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FINAL
FLORIDA APPLICATION FOR AIR PERMIT
TITLE V SOURCE
STUART, FLORIDA

Dakota Yachts Industries, Inc.



ARCADIS

GERAGHTY & MILLER

2900 West Fork Drive, Suite 540
Baton Rouge, Louisiana 70827
Tel (504) 292-1004
Fax (504) 292-5210

PBF000939.0002.LA001
REPORT

March 12, 1999

ARCADIS GERAGHTY & MILLER

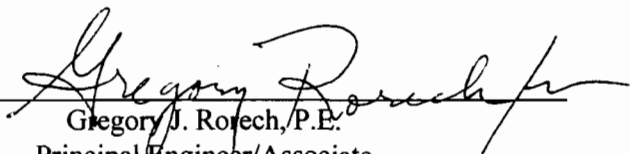
FLORIDA APPLICATION FOR AIR PERMIT
TITLE V SOURCE
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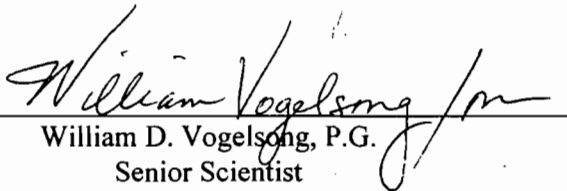
Prepared by ARCADIS Geraghty & Miller, Inc.



Michael S. Hannan, E.I.T.
Project Manager/Air Quality Engineer



Gregory J. Rorech, P.E.
Principal Engineer/Associate



William D. Vogelsong, P.G.
Senior Scientist

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1. Area Map Showing Facility Location.
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3. Simplified Process Flow Diagram.

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- B. CAAA Section 112(g) MACT Determination
- C. Emission Calculations.

**FLORIDA APPLICATION FOR AIR PERMIT
TITLE V SOURCE
STUART, FLORIDA**

1.0 Introduction

Dakota Yachts Industries, Inc. (Dakota) plans to lease Building 4 of the former Northrop Grumman Corporation facility located in Stuart, Florida, for the purposes of constructing and operating a boat manufacturing facility. Dakota is submitting this air permit application to the Florida Department of Environmental Protection (FDEP) in order to obtain an air permit for air emissions associated with the proposed boat manufacturing facility.

The Application for Air Permit - Title V Source is contained in Appendix A. A Maximum Achievable Control Technology (MACT) 112(g) determination is contained in Appendix B (see Section 3.0, Regulatory Applicability Analysis, for details). Emission rate calculations are contained in Appendix C. An Area Map Showing Facility Location, and a Facility Plot Plan are included as Figures 1 and 2, respectively.

2.0 Process Description

The boat manufacturing process consists of two separate phases: mold production and boat manufacturing. The mold production process is typically a one time event, unless a mold becomes unusable or the facility plans on expanding production. Dakota anticipates building 8 molds to use at this facility, and manufacturing a maximum of 4 boats per week. The mold production and boat manufacturing operations use, among other materials, gelcoat, resin, and Spraycore 2000. The gelcoat, resin, and Spraycore 2000 contain chemicals regulated by the air pollution regulations of the FDEP. Figure 3 shows a simplified process flow diagram for the boat manufacturing process.

The mold production process is expected to emit approximately 0.5 ton of volatile organic compounds (VOC), of which most will be styrene, and the remainder being methyl methacrylate and methyl ethyl ketone peroxide (MEKP). The boat manufacturing operation is expected to emit approximately 23 tons per year (TPY) of VOC, once again with the majority being styrene and the remainder being methyl

methacrylate and MEKP. The emissions are fugitive in nature. Styrene and methyl methacrylate are both classified as hazardous air pollutants (HAPs) by the FDEP.

3.0 Regulatory Applicability Analysis

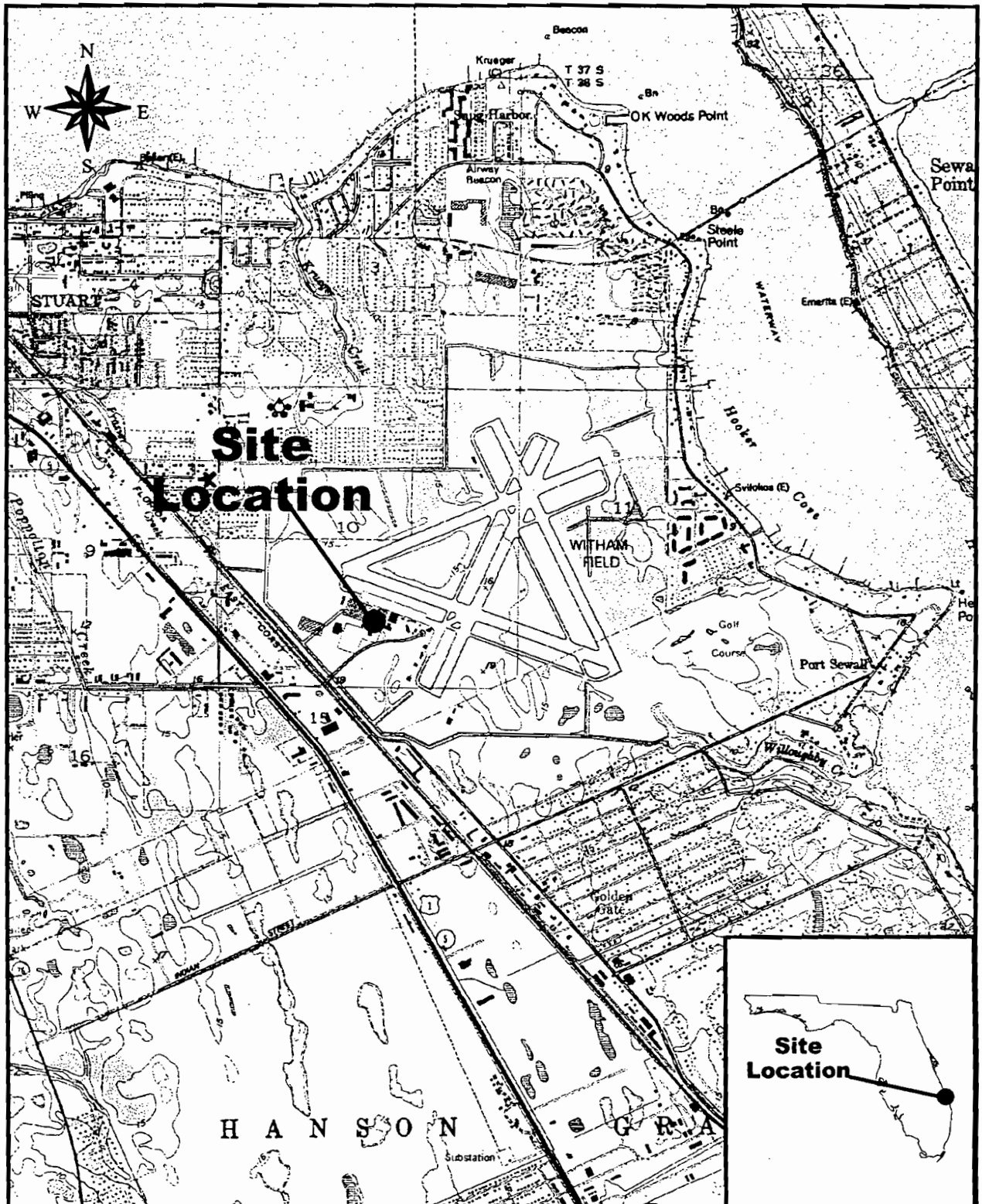
This section of the air permit application provides a comprehensive review of potentially applicable state and federal air regulatory requirements. The FDEP has developed a list of regulations (Appendix TV-1, Title V Conditions, version dated 12/02/97) to which all Title V sources are presumably subject. Dakota does not seek exception to any of these general Title V conditions.

