September 1, 2000

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

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:di



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



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

•						
Facility Owner/Company Name:		<u> </u>	. 1			
Donzi Yachts by Roscioli Internation	onal, I	ncorpora	ted			
Site Name:						
Donzi Yachts by Roscioli Internation	onal, I	nc.		_		
Facility Identification Number:			[]] Un	known	
- ·				-		
Facility Location:						
	61112	21st Street	East			
City: Bradenton Cou	unty: M	lanatee		Zip	Code: 34203	
Relocatable Facility?		6. Exist	ing Perm	nitted	Facility?	
[] Yes [X] No		[X]	Yes		No	
pplication Contact						
Name and Title of Application Contact	ct: Ron	Rooksto	ol, Gener	al M	anager	
Application Contact Mailing Address:	:					
Organization/Firm: Donzi Yachts by Roscioli International, Inc.						
Street Address: 6111 21st Street East						
City: Bradenton State: Florida Z	ip Cod	le: 34203				
Application Contact Telephone Numb	ers:					
Telephone: (941) 755-7411		Fax:	(941) 75	53-26	46	
Application Processing Information (DEP Use)						
Date of Receipt of Application:						
Permit Number:						
PSD Number (if applicable):						
Siting Number (if applicable):						
	Site Name: Donzi Yachts by Roscioli Internation Facility Identification Number:	Site Name: Donzi Yachts by Roscioli International,	Site Name: Donzi Yachts by Roscioli International, Inc. Facility Identification Number:	Site Name: Donzi Yachts by Roscioli International, Inc. Facility Identification Number: 9250596	Site Name: Donzi Yachts by Roscioli International, Inc. Facility Identification Number: [] Uncertain University Identification: [] Uncertain University Identification University Identification Identification: [] Uncertain University Identification	Site Name: Donzi Yachts by Roscioli International, Inc. Facility Identification Number: [] Unknown 9250596 > 081009/ Facility Location: Street Address or Other Locator: 6111 21st Street East City: Bradenton

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 [X]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: <u>0810091-002-AF</u> 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. ſ

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 21st 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, 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.

Cand My

Signature

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 4th 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

Attach letter of authorization if not currently on file.

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

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: [X] 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 Coor	dinates:		
L		Zone: 17	East (km)	: 347.9 North	n (km): 3034.8
	2.	Facility Latitude/Lo Latitude (DD/MM/	U	Longitude (DD/MM/SS): 082/32/20
	3.	Governmental	4. Facility Status	5. Facility Major	6. Facility SIC(s):
		Facility Code: 0	Code: A	Group SIC Code: 37	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 limitsand 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 21st 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.] Small Business Stationary Source? [X] Unknown
2.] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?
3.	X] Synthetic Minor Source of Pollutants Other than HAPs?
4.	X] Major Source of Hazardous Air Pollutants (HAPs)?
5.] Synthetic Minor Source of HAPs?
6.] One or More Emissions Units Subject to NSPS?
7.] One or More Emission Units Subject to NESHAP?
8.] Title V Source by EPA Designation?
9.	acility Regulatory Classifications Comment (limit to 200 characters):
em	conthly record keeping of materials used, methods of application and calculation of cons is proposed as demonstration of compliance with permit conditions.

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

[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.]

Effective: 03/25/96

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.

n:\t5permit\canned\core.lst

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested E	missions Cap	4. Basis for Emissions	5. Pollutant Comment
		lb/hour	tons/year	Cap	
individual HAP	М	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:1 [] Not Applicable [] Waiver Requested
2.	Facility Plot Plan: [X] Attached, Document ID:1 [] Not Applicable [] Waiver Requested
3.	Process Flow Diagram(s): [X] Attached, Document ID:2 [] Not Applicable [] Waiver Requested
4.	Precautions to Prevent Emissions of Unconfined Particulate Matter: [X] Attached, Document ID:2 [] Not Applicable [] Waiver Requested
5.	Fugitive Emissions Identification: [X] Attached, Document ID: 2 [] Not Applicable [] Waiver Requested
6.	Supplemental Information for Construction Permit Application: [X] Attached, Document ID: 3,4 [] Not Applicable
7.	Supplemental Requirements Comment:
cu	Information on the existing facility was submitted previously and the information and the rrent 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: [X] Attached, Document ID:3 [] Not Applicable
9.	List of Equipment/Activities Regulated under Title VI:
	[] Attached, Document ID:
	[] Equipment/Activities On site but Not Required to be Individually Listed
	[X] Not Applicable
10	Alternative Methods of Operation: [] Attached, Document ID:[X] Not Applicable
11	Alternative Modes of Operation (Emissions Trading): [] Attached, Document ID: [X] Not Applicable
12	Identification of Additional Applicable Requirements: [X] Attached, Document ID:4 [] Not Applicable
13	. Risk Management Plan Verification:
	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:)
	[] Plan to be submitted to CEPPO (Date required:)
,	[X] Not Applicable
14.	Compliance Report and Plan: [] Attached, Document ID: [] Not Applicable
15.	Compliance Certification (Hard-copy Required): [] Attached, Document ID: [] Not Applicable

EMISSION UNIT INFORMATION Emission Unit 1 New Building

	Emissions	Unit Information	Section	1	of	2
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III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) m 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 Section 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)					
[] 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).					
[X] 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.					
[] 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)					
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.					
[] 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: [] No ID ID: 002 [] ID Unknown					
5. Emissions Unit Status Code: Date: 7. Emissions Unit Major Group SIC Code: [X] No Permit Receipt 37					
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.					

