

TomJohn Engineering, Inc.

8424 4th St. N. Suite G
St. Petersburg, FL 33702
(727) 579-0403
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September 1, 2000

Mr. Jerry Kissel, P.E.
Air Permitting Section
Dept. Of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

D.E.P.
SEP 28 2000
Southwest District Tampa

re: **Donzi Yachts by Roscioli International, Inc**

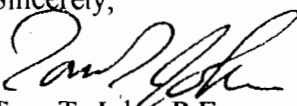
Dear Mr. Kissel:

As environmental engineer of record for the referenced facility, and in conjunction with Donzi Yachts by Roscioli International, Incorporated, we are submitting the enclosed set of three applications for an FDEP Title V Air Construction Permit Application for the Donzi Yachts fiberglass boat building facility located in Manatee County. Additional copies of the application are available upon request.

The facility is currently a Synthetic Minor Source; upon issuance of this permit the facility will become a Major Source under Title V. The applications contain original signatures and seal, and are accompanied by a check for \$1050.00 as the processing fee for a construction/modification permit for a source emissions increase of more than 5 but less than 25 tons per year.

Thank you for your assistance in this project. Should you have any questions or if I can provide any additional information, please contact me at my office.

Sincerely,


Tom T. John, P.E.

RECEIVED

OCT 06 2000

BUREAU OF AIR REGULATION

Enclosures: as stated

TTJ:dj

Tom John Engineering
8424 4th Street N. Suite K
St. Petersburg, FL 33702
(727) 579 - 0403

Title V
Air Construction
Permit Application

Donzi Yachts by Roscioli International
Manatee County
Bradenton, Florida

September 1, 2000

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Title V Construction Permit Application

Donzi Yachts by Roscioli International

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Application Information

Application Information



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Donzi Yachts by Roscioli International, Incorporated	
2. Site Name: Donzi Yachts by Roscioli International, Inc.	
3. Facility Identification Number: [] Unknown 0250596 → <i>0810091</i>	
4. Facility Location: Street Address or Other Locator: 6111 21st Street East City: Bradenton County: Manatee Zip Code: 34203	
5. Relocatable Facility? [] Yes [<input checked="" type="checkbox"/>] No	6. Existing Permitted Facility? [<input checked="" type="checkbox"/>] Yes [] No

Application Contact

1. Name and Title of Application Contact: Ron Rookstool, General Manager	
2. Application Contact Mailing Address: Organization/Firm: Donzi Yachts by Roscioli International, Inc. Street Address: 6111 21st Street East City: Bradenton State: Florida Zip Code: 34203	
3. Application Contact Telephone Numbers: Telephone: (941) 755-7411 Fax: (941) 753-2646	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application NOT APPLICABLE

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: 0810091-002-AF

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

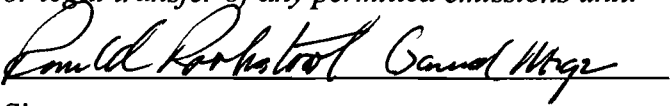
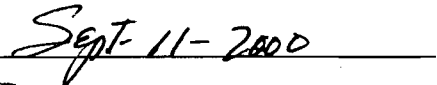
Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Ron Rookstool, General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Donzi Yachts by Roscioli International, Inc. Street Address: 6111 21 st Street East City: Bradenton State: Florida Zip Code: 34203
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941) 755-7411 Fax: (941) 753-2646
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature  Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Tom T. John, P.E Registration Number: 33157
2. Professional Engineer Mailing Address: Organization/Firm: Tom John Engineering, Inc Street Address: 8424 4 th Street North, Suite K City: St. Petersburg State: Florida Zip Code: 33702
3. Professional Engineer Telephone Numbers: Telephone: (727) 579 - 0403 Fax: (727) 579 - 0205

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [NA], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

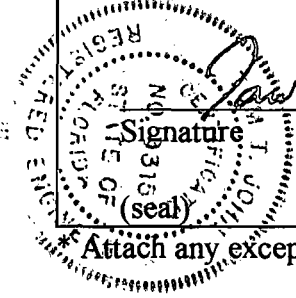
If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

[Signature]

Signature

1 September 2000

Date



* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
002	new Fiberglass Boat Building - resin and gelcoat application, mold care, and related assembly and cleanup activities	AC1E	\$1000.00
001	existing Fiberglass Boat Building - resin and gelcoat application, mold care, related assembly and cleanup activities	ACM2	\$50.00

Application Processing Fee

Check one: Attached - Amount: \$ 1050.00 Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

This project is for the increase of VOC emissions from a fiberglass boat building operation and modification of existing specific conditions. Total facility emissions will be limited to 32 TPY. The styrene emissions will make the facility subject to Title III and Title V, CAAA (1990).

2. Projected or Actual Date of Commencement of Construction: permit receipt

3. Projected Date of Completion of Construction: permit receipt

Application Comment

Activities and recordkeeping for the facility will be in accordance with the provisions of the current permit until revised by FDEP and until adoption of the USEPA boat building MACT.

Facility Information

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 347.9 North (km): 3034.8			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 027/25/47 Longitude (DD/MM/SS): 082/32/20			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 37	6. Facility SIC(s): 3732
7. Facility Comment (limit to 500 characters): Current facility VOC limits are set at 10.4 TPY and 8 TPY styrene(0810091-003-AF). This application requests that the existing facility specific conditions (designated by FDEP as Emission Unit 1) be modified to 10.4 TPY of VOC, individual HAP, and total HAP emissions, with no limitations on hourly emission limits or material usage limits and monthly/rolling 12 month total recordkeeping. The emissions from the increased operations (identified in this application as Emission Unit 2) will be limited to 24.5 TPY of VOC with no material usage limits. Total facility limits will increase to 35 TPY. The construction application requests an increase in styrene emissions greater than 10 TPY; the generation of HAP species from a building previously used as storage will be subject to the presumptive MACT for fiberglass boat building.			

Facility Contact

1. Name and Title of Facility Contact: Ron Rookstool, General Manager
2. Facility Contact Mailing Address: Organization/Firm: Donzi Yachts by Roscioli International, Inc. Street Address: 6111 21 st Street East City: Bradenton State: Florida Zip Code: 34203
3. Facility Contact Telephone Numbers: Telephone: (941) 755-7411 Fax: (941) 753-2646

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input checked="" type="checkbox"/> Unknown
2. <input type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input checked="" type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	
<p>Monthly record keeping of materials used, methods of application and calculation of emissions is proposed as demonstration of compliance with permit conditions.</p>	

List of Applicable Regulations

62-296.320(1), F.A.C.	General VOC Standards
62-296.320(2), F.A.C.	Objectionable Odor Prohibition
62-296.320(4)(b), F.A.C.	General Visible Emission Standard
62-296.320(4)(c), F.A.C.	Unconfined Emissions of Particulate Matter
62-297, F.A.C.	Testing, Reporting and Record Keeping
Title V Core List, following	

Title V Core List

Effective: 03/25/96

[Note: The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

Federal: (description)

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP)

40 CFR 61, Subpart M: National Emission Standard for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: (description)

CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application.

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review.

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

**CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE,
effective 12-31-95**

62-103.150, F.A.C.: Public Notice of Application and Proposed Agency Action.

62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to
Administrative Proceeding.

Title V Core List

Effective: 03/25/96

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 03-21-96

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(3)(a), F.A.C.: Full Exemptions.

62-210.300(3)(b), F.A.C.: Temporary Exemption.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.350, F.A.C.: Public Notice and Comment.

62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.

62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.

62-210.650, F.A.C.: Circumvention.

62-210.900, F.A.C.: Forms and Instructions.

62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.

62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96

62-213.205, F.A.C.: Annual Emissions Fee.

62-213.400, F.A.C.: Permits and Permit Revisions Required.

62-213.410, F.A.C.: Changes Without Permit Revision.

62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.

62-213.420, F.A.C.: Permit Applications.

62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.

62-213.440, F.A.C.: Permit Content.

62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.

62-213.900(1) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.

Title V Core List

Effective: 03/25/96

CHAPTER 62-256, F.A.C.: OPEN BURNING AND FROST PROTECTION FIRES, effective 11-30-94

CHAPTER 62-257, F.A.C.: ASBESTOS NOTIFICATION AND FEE, effective 03/24/96

CHAPTER 62-281, F.A.C.: MOTOR VEHICLE AIR CONDITIONING REFRIGERANT RECOVERY AND RECYCLING, effective 03-07-96

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-13-96

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

62-296.320(3), F.A.C.: Industrial, Commercial, and Municipal Open Burning Prohibited.

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

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B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. <u>Requested Emissions Cap</u>		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
individual HAP	M	Not Applicable	35	ESCPSD; other	styrene H163
total HAP	M	Not Applicable	35	ESCPSD; other	includes styrene
total VOC	M	Not Applicable	35	ESCPSD; other	includes HAP species

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [X] Attached, Document ID: <u> 1 </u> [] Not Applicable [] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: <u> 1 </u> [] Not Applicable [] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: <u> 2 </u> [] Not Applicable [] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [X] Attached, Document ID: <u> 2 </u> [] Not Applicable [] Waiver Requested
5. Fugitive Emissions Identification: [X] Attached, Document ID: <u> 2 </u> [] Not Applicable [] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID: <u> 3,4 </u> [] Not Applicable
7. Supplemental Requirements Comment: Information on the existing facility was submitted previously and the information and the current permit are available at FDEP; all information was submitted within the last 5 years.

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input checked="" type="checkbox"/> Attached, Document ID: <u>3</u> <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input checked="" type="checkbox"/> Attached, Document ID: <u>4</u> <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

EMISSION UNIT INFORMATION

Emission Unit 1

New Building

Emission Unit Information Section

SEP 28 2000
 D.E.P.
 Southwestern District

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Fiberglass boat building utilizing styrene based resins and gelcoats; includes assembly and cleanup materials.			
4. Emissions Unit Identification Number: ID: 002		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: C	6. Initial Startup Date: Permit Receipt	7. Emissions Unit Major Group SIC Code: 37	8. Acid Rain Unit? <input checked="" type="checkbox"/> No
9. Emissions Unit Comment: (Limit to 500 Characters) The activities and emissions from the existing permit are designated as Emission Unit Identification Number 1; the proposed increase is designated as Emission Unit Identification Number 2 and is the subject of this segment.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

No controls for VOC emissions

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit: **Not Applicable**
Manufacturer: **Not Applicable** Model Number: **Not Applicable**

2. Generator Nameplate Rating: **Not Applicable** MW

3. Incinerator Information: **Not Applicable**
Dwell Temperature: °F
Dwell Time: seconds
Incinerator Afterburner Temperature: °F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: Not Applicable			
2. Maximum Incineration Rate:	Not Applicable lb/hr		tons/day
3. Maximum Process or Throughput Rate: Not Applicable			
4. Maximum Production Rate: approximately 500 tons/year of VOC based raw materials*			
5. Requested Maximum Operating Schedule:			
	24	hours/day	7 days/week
	52	weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):			
*Annual material usages are a surrogate indicator of emissions, and should not be considered a permit limitation. See Attachment 2. These values are for Emission Unit 2 (increased capacity).			

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

See Page 8 of Facility Information section	

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? See Attachment 1		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Not Applicable			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Not Applicable			
5. Discharge Type Code: V	6. Stack Height: 34 feet (est.)	7. Exit Diameter: 2.5 (est.)	feet
8. Exit Temperature: 77°F	9. Actual Volumetric Flow: 9950 (est.)	10. Water Vapor: negligible	%
11. Maximum Dry Standard Flow Rate: Not Applicable		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Applicable Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): The exhaust ventilation information for the existing activities was submitted with the previous operating permit application.			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Styrene based resin and catalyst, mechanically (non atomized) spray applied to forms and molds.		
2. Source Classification Code (SCC): 3-14-015-17 Open contact molding, Resin/Laminate application, (non atomized) spray layup	3. SCC Units: Tons applied	
4. Maximum Hourly Not Applicable	5. Maximum Annual Rate: 400*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): * Individual limitations on resin usage are not required. Potentially all material used could be resin. Monthly record keeping is proposed as demonstration of compliance with emission limitations. Presumptive MACT will apply.		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Styrene based gelcoat and catalyst, spray applied to forms and molds		
2. Source Classification Code (SCC): 3-14-015-12	3. SCC Units: Tons of coating applied	
4. Maximum Hourly Rate: Not Applicable	5. Maximum Annual Rate: 100*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): * Individual limitations on gelcoat usage are not required. Potentially all material used could be gelcoat. Monthly record keeping is proposed as demonstration of compliance with emission limits. Presumptive MACT will apply.		

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mold care, assembly and acetone cleanup are included in this segment. Product is removed from the molds, trimmed and sanded as required, and assembled.		
2. Source Classification Code (SCC): 3-14-015-50 (-51, -52, -53, -60)		3. SCC Units: Tons of solvent
4. Maximum Hourly Rate: Not Applicable	5. Maximum Annual Rate: 100*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): * Individual limitations on putties, fillers, solvents, coatings and adhesives usage are not required. Potentially all material used could be solvents under this category. Monthly record keeping is proposed as demonstration of compliance with emission limits. Presumptive MACT will apply.		

Emissions Unit Information Section 1 of 2
F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
styrene H163	not applicable	not applicable	NS
total HAP	not applicable	not applicable	NS
total VOC	not applicable	not applicable	NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: total VOC	2. Total Percent Efficiency of Control: Not applicable
3. Potential Emissions: not applicable Lb/hr 24.5 tons/yr	4. Synthetically Limited ? Y
5. Range of Estimated Fugitive Emissions: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37 Process Knowledge	7. Emissions Method Code: 5 (FDEP Guidance)
8. Calculation of Emissions (limit to 600 characters): See attachment 2 for sample spreadsheet	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____ Not Applicable

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: total HAP		2. Total Percent Efficiency of Control: Not applicable	
3. Potential Emissions: not applicable Lb/hr 24.5 tons/yr		4. Synthetically Limited ? Y	
5. Range of Estimated Fugitive Emissions: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: see attached spreadsheet Reference: PERGEN37 Process Knowledge		7. Emissions Method Code: 5 (FDEP Guidance)	
8. Calculation of Emissions (limit to 600 characters): See attached spreadsheet			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____ Not Applicable

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
 (Regulated Emissions Units -
 Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: Individual HAP - total Styrene, H-163	2. Total Percent Efficiency of Control: Not applicable
3. Potential Emissions: not applicable Lb/hr 24.5 tons/yr	4. Synthetically Limited ? Y
5. Range of Estimated Fugitive Emissions: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37	7. Emissions Method Code: 5 (FDEP Guidance)
8. Calculation of Emissions (limit to 600 characters): See attached spreadsheet	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____ Not Applicable

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION

(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: <20 % Exceptional Conditions: <20 % Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: EPA Method 9 as required by Agency	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION

(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____ NOT APPLICABLE

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

<p>1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u> 1 </u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <u> 3,4 </u> <input type="checkbox"/> Not Applicable</p>
<p>9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>10. Supplemental Requirements Comment: Presumptive MACT discussion presented in Attachment 2.</p>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [] Attached, Document ID: _____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

EMISSION UNIT INFORMATION

Emission Unit 2
Existing Building(s)

Emission Unit Information Section

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Currently permitted fiberglass boat building operation utilizing styrene based resins and gelcoats; includes assembly and cleanup materials and five resin storage tanks.</p>			
<p>4. Emissions Unit Identification Number: ID: 001</p>		<p><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>	
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date: Not Applicable</p>	<p>7. Emissions Unit Major Group SIC Code: 37</p>	<p>8. Acid Rain Unit? <input checked="" type="checkbox"/> No</p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>The currently permitted activities and emissions are designated as Emission Unit Identification Number 1 and are the subject of this section; the proposed increase is designated as Emission Unit Identification Number 2 and is the subject of the previous section.</p>			

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: Not Applicable			
2. Maximum Incineration Rate: Not Applicable lb/hr		tons/day	
3. Maximum Process or Throughput Rate: Not Applicable			
4. Maximum Production Rate: approximately 100* tons/year of VOC based raw materials			
5. Requested Maximum Operating Schedule:			
24	hours/day	7	days/week
52	weeks/year	8760	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):			
<p>*Annual material usages are a surrogate indicator of emissions, and should not be considered a permit limitation. See Attachment 2. These values are for Emission Unit 1 (existing activities) and are based on existing permit 0810091-003-AF.</p>			

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

See Page 8 of Facility Information section	

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? See previous submission for existing facility information.		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): See previous submission for existing facility information.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Not Applicable			
5. Discharge Type Code: See previous submission	6. Stack Height: feet See previous submission	7. Exit Diameter: feet See previous submission	
8. Exit Temperature: 77°F	9. Actual Volumetric Flow See previous submission	10. Water Vapor: negligible %	
11. Maximum Dry Standard Flow Rate: Not Applicable		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Applicable Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Parameters for Section D. were provided with the previous application for Synthetic Minor operating permit.			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Styrene based resin and catalyst, mechanically (non atomized) spray applied to forms and molds.		
2. Source Classification Code (SCC): 3-14-015-17 Open contact molding, Resin/Laminate application, (non atomized) spray layup	3. SCC Units: Tons applied	
4. Maximum Hourly Not Applicable	5. Maximum Annual Rate: 80*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): * Individual limitations on resin usage are not required. Potentially all material used could be resin. Monthly record keeping is proposed as demonstration of compliance with emission limitations.		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Styrene based gelcoat and catalyst, spray applied to forms and molds		
2. Source Classification Code (SCC): 3-14-015-12	3. SCC Units: Tons of coating applied	
4. Maximum Hourly Rate: Not Applicable	5. Maximum Annual Rate: 20*	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): * Individual limitations on gelcoat usage are not required. Potentially all material used could be gelcoat. Monthly record keeping is proposed as demonstration of compliance with emission limits.		

<p>1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mold care, assembly and acetone cleanup are included in this segment. Product is removed from the molds, trimmed and sanded as required, and assembled.</p>		
<p>2. Source Classification Code (SCC): 3-14-015-50 (-51, -52, -53, -60)</p>		<p>3. SCC Units: Tons of solvent</p>
<p>4. Maximum Hourly Rate: Not Applicable</p>	<p>5. Maximum Annual Rate: 10*</p>	<p>6. Estimated Annual Activity Factor: Not Applicable</p>
<p>7. Maximum % Sulfur: Not Applicable</p>	<p>8. Maximum % Ash: Not Applicable</p>	<p>9. Million Btu per SCC Unit: Not Applicable</p>
<p>10. Segment Comment (limit to 200 characters): * Individual limitations on putties, fillers, solvents, coatings and adhesives usage are not required. Potentially all material used could be solvents under this category. Monthly record keeping is proposed as demonstration of compliance with emission limits.</p>		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
styrene H163	not applicable	not applicable	NS
total HAP	not applicable	not applicable	NS
total VOC	not applicable	not applicable	NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
 (Regulated Emissions Units -
 Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: total VOC	2. Total Percent Efficiency of Control: Not applicable
3. Potential Emissions: not applicable Lb/hr 10.45 tons/yr	4. Synthetically Limited ? Y
5. Range of Estimated Fugitive Emissions: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37 Process Knowledge	7. Emissions Method Code: 5 (FDEP Guidance)
8. Calculation of Emissions (limit to 600 characters): See attachment 2 for sample spreadsheet	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____ Not Applicable

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: total HAP	2. Total Percent Efficiency of Control: Not applicable
3. Potential Emissions: not applicable Lb/hr 10.4 tons/yr	4. Synthetically Limited ? Y
5. Range of Estimated Fugitive Emissions: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37 Process Knowledge	7. Emissions Method Code: 5 (FDEP Guidance)
8. Calculation of Emissions (limit to 600 characters): See attached spreadsheet	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____ Not Applicable

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: Individual HAP, total Styrene, H-163	2. Total Percent Efficiency of Control: Not applicable
3. Potential Emissions: not applicable Lb/hr 10.4 tons/yr	4. Synthetically Limited ? Y
5. Range of Estimated Fugitive Emissions: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37	7. Emissions Method Code: 5 (FDEP Guidance)
8. Calculation of Emissions (limit to 600 characters): See attached spreadsheet	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____ Not Applicable

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION

(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: <20 % Exceptional Conditions: <20 % Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: EPA Method 9 as required by Agency	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION

(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____ **NOT APPLICABLE**

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> * Waiver Requested * Submitted with previous application
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

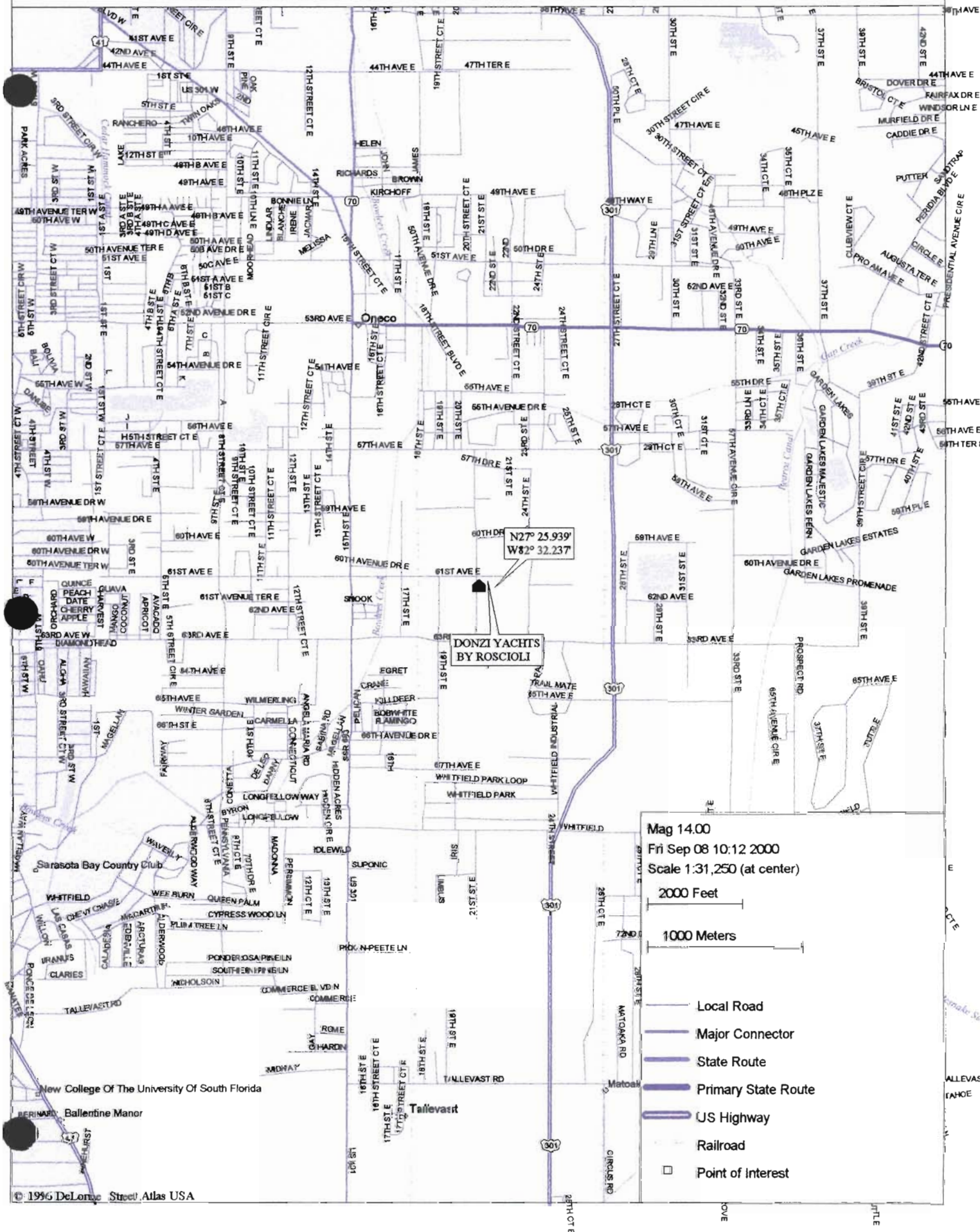
Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [] Attached, Document ID: _____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

Site Location and
Facility Layout

Attachment 1

DONZI YACHTS BY ROSCIOLI MANATEE COUNTY



N27° 25.939'
W82° 32.237'

DONZI YACHTS
BY ROSCIOLI

Mag 14.00
 Fri Sep 08 10:12 2000
 Scale 1:31,250 (at center)

2000 Feet

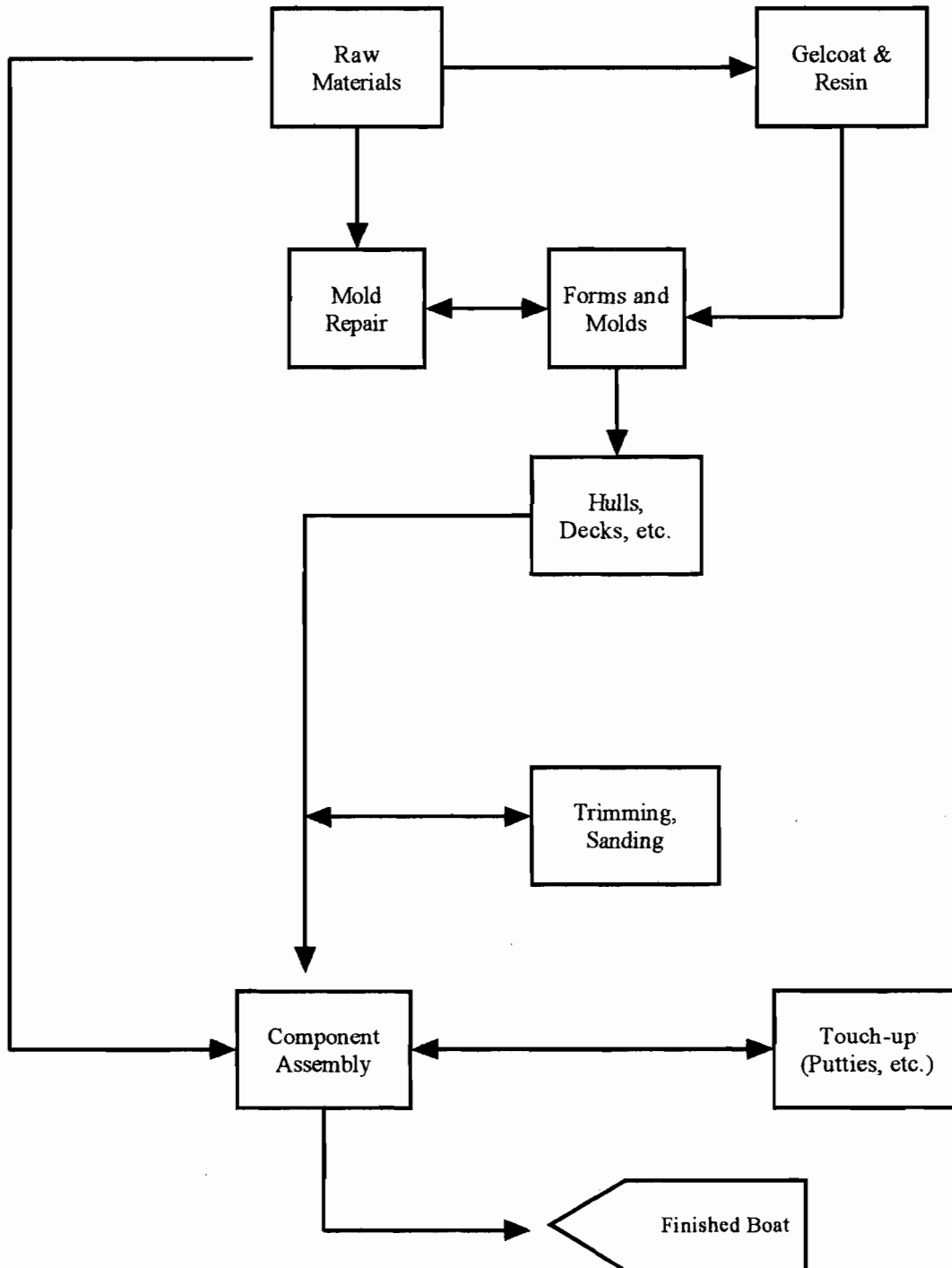
1000 Meters

- Local Road
- Major Connector
- State Route
- Primary State Route
- US Highway
- Railroad
- Point of Interest

Process Flowsheet, Process Description,
Emission Estimates and
Proposed Case by Case MACT Conditions

Attachment 2

Process Flow Diagram



Donzi Yachts by Roscioli International, Inc
ManateeCounty
Bradenton, FL

Tom John Engineering, Inc. St. Petersburg, FL
Phone (727) 579 - 0403 FAX (727) 579-0205 www.tjengr.com

Process Description, Emission Estimates and Process Flowsheet

Process Description

Donzi Yachts by Roscioli International manufactures fiberglass fishing boats in a wide range of sizes and styles at their facility at 6111 21st Street East, Bradenton (Manatee County). The general process flowsheet for boat building is shown in the preceding figure. The source is an existing facility with permitted styrene annual missions below the threshold for a Title V permit and is designated as a “minor” source under that program. This submittal requests an increase in emissions of Title III, CAAA (1990) species above the threshold levels, and the facility will become a Title V source upon receipt of permit. These additional emissions will be the result of activities conducted in a building not previously used for production, and will therefore be subject to the MACT regulations for fiberglass boatbuilding and FDEP presumptiive MACT until adoption of the EPA regulations. This submittal also requests that “lbs/hr” limitations and daily record keeping requirements be omitted from the permit, in accordance with other permits for similar facilities permitted by FDEP.

The location of the facility and the site buildings are illustrated in layout in Attachment 1. The building of interest is located adjacent to the current lamination building. Due to the size of the boat being constructed, the boat is not moved and all sequential activities are conducted at the same location. VOC species, principally from lamination/gelcoating activities are dispersed through the large exhaust fan in the roof of the building. Assembly activities are minor contributors to VOC emissions; the gelcoating and lamination will be the primary sources of the VOC emissions.

Expected facility total operating hours to meet the projected demand for the new building will be 10 to 14 hours per day, 5 to 7 days per week, 52 weeks per year. Production demand will not be completely uniform throughout the year, and based on situation variables (product delivery schedule, preparation for trade shows, etc.) 24 hour days of resin and/or gelcoat use for seven days per week may be required for short periods. The facility therefore requests an unlimited daily facility operating schedule (8760 hours per year) and up to 24 hours per day, seven days per week for laminating/gelcoating activities, subject to a maximum regulated styrene and other HAP/VOC emissions as specified in the “facility information” section of the application. Record keeping of raw material usages and corresponding chemical species usage and estimated

emissions, as illustrated in the following spreadsheet (and currently required by permit), is proposed as demonstration of "reasonable assurance" of compliance with permit emission limits.

Acetone, a VOC-exempt species, is the primary clean up solvent. Hazardous wastes are removed from the facility by a licensed hauler as necessary.

Adhesives and coatings, either water based or containing miscellaneous solvents, may be utilized principally in the assembly area of the building. In this area items such as seat cushions, covers and deck carpet may be prepared and applied to the boats. Two part foam may be introduced as needed. In general, these materials will be used in minor quantities, they do not contain sufficient single species or aggregate HAPs to trigger reporting concerns, and the contribution to total VOC is considered to be within the error of the total facility VOC estimation and therefore deemed "negligible."

The minor quantities of particulates generated from wood and fiberglass cutting, shaping and sanding operations performed by hand tools (exempt activities list) and limited tabletop equipment are in general controlled by portable "shop-vac" vacuum collectors and normal "good housekeeping" procedures. Careful "good housekeeping practices" providing control of fugitive particulates is necessary to prevent contamination of the fiberglass and gelcoat surfaces in the adjoining work area, and will be given the appropriate consideration by employees and management. There are no outside discharge points from these operations.

The main Clean Air Act Amendment (CAAA) Title III VOC/HAP species emitted from the fiberglassing operation is styrene, which forms the base for polyester resins and gelcoats used in the product manufacture. In some gelcoat materials, (typically) 3% to perhaps 5% of the styrene may be replaced with methyl methacrylate (MMA); MMA would then be the CAAA Title III VOC species emitted in second highest quantity from the facility. Since proper flow characteristics of the gelcoat are held constant as styrene decreases by the increasing MMA concentration, the total VOC emissions would remain essentially unchanged by this substitution of MMA.

The typical anticipated chemical usages after receipt of permit will result in estimated facility emissions of Clean Air Act Amendments of 1990 Title III and V species above the triggers for "major source" categorization. Monthly record keeping, similar to that provided in the following spreadsheet, and detailed report submissions for the FDEP Annual Operating Report are proposed

as a method of demonstrating compliance with these limitations and the USEAP MACT requirements for fiberglass boat builders.

Emission Estimates

Lamination/gelcoating activities

The general procedure for estimating VOC/OS emissions is:

$$\text{Material Usage Rate} \times \text{Species Concentration} \times \text{Emission Factor} = \\ \text{Species Emission Rate}$$

The following spreadsheet presents a representation of the major raw materials typically used, the species composition of those materials, and major raw material usage rates. Note that these values are not requested permit maximums, but are used as an illustration. Records for the new facility will be kept separately from the existing facility operations due to the need to demonstrate compliance with the MACT requirements.

The styrene contents shown for resin and gelcoat are values based on current materials and vendors, obtained from the Material Safety Data (MSD) sheets. The complete set of MSD sheets is available for inspection upon request by the Department.

Also presented in the following spreadsheet is the calculated maximum VOC emissions of the major species from the materials currently used at the presented rates. Donzi Yachts by Roscioli International recognizes that a change in materials or usages that results in significant emissions of a new species or a significant increase in a currently identified species may require notification and approval by FDEP.

The styrene emission factors utilized for emission calculations and shown in the following spreadsheet are based on current FDEP guidance. Minor contributions of styrene from such materials as putty and fillers may be assumed to have an emission factor no greater than the hand layup of resin (0.1). Methyl methacrylate (MMA) present in gelcoat is assumed to have an emission factor approximately 1.5 times the factor for styrene in gelcoat (CFA test data). General VOC species are assumed to have an emission factor of 1.0, except for reactive species (e.g., isocyanates or peroxides) and for high molecular weight/low volatility species (kerosene, oils) which are assumed to have negligible emission factors. Acetone, delisted by EPA and FDEP in June of 1995, may be included in the spreadsheets for informational purposes but not included in the emission inventory.

Additional operations and chemicals which may be modified, added or deleted from the inventory include cleanup materials, propellants, mold care/cleaners, and adhesives. When these materials are introduced on site, the material data will be evaluated; new species or changes to existing species resulting in estimated emissions of over 1000 lbs/yr will be entered, and usages and emissions will be captured, in the facility data spreadsheet. The changes are expected to represent a small variation in the total facility emissions. Fugitive sources, such as open product and waste containers, will be identified and minimized, and solvents in general will be subject to careful disbursement and general "good housekeeping" practices, including the use of solvent safety cans, etc. These emissions may be considered "negligible" in comparison to the major species emitted from the operations.

The styrene content of the resin and gelcoat may vary depending on particular type, purpose, blend or supplier, and the species and concentrations of all other raw materials are subject to change, outside the control of Donzi Yachts by Roscioli International. Despite these changes, the record keeping system will track each individual species, e.g., styrene, at its actual concentration in each shipment (as identified from its accompanying MSD sheet), assign an emission factor, and determine the emissions of an individual raw material or source as well as total facility emission. Compliance with the USEAP MACT standards will be demonstrated in a similar manner.

It should be noted that the raw material usage rate is a surrogate measure of the VOC species emission rate, which is the product of the usage rate, the species concentration and the emission factor for a particular species in a particular operation. If the species concentration varies up or down, as is often the case, the usage rate may be adjusted accordingly to maintain compliance with a VOC emission limitation. Careful record keeping is proposed as a means of demonstrating compliance with VOC species emissions limitations imposed on the facility by permit. Those records will be provided to the Department with the Annual Operating Report required of facilities. This report will identify and quantify usages and emissions from the major VOC-containing production-related materials used at the facility.

Material Usage and Emission Discussion

It is clear that the quantity and variety of VOC containing materials potentially used at the facility makes it impractical to provide (or accept permit limits for) specific usage limits for all raw materials. Many of these materials will be used infrequently and may be replaced by alternatives or substitutes. However, as noted the contribution of these miscellaneous VOC emissions to the total facility emission will be small; the actual material usages and speciated emissions will be captured accurately in the facility data record and spreadsheet as illustrated, and will provide assurance that the styrene and miscellaneous VOC emission limits are not exceeded. Additional recordkeeping will demonstrate compliance with the MACT regulations for the new building. Donzi Yachts by Roscioli International requests that the Department limit by permit only the total facility general VOC emissions, total HAP emissions and total styrene emissions. Donzi Yachts by Roscioli International requests that individual raw material usages and species concentrations be allowed to vary as necessary for facility operations (e.g., substitution of a high styrene resin for a low styrene resin or increased resin lbs/hr and corresponding reduced gelcoat lbs/hr) provided that Donzi Yachts by Roscioli International demonstrates in the facility usage and emission report that the variations result in emissions less than or equal to the FDEP permit limits and MACT requirements, as is common practice for fiberglass boat building permits. Donzi Yachts by Roscioli International further requests that the Department accept the determination of the FDEP presumptive MACT as an interim condition, to be superceded by the USEPA MACT requirements when promulgated. Donzi Yachts by Roscioli International requests that the Department revise by administrative action any permit conditions superceded by the USEPA MACT requirements.

Proposed Case by Case MACT Conditions

Although Florida DEP has not developed a Presumptive MACT for boat builders, recent permits for similar sized facilities have been issued with limits generally consistent with the proposed MACT standards of USEPA. Donzi Yachts by Roscioli International is proposing that activities conducted in the new building will comply with the proposed EPA MACT (Subpart VVV) and in particular Table 1, 2, 3, and 4 of that Subpart, as attached.

Donzi Yachts by Roscioli International believes that compliance with these limitations is sufficient to allow the processing of this application.

TABLES TO SUBPART VVVV

Table 1 to Subpart VVVV - Compliance Dates for New and Existing Boat Manufacturing Facilities

If your facility is...	and...	then you must comply by this date:
1. an existing source	is a major source on or before the promulgation date of the rule	3 years after the promulgation date of the rule.
2. an area source	becomes a major source after the promulgation date of the rule	1 year after becoming a major source or 3 years after the promulgation date of the rule, whichever is later.
3. a new source	is a major source at startup ^a	upon startup or the promulgation date of the rule, whichever is later.

^a Your facility is a major source if it is a stationary source or group of stationary sources located within a contiguous area and under common control that emits or can potentially emit, considering controls, in the aggregate, 9.1 megagrams (10 tons) or more per year of a single hazardous air pollutant or 22.7 megagrams (25 tons) or more per year of a combination of hazardous air pollutants.

Table 2 to Subpart VVVV - Alternative HAP Content Requirements for Open Molding Resin and Gel Coat Operations

For this operation ...	And this application method ...	You must not exceed this weighted-average HAP content (weight percent) requirement:
1. Production resin operations	Atomized (spray)	28 percent
2. Production resin operations	Nonatomized (nonspray)	35 percent
3. Pigmented gel coat operations	Any method	33 percent
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent
6. Tooling resin operations	Nonatomized (nonspray)	39 percent
7. Tooling gel coat operations	Any method	40 percent

**Table 3 to Subpart VVVV - MACT Model Point Value Equations
for Open Molding Operations^a**

For this operation...	and this application method...	Use this formula to calculate the MACT model plant value for each resin and gel coat
1. Production resin, tooling resin	Atomized	$0.014 \times (\text{Resin HAP}\%)^{2.425}$
	Atomized, plus vacuum bagging with roll-out	$0.01185 \times (\text{Resin HAP}\%)^{2.425}$
	Atomized, plus vacuum bagging without roll-out	$0.00945 \times (\text{Resin HAP}\%)^{2.425}$
	Nonatomized	$0.014 \times (\text{Resin HAP}\%)^{2.275}$
	Nonatomized, plus vacuum bagging with roll-out	$0.0110 \times (\text{Resin HAP}\%)^{2.275}$
	Nonatomized, plus vacuum bagging without roll-out	$0.0076 \times (\text{Resin HAP}\%)^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	$0.445 \times (\text{Gel coat HAP}\%)^{1.675}$

^a Equations calculate MACT model point value in kilograms of HAP per megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric. HAP% = HAP content expressed as a weight-percent value between 0 and 100%.

Table 4 to Subpart VVVV - Applicability and Timing of Notifications

If your facility ...	You must submit ...	By this date ...
1. is an existing source subject to this subpart	an initial notification containing the information specified in §63.9(b)(2)	no later than the dates specified in §63.9(b)(2).
2. is a new source subject to this subpart	the notifications specified in §63.9(b)(3) to (5)	no later than the dates specified §63.9(b)(4) and (5).
3. qualifies for a compliance extension as specified in §63.9(c)	a request for a compliance extension as specified in §63.9(c)	no later than the dates specified in §63.6(i).
4. is complying with HAP content limits, application equipment requirements, or MACT model point value averaging provisions	a notification of compliance status as specified in §63.9(h)	no later than 30 calendar days after the end of the first 3-month averaging period after your facility's compliance date.
5. is complying by using an add-on control device	a notification of intent to conduct a performance test as specified in §63.9(e)	no later than the date specified in §63.9(e).
	a notification of the date for the continuous monitoring system performance evaluation as specified in §63.9(g)	with the notification of intent to conduct a performance test.
	a notification of compliance status as specified in §63.9(h)	no later than 60 calendar days after the completion of the add-on control device performance test and continuous monitoring system performance evaluation.

DONZI BY ROSCIOLI
MATERIAL USAGE AND EMISSION ESTIMATES

2000 rolling 12 May

A. Material Usages and Compositions		HAP?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
part	item	CAS No.	styrene	methylmethacrylate	78-93-3 methyl ethyl ketone	131-11-3 dimethyl phthalate	1330-20-7 xylene	108-88-3 toluene	110-54-3 hexane	103-10-1 methylisobutyl ketone	108-95-2 phenol	67-56-1 methanol	822-06-0 1,6HMDI	101-68-8 MDDI	gen VOC
1	270002	foam a	728												
2	270003	foam b	693												
3	294006	laminex hull/deck	2743	40%											10%
4	294010	laminex fillet	0	40%											
5	380030	yellow glue	0												4%
6	380031	glue, jowett	0												55%
7	380034	contact cement	994												84%
8	380032	contact cement	124		0%			9%	9%						
9	468002	545 w/rt epoxy primer	517		10%		2%	14%	41%						40%
10	468003	545 reducer	112		19%			20%							61%
11	468004	545 epoxy cat	540												
12	468005	545 gray primer	0		10%		2%								40%
13	468010	high build cat	22												
14	468013	yellow primer	44												
15	468015	hi spd reducer	0												
16	468020	reducer-std topcoat	189		19%			20%							61%
17	468021	awl-prep cleaner	247								4%				92%
18	468022	awl cat #2 converter	310				4%	11%				36%			50%
19	468030	evap reducer	0												
20	468034	accelerator	0												
21	468035	accelerator	1												
22	468065	awgrip 2000 snowwhite	583		6%		1%	10%							42%
23	468067	sunfast red	8												
24	468085	545 primer accelerator	0												
25	468230	cat	0												
26	468235	epoxy#88 cr tubes	11												
27	468245	interlux epoxy primer	0												
28	468250	interlux reducing solvent	0												
29	468255	zinc wsh primr base	0												
30	468260	acid reducer	0												
31	468265	urethane primer	88												
32	468270	urethane converter	104												
33	468275	epoxy glue	29												
34	468280	epoxy glue	9												
35	468285	clear urethane	0				44%								910%
36	468290	urethane catalyst	0							25%					75%
37	468295	solvent 21	7												100%
38	468995	west syst epoxy	2677												
39	468996	west syst hardener	445								6%				
40	468998	west syst fast hardener	456								6%				
41	468999	west syst fast hardener	147								6%				
42	469001	west syst resin	114												14%
43	469002	west syst slow hardnr	0												1%
44	469100	epon epoxy resin	0												
45	469105	epic cure hardener	0												
46	470200	h/rt fill w/hardner	370												
47	470300	h h cart	249												
48	470350	adtech white tub	165												
49	470400	adtech fairing putty	11												15%
50	470500	adtech 30# cartridg	0												15%
51	470600	atech 3qt cartridge	1227												
52	470700	adtech epoxy resin	94												
53	470800	adtech hardner	0												
54	554770	w/rt int gelcoat	0	32%											
55	554772	w/rt gelcoat pail	690	32%	12%										
56	554774	wkr w/rt gel ext	6994	32%	12%										
57	555000	ame 5000 c resin	539	36%											
58	555050	ame 5000 q resin	334	36%											
59	555100	nsr 20 resin	9428	36%											
60	555220	a 220 resin	62495	45%											
61	555230	ame 5000 b resin	21566	31%											
62	555300	mvr 03 lresin	450	36%											
63	556710	tooling gel	160	43%	4%										
64	556723	hi point 90 red	0			2%	47%								25%
65	556725	mek red	1518			1%	21%								27%
66	556730	styrene monomer	59	100%											
67	556995	partail #10	124												
68	560002	hi point 90 cr	151			2%	47%								
69	659016	glue	7												
70	660122	resin	79												
71	660175	drtc ve primer	0												
72	810005	denatured alcohol	32							2%		4%			94%
73	810006	mineral spirits	32												100%
74	810007	fast dry lacquer thinner	242												
75	810008	lctt spirit glue reducer	0		60%			76%	41%		11%				38%
76	890008	chockfast orange	34												0%
77	934095	fv-6 mold release	24					10%							90%
78	934100	fv-6 mold release	130												
79	934105	honeywax paste	12												
80	934115	partail paste	43												
81	990030	slick sand	84	20%		5%		5%							5%

119283.5

B. Species Usages

HAP?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
CAS No.	100-42-5	80-62-6	78-93-3	131-11-3	1330-20-7	108-88-3	110-54-3	103-10-1	108-95-2	67-56-1	822-06-0	101-68-8		
species	styrene	methylmethacrylate	methylmethacrylate	dimethylphthalate	xylylene	toluene	hexane	methylisobutylketone	phenol	methanol	1,6-HMDI	MDDI	gen VOC	
1	270002	foam a	0	0	0	0	0	0	0	0	0	728	0	
2	270003	foam b	0	0	0	0	0	0	0	0	0	0	69	
3	294006	laminex hull/deck	1097	0	0	0	0	0	0	0	0	0	0	
4	294010	laminex fillet	0	0	0	0	0	0	0	0	0	0	0	
5	380030	yellow glue	0	0	0	0	0	0	0	0	0	0	0	
6	380031	glue, jowett	0	0	0	0	0	0	0	0	0	0	0	
7	380034	contact cement	0	0	0	0	89	89	0	0	0	0	835	
8	380032	contact cement	0	0	0	0	17	51	0	0	0	0	0	
9	468002	545 wht epoxy primer	0	0	52	0	10	0	0	0	0	0	207	
10	468003	545 reducer	0	0	21	0	22	0	0	0	0	0	68	
11	468004	545 epoxy cat	0	0	0	0	0	0	0	0	0	0	0	
12	468005	545 gray primer	0	0	0	0	0	0	0	0	0	0	0	
13	468010	high build cat	0	0	0	0	0	0	0	0	0	0	0	
14	468013	yellow primer	0	0	0	0	0	0	0	0	0	0	0	
15	468015	hi spd reducer	0	0	0	0	0	0	0	0	0	0	0	
16	468020	reducer-std topcoat	0	0	36	0	38	0	0	0	0	0	115	
17	468021	awl-prep cleaner	0	0	0	0	0	0	0	10	0	0	227	
18	468022	awl cat #2 converter	0	0	0	0	12	34	0	0	0	112	0	155
19	468030	evap reducer	0	0	0	0	0	0	0	0	0	0	0	
20	468034	accelerator	0	0	0	0	0	0	0	0	0	0	0	
21	468035	accelerator	0	0	0	0	0	0	0	0	0	0	0	
22	468065	awgrip 2000 snowwhite	0	0	35	0	6	58	0	0	0	0	245	
23	468067	sunfast red	0	0	0	0	0	0	0	0	0	0	0	
24	468085	545 primer accelerator	0	0	0	0	0	0	0	0	0	0	0	
25	468230	cat	0	0	0	0	0	0	0	0	0	0	0	
26	468235	epoxy#88 cr tubes	0	0	0	0	0	0	0	0	0	0	0	
27	468245	interlux epoxy primer	0	0	0	0	0	0	0	0	0	0	0	
28	468250	interlux reducing solvent	0	0	0	0	0	0	0	0	0	0	0	
29	468255	zinc wsh primr base	0	0	0	0	0	0	0	0	0	0	0	
30	468260	acid reducer	0	0	0	0	0	0	0	0	0	0	0	
31	468265	urethane primer	0	0	0	0	0	0	0	0	0	0	0	
32	468270	urethane converter	0	0	0	0	0	0	0	0	0	0	0	
33	468275	epoxy glue	0	0	0	0	0	0	0	0	0	0	0	
34	468280	epoxy glue	0	0	0	0	0	0	0	0	0	0	0	
35	468285	clear urethane	0	0	0	0	0	0	0	0	0	0	0	
36	468290	urethane catalyst	0	0	0	0	0	0	0	0	0	0	0	
37	468295	solvent 21	0	0	0	0	0	0	0	0	0	0	7	
38	468995	west syst epoxy	0	0	0	0	0	0	0	0	0	0	0	
39	468996	west syst hardener	0	0	0	0	0	0	27	0	0	0	0	
40	468998	west syst fast hardener	0	0	0	0	0	0	27	0	0	0	0	
41	468999	west syst fast hardener	0	0	0	0	0	0	9	0	0	0	0	
42	469001	west syst resin	0	0	0	0	0	0	0	0	0	0	16	
43	469002	west syst slow hardnr	0	0	0	0	0	0	0	0	0	0	0	
44	469100	epon epoxy resin	0	0	0	0	0	0	0	0	0	0	0	
45	469105	epic cure hardener	0	0	0	0	0	0	0	0	0	0	0	
46	470200	h/h fill w/hardner	0	0	0	0	0	0	0	0	0	0	0	
47	470300	h h cart	0	0	0	0	0	0	0	0	0	0	0	
48	470350	adtech white tub	0	0	0	0	0	0	0	0	0	0	0	
49	470400	adtech fairing putty	0	0	0	0	0	0	0	0	0	0	2	
50	470500	adtech 30# cartridg	0	0	0	0	0	0	0	0	0	0	0	
51	470600	adtech 3g cartridg	0	0	0	0	0	0	0	0	0	0	0	
52	470700	adtech epoxy resin	0	0	0	0	0	0	0	0	0	0	0	
53	470800	adtech hardner	0	0	0	0	0	0	0	0	0	0	0	
54	554770	wht int gelcoat	0	0	0	0	0	0	0	0	0	0	0	
55	554772	wht gelcoat pail	221	83	0	0	0	0	0	0	0	0	0	
56	554774	wkr wht gel ext	2238	839	0	0	0	0	0	0	0	0	0	
57	555000	ame 5000 c resin	194	0	0	0	0	0	0	0	0	0	0	
58	555050	ame 5000 q resin	120	0	0	0	0	0	0	0	0	0	0	
59	555100	nsr 20 resin	3394	0	0	0	0	0	0	0	0	0	0	
60	555220	a 220 resin	28123	0	0	0	0	0	0	0	0	0	0	
61	555230	ame 5000 b resin	6685	0	0	0	0	0	0	0	0	0	0	
62	555300	mvr 031resin	162	0	0	0	0	0	0	0	0	0	0	
63	556710	tooling gel	69	7	0	0	0	0	0	0	0	0	0	
64	556723	hi point 90 red	0	0	0	0	0	0	0	0	0	0	0	
65	556725	mek red	0	0	15	316	0	0	0	0	0	0	404	
66	556730	styrene monomer	59	0	0	0	0	0	0	0	0	0	0	
67	556995	partall #10	0	0	0	0	0	0	0	0	0	0	0	
68	560002	hi point 90 ctr	0	0	3	71	0	0	0	0	0	0	0	
69	659016	glue	0	0	0	0	0	0	0	0	0	0	0	
70	660122	resin	0	0	0	0	0	0	0	0	0	0	0	
71	660175	drtc ve primer	0	0	0	0	0	0	0	0	0	0	0	
72	810005	denatured alcohol	0	0	0	0	0	0	1	0	1	0	30	
73	810006	mineral spirits	0	0	0	0	0	0	0	0	0	0	32	
74	810007	fast dry lacquer thinner	0	0	0	0	184	0	0	27	0	0	0	
75	810008	lct spirit glue reducer	0	0	0	0	0	0	0	0	0	0	0	
76	890008	chocflast orange	0	0	0	0	0	0	0	0	0	0	0	
77	934095	fv-6 mold release	0	0	0	0	2	0	0	0	0	0	22	
78	934100	fv-6 mold release	0	0	0	0	0	0	0	0	0	0	0	
79	934105	honeywax paste	0	0	0	0	0	0	0	0	0	0	0	
80	934115	partall paste	0	0	0	0	0	0	0	0	0	0	0	
81	990030	sick sand	17	0	4	0	4	0	0	0	0	0	4	
TOTAL SPECIES USAGES, lbs		42379	929	166	387	33	445	140	1	63	38	112	728	2438

Trivial and Exempt
Activities

PROPOSED EXEMPT AND TRIVIAL ACTIVITIES

Donzi Yachts by Roscioli performs or may perform in the future many of the activities presented in Attachment A, following, which lists “trivial” and presumptively exempt activities and emission units. No specific mention is made of these activities in the permit application.

All resins and gelcoats are received and stored in drums, eliminating VOC breathing and working losses. Transfer losses are minimized by work practices as addressed in rule 62-297.320. These activities are considered presumptively exempt from permitting.

Potential emissions from miscellaneous solvents result from product transfer and uncondensed vapors. Due to the small quantity of material processed (excluding acetone, no longer considered a VOC) these activities are considered presumptively exempt from permitting.

Activities involving the cutting, shaping, or trimming of fiberglass, wooden or foam parts, where not performed by hand held tools (trivial list activity) are conducted under Good Work Practice Standards. No particulate collection devices with a discrete exhaust point exiting outside the building are utilized. No activities are conducted which result in a plume of greater than 20 % opacity or which extends beyond the facility boundaries. Particulate emissions from these activities are minimized as discussed in Attachment 5, and the activities are considered exempt from permitting.

Additional Applicable
Requirements

ADDITIONAL APPLICABLE REQUIREMENTS

Additional applicable requirements for this facility are detailed in the current synthetic minor FDEP air permit. The permit describes the recordkeeping parameter requirements, the reporting requirements, and compliance testing requirements, as appropriate.

The facility will comply with the Specific Conditions and requirements of the current air permit and the Title V operating permit when issued, as noted in Attachment 5.

Examples of the current raw material recordkeeping follow Attachment 2. The activities conducted in the new building will comply with the MACT requirements for fiberglass boatbuilding, as demonstrated by source specific recordkeeping.

Compliance Plan and Certification

Attachment 5

DONZI YACHTS BY ROSCIOLI

COMPLIANCE REPORT

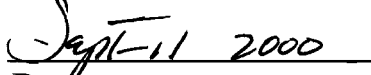
The subject facility is in compliance with each existing applicable requirement outlined in the Title V application, except as noted below. A statement of compliance follows as required.

Emissions Unit ID	Description of Emission Unit	Compliance Status
1	Fiberglass Boat Manufacturing	In Compliance

Compliance Certification

I, the undersigned, am the responsible official as defined in Chapter 62-210.200 Florida Administrative Code (FAC) of the Title V source for which this report is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.


Signature


Date

DONZI YACHTS BY ROSCIOLI

COMPLIANCE PLAN

The purpose of this attachment is to document the methods by which the facility proposes to demonstrate compliance with its applicable requirements. Most of the facility-wide applicable requirements address general permitting standards for stationary air pollution sources and general prohibitions on certain types of activities (e.g., open burning and motor vehicle air conditioner repair). For these types of requirements, no specific actions are required to be performed by the facility except on a periodic, as-needed basis. The facility will continue to comply with these general requirements by taking the necessary steps to ensure that all necessary air permits are applied for and obtained in accordance with FDEP's protocols and by not performing those activities that are prohibited.

For the purposes of the following discussion, compliance plans have been included only for those substantive requirements that set work practice standards or emissions limits, or will necessitate regular monitoring, recordkeeping, or reporting. Compliance plans for the facility as a whole and for each regulated emissions unit are described below.

A. GENERAL FACILITY COMPLIANCE PLAN

The compliance plans presented in this section address monitoring, recordkeeping, and reporting requirements for the facility as a whole.

1. In accordance with 62-210.370(3) FAC, the facility will submit an annual operating report to the appropriate FDEP district office by March 1 of the following year unless otherwise indicated by permit condition or FDEP request. The annual operating report will be completed on the form 62-210.900(5) FAC or as instructed by FDEP.
2. In accordance with 62-213.205 FAC, between January 15 and March 1 of each year, the facility will pay upon written notice from FDEP, an annual emissions fee in an amount determined by the procedures specified by the rule. The emissions fee will be submitted along with a completed form 62-213.900(1) FAC.
3. In accordance with 62-296.320(4)(c), the facility will take reasonable precautions to prevent emissions of unconfined particulate matter from the facility. Activities which can cause fugitive particulate emissions at the facility include vehicular movement, transportation of materials, and industrially related activities such as materials loading, unloading, storing, and handling. Reasonable precautions to be taken by the facility include:

Application of water to paved and unpaved areas accommodating vehicular traffic if a visible particulate plume is observed to extend more than 15 feet from the point of origin.

Removal of particulate matter from buildings or work areas to prevent a visible particulate plume of unconfined particulate greater than 20%.

Enclosure or covering of activities or equipment where necessary to prevent unconfined particulate emissions from having an opacity greater than 20%.

B. CONTROL DEVICE/WORK PRACTICE PLAN

In order to comply with the permit general and specific conditions, all control devices (regulated and unregulated) will be properly maintained. Routine facility inspections will be performed to confirm the effectiveness of control devices and work practice standards in minimizing emissions. Repairs to equipment and modifications to work practice procedures will be made as necessary. Records of these repairs or modifications will be maintained on site for a minimum of 5 years and will be available for review by FDEP or the Agency's designated representatives. All compliance testing and facility recordkeeping will be conducted in a timely manner and in conformance with the applicable permit specific conditions.

C. RECORDKEEPING/COMPLIANCE TESTING

Examples of the recordkeeping required under the current permit are presented in Attachment 2. The facility will continue to record material usages and estimate emissions as required under the current permit until it is superceded by the Title V permit requirements.

Additional record keeping necessary to demonstrate compliance with the MACT requirements will be conducted for the new building.