The EPA is scheduled to propose a Maximum Achievable Control Technology (MACT) standard for the boat manufacturing industry by December 1999, with final promulgation expected in December 2000. Dakota Yachts Industries, Inc. (Dakota) has identified itself as being subject to the boat manufacturing MACT. Dakota's obligations for the MACT requirements are defined in Title 40 (Protection of Environment), Part 63 (National Emission Standards for Hazardous Air Pollutants for Source Categories), Subpart B (Requirements for Control Technology Determinations for Major Sources) of the Code of Federal Regulations. Florida has these requirements by reference (with minor exceptions) at 62-204.800(10)(d) of the Florida Administrative Code (F.A.C.). EPA was given 10 years from the date of the 1990 Clean Air Act Amendments (CAA) to prepare and issue MACT standards. However, Congress wanted to be sure that HAP-emitting facilities built during the interim period would also be controlled, so it included a preconstruction review program within CAA Section 112 (g).

EPA regulations implementing the Section 112(g) mandate impose the preconstruction review process on newly constructed major sources of HAPs in source categories where MACT has not yet been promulgated. A major source of HAPs is a facility that has the potential to emit 10 tons per year (TPY) of any individual HAP or 25 TPY of total HAPs. Such facilities must obtain a preconstruction permit and implement MACT at start-up. Dakota's 112(g) MACT determination is contained in Appendix B of this application package.

None of the operations conducted at Dakota are defined as a "regulated unit" under FDEP regulations. Therefore, any section of the Application for Air Permit which solely addresses regulated units has been left blank.

Figures



ARCADIS
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Area Map Showing Facility Location Dakota Yachts Industries, Inc. Stuart, Florida

2000 0 2000 4000 Feet

Source:
1:24,000 Digital Raster Graphic
St. Lucie Inlet, Florida - USGS

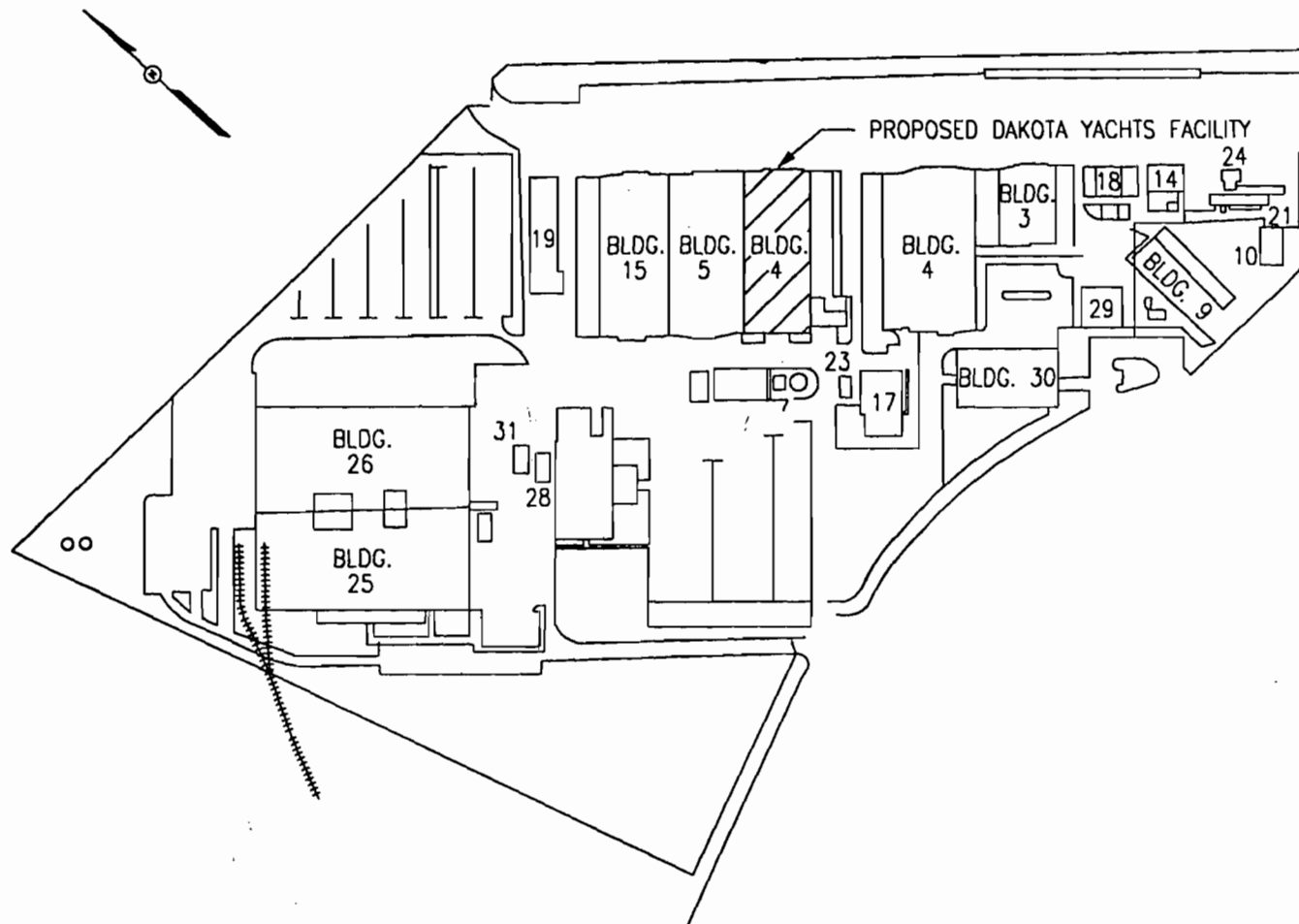
h:\gis\projects\northrup\site.apr mr
3/4/99

Figure
1

Filename = H:\GMOOHA\DAKOTA-YACHTS\PF939-2.dwg
 Menuname = C:\PROGRAM FILES\AUTOCAD R14\support\acad

AutoCAD Version = 14.0
 Username = gmo0ha

03-05-1999
 11:26:39



copyright © 19 98

NO.	DATE	REVISION DESCRIPTION	BY
			CKD

FACILITY PLOT PLAN

BOAT MANUFACTURING

DAKOTA YACHTS
INDUSTRIES, INC.
Stuart, Florida



ARCADIS
GERAGHTY & MILLER

2900 WEST FORK DRIVE
SUITE 540, BATON ROUGE, LA 70827
Tel: 225-292-1004 Fax: 225-292-5210

PROJECT MANAGER: MSH	CHECKED BY: MSH
DRAWING FILE: PF939-2	CAD FILE: APF939-2
DRAWN: GRM/PJW	DATE: 3-4-99/3-5-99
PROJECT NUMBER: PF000939.0001 LA001	DRAWING NUMBER: 2

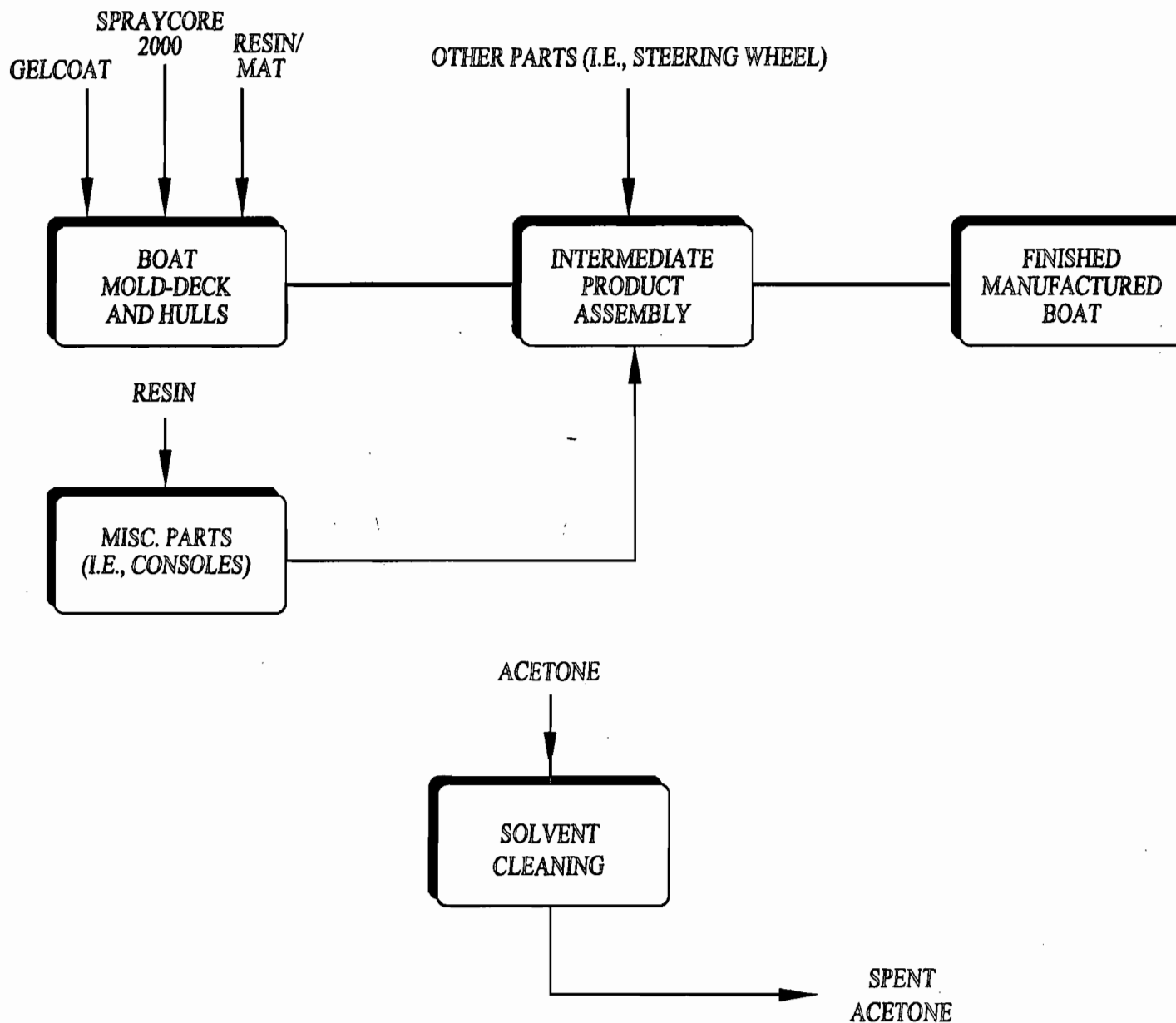
ARCADIS GERAGHTY & MILLER



2900 WEST FORK DRIVE
 SUITE 540, BATON ROUGE, LA 70827
 Tel (225) 292-1004 Fax (225) 292-5210

SIMPLIFIED PROCESS FLOW DIAGRAM

BOAT MANUFACTURING



DATE
 3-4-99/3-5-99

DRAWN
 GRM/PJW

PROJECT MANAGER
 MSH

CHECKED
 MSH

DAKOTA YACHTS
 INDUSTRIES, INC.
 Stuart, Florida

DRAWING FILE:
 PF939-1

CAD FILE:
 A-PF939-1

PROJECT NUMBER
 PF000939.0002
 LA001

DRAWING NUMBER

3

APPENDIX A

**APPLICATION FOR AIR PERMIT -
TITLE V SOURCE**



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: Dakota Yachts Industries, Inc.	
2. Site Name:	
3. Facility Identification Number: [] Unknown	
4. Facility Location: Street Address or Other Locator: 1985 SE Airport Road City: Stuart County: Martin Zip Code: 34995	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [] Yes [X] No