Em	issions Unit Information Section	<u>1</u> of	2	_		
<u>Em</u>	issions Unit Control Equipment					
1.	Control Equipment/Method Description	on (Limit	to 200 char	racters per	device or method):	
	No controls for VOC emissions					
	,					
2.	Control Device or Method Code(s):					
<u>Em</u>	issions Unit Details					
1.	Package Unit: Not Applicable Manufacturer: Not Applicable	Mode	el Number:	Not Applic	able	
2.	Generator Nameplate Rating: Not App	plicable	MW			
3.	Incinerator Information: Not Applicate Dwell Temperature				٥È	
	Dwell Time				seconds	
	Incinarator Afterburgar Tomporature	~•			OE.	

Emissions	Unit	Information	on	Section	1	of	2

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 Through	hput Rate: Not Applicable					
4. Maximum Production Rate: a	pproximately 500 tons/year of	f VOC bas	ed raw materials*			
5. Requested Maximum Operation	ng Schedule:					
24	hours/day	7	days/week			
52	weeks/year	8760	hours/year			
6. Operating Capacity/Schedule	Comment (limit to 200 charac	cters):				
 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). 						

Emissions	Unit	Information	Se	ection	1		of	2	_
			_	TRATE	ccio	NIC I	TATE	DECIII	ATION

C. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

List of Applicable Regulations

See Page 8 of Facility Information section		
	See Page 8 of Facility Information section	
		·

Emissions Unit Information Section	1	of	2
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D. EMISSION POINT (STACK/VENT) INFORMATION (Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Pl Flow Diagram? See Attachment		2. Emission Po	int 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 (est.)	ht: 34 feet	7. Exit Diameter: 2.5 (est.)	feet	
8. Exit Temperature: 77°F	9. Actual Vol 9950 (est.)	umetric Flow	10. Water Vapor: negligible	%	
11. Maximum Dry Standard Flo Not Applicable	w Rate:	12. Nonstack Er Not Applicab	nission Point Height: le	feet	
13. Emission Point UTM Coord	linates: Not App	olicable			
Zone: E	ast (km):	North (km):			
14. Emission Point Comment (li	mit to 200 chara	cters):			
The exhaust ventilation information for the existing activities was submitted with the previous operating permit application.					

Emissions Unit Informa	tion Section	1	of	2	
E.	SEGMENT	(PROC		,	ORMATION

<u>Seg</u>	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. 						
Re	Source Classification Code 3-14-015-17 Open contac sin/Laminate application, (nearly layup	et molding,	3. SCC Units: Tons applied				
4.	Maximum Hourly Not Applicable	5. Maximum A 400*	Annual Rate:	6. Estimated Annual Activity Factor: Not Applicable			
7.	Maximum % Sulfur: Not Applicable	8. Maximum % Not Applica		9. Million Btu per SCC Unit: Not Applicable			
10	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.						
Seg	ment Description and Rat	e: Segment	2 of	3 <u> </u>			
1.	Segment Description (Proc Styrene based gelcoat and		•	•			
2.	Source Classification Code 3-14-015-12	e (SCC):	3. SCC Units Tons of co	s: pating applied			
4.	Maximum Hourly Rate: Not Applicable	5. Maximum A 100*	Annual Rate:	6. Estimated Annual Activity Factor: Not Applicable			
7.	Maximum % Sulfur: Not Applicable	8. Maximum % Not Applica		9. Million Btu per SCC Unit: Not Applicable			
10	 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. 						

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

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. SCC Units: 3-14-015-50 (-51, -52, -53, -60) Tons of solvent						
4. Maximum Hourly Rate: Not Applicable	5. Maximum A 100*	Annual Rate:	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	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
-			
,			
· · · · · ·			
		, , ,	·

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

Emissions Unit Information Section		1	of	2
Pollutant Detail Information Page	1	of	3	

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: [X] 1	to 1	cons/year		
6. Em	nission Factor: see attached spreadsheet Reference: PERGEN37 Process Knowledge		7. Emissions Method Code: 5 (FDEP Guidance)		
8.					
9.	Pollutant Potential/Fugitive Emissions Comm	nent (limit to 200 characte	ers):		
Allo	wable Emissions Allowable Emissions	of Not Applic	able		
1.	Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	te of Allowable		
3.	Requested Allowable Emissions and Units:	4. Equivalent Allowab	le Emissions:		
		lb/hour	tons/year		
5.	5. Method of Compliance (limit to 60 characters):				
6.	6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):				

Emissions Unit Information Section	1	<u> </u>	of	2
Pollutant Detail Information Page	2	of	3	

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 Efficie Not applicable	ency of Control:
3.	Potential Emissions: not applicable Lb/h	r 24. :	5 tons/yr	4. Synthetically Limited? Y
5.	Range of Estimated Fugitive Emissions: [X] 1 [] 2 [] 3		to1	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 charac	cters)):	
	See attached spreadsheet		·	
9.	Pollutant Potential/Fugitive Emissions Comm	nent	(limit to 200 charact	ers):
			÷	
Allo	wable Emissions Allowable Emissions	c	fNot Applic	cable
1.	Basis for Allowable Emissions Code:	2.	Future Effective Da Emissions:	te of Allowable
3.	Requested Allowable Emissions and Units:	4.	Equivalent Allowab	le Emissions:
			lb/hour	tons/year
5.	Method of Compliance (limit to 60 character	rs):		
6.	Allowable Emissions Comment (Desc. of Op	erati	ng Method) (limit to	200 characters):

Emissions Unit Information Section		1	of	2
Pollutant Detail Information Page	3	of	3	

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 Efficien Not applicable	ency of Control:	
3.	Potential Emissions: not applicable Lb/h	r 24.5 tons/yr	4. Synthetically Limited ? Y	
5.	Range of Estimated Fugitive Emissions: [X] 1 [] 2 [] 3	to1	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	cters):		
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):				
Allo	wable Emissions Allowable Emissions	of Not Applic	cable	
1.	Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	te of Allowable	
3.	Requested Allowable Emissions and Units:	4. Equivalent Allowab	le Emissions:	
		lb/hour	tons/year	
5.	Method of Compliance (limit to 60 character	rs):		
6.	Allowable Emissions Comment (Desc. of Op	perating Method) (limit to	200 characters):	

Em	Emissions Unit Information Section 1 of 2					
<i>(</i> 0-		SIONS INFORMATION				
•	(Only Regulated Emissions Units Subject to a VE Limitation) Visible Emissions Limitation: Visible Emissions Limitation1_ of1_					
1.	Visible Emissions Subtype: VE20	Basis for Allowable Opacity: [X] Rule [] Other				
3.	Requested Allowable Opacity: Normal Conditions: <20 % Ex Maximum Period of Excess Opacity Allowe	cceptional Conditions: <20 % d: 0 min/hour				
4.	Method of Compliance: EPA Method 9 as re	equired by Agency				
5.	Visible Emissions Comment (limit to 200 ch	aracters):				
	•					
	-	ONITOR INFORMATION s Subject to Continuous Monitoring)				
Cor	ntinuous Monitoring System: Continuous M	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):				
		·				

Emissions Cuit Information Section 1 of 2	on 1 of 2	1 Section	Unit Information	Emissions Ur
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J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION (Regulated Emissions Units Only)

Supplemental Requirements

1.	Process Flow Diagram [X] Attached, Document ID:1_ [] Not Applicable [] Waiver Requested
2.	Fuel Analysis or Specification [] Attached, Document ID: [X] Not Applicable [] Waiver Requested
3.	Detailed Description of Control Equipment [] Attached, Document ID: [X] Not Applicable [] Waiver Requested
4.	Description of Stack Sampling Facilities [] Attached, Document ID: [X] Not Applicable [] Waiver Requested
5.	Compliance Test Report
	[] Attached, Document ID:
	[] Previously submitted, Date:
	[X] Not Applicable
_	Decodures for Startum and Shutdown
6.	Procedures for Startup and Shutdown [] Attached, Document ID: [X] Not Applicable [] Waiver Requested
	Operation and Maintenance Plan [] Attached, Document ID: [X] Not Applicable [] Waiver Requested Operation and Maintenance Plan [] Attached, Document ID: [X] Not Applicable [] Waiver Requested
7.	[] Attached, Document ID: [X] Not Applicable [] Waiver Requested Operation and Maintenance Plan [] Attached, Document ID: [X] Not Applicable [] Waiver Requested Supplemental Information for Construction Permit Application
7. 8. 9.	Operation and Maintenance Plan [] Attached, Document ID: [X] Not Applicable [] Waiver Requested Operation and Maintenance Plan [] Attached, Document ID: [X] Not Applicable [] Waiver Requested Supplemental Information for Construction Permit Application [X] Attached, Document ID: 3,4 [] Not Applicable Other Information Required by Rule or Statute
7. 8. 9.	Operation and Maintenance Plan [] Attached, Document ID: [X] Not Applicable [] Waiver Requested Supplemental Information for Construction Permit Application [X] Attached, Document ID: [X] Not Applicable Other Information Required by Rule or Statute [] Attached, Document ID: [X] Not Applicable

Emissions Unit Information Section of
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.)

[X] Not Applicable

Attached, Document ID:_____

Attached, Document ID:

Attached, Document ID:

Attached, Document ID:_____

Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)

Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)

Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)

EMISSION UNIT INFORMATION Emission Unit 2 Existing Building(s)

Emissions Unit Information Section	2	of	2
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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

Emissions only Description and Status	Emissions Chit Description and Status			
1. Type of Emissions Unit Addressed in This Section	n: (Check one)			
[] This Emissions Unit Information Section addresses or production unit, or activity, which provides which has at least one definable emission point (roduces one or more air pollutants and			
[X] 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.				
[] 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? (Chec	k one)			
[X] The emissions unit addressed in this Emissions emissions unit.	s Unit Information Section is a regulated			
[] 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): Currently permitted fiberglass boat building operation utilizing styrene based resins and gelcoats; includes assembly and cleanup materials and five resin storage tanks.				
4. Emissions Unit Identification Number: ID: 001	[] No ID [] ID Unknown			
-	missions Unit Major roup SIC Code: [X] No			
9. Emissions Unit Comment: (Limit to 500 Characters)				
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.				

Em	dissions Unit Information Section 2 of	2
<u>Em</u>	nissions 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):	
Em	nissions Unit Details	
1.	Package Unit: Not Applicable Manufacturer: Not Applicable Mode	el Number: Not Applicable
2.	Generator Nameplate Rating: Not Applicable	MW
3.		OT:
	Dwell Temperature:	°F seconds

Incinerator Afterburner Temperature:

°F

	Emissions	Unit	Information	Section	2	of	2
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B. EMISSIONS UNIT CAPACITY INFORMATION (Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1.	Maximum Heat Input Rate: No	ot Applicable			
2.	Maximum Incineration Rate:	Not Applicable lb/hr		tons/day	
3.	Maximum Process or Throughp	out Rate: Not Applic	able	_	
4.	Maximum Production Rate: app	proximately 100* tons/	year of VOC ba	sed 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 1 (existing activities) and are based on existing permit 0810091-003-AF.

Emissions Unit Information Section		of	
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C. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

List of Applicable Regulations

	_
See Page 8 of Facility Information section	

Emissions Unit Information Se	ction 2 o	f 2
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D. EMISSION POINT (STACK/VENT) INFORMATION (Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Ple Flow Diagram? See previous su existing facility information.		2. Emission Po	int Type Code: 3		
3. Descriptions of Emission Po 100 characters per point):	pints Comprising	this Emissions U	nit for VE Tracking (limit to		
See previous submission for existing facility information.					
4. ID Numbers or Descriptions Not Applicable	s of Emission Un	its with this Emis	sion Point in Common:		
5. Discharge Type Code: See previous submission	6. Stack Heig See previous su	7. Exit Diameter: feet See previous submission			
8. Exit Temperature: 77°F	9. Actual Volume See previous		10. Water Vapor: negligible %		
11. Maximum Dry Standard Flo Not Applicable	11. Maximum Dry Standard Flow Rate: Not Applicable 12. Nonstack Emission Point Height: Not Applicable feet				
13. Emission Point UTM Coord	linates: Not App	olicable			
Zone: E	ast (km):	Nort	h (km):		
14. Emission Point Comment (li	mit to 200 chara	icters):			
Parameters for Section D. were provided with the previous application for Synthetic Minor operating permit.					

Emissions Unit Information Section	2 (of ·	2
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E. SEGMENT (PROCESS/FUEL) INFORMATION (All Emissions Units)

Segm _e	ent Description and Rat	e: Segment	<u>1</u> of <u>3</u>	_	
S	Segment Description (Proc Styrene based resin and ca molds.				ers): spray applied to forms and
Resir	Source Classification Code 3-14-015-17 Open contact of Laminate application, (not layup)	ct molding,	3. SCC Units	: Тоі	ns applied
	Maximum Hourly Not Applicable	5. Maximum A 80*	Annual Rate:	6.	Estimated Annual Activity Factor: Not Applicable
	Maximum % Sulfur: Not Applicable	8. Maximum % Not Applica		9.	Million Btu per SCC Unit: Not Applicable
1	Segment Comment (limit to * Individual limitations on be resin. Monthly record emission limitations.	resin usage are i	not required. Po		cially all material used could on of compliance with
<u>Segm</u>	ent Description and Rat	e: Segment	2 of:	3	
I	legment Description (Proc Styrene based gelcoat and		•		-
2. S	Source Classification Code 3-14-015-12	e (SCC):	3. SCC Unit Tons of c		ng applied
4. M	Maximum Hourly Rate: Not Applicable	5. Maximum A 20*	Annual Rate:	6.	Estimated Annual Activity Factor: Not Applicable
	Maximum % Sulfur: Not Applicable	8. Maximum % Not Applica		9.	Million Btu per SCC Unit: Not Applicable
*	segment Comment (limit to Individual limitations on could be gelcoat. Monthly with emission limits.	gelcoat usage are	e not required.		

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

1.	Segment Description (Prod Mold care, assembly and a removed from the molds, to	cetone cleanup ar	e included in the	is segment. Product is			
2.	Source Classification Code 3-14-015-50 (-51, -5	` ,	3. SCC Unit Tons of se				
4.	Maximum Hourly Rate: Not Applicable	5. Maximum A 10*	nnual Rate:	6. Estimated Annual Activity Factor: Not Applicable			
7.	Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable 9. Million Btu per SCC U Not Applicable					
10	Not Applicable Not Applicable Not Applicable 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.						

Emissions	Unit	Information	Section	2	of	2

F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1. Pollutant Emitted	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
·			

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Emissions Unit Information Section		2	of	2
Pollutant Detail Information Page	1	of	3	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

. 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: [X] 1 [] 2 [] 3	to1	ons/year	
6. Emission Factor: see attached spreadsheet Reference: PERGEN37 Process Knowledge 8. Calculation of Emissions (limit to 600 character)	cters):	7. Emissions Method Code: 5 (FDEP Guidance)	
See attachment 2 for sample spreadsheet			
9. Pollutant Potential/Fugitive Emissions Comm	nent (limit to 200 charact	ers):	
Allowable Emissions Allowable Emissions	of Not Applic	able	
1. Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	te of Allowable	
3. Requested Allowable Emissions and Units:	4. Equivalent Allowab	le Emissions:	
	lb/hour	tons/year	
5. Method of Compliance (limit to 60 character	rs):		
6. Allowable Emissions Comment (Desc. of Op	erating Method) (limit to	200 characters):	

Emissions Unit Information Section		2	of	2
Pollutant Detail Information Page	2	of	3	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

<u>Potentia</u>	/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: [X] 1 [] 2 [] 3	to1	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 charac	cters):				
	See attached spreadsheet					
9.	Pollutant Potential/Fugitive Emissions Comm	nent (limit to 200 charact	ers):			
Allo	owable Emissions Allowable Emissions	of Not Applic	cable			
1.	Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	te of Allowable			
3.	Requested Allowable Emissions and Units:	4. Equivalent Allowab	ole Emissions:			
		lb/hour	tons/year			
5.	Method of Compliance (limit to 60 character	rs):				
6.	Allowable Emissions Comment (Desc. of Op	perating Method) (limit to	200 characters):			

Emissions Unit Information Section	2	<u>; </u>	of	2
Pollutant Detail Information Page	3	of	3	

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/h	r 10.4 tons/yr	4. Synthetically Limited ? Y			
5.	Range of Estimated Fugitive Emissions: [X] 1 [] 2 [] 3	to1	tons/year			
6.	Emission Factor: see attached spreadsheet Reference: PERGEN37		7. Emissions Method Code: 5 (FDEP Guidance)			
8.	Calculation of Emissions (limit to 600 charac	cters):	<u>.</u>			
	See attached spreadsheet					
9.	Pollutant Potential/Fugitive Emissions Comm	ment (limit to 200 charact	ers):			
Allo	wable Emissions Allowable Emissions	of Not Applic	able			
1.	Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	te of Allowable			
3.	Requested Allowable Emissions and Units:	4. Equivalent Allowab	le Emissions:			
		lb/hour	tons/year			
5.	Method of Compliance (limit to 60 character	rs):				
6.	Allowable Emissions Comment (Desc. of Op	perating Method) (limit to	200 characters):			

EM	Emissions Unit Information Section 2 of 2							
.	H. VISIBLE EMISSIONS INFORMATION							
•	(Only Regulated Emissions Units Subject to a VE Limitation)							
Vis	ible Emissions Limitation: Visible Emission	ns Li	mitati	on <u>1</u>	of _	1	<u> </u>	
1.	Visible Emissions Subtype: VE20	2.		for Allowa Rule	ble C	paci [ty:] Other	
3.	3. Requested Allowable Opacity: Normal Conditions: <20 % Exceptional Conditions: <20 % Maximum Period of Excess Opacity Allowed: 0 min/hour							
4.	4. Method of Compliance: EPA Method 9 as required by Agency							
5.	Visible Emissions Comment (limit to 200 ch	arac	ters):					
			٠.,					
	I. CONTINUOUS MO (Only Regulated Emissions Unit						itoring)	
Cor	ntinuous Monitoring System: Continuous I		-				-	
1.	Parameter Code:	2.	Pollu	tant(s):				
3.	CMS Requirement:	[] Ru	le	[] C	ther	
4.	Monitor Information: Manufacturer: Model Number:		S	erial Numb	er:			
5.	Installation Date:	6.				ation	Test Date:	
7.	Continuous Monitor Comment (limit to 200	cha	racter	s):				

Emissions	Unit:	Information	Section	2	of	2

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

Supplemental Requirements

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

Addition	nal Supplemental Requirements for Title V Air Operation Permit Applications
	ernative Methods of Operation Attached, Document ID: [X] Not Applicable
	ernative Modes of Operation (Emissions Trading) Attached, Document ID: [X] Not Applicable
	tification of Additional Applicable Requirements Attached, Document ID: [X] Not Applicable
	npliance Assurance Monitoring Plan Attached, Document ID: [X] Not Applicable
15. Aci	d 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.)

Emissions Unit Information Section ____ of

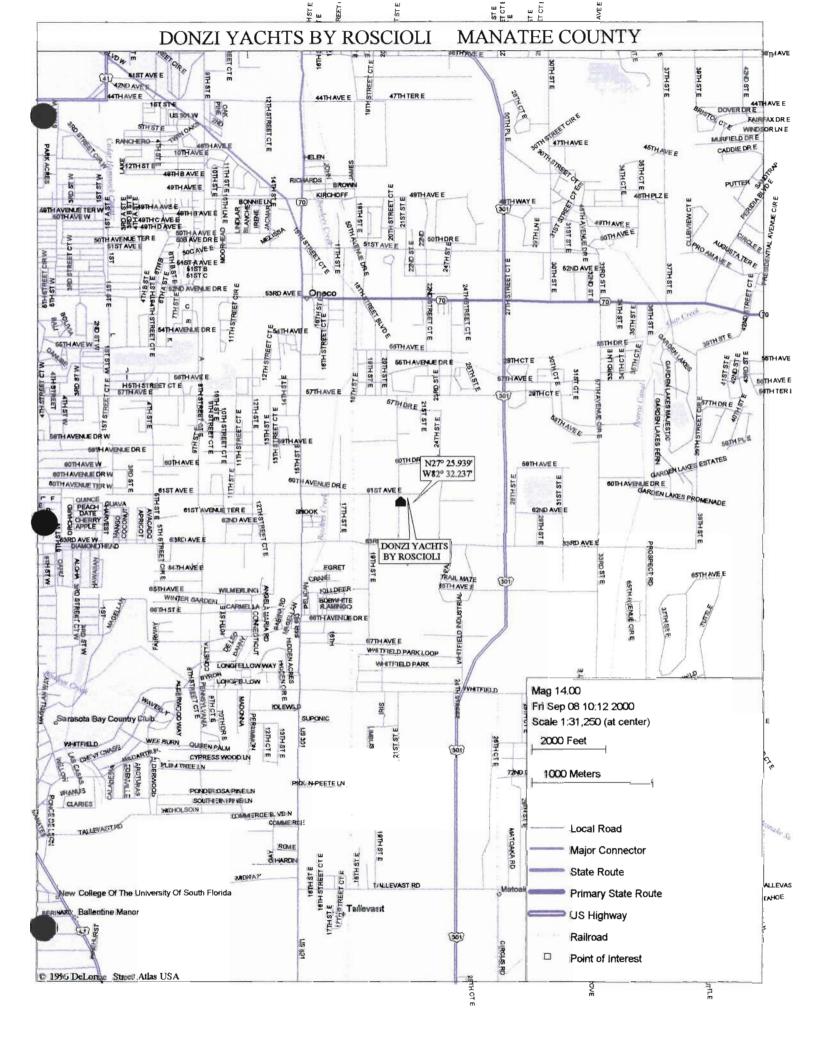
Attached, Document ID:_____

Attached, Document ID:_____

[] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)

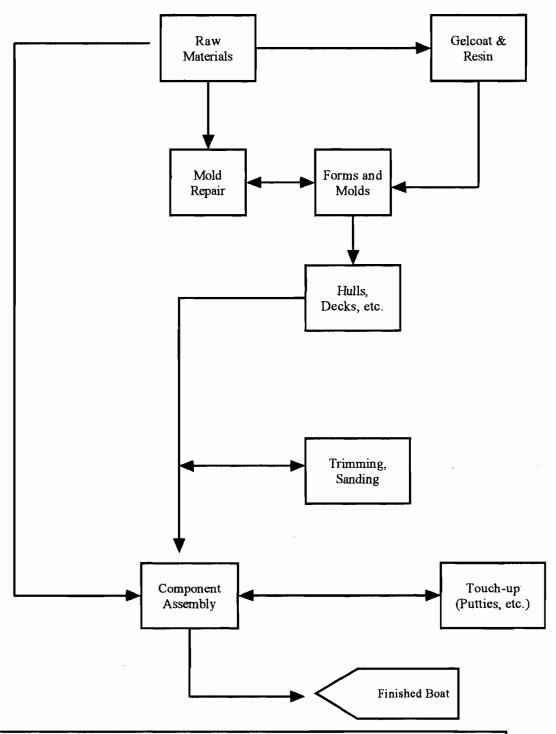
[X] Not Applicable

Site Location and Facility Layout



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

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:

Material Usage Rate x Species Concentration x Emission Factor =

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 superceeded 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		I 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.

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,	Atomized	0.014 x (Resin HAP%) ^{2.425}
tooling resin	Atomized, plus vacuum bagging with roll-out	0.01185 x (Resin HAP%) ^{2.425}
	Atomized, plus vacuum bagging without roll-out	0.00945 x (Resin HAP%) ^{2.425}
	Nonatomized	0.014 x (Resin HΛP%) ^{2.275}
•	Nonatomized, plus vacuum bagging with roll-out	0.0110 x (Resin HAP%)2.275
	Nonatomized, plus vacuum bagging without roll-out	0.0076 x (Resin HAP%) ^{2.275}
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	0.445 x (Gel coat HAP%) 1.675

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

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If your facility	You must submit	By this date
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

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	Α.	Material U	sages and Compositions	CAS No.			78-93-3		1330-20-7	108-88-3	110-54-3	Y 103-10-1	Y 108-95-2	67-56-1	822-06-0	Y 101-68-8	N
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4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	11 12 13 14 15 16 17 18 19 19 19 19 19 19 19 19 19 19 19 19 19	468999 469902 469100 469105 470200 470300 470400 470500 470500 470700 470800 554770 554772 554774 5555050 555050 555100 556702 556702 556702 556703 556703 556703 556703 556000 810006 810006 810006 810008	west syst resin west syst resin west syst resin west syst resin epon epoxy resin epoc ure hardener hyfit fill whardner h h cart adtech write tub adtech fairing putty adtech 30# carridge adtech poxy resin adtech hardner with int gelcoat wit int gelcoat pail wor wit gel ext ame 5000 c resin ame 5000 c resin an 20 resin a 220 resin a 220 resin beloof point gel in point 90 red mek red styrene monomer partal #10 hi point 90 cr due resin derabured alcohol mineral spirits fast dry lacquer thinner lot spirit give reducer chockfast orange	147 1114 0 0 0 370 249 165 11 0 1227 94 0 690 6994 539 334 9428 62495 21566 450 0 1518 59 124 151 7 7 7 9 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	32% 32% 36% 36% 36% 45% 31% 36% 43%	12%	2%	47% 21%		76%			6%				15% 15% 15% 25% 27% 94% 100%
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В.	Species U	Isages	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	Y 101-68-8	N
		V-900	species	styrene	methylmeth	methylethyl	dimethyl	xylene	totuene	hexane	methylisobutyl	phenol	methanoi	1,6HMDI	MDDI	gen
					acrylate	ketone	phthalate	//Jiene	toracino	HOAGHO	ketone	_processor	THESTATION	1,01111101	11001	VOC
1	270002	foam a		0	0	0	0	0 ,	0:	0	0	0	0	0	728	1 0
2		foam b		0	0	0	0	0	0	0	0	0	0	0	0	69
3	234000	laminex hull/deck		1097	0	0	0	0	0	0	0 '	. 0	0	0	0 '	0
,	294010 380030	laminex fillet	-	0	0 .	0	0	0	0	0	0 1	0	0	0	0	0
6		yellow glue glue, jowett		0	0 -	0		0	0 '	0	0	0	. 0	0	0	0
7	380034	contact cement	•	- 0	ŏ	0	- 6	Ö	89	89 .	0	0	. 0	0	· 0	835
8		contact cement	·	0	Ō		0	ō	17	51	.0	Ö	0	0	0	0
9	468002	545 wht epoxy primer		0	0	52	0	10	0	0	0	0	Ö	1 0 1	ō	207
10		545 reducer	. [0	0	21	. 0	0	22	0	0	0	0	0	0	68
11		545 epoxy cat		0	0	0	0	0	0	0	0	0	0	0	0	0
12		545 gray primer	.	0	0	0	0	0	0	0	0	0	0	0	0	0
13 14	468010	high build cat	.	0	0	0	0.	. 0	0	0	0	0	0.	0	0	0
15		yellow primer hi spd reducer	. }	0	0	0	0	0	0 1	0	0	0	0	0	0	0
16		reducer-std topcoat	.	0	0	36 ·	0	-0 -	38	0	0	0	0	0 1	- 0 -	115
17	468021	awl-prep cleaner		0	ō	Ö	0	0	0	· D	, 0	0,0	10	0	0	227
18	468022	awl cat #2 converter	·	0	Ō	0	ō	12	34	0	0	0	0	112	ō	155
19	468030	evap reducr		0	0	0	0	0	0	0	0	0	0 .	. 0	ō	0
20	468034	accelerator		0	0 .	0	0	' 0	0	0	0	0	0	0	Ο,	0
21	468035	accelerator	. [0	0	0	0	0	0 .	0	0	. 0	. 0	Ō	0	0
22		awlgrip 2000 snowwhite		0	0	35	0	6	58	0	. 0	0	0	0_	10	245
23	468067	sunfast red		0	0	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	0	0
25 26	468230	cat	. }	0	0	0	0	0	0 .	0	0	. 0	0	-0	. 0	0
26 27	468235 468245	epoxy#88 ctr tubes intertux epoxy primer	. }	- 0	0	. 0	0	0	-	0	0	0	° 0	, 0	0	0
28	468250	intertux reducing solvent	.	0	0	0	0 .	-6-	0	0	0 ,	0	0	0 .	0	0
29	468255	zinc wsh primr base	·	- 6 -	0	0	-	ŏ	0	0	0	-0	Ö	0	0	0
30	468260	acid reducer	•	0	0	Ö	0	0	. 0	0	-0	ō	0	0	ő	0
31	468265	urethane primer	·	ō	Ö	Ō	' 0	ō	0	Õ	0	0	0 '	0	. 0	1 0
32	468270	urethane converter	1	0	0	0	0		0	0	0	0	0	0	0	0
33	468275	epoxy glue	. [0	0	0	0	0	0	0	0	ō	0	0.	0	0
34	468280	epoxy glue		0	0	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	0	0
36	468290	urethane catalyst		0	0	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	0	0	7
38 39	468995 468996	west syst epoxy west syst hardener		0	0	0	0	0	0	0	0	0 27	. 0	0	0	0
40	468998	west syst fast hardener	.	0	0	0	0	0	0	0	0	27	0	0	0	0
41	468999	west syst fast hardener		- 6	0	0	0	0	0.	0	0	9	- 0	0	; 0	0
42	469001	west syst resin	.	_ _ _	0		ō	ŏ	0	0 ·	<u>ō</u>	0	- 0	ŏ	0	16
43	469002	west syst slow hardnr	•	ō	0	Ö	ō	-	 ō	ō	ŏ,	- 0	ō	ō	Ö,	0
44	469100	epon epoxy resin		Ö	0	Ö	0 .	ō	0	Ö	0	0	0	0	. 0	0
45	469105	epic cure hardener		0	0	0	0	0	0 .	0	0	0	0	٥,	0	0
46	470200	h/ht fill w/hardner	. [0	0	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	10.	0	, 0	0
48	470350	adtech white tub		0	0	0	0	0	0	0	0	0	0	0	0	0
49 50	470400	adtech fairing putty		0	0	0	0	0	0	0	0	0	0	0 -	0	
51	470500 470600	adtech 30# cartridg atech 3gl cartridge		0	0	- 0	0	- 0	0	- 0	0	0	0	0	0	- 0
52		adtech epoxy resin	. }	- 0	0	0	0	- 6	0	0	-	0	0	ō	0	0
53	470800	adtech hardner	-	0	ő	0	ō	ō	0	0	ō	0	Õ	 0	ō	0
54	554770	whit int gelcoat	·	0	ō	0	0 .	, 0	ŏ	0 .	ö	. 0	ő	ō	Ö	0,0
55	554772	wht gelcoat pail	·	221	83	0	0	0	0 .	· 0	0 .	0	0	0	0	0
56		wkr wht gel ext	. [2238	839	0	0	0	0	0	0	0	0	<u> </u>	0	0
57	555000	ame 5000 c resin	. [194	0	0	, 0	0	0	0	<u>0</u> .	, 0	. 0	0	0	0
58	555050	ame 5000 q resin		120	0	0	0	0	0	. 0	, 0	0	0	0	0	0
59		nsr 20 resin		3394	0	0 .	0	. 0	0	0,	0 0	0	0	0	0	0
60 61	555220	a 220 resin ame 5000 b resin		28123 6685	0	0 .	0	0	0	0	0	. 0	0	- 0	0	0
62		mvr 031resin	. }	162	0	0	0	6	0	0	0	0	- 0	0	ő	- 0
63		tooling gel	.	69	7	0	0	Ö	0	0	. 0	0	ō	0	- 0	0
64		hi point 90 red		0	0	Ō	0	0	0	0	0	0	0	0	0.	0
65		mek red		0	0	15	316	0	0	0	0	0	0	0	0	404
66		styrene monomer		59	0	. 0	0	0	0	0	. 0	0	. 0	0	. 0	0
67	556995	partal #10		0	0	0	0	0	0	0	. 0	0	0	' 0	0	0
68		hi point 90 ctr	. [0	0	3	71	0	0	0	0	0	0	'0	0	0
69		glue		0	0	0	0 .	0	0	0	0 '	0	0	0	0	0 .
70		resin		0	0.	0	0	0	0	0	. 0	0 .	0	0	0	0
71		drtc ve primer		0	0	0	. 0	0	0	0	. 0	0	0	0	0 '	30
72 73		denatured alcohol		0	0	0	0	0	0	0 -	0	0	0	0	0	32
74		mineral spirits fast dry lacquer thinner	• }	0	0	0	0	"	: 184	0	0	0	27	0	0	. 0
75		lct spirit glue reducer	-	0	0	0	0	- 6	0	. 0	0	0	0	- 6	. Ō	- 0
76		chockfast orange	-	0	0	0	0	ŏ	0	0	ŏ	0	0	- 0	ő	10
77		fv-6 mold release	.	0	0	0	ō	ŏ	. 2	Ö	. 0	ō .	ŏ	0	0	22
78		t-r mold release	·	0	0	0	ō	0	0	Ö	. 0	ō	ō	0	0	0
79		honeywax paste		0	0	0	0	ō	0	0 .	0	Ö	0	0	.0	0
80	934115	partall paste	[0	0	0	0	0	0	0	0	0	0	Ö	0	0
81		slick sand		17	0	4	0	4	0	0	0	0	0	0	0	4
		TOTAL SPECIES USAG	ES, Nos	42379	929	166	387	33	445:	140	1	63	38	112	728	2438

			HAP?	Y	Y	Y	Y	Y	Y	Y	Υ -	<u>у</u> -	· Y ·	Y	l y	! I N
			CAS No.	Ö	0	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	
C.	Species E	Emissions	species	styrene	methylmeth	methylethyl	dimethyl	xylene	totuene	hexane	methylisobutyl	phenol	methanol	1,6HMDI	MDDI	gen
1	270002	foam a		0.00	0.00	0.00	phthalate 0.00	0.00	0.00	0.00	ketone 0.00	0.00	0.00	0.00	728.00	0.00
2	270003	foam b		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	69.30
3		laminex hull/deck		164.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
/ 4 5		laminex fillet yellow glue		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6		glue, jowett		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7	380034	contact cement		0.00	0.00	0.00	0.00	0.00	89.46	89.46	0.00	0.00	. 0.00	0.00	0.00	834.96
8		contact cement		0.00	0.00	0.12 51.70	0.00	0.00 10.34	17.36 0.00	50.84 0.00	0.00	0.00	0.00	0.00	0.00	0.00
10		545 wht epoxy primer 545 reducer		0.00	0.00	21.31	0.00	0.00	22.43	0.00	0.00	0.00	0.00	0.00	0.00	206.80 68.42
11	468004	545 epoxy cat		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
12		545 gray primer		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13 14		high build cat yellow primer		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15		hi spd reducer		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
16	468020	reducer-std topcoat		0.00	0.00	35.91	0.00	0.00	37.80	0.00	0.00	0.00	0.00	0.00	0.00	115.29
17 18		awl-prep cleaner awl cat #2 converter		0.00	0.00	0.00	0.00	0.00	0.00 34.10	0,00	0.00	0.00	9.86	0.00	0.00	226.78 155.00
19		evap reducr		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	111.60 0.00	0.00	0.00
20		accelerator		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21		accelerator		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22 23		awlgrip 2000 snowwhite sunfast red		0.00	0.00	34.98 0.00	0.00	5.83 0.00	58.30 0.00	0.00	0.00	0.00	0.00	0.00	0.00	244.86 0.00
24		545 primer accelerator		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
25	468230	cat .		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
26 27		epoxy#88 cir tubes interiux epoxy primer		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
28		intenux epoxy primer I interiux reducina solvent		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
29		zinc wsh primr base		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30		acid reducer		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31		urethane primer		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32 33		urethane converter epoxy glue	}	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
34		epoxy glue		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
35		clear urethane		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
36 37		urethane catalyst solvent 21	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 7.26
38		west syst epoxy		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
39		west syst hardener		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26.72	.0.00	0.00	0.00	0.00
40		west syst fast hardener		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	27.36	0.00	0.00	0.00	0.00
41 42		west syst fast hardener west syst resin		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.80 0.00	0.00	0.00	0.00	0.00 15.82
43		west syst slow harding		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
44	469100	epon epoxy restn		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
45 46		epic cure hardener h/ht fill w/hardner		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
47		h h cart		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
48		adtech white tub		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 :	0.00	0.00	. 0.00	0.00
49 50		adtech fairing putty adtech 30# cartridg		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
51		atech 3gl cartridge	ľ	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
52	470700	adtech epoxy resin	į	0.00	0.00	0.00	. 0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
53		adtech hardner	ļ	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
54 55		whit int gelcoat whit gelcoat pail		0.00 81.70	0.00 57.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56	554774	wkr wht gel ext		828.09	587.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57		ame 5000 c resin		52.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
58 59		ame 5000 q resin nsr 20 resin		32.46 916.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
60		a 220 resin		7593.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 '
61	555230	ame 5000 b resin		1805.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
62		mvr 031resin tooling gel		43.74 10.34	0.00 4.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 :	0.00
63 64		hi point 90 red		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	. 0.00	0.00
65	556725	mek red		0.00	0.00	15.18	315.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	403.88
66		styrene monomer		21.83	0.00	0.00	0.00	0.00	0.00	0.00	. 0.00	0.00	0.00	0.00	0.00	0.00
67 68		partall #10 hi point 90 chr		0.00	0.00	0.00 3.02	0.00 70.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
69				0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
70	660122	resin		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 '	0.00	0.00	0.00	0.00	0.00
71		drtc ve primer		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
72 73		denatured alcohol mineral spirits		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.64	0.00	0.00	0.00	0.00	30.08 32.00
74		fast dry lacquer thinner		0.00	0.00	0.00	0.00	0.00	183.54	0.00	0.00	0.00	26.57	0.00	0.00	0.00
75	810008	lcti spirit glue reducer		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
76 77		chockfast orange		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	. 0.00	0.00
78		tv-6 mold release		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.60 0.00
79	934105	honeywax paste		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
80		partal paste		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
81	990030	slick sand TOTAL SPECIES EMIS	SIONS Ibs	4.54 11554.29	0.00 650.45	4.20 166.42	0.00 386.66	4.20 32.77	0.00 445.39	0.00 140.30	0.00 0.64	0.00 62.88	0.00 37.71	0.00	0.00 728.00	4.20 2437.90
			, 203		222.70		200,00			, ,,,,,,,,	5.57	52.00	J		, 20,00	

Material	Method	Factor	notes	
Resin	Spray	0.27	at styrene	35%
	Hand	0.15	at styrene	35%
Gelcoat	Spray	0.37	at styrene	35%
MMA		0.7	CFA data	
Reactive		0.0001		
Gen VOC		1		

Emission Summary							
category	lbs	tons					
Styrene	11554	5.78					
Total HAP	14317	7.16					
Total VOC	16755	8.38					

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

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.

whater Canal Map

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.