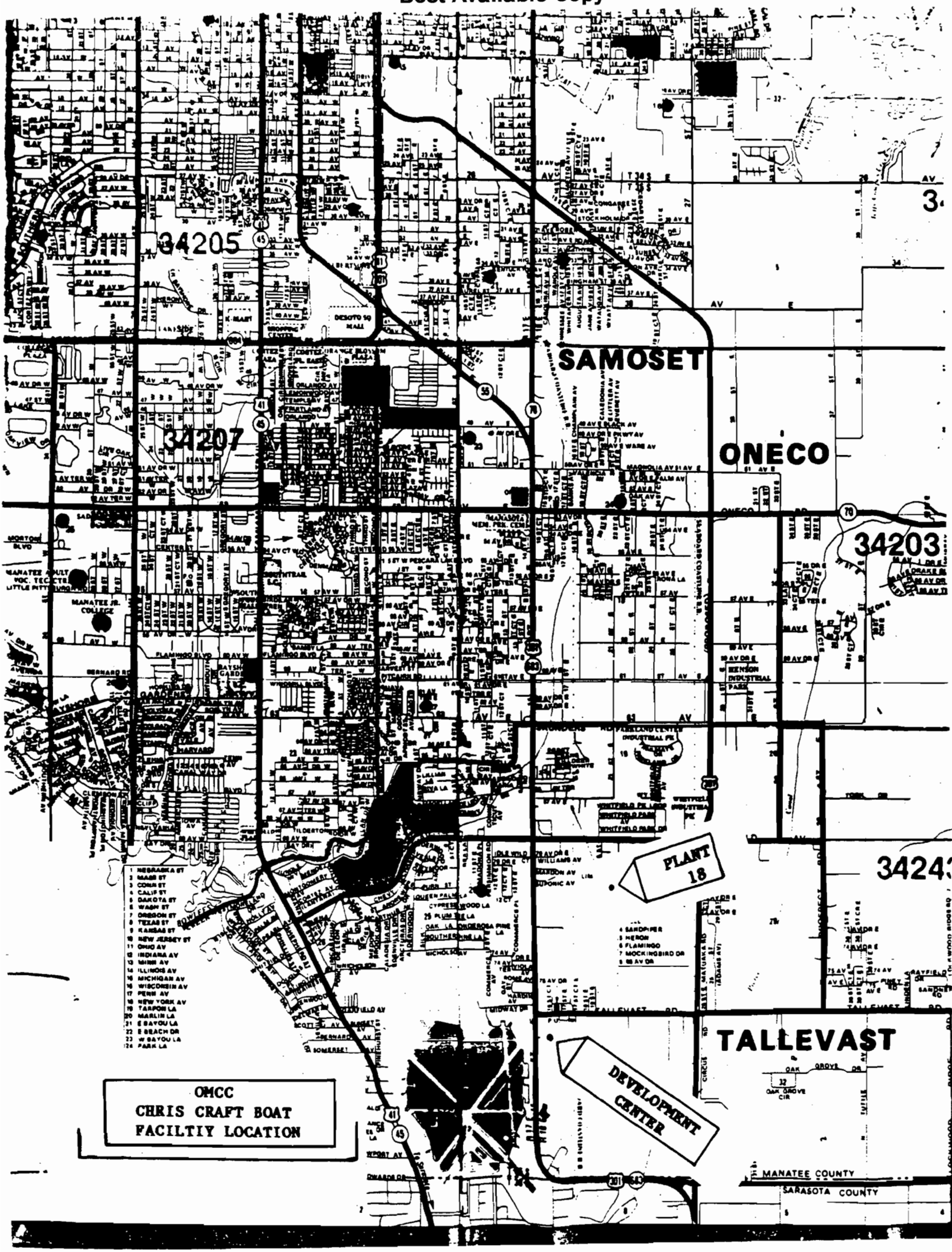
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

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

Best Available Copy



ATTACHMENT 2

FACILITY LAYOUT

■ — 42"Ø EX. FAN = 13,600 CFM

■ — 72"Ø EX. FAN = 67,200 CFM

■ — 48"Ø EX FAN = 18,400 CFM

▨ — 30"Ø EX FAN = 7,550 CFM

1-48" EX FAN LOCATED IN UPPER CUTTING AREA - OPEN TO LAM. 4'6" OFF CUTTING ROOM FLOOR OR 19'2" OFF LAM. FLOOR

1-42"Ø EX FAN 9' OFF FLOOR

MOLD CARE (DWN)

GLASS CUTTING (UP)

OFFICE

OFFICE

GRINDING BOOTH

SMALL PARTS

32'

13'

50'

1-42"Ø EX FAN 4' OFF FLOOR

MEK

HULL LAY-UP

DECK LAY-UP

50'

25'

87'

2-42"Ø EX FANS 1-4' OFF FLOOR (TYP. THIS WALL UNLESS NOTED) 1-15'5 OFF FLOOR

FLOORS FUEL TANKS

42"Ø EX. FAN 11'6" OFF FLOOR

GEL COAT BOOTH

12'

RESIN TANK

GUARD HOUSE

16' GATE

FUEL TANK STORAGE

140'

LAMINATION BLDG (27,500 SQ FT.)

225'

TOTAL CFM OF EXHAUST IN LAMINATION AREA

231,550 CFM

42"Ø EX. FAN 3'5" TO ℄ OF FAN. 17'6" OFF FLOOR TO ℄ OF FAN.

42"Ø EX FAN 13'5" TO ℄ OF FAN OFF FLOOR

105'

50'

12'

122'

MILL

42"Ø EX. FAN 14' TO ℄ OF FAN

42"Ø EX. FAN 11' TO ℄ OF FAN.

36'6"

16'6"

STRINGER ASSY.

120'

42"Ø EX FAN VENTS OUT ROOF

12' UPH. SEWING (UP)

LOFT OVER

42" Ø EX. FAN - OUT ROOF WOOD INVENTORY

54'

33'

MEN

WOMEN

42"Ø EX FANS LOCATED 13'5" OFF FLOOR TO ℄ OF FAN

80'6"

ASSEMBLY BLDG (69,930 SQ FT)

ENGINE DEPT

FINISH

72"Ø CEILING EX FAN.

95'

OFFICES

FINISH

STORAGE

LOFT OVER

32'

18'

20'

STOCK Room

21'

STORAGE

MAINTENANCE

OFFICE

16'6" LOFT OVER

2-42"Ø EX FANS VENT OUT ROOF

315'

TOTAL CFM OF EXHAUST IN ASSEMBLY BLDG.

321,600 CFM

ATTACHMENT 3

MATERIALS USAGE

Attachment 3
Section III: A
Raw Materical and Chemicals Used
Based on Current Usage
CHRIS CRAFT BOATS, PLANT 18

Description	Contaminants Type	%Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
Acetone[1]	VOC	100	79	See Attachment 2
Styrene Monomer	VOC	100	4.8	"
Methylethyl Ketone Peroxide	VOC	100	25.64	"
Gelcoat	VOC	30	178.42	"
Styrene Polyester Resin	VOC	30-40	1531.01	"
Autofroth A	VOC-exempt	46-48	4.63	"
Autofroth B	VOC-exempt	20-25	75.29	"
Spray Adhesive	VOC	90	12.47	"

[1] 30% (average) of acetone is collected and sent offsite for recovery; 70% is volatilized.

Attachment 3
Section III: A
Raw Materical and Chemicals Used
Based on Requested Usage
CHRIS CRAFT BOATS, PLANT 18

Description	Contaminants Type	%Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
Acetone[1]	VOC	100	98.75	See Attachment 2
Styrene Monomer	VOC	100	6	"
Methylethyl Ketone Peroxide	VOC	100	32.05	"
Gelcoat	VOC	30	223.03	"
Styrene Polyester Resin	VOC	30-40	1913.76	"
Autofroth A	VOC-exempt	46-48	5.79	"
Autofroth B	VOC-exempt	20-25	94.11	"
Spray Adhesive	VOC	90	15.59	"

[1] 30% (average) of acetone is collected and sent offsite for recovery; 70% 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
CHRIS CRAFT BOATS, PLANT 18

Name of Contaminant	Emission Maximum lbs/hr	Emission Actual T/yr	Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission lbs/yr	Potential Emission T/yr	Relate to Flow Diagram
1. acetone	55.3	57.5	N/A	N/A			See attachment 2
2. styrene - resin[1]	59.7	62.1	N/A	N/A			"
gelcoat[2]	18.73	19.5	N/A	N/A			"
monomer[3]	1.15	1.2	N/A	N/A			"
3. methylethyl ketone peroxide[4]	0	0	N/A	N/A			"
4. Autofroth A dichloro-difluoromethane[5]	.014	.0146	N/A	N/A			"
isocyanate	0	0	N/A	N/A			"
5. Autofroth B trichloro-fluoromethane[6]	6.02	6.26	N/A	N/A			"
6. methyl methacrylate[2] (5% wt. in gelcoat)	3.12	3.25	N/A	N/A			"
7. spray adhesive							"
toluene	3.79	3.89	N/A	N/A			"
acetone	3.79	3.89	N/A	N/A			"
hexane	3.79	3.89	N/A	N/A			"

Attachment 4
Section III: C
Airborne Contaminants Emitted
Based On Requested Usage
CHRIS CRAFT BOATS, PLANT 18

Name of Contaminant	Emission Maximum lbs/hr	Emission Actual T/yr	Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential Emission lbs/yr	Potential Emission T/yr	Relate to Flow Diagram
1. acetone	69.1	71.9	N/A	N/A			See attachment 2
2. styrene - resin[1]	74.6	77.6	N/A	N/A			"
gelcoat[2]	23.4	24.3	N/A	N/A			"
monomer[3]	1.44	1.49	N/A	N/A			"
3. methylethyl ketone peroxide[4]	0	0	N/A	N/A			"
4. Autofroth A dichloro-difluoromethane[5]	.0175	.018	N/A	N/A			"
isocyanate	0	0	N/A	N/A			"
5. Autofroth B trichloro-fluoromethane[6]	7.5	7.83	N/A	N/A			"
6. methyl methacrylate[2] (5% wt. in gelcoat)	3.9	4.05	N/A	N/A			"
7. spray adhesive							"
toluene	4.74	4.93	N/A	N/A			"
acetone	4.74	4.93	N/A	N/A			"
hexane	4.74	4.93	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 thinning agent for the resin and gelcoat
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 Usage) - Styrene

1. Resin contribution

   1531.01 lbs/hr x 0.4 lbs styrene/lb resin x .13 lb emitted/lb used = 79.61 lbs/hr

   79.61 lbs/hr x 2080 hrs/yr x ton/2000 lbs = 82.8 TPY

2. Gelcoat contribution

   178.42 lbs/hr x 0.3 lbs styrene/lb gelcoat x 0.35 lbs emitted/lb used = 18.73 lbs/hr

   18.73 lbs/hr x 2080 hrs/yr x ton/2000 lbs = 19.48 TPY

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

   resin: 4.8 lbs/hr x 0.5 x 0.13 lbs emitted/lb used = 0.31 lbs/hr
   gelcoat: 4.8 lbs/hr x 0.5 x 0.35 lbs emitted/lb used = 0.84 lbs/hr

Current Total Styrene Emissions:

(79.61 + 18.73 + 1.15) = 99.49 lb/hr or 103.48 TPY

Current Total Facility VOC emissions: 170.4 TPY

Requested Total Styrene Emissions: 80.18 lb/hr or 83.39 TPY

Requested Total Facility VOC Emissions: 202 TPY

ATTACHMENT 5

EXHAUST VENT DATA
AND
MODEL INPUT PARAMETERS

The lamination building detailed in Attachment 2, is the source of the VOC emissions. The building is 140 ft. by 234 ft. by 20 ft. high. Ventilation is achieved by a 48" (18,400 ACFM) exhaust fan on the north wall, 19 feet 2 inches above the floor, twelve 42" (15,600 ACFM) exhaust fans, and one 48" (18,400 ACFM) exhaust fan along the west wall, located as shown in Attachment 2. These fans are located typically at 4 feet and 15 feet above the floor, and 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

Chris Craft Contact Adhesive

MATERIAL SAFETY DATA SHEET

03/16/89

DataLogix Formula Systems Inc.

SECTION I - PRODUCT INDENTIFICATION

Manufacturer: DELTA LABORATORIES INC.
P.O. BOX 2258
CR 326 ZUBER,(NEAR OCALA)
OCALA FL 32678

Information Phone: 904 629 8101
Emergency Phone: 904 629 8101

Product Class: CONTACT ADHESIVE
Trade Name : SPRAY CONTACT ADHESIVE
Product Code : 90C000206
C.A.S. Number:

Hazard Ratings: none -> extreme 0 ---> 4
Health - 2
Fire - 3
Reactivity - 0

SECTION II - HAZARDOUS INGREDIENTS

Ingredients	CAS #	Weight %	Exposure Limits		Vapor Pr. mm Hg
TOLUENE**	108-88-3	20-50	100.	ppm	24.
ACETONE**	67-64-1	20-50	750.	ppm	186.
HEXANE	110-54-3	20-50	50.	ppm	140.

SECTION III - PHYSICAL DATA

Boiling Range: 131 - 232 Deg. F
Evap. Rate: Faster than n-Butyl Acetate
Volatiles volume: 90.7 %
Appearance:

Vapor Density: Heavier than Air.
Liquid Density: Lighter than Water.
Wgt per gallon: 6.55 Pounds.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flammability Class: 1B Flash Point: -20 F tcc LEL : 1.

-EXTINGUISHING MEDIA:

THE NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) CLASSIFIES BURNING LIQUIDS AS CLASS B FIRES. THEREFORE, ANY APPROVED CLASS B FIRE EXTINGUISHER OR EXTINGUISHING AGENT MAY BE USED FOR FIREFIGHTING PURPOSES. FOR EXAMPLE: DRY CHEMICAL, FOAM, CARBON DIOXIDE.

-SPECIAL FIREFIGHTING 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 BUILDUP AND POSSIBLE AUTOIGNITION OR EXPLOSION WHEN EXPOSED TO EXTREME HEAT

-UNUSUAL FIRE & EXPLOSION HAZARDS:

*** EXTREMELY FLAMMABLE *** KEEP CONTAINERS TIGHTLY CLOSED. MATERIAL IS HIGHLY VOLATILE AND READILY GIVES OFF VAPORS WHICH MAY TRAVEL ALONG THE GROUND OR BE MOVED BY VENTILATION AND CAUSE FLASH FIRES OR BE IGNITED EXPLOSIVELY BY PILOT LIGHTS, OTHER FLAMES, SPARKS, HEATERS, SMOKING, ELECTRIC MOTORS, OR OTHER SOURCES OF IGNITION AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT. CLOSED CONTAINERS MAY EXPLODE WHEN EXPOSED TO EXTREME HEAT. DO NOT APPLY TO HOT SURFACES. NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE PRODUCT (EVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY. DURING EMERGENCY CONDITIONS OVEREXPOSURE TO DECOMPOSITION MAY CAUSE A HEALTH HAZARD. SYMPTOMS MAY NOT BE IMMEDIATELY APPARENT. OBTAIN MEDICAL ATTENTION.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA (cont.)

-UNUSUAL FIRE & EXPLOSION HAZARDS: (cont.)

SECTION V - HEALTH HAZARD DATA

-PERMISSIBLE EXPOSURE LEVEL:

**

ANY ITEM IN SECTION II MARKED WITH ** IS A TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF SARA TITLE III AND OF 40 CFR 372.

****

EXPOSURE LIMITS LISTED IN SECTION II ARE EXPRESSED AS TLV UNLESS NOTED HERE.

TOLUENE OSHA PEL=200ppm, TLV=100ppm ACGIH TWA

ACETONE OSHA PEL=750ppm, ACGIH TLV=750ppm TWA

HEXANE OSHA PEL=500ppm, TLV=50ppm ACGIH TWA

-EFFECTS OF OVEREXPOSURE:

---EYES--- CAN CAUSE SEVERE IRRITATION, REDNESS, TEARING, AND BLURRED VISION.

---SKIN---PROLONGED OR REPEATED CONTACT CAN CAUSE MODERATE IRRITATION, DEFATTING, AND DERMATITIS. REPEATED CONTACT MAY CAUSE SENSITIZATION.

---BREATHING---EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL AND RESPIRATORY IRRITATION, DIZZINESS, WEAKNESS, FATIGUE, NAUSEA, HEADACHE, POSSIBLE UNCONSCIOUSNESS, AND EVEN ASPHYXIATION.

---SWALLOWING---CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, AND DIARRHEA. ASPIRATION OF MATERIAL INTO THE LUNGS CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.

OVEREXPOSURE TO TOLUENE MAY CAUSE LIVER DAMAGE & KIDNEY DAMAGE, CENTRAL NERVOUS SYSTEM DEPRESSION (IN HIGH CONCENTRATIONS), AND BRAIN CELL DAMAGE FROM LONG TERM INHALATION OF VAPORS.

OVEREXPOSURE TO ACETONE MAY CAUSE EYE, SKIN, AND RESPIRATORY TRACT IRRITATION, WITH POSSIBLE EYE TISSUE INJURY IF NOT REMOVED PROMPTLY. INHALATION OF VAPORS MAY CAUSE HEADACHES, DIZZINESS, AND CENTRAL NERVOUS SYSTEM DEPRESSION.

OVEREXPOSURE TO HEXANE MAY CAUSE MODERATE SKIN & EYE IRRITATION, RESPIRATORY TRACT IRRITATION, AND CENTRAL NERVOUS SYSTEM DEPRESSION (IN HIGH VAPOR CONCENTRATIONS).

-FIRST AID:

-IF IN EYES--FLUSH WITH LARGE AMOUNTS OF WATER, LIFTING THE UPPER AND LOWER LIDS OCCASIONALLY, GET MEDICAL ATTENTION.

-IF ON SKIN--THOROUGHLY WASH EXPOSED AREA WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE RE-USE.

--IF BREATHED---IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED, GIVE ARTIFICIAL RESPIRATION. KEEP PERSON WARM, QUIET, AND GET MEDICAL ATTENTION.

-IF SWALLOWED---DO NOT INDUCE VOMITING. KEEP PERRSON WARM, QUIET, AND GET MEDICAL ATTENTION. ASPIRATION OF MATERIAL INTO THE LUNGS DUE TO VOMITING CAN CAUSE PNEUMONITIS WHICH CAN BE FATAL.

SECTION VI - REACTIVITY DATA

STABLITY: [ ] Unstable [x] Stable
HAZARDOUS POLYMERIZATION: [ ] May occur [x] Will not occur

-INCOMPATIBILITY:

STRONG OXIDIZING AGENTS; SULFURIC ACID. AMINES, ALKANOLAMINES, OXYGEN, HALOGENS, ALDEHYDES, AMMONIA, AND CHLORINATED COMPOUNDS.

-CONDITIONS TO AVOID:

HIGH TEMPERATURE OR HEAT OR OPEN FLAMES.

-HAZARDOUS DECOMPOSITION PRODUCTS:

THERMAL DECOMPOSITION MAY PRODUCE CARBON MONOXIDE, CARBON DIOXIDE, CHLORINE COMPOUNDS, AND TOXIC FUMES.

SECTION VII - SPILL OR LEAK PROCEEDURES

-STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

REMOVE ALL SOURCES OF IGNITION (FLAMES, HOT SURFACES, PILOT LIGHTS, AND ELECTRIC, STATIC, OR FRICTIONAL SPARKS). AVOID BREATHING VAPORS. VENTILATE AREA. REMOVE WITH INERT ABSORBENT AND NON-SPARKING TOOLS. PERSONS NOT WEARING PROTECTIVE EQUIPMENT SHOULD BE EXCLUDED FROM AREA OF SPILL UNTIL CLEAN-UP HAS BEEN COMPLETED.

-WASTE DISPOSAL METHOD:

DISPOSE IN ACCORDANCE WITH LOCAL, STATE, AND FEDERAL LAW REGULATIONS. INCINERATE IN APPROVED FACILITY. DO NOT INCINERATE CLOSED CONTAINERS.

SECTION VIII - SPECIAL PROTECTION INFORMATION:

-RESPIRATORY PROTECTION:

IF THE 'TLV' OF THE PRODUCT OR ANY COMPONENT IS EXCEEDED, A NIOSH/MESA JOINTLY APPROVED SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACE PIECE OPERATED IN PRESSURE DEMAND OR OTHER POSITIVE PRESSURE MODE IS ADVISED; HOWEVER, OSHA REGULATIONS ALSO PERMIT OTHER NIOSH/MESA RESPIRATORS UNDER SPECIFIC CONDITIONS. AREAS OF STORAGE AND USE SHOULD BE SURVEYED BY A QUALIFIED INDUSTRIAL HYGIENIST TO ASSURE ADEQUACY OF RESPIRATORY PROTECTION, VENTILATION, AND OTHER PROTECTIVE EQUIPMENT.

-VENTILATION:

PROVIDE GENERAL DILUTION OR LOCAL EXHAUST VENTILATION IN VOLUME AND PATTERN TO KEEP TLV OF ALL HAZARDOUS INGREDIENTS IN SECTION II BELOW ACCEPTABLE LIMIT; LEL IN SECTION II BELOW STATED LIMIT.

-PROTECTIVE GLOVES:

REQUIRED FOR PROLONGED OR REPEATED CONTACT.

-EYE PROTECTION:

USE SAFETY EYEWEAR DESIGNED TO PROTECT AGAINST SPLASH OF LIQUID.

-OTHER PROTECTIVE EQUIPMENT:

WEAR IMPERVIOUS CLOTHING AND BOOTS TO PREVENT REPEATED OR PROLONGED SKIN CONTACT.

SECTION IX - SPECIAL PRECAUTIONS

-PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

KEEP AWAY FROM HEAT, SPARKS, FIRE, AND ALL IGNITION SOURCES. DO NOT LEAVE CONTAINER OPEN. DO NOT STORE ABOVE 100 DEGREES F. STORE IN BUILDINGS DESIGNED AND PROTECTED FOR STORAGE OF NFPA CLASS I FLAMMABLE LIQUIDS. USE IN AREAS DESIGNED AND PROTECTED FOR USE OF CLASS I FLAMMABLE LIQUIDS.

-OTHER PRECAUTIONS:

USE ONLY WITH ADEQUATE VENTILATION. AVOID PROLONGED OR REPEATED BREATHING OF VAPOR. AVOID CONTACT WITH EYES OR SKIN. DO NOT TAKE INTERNALLY. CONTAINERS SHOULD BE GROUNDED WHEN POURING. AVOID FREE FALL OF LIQUID IN EXCESS OF A FEW INCHES. STORE, DISPENSE AND USE IN ACCORDANCE WITH NFPA STANDARDS FOR CLASS I FLAMMABLE LIQUIDS. CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPTIED. SINCE EMPTIED CONTAINERS RETAIN PRODUCT RESIDUES (VAPOR, LIQUID, AND/OR SOLID), ALL HAZARD PRECAUTIONS GIVEN IN THIS DATA SHEET MUST BE OBSERVED. THE CONSUMER PRODUCT SAFETY COMMISSION HAS BANNED THIS PRODUCT FOR CONSUMER USE BECAUSE OF FLAMMABILITY HAZARDS. IT MAY NOT BE SUPPLIED TO CONSUMERS, AND MAY NOT BE PACKAGED IN CONTAINERS SUITABLE FOR CONSUMER OR HOUSEHOLD USE. *** FOR INDUSTRIAL USE ONLY. NOT FOR HOUSEHOLD USE. ***
NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY BE HARMFUL OR FATAL.

THE INFORMATION ACCUMULATED HEREIN IS BELIEVED TO BE ACCURATE, BUT IS NOT WARRANTED TO BE. RECIPIENTS ARE ADVISED TO CONFIRM IN ADVANCE OF NEED THAT THE INFORMATION IS CURRENT, APPLICABLE AND SUITABLE FOR THEIR CIRCUMSTANCES.

OCEAN℠ Network
EMERGENCY PHONE 1 800 OLIN 911

MATERIAL SAFETY DATA

FOAMCRAFT, INC.
P. O. BOX 15246
SARASOTA, FLA. 33579
813 - 366-9393

SECTION I - IDENTIFICATION

2-19-87 B Genet

CHEMICAL NAME & SYNONYMS AUTOFROTHO A Side	LABEL 2	A602 Series
CHEMICAL FAMILY Isocyanate	FORMULA Proprietary mixture	TRADE NAME AUTOFROTHO P
DESCRIPTION Dark liquid		CAS NO. . Not assigned/mixture

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE

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.

PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
EYES Goggles GLOVES Required OTHER Coveralls and boots	Local exhaust as required to keep airborne concentrations below TLV.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	OSHA PEL	LD50	LC50	SIGNIFICANT EFFECTS
Polymeric Isocyanate wt% - 101-65-1 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 - (6-8%) 1.6%=3% low 2x4x6 48 vertical 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	UPPER
			ND	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.

INHALATION Remove victim to fresh air, call a physician

PRODUCT CODE 980337 CHEMICAL NAME AUTOFROTH® P

SECTION VI - TOXICOLOGY (PRODUCT)

ACUTE ORAL LD 50
> 5 g/kg (rats)
ACUTE DERMAL LD 50
> 2 g/kg
ACUTE INHALATION LC 50
Not known

CARCINOGENICITY Not known to be carcinogenic
MUTAGENICITY Not known to be mutagenic
EYE IRRITATION Irritant
PRIMARY SKIN IRRITATION
Irritant

PRINCIPAL ROUTES OF ABSORPTION
Inhalation, dermal

EFFECTS OF ACUTE EXPOSURE Irritation to eyes, skin and mucous membrane. May cause allergic sensitization characterized by labored breathing.

EFFECTS OF CHRONIC EXPOSURE
May cause allergic sensitization of skin and respiratory tract.

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. 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.

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.

D.O.T. Dichlorodifluoromethane, mixture, non-flammable gas, UN 1028 (for cargo tank transport)

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 x UNSTABLE AT____C ____ F	HAZARDOUS POLYMERIZATION	MAY OCCUR	x
		WILL NOT OCCUR	

CONDITIONS TO AVOID
Water and incompatible materials in a closed system.
INCOMPATIBILITY(MATERIAL TO AVOID)
Acids, bases and alcohols and hydrochloric acid.
HAZARDOUS DECOMPOSITION PRODUCTS
Carbon monoxide, oxides of nitrogen, cyanides

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

3449

Olin CORPORATION
120 Long Ridge Road, Stamford, Connecticut 06904
OCEAN℠ Network
EMER[illegible] ONE 1-800-OLIN-911

Olin

OCEAN℠ Network
EMERGENCY PHONE 1-800-OLIN-911

MATERIAL SAFETY DATA

FOAMCRAFT, INC.
P. O. BOX 15246
SARASOTA, FLA. 33579
813 - 366-9393

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	VENTILATION REQUIREMENTS
EYES Goggles GLOVES Not required OTHER Coveralls and boots	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 ~7 20-25 R11 ? R12 5-8%	1,000 ppm	No data	TCLO human 50,000 ppm/30 min	Eye effects, irritation
Amine catalyst	None established	No data	No data	Irritation
1.9 density 3½ in Froth				

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 392°F COC METHOD	OSHA CLASSIFICATION Slightly combustible liquid	FLAMMABLE EXPLOSIVE LIMIT	LOWER	UPPER
			ND	ND

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.

PRODUCT CODE 981072 CHEMICAL NAME AUTOFROTH®

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 X UNSTABLE AT____C ____ F

HAZARDOUS POLYMERIZATION	MAY OCCUR	
	WILL NOT OCCUR	X

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(H2O=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
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
OCEAN℠ Network
EMERGENCY PHONE 1-800-OLIN-911

MATERIAL SAFETY DATA SHEET

Gelcoat - 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

TAILEVAST FL 34270

CUSTOMER NUMBER: 533890
DATE PRINTED: 12/14/88
COMPLEX: 300

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 #: 000080-62-6 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.-LE

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).

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

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

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

SECTION IV - PHYSICAL DATA

BOILING POINT,DEG.F. 212

WEIGHT PER GALLON: 10.27

PERCENT VOLATILE BY VOLUME: 45.861

VAPOR DENSITY IS HEAVIER THAN AIR

EVAPORATION RATE IS SLOWER THAN ETHER

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.

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

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 (NIOSHI/MSHA APPROVED) DURNG 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.

MATERIAL SAFETY DATA SHEET

PRODUCT CODE IDENTITY: 942Y380 PRODUCT NAME: BRIGHT YELLOW

CHEMICAL NAME	CAS NUMBER	% BY WEIGHT	SARA TITLE III SECTION 311 AND 312 HAZARD CATAGORIES
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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