Application Contact

1. Name and Title of Application Contact: Michael S. Hannan, Project Engineer/Environmental	
2. Application Contact Mailing Address: Organization/Firm: ARCADIS Geraghty & Miller, Inc. Street Address: 2900 Westfork Drive, Suite 540 City: Baton Rouge State: LA Zip Code: 70827	
3. Application Contact Telephone Numbers: Telephone: (225) 292-1004 - Fax: (225)292-5210	

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

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: _____

- ☐ 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)

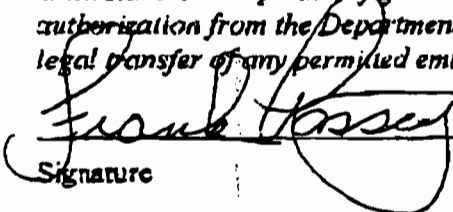
- ☒ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted,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

FROM : DAKOTA YACHTS

PHONE NO. : 954 522 0109

Mar. 10 1999 03:32PM P1

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Frank Passey, President
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Dakota Yachts Industries, Inc. Street Address: 999 NW 10 th Terrace, Suite 3 City: Fort Lauderdale State: FL Zip Code: 33311
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (954) 522-0082 Fax: (954) 522-0109
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 3/10/99 Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Gregory J. Rorech Registration Number: 44125
2. Professional Engineer Mailing Address: Organization/Firm: ARCADIS Geraghty & Miller, Inc. Street Address: 14497 N. Dale Mabry Highway, Suite 115 City: Tampa State: FL Zip Code: 33618
3. Professional Engineer Telephone Numbers: Telephone: (813)961-1921 Fax: (813)961-2599

4. Professional Engineer Statement:

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

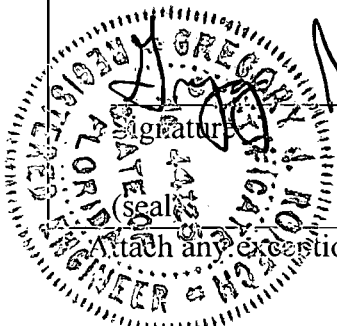
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions 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 [], 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 [], 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.



3/10/99
Date

Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
No corresponding ID	Fugitive VOC and HAP emissions from the mold building and boat manufacturing processes conducted at the facility.	AC1E	\$1,000

Application Processing Fee

Check one: ☒ Attached - Amount: \$ 1,000 ☐ Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Dakota Yachts Industries, Inc. (Dakota) proposes to construct and operate a boat manufacturing facility in a leased building at the location indicated on page 1 of this form. Prior to boat production, Dakota will produce eight molds with which to manufacture the boats. Upon completion of the molds, boat production will begin with an anticipated maximum production rate of four boats per week. The emission unit being applied for is fugitive VOC and HAP emissions from the mold building and boat manufacturing processes. The manufactured boats are intended for use in the recreational sport fishing industry.

2. Projected or Actual Date of Commencement of Construction: April 1999

3. Projected Date of Completion of Construction: April 1999

Application Comment

Dakota respectfully requests that the FDEP expedite the permit issuance process for this proposed facility. Dakota is ready to begin construction upon permit receipt. Dakota requires the production capacity which will be provided by this facility in order to meet existing back orders.

A. GENERAL FACILITY INFORMATION

1. Facility UTM Coordinates: Zone: 17				East (km): 576.4	North (km): 3006.3
2. Facility Latitude/Longitude: Latitude (DD/MM/SS):				Longitude (DD/MM/SS):	
3. Governmental Facility Code: 0	4. Facility Status Code: C	5. Facility Major Group SIC Code: 37	6. Facility SIC(s): 3732		
7. Facility Comment (limit to 500 characters):					

[illegible]

Check all that apply:

List of Applicable Regulations

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

B. FACILITY POLLUTANTS

List of Pollutants Emitted

[illegible]

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [X] Attached, Document ID: <u>Figure 1</u> [] Not Applicable [] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: <u>Figure 2</u> [] Not Applicable [] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: <u>Figure 3</u> [] Not Applicable [] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
5. Fugitive Emissions Identification: [X] Attached, Document ID: _____ [] Not Applicable [] Waiver Requested
6. Supplemental Information for Construction Permit Application: [] Attached, Document ID: _____ [X] Not Applicable
7. Supplemental Requirements Comment: Emission calculations (Appendix C)

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" 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 type="checkbox"/> Attached, Document ID: _____ <input checked="" 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 checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

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 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 checked="" 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 type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input checked="" 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): Fugitive VOC and HAP emissions - mold and boat manufacturing.			
4. Emissions Unit Identification Number:		<input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID:			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
C		37	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):
Low styrene resin and gel coat.

2. Control Device or Method Code(s): 102

Emissions Unit Details

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating: MW	
3. Incinerator Information:	
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:	mmBtu/hr
2. Maximum Incineration Rate: lb/hr	tons/day
3. Maximum Process or Throughput Rate:	
4. Maximum Production Rate: 4 boats/week	
5. Requested Maximum Operating Schedule:	
16 hours/day	7 days/week
52 weeks/year	5,824 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): Each mold is expected to require 200 lbs. gel coat; 3,000 lbs. resin; 60 lbs. MEKP and 1,600 lbs. Spraycore 2000. Each boat is expected to require 200 lbs. gel coat; 2,400 lbs. resin; 48 lbs. MEKP, and 1,400 lbs. Spraycore 2000	

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

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?		2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

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

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Boat manufacturing			
2. Source Classification Code (SCC): 3-14-999-99		3. SCC Units: Tons Processed	
4. Maximum Hourly Rate: 0	5. Maximum Annual Rate: 430.4	6. Estimated Annual Activity Factor:	
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:	
10. Segment Comment (limit to 200 characters): Maximum Annual Rates (tons) Molds: gel coat - 0.8 Boats: gel coat - 20.8 resin - 12 resin - 249.6 Spraycore 2000 - 6.4 Spraycore 2000 - 145.6 MEKP - 0.24 MEKP - 5.0			

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):			
2. Source Classification Code (SCC):		3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:	
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:	
10. Segment Comment (limit to 200 characters):			

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	0	102	NS
H163	102		NS

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
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 _____

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 type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input 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 type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

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

APPENDIX B

CAA SECTION 112(g) MACT DETERMINATION

CASE-BY-CASE MACT DETERMINATION

DAKOTA YACHTS INDUSTRIES, INC.

Introduction

The EPA is scheduled to propose a Maximum Achievable Control Technology (MACT) standard for the boat manufacturing industry by December 1999, with final promulgation expected in December 2000. Dakota Yachts Industries, Inc. (Dakota) has identified itself as being subject to the boat manufacturing MACT. Dakota's obligations for the MACT requirements are defined in Title 40 (Protection of Environment), Part 63 (National Emission Standards for Hazardous Air Pollutants for Source Categories), Subpart B (Requirements for Control Technology Determinations for Major Sources) of the Code of Federal Regulations. Florida has these requirements by reference (with minor exceptions) at 62-204.800(10)(d) of the Florida Administrative Code (F.A.C.). EPA was given 10 years from the date of the 1990 Clean Air Act Amendments (CAA) to prepare and issue MACT standards. However, Congress wanted to be sure that HAP-emitting facilities built during the interim period would also be controlled, so it included a preconstruction review program within CAA Section 112 (g).

EPA regulations implementing the Section 112(g) mandate impose the preconstruction review process on newly constructed major sources of HAPs in source categories where MACT has not yet been promulgated. A major source of HAPs is a facility that has the potential to emit 10 tons per year (TPY) of any individual HAP or 25 TPY of total HAPs. Such facilities must obtain a preconstruction permit and implement MACT at start-up.

MACT Proposal and Discussion

Consistent with the requirements of 40 CFR 63.43(e), the following information is provided to allow the FDEP to make a MACT determination for Dakota. Each HAP emitting Dakota process is described below, along with the proposed MACT for the process.

Production Resin

Dakota's position on new source MACT is that end of pipe treatment should only be required for large sources with HAP emissions greater than 500 TPY. Although one industry source uses end of pipe treatment for HAP control, it is a facility permitted for greater than 500 TPY, and the control efficiency has not been established to date. In addition, this facility manufactures jet boats less than 20 feet and was designed to operate using robotics. The cost of end of pipe control is not considered economically feasible for Dakota. The second best controlled source, located in an ozone nonattainment area in Southern California, uses vacuum bagging to improve their resin to laminate ratio and meet the stricter emission limits. The facility is not considered representative of boat builders in general. The third best controlled source in the database uses a 34.2% styrene resin and non-atomized application technology. Dakota proposes that its MACT be the use of resin which contains less than 35% (weight) styrene, and non-atomized methods application technology.

Pigmented Gel Coat

Dakota's position on new source MACT is that end of pipe treatment should only be required for large sources with HAP emissions greater than 500 TPY. Although one industry source uses end of pipe treatment for HAP control, it is a facility permitted for greater than 500 TPY, and the control efficiency has not been established to date. In addition, this facility manufactures jet boats less than 20 feet and was designed to operate using robotics. The cost of end of pipe control is not considered economically feasible for Dakota. The second best controlled source manufactures personal water craft using a closed molding SMC type process. The EPA database reports that it does not have enough information to adequately evaluate this technology. Industry reports that this source uses a SMC process and paints its parts instead of using gel coat. This is not typical of the process used to manufacture boats. The third best controlled source in the industry uses a 32.2% HAPs (styrene plus methyl methacrylate) gel coat. Dakota proposes that its MACT be the use of gel coat which contains less than 32.2% (weight) HAPs.

Skin Coat

Dakota uses Spraycore 2000 as a layer between the gel coat and glass that prevents print through. This process is not widely used in the industry, and therefore data regarding this process is minimal. To its knowledge, Dakota utilizes the lowest styrene containing material available. Additionally, Dakota has checked with its suppliers and determined that Spraycore 2000 cannot currently be applied using non-atomized application technology. Dakota proposes new source MACT to be the use of Spraycore 2000 which contains 36% (weight) or less styrene.

Tooling Operations

Dakota's position is that all activities associated with tooling need to be exempt from MACT standards. This includes tooling resin, gel coat, Spraycore 2000, along with mold sealing and releasing materials. Both resin and gel coat manufacturers have stated that this is an area where materials cannot be compromised. The additional emissions that would be generated by having to both repair and replace tools and defective parts, not to mention the cost, makes it counterproductive to regulate these processes. Tooling resin, gel coat, and Spraycore 2000 usage is a small percentage of Dakota's total usage of these materials. Resin and gel coat companies are in the process of developing information to support an exemption and identify the technical problems associated with using low styrene materials for mold fabrication.

APPENDIX C
EMISSION CALCULATIONS

Air Emission Calculations

Dakota Yachts

Molds Only:

Component	Material	Per Item Usage (lbs) ⁽¹⁾	Annual Prod. (# items/yr)	Annual Material Usage (lbs)	Percent Styrene (%) ⁽²⁾	Percent Styrene Emitted (as % available) ⁽³⁾	Styrene Emissions (lbs/yr)	Styrene Emissions (TPY)	Percent Methyl Methacrylate (%) ⁽²⁾	Percent Methyl Methacrylate Emitted (as % available)	Methyl Methacrylate Emissions (lbs/yr)	Methyl Methacrylate Emissions (TPY)
Molds	Gel Coat	200	8	1600	20%	48%	154	0.08	5%	48%	38	0.02
Molds	Resin	3000	8	24000	35%	11%	924	0.46	0%	0%	0	0.00
Molds	Spraycore 2000	1600	8	12800	36%	11%	507	0.25	0%	0%	0	0.00
							Total TPY	0.79			Total TPY	0.02

4 boats/week production:

Component	Material	Per Item Usage (lbs) ⁽¹⁾	Annual Prod. (# items/yr)	Annual Material Usage (lbs)	Percent Styrene (%) ⁽²⁾	Percent Styrene Emitted (as % available) ⁽³⁾	Styrene Emissions (lbs/yr)	Styrene Emissions (TPY)	Percent Methyl Methacrylate (%) ⁽²⁾	Percent Methyl Methacrylate Emitted (as % available)	Methyl Methacrylate Emissions (lbs/yr)	Methyl Methacrylate Emissions (TPY)
Decks	Gel Coat	100	208	20800	20%	48%	1997	1.00	5%	48%	499	0.25
Decks	Resin	400	208	83200	35%	11%	3203	1.60	0%	0%	0	0.00
Decks	Spraycore 2000	620	208	128960	36%	11%	5107	2.55	0%	0%	0	0.00
Hull	Gel Coat	100	208	20800	20%	48%	1997	1.00	5%	48%	499	0.25
Hull	Resin	1500	208	312000	35%	11%	12012	6.01	0%	0%	0	0.00
Hull	Spraycore 2000	780	208	162240	36%	11%	6425	3.21	0%	0%	0	0.00
Misc.	Resin	500	208	104000	35%	11%	4004	2.00	0%	0%	0	0.00
							Total TPY	17.37			Total TPY	0.50

Notes:

- (1) From conversation w/Frank Passey (Dakota Yachts President).
- (2) From MSDS sheets. Used upper end of range given.
- (3) From Table I of Florida Department of Environmental Protection (FDEP) June 1, 1998 memorandum entitled "Guidance on the Use of Styrene Emission Factors for Certain Polyester Resin Plastics Product Fabrication Processes".

Methyl Ethyl Ketone Peroxide (MEKP), a VOC, emissions:

MEKP usage is 2% (by weight) of resin usage.

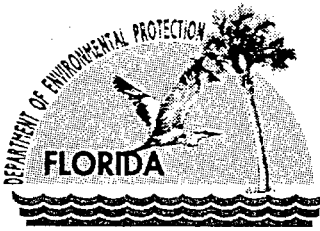
Resin usage (lbs/yr) = 523,200

MEKP usage (lbs/yr) = 10,464

MEKP emissions (lbs/yr)* = 10,464

MEKP emissions (TPY) = 5.2

* Assume 100% emitted to atmosphere.



Jeb Bush
Governor

Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

David B. St. John
Secretary

March 24, 1999

CERTIFIED MAIL

Mr. Frank Passey, President
Dakota Yachts Industries, Inc.
999 NW 10th Terrace, Suite 3
Ft. Lauderdale, Fl 33311

RECEIVED

MAR 25 1999

BUREAU OF
AIR REGULATION

RE: Status of Application Review -- Request for Additional Information
DEP File No. 0850131-001-AC

Dear Mr. Passey:

The Department has reviewed your application received on March 12, 1999. However, your application remains incomplete. Please provide the following information promptly. Evaluation of your proposed project will continue to be delayed until all requested information has been received.

Please provide the following information in order to complete review of your application pursuant to Chapters 120 and 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4.070(1) and 62-204 through 62-297.

1. On the facility plot plan, Dakota Yachts proposes to use building 4 for its operations. Will there be any vents or stacks on the building? If yes, then the second category in field one on page 12 of the application needs to be checked and resubmitted. If no, please explain how the emissions will be vented from the building.
2. Although the proposed project -boat manufacturing facility- does not have a standard under 112(d) of Title III of the Clean Air Act of 1990 as amended, the proposed project is regulated due to the projected proposed emissions for hazardous air pollutants which have triggered preconstruction review under 112(g). As a result, please resubmit page 12 of the application with field 2 indicating "regulated emissions unit". Also, please resubmit all relevant information for all pages that were left blank under "regulated emissions unit" from all sections.
3. On page 17 of the application, should the "Maximum Annual Rate" be 440.4 instead of 430.4?
4. Besides requesting that tooling operations be exempt from Maximum Achievable Control Technology, please explain how Dakota Yachts plans to address the particulate generated from tooling operations.
5. Please submit all MSDS sheets used for emissions calculations.

6. Please submit a list of all facilities contacted or researched with facility contacts, including addresses and phone numbers.
7. What are the miscellaneous components that will use a maximum of 500 pounds resin per boat according to the emission calculations worksheet?
8. Will the proposed facility use any catalysts, mold release (wax) or vinyl paint in its operations? If yes, please submit the annual usage.

Note that all submittals must be signed and sealed by a professional engineer registered in the state of Florida.

If you have any questions, please contact Lennon Anderson at 561/681-6632. When referring to this project, please use the file number indicated.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lennon Anderson', enclosed within a hand-drawn oval.

Lennon Anderson
Air Permitting Engineer

cc: Ms. Cindy Phillips, P.E. (DARM)
Mr. Michael S. Hannan, EIT (ARCADIS)
Mr. William D. Vogelsong (ARCADIS)



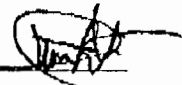
Jeb Bush
Governor

Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

David B. Scrubs
Secretary

FAX TRANSMITTAL

DATE 050599 # OF PAGES (including this page) 3 FROM: Loren Anderson 

TO: Cindy Phillips, P.E.

PERSON SENDING FAX: _____

AGENCY: DARM

TRANSMITTAL ON A HITACHI/HIFAX/35

FAX NUMBER: _____

FAX NUMBER: (407) 681-6790-(AIR PROGRAM FAX)

IF ANY OF THE PAGES ARE NOT CLEARLY RECEIVED PLEASE CALL SENDER AT: (407) - 681-6600
S/C 226-6600

COMMENTS: As requested.
Thanks!

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Table 1. Dakota's Air Emissions Calculations: Before low Styrene Usage

Molds:

Component	Material	Annual Material Usage (lbs)	Percent Styrene (%)	Styrene Emissions (TPY)	Percent MMA (%)	MMA Emissions (TPY)
Molds	Gelcoat	1600	45	0.17	5	0.02
Molds	Resin	24000	35	0.46	0	0.00
Molds	Spraycore	12800	40	0.28	0	0.00

Boats:

Decks	Gelcoat	20800	45	2.25	5	0.25
Decks	Resin	83200	35	1.60	0	0.00
Decks	Spraycore	128960	40	2.84	0	0.00
Hull	Gelcoat	20800	45	2.25	5	0.25
Hull	Resin	312000	35	6.01	0	0.00
Hull	Spraycore	162240	40	3.57	0	0.00
Misc.	Resin	104000	35	2.00	0	0.00

Total HAPs = 21.94

Table 2. Dakota's Air Emissions Calculations: After low Styrene Usage (proposed)

Molds:

Component	Material	Annual Material Usage (lbs)	Percent Styrene (%)	Styrene Emissions (TPY)	Percent MMA (%)	MMA Emissions (TPY)
Molds	Gelcoat	1600	27.2	0.10	5	0.02
Molds	Resin	24000	35	0.46	0	0.00
Molds	Spraycore	12800	36	0.25	0	0.00

Boats:

Decks	Gelcoat	20600	27.2	1.36	5	0.25
Decks	Resin	83200	35	1.60	0	0.00
Decks	Spraycore	126960	36	2.55	0	0.00
Hull	Gelcoat	20800	27.2	1.36	5	0.25
Hull	Resin	312000	35	6.01	0	0.00
Hull	Spraycore	182240	36	3.21	0	0.00
Misc.	Resin	104000	35	2.00	0	0.00

Total HAPs = 19.43

Reduction = 11.46 %

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

Dakota Yachts Industries, Inc.
Stuart Facility
Martin County

DEP File No. 0850131-001-AC
MACT No.: 002

Department of Environmental Protection
Division of Air Resources Management
Southeast District Office
Air Program

May 5, 1999

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL INFORMATION

1.1 APPLICANT NAME AND ADDRESS

Dakota Yachts Industries, Inc.
1985 SE Airport Road
Stuart, FL 34995

Authorized Representative: Frank Passey, President

1.2 REVIEWING AND PROCESS SCHEDULE

March 12, 1999	Received permit application
March 24, 1999	Department's request for additional information
March 25, 1999	Received response to request for additional information
March 31, 1999	Application complete

2. FACILITY INFORMATION

2.1 FACILITY LOCATION

The facility, Stuart, is located at 1985 SE Airport Road, Stuart, Martin County. The UTM coordinates are Zone 17; 576.4 km E; 3006.3 km N.

2.2 STANDARD INDUSTRIAL CLASSIFICATION CODES (SIC)

Industry Group No.	37	Transportation Equipment
Industry No.	3732	Boat Building and Repairing

2.3 FACILITY CATEGORY

It is classified as a Major Title V Source of air pollution because emissions of at least one regulated hazardous air pollutant (HAP), such as styrene, exceeds 10 tons per year (TPY). Because emissions are greater than 10 TPY for at least one HAP and construction will begin after July 1, 1997, the facility is also major with respect to Florida Administrative Code Rule 62-204.800(10)(d)2, Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j).

B. PROJECT DESCRIPTION

This project addresses the following emissions unit:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Fiberglass boatbuilding, resin and gelcoat application, miscellaneous solvents, and related assembly/cleanup activities

This permitting action is to allow the construction of a fiberglass boat manufacturing facility. The applicant proposes an annual production rate of 208 fiberglass boats. Through this permitting action, the Maximum Available Control Technology (MACT) floor for new will be set for the fiberglass boat industry, nationwide.

Dakota Yachts Industries, Inc.
Stuart Facility
Construction of Boat Manufacturing Facility

DEP File No. 0850131-001-AC
MACT No. 002

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

4. PROJECT EMISSIONS

The emissions associated with this project are primarily HAPs and VOCs. The applicant estimated total HAPs at 19 TPY and VOCs at 24 TPY.

The following table summarizes the potential maximum emissions in TPY:

Pollutant	Maximum Emissions	HAP Threshold Level ¹	Subject to 112(g) Review?
Styrene	18.9	10	yes
Methyl Methacrylate	0.52	10	No

¹ Rule 62-210.200(178)(a)

The proposed project results in emission increases that are greater than the HAP threshold level, 10 TPY. Therefore, the construction of the proposed fiberglass boat manufacturing facility is subject to review under 112(g).

5. RULE APPLICABILITY

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-213, 62-297 of the Florida Administrative Code (F.A.C) and 40 CFR 63.

5.1 STATE REGULATIONS

Chapter 62-4	Permits
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.200	Definitions
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.650	Circumvention
Rule 62-210.900	Forms and Instructions
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-297.310	General Test Requirements
Rule 62-297.401	Compliance Test Methods

5.2 FEDERAL RULES

40 CFR 63	National Emission Standards for Hazardous Air Pollutants for Source Categories
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6. AIR POLLUTION CONTROL TECHNIQUES

For new sources, MACT floor means: “the emission limitation achieved by the best controlled similar source”^{1,2}. Furthermore, pursuant to 40 CFR 63.43(d)1, the MACT emission limitation or MACT requirements recommended by the applicant and approved by the permitting authority shall not be less stringent than the emission control which is achieved in practice by the best controlled similar source, as determined by the permitting authority. Thus, a single plant’s level of control appears to establish the “floor” for new sources, regardless of whether this control level can be met by other companies with different economic circumstances.³ Similar source is defined at 40 CFR 63.51 as an emissions unit that has comparable emissions and is structurally similar in design and capacity to other emission units such that the emission units

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

could be controlled using the same control technology. The best controlled similar source within the source category of boat building and repair, SIC 3732, Corsair Marine located in Chula Vista, California. Corsair uses low styrene content materials and vacuum bagging⁴. Vacuum bagging reduces HAP emissions by 45 percent⁵. Although Corsair is located in a state where emission limits are stringent relative to other states, California's sources are not to be excluded from the 112(g) determination process⁶. Information on Corsair can be obtained from their website at www.corsairmarine.com.

The applicant proposed MACT to be 35 percent maximum styrene content by weight for resin using non-atomizing technology, 32.2 percent maximum HAP content by weight for gelcoat and 36 percent maximum styrene content by weight for skin coat. The reduction achieved using the applicant's proposed method is 11.5 percent or 2.51 TPY (see attached Tables 1 and 2).

7. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will not comply with all applicable state and federal air pollution regulations. In order to comply, the Department will issue a draft permit to the applicant that allows construction of a fiberglass boat manufacturing facility requiring vacuum bagging and low styrene content resin to be applied with non-atomizing technology. This technical evaluation and preliminary determination was drafted by:

Lennon Anderson, EIT
Department of Environmental Protection
Southeast District
400 North Congress Avenue
West Palm Beach, FL 33416
561/681-6632

REFERENCES

¹ 40 CFR 63.51(2), definition of MACT floor.

² Boat Manufacturing Standards Development, October 23, 1998, Madeleine Strum, EPA.

³ The New Title III Air Toxics Program by David P. Novello, 1994, p.14.

⁴ Conversation with company representative at Corsair.

⁵ EPA MACT Model Point Values.

⁶ Kathy Kaufman, EPA



Department of Environmental Protection

FILE

Jeb Bush
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

David B. Struhs
Secretary

CERTIFIED MAIL

In the Matter of an Application for Permit by:

P 109 463 747

Mr. Frank Passey, President
Dakota Yachts Industries, Inc.
1985 Airport Road
Stuart, FL 34996

DEP File No. 0850131-001-AC
Martin County
Project: Construction of a fiberglass boat
manufacturing facility

RECEIVED

JUN 14 1999

INTENT TO ISSUE

BUREAU OF
AIR REGULATION

Dear Mr. Passey:

The Department of Environmental Protection gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below. A copy of the draft permit is attached.

The applicant, Mr. Frank Passey, applied on March 12, 1999, to the Department of Environmental Protection for a permit to construct an air pollution source consisting of a fiberglass boat manufacturing facility. This facility is located at 1985 Airport Road, Stuart, Florida. The purpose of this application was to obtain a permit with Title V conditions which required a case-by-case MACT Determination. However, on May 26, 1999, an application was submitted for non-Title V status to avoid the MACT Determination. The objective of the non-title V status is to limit hazardous air pollutants (HAPs) below the 10/25 tons per year threshold.

Specifically, the applicant requested that emissions of air pollutants from this project be limited to less than the Title V applicability criteria through enforceable permit limitations. These limitations, which address emissions of air pollution on a facility-wide basis. The draft permit contains specific conditions which will limit air pollution emissions to the amounts described above.

The Department has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.), to issue or deny permits for air pollution sources. The project is not exempt from permitting procedures. The Department has determined that an air pollution construction permit is required for the proposed work.

The Department intends to issue this air construction permit based on Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297, and the belief reasonable assurances have been provided to indicate the proposed project will not adversely impact air quality, and that the specific conditions in the draft permit limit the potential emissions of air pollutants to the amounts described above.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Construction Permit". The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C. requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Air Permitting Section of the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Air Permitting Section of the Department of Environmental Protection, in person at 400 North Congress Avenue, West Palm Beach, Florida 33401, or by mail to the Department of Environmental Protection, Southeast District, P.O. Box 15425, West Palm Beach, Florida 33416 (Telephone 561-681-6600; Fax 561-681-6790). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form

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prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C..

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change or terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Air Permitting Section of the Department's Southeast District Office, 400 North Congress Avenue, West Palm Beach, Florida 33401. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida's Statutes.. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in West Palm Beach, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

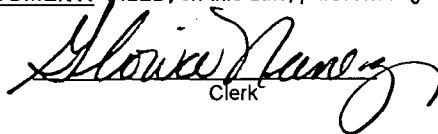
D. Goldman, P.E. 6-2-99
Isidore Goldman, P.E. Date
District Air Program Administrator
Southeast District

IG/la

attachment

cc: Clair Fancy, P.E., Chief, Bureau of Air Regulation, DEP
Gracy Danois, Operating Source Section, U.S. EPA, Region IV
Tom Tittle, Air Program
Tom John, P.E., TJE

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to § 120.52(7), F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

JUN - 2 1999
Date

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection gives notice of its intent to issue a permit to Frank Passey of Dakota Yachts, to construct an air pollution source consisting of manufacturing fiberglass boats. This facility is located at 1985 Airport Road, Stuart, Florida. The Department's file number in this matter is 0850131-001-AC. The Department intends to issue this permit based on Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297, and the belief that reasonable assurances have been provided to indicate the proposed project will not adversely impact air quality.

Specifically, the applicant requested that emissions of hazardous air pollutants (HAPs) from this project be limited to less than 10/25 tons per year through enforceable permit limitations. These limitations, which address emissions of air pollution on a facility-wide basis will become enforceable upon issuance of the final permit. The draft permit contains specific conditions which will limit air pollution emissions to the amounts described above.

The Department will issue the permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change or terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Air Permitting Section of the Department's Southeast District Office, 400 North Congress Avenue, West Palm Beach, Florida 33401. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures petitioning for a hearing are set forth below. Mediation is not available for this action.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida's Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

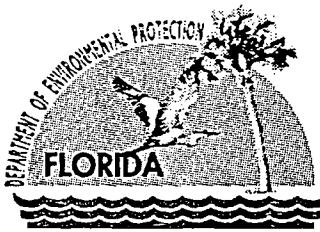
A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.



Jeb Bush
Governor

Department of Environmental Protection

DRAFT

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

David B. Struhs
Secretary

NOTICE OF AIR POLLUTION PERMIT

CERTIFIED MAIL

ISSUED TO:

Dakota Yachts Industries, Inc.
1985 Airport Road
Stuart, FL 34996

Permit Number: 0850131-001-AC
Issue Date: June 2, 1999
Expiration Date: June 2, 2000

Authorized Representative: Frank Passey, President

PROJECT:

Project: Construction of a fiberglass boat manufacturing facility.
Facility Description: This facility manufactures fiberglass boats for the sports fishing industry (SIC # 3732)
Location: Martin County, Florida
UTM: Zone 17; 576.4 Km. E; 3006.3 Km. N

Dear Mr. Passey:

This is Permit Number 0850131-001-AC to construct an air pollution source issued pursuant to Chapter 403.087, Florida Statutes (F.S.). This is a new construction permit to authorize construction of the emissions unit described in this permit.

NOTICE OF RIGHTS:

Any party to this Order has the right to seek judicial review of the permit under Section 120.68 of the Florida Statutes, by filing a Notice of Appeal under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department of Environmental Protection in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Order is filed with the Clerk of the Department.

STATEMENT OF BASIS:

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297, and in conformance with all existing regulations of the Florida Department of Environmental Protection. The above named owner or operator is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department, in accordance with the terms and conditions of this permit.

PART I -- SUMMARY INFORMATION**PERMIT CONTENTS:**

Part I -- Summary Information
 Part II -- Facility-Wide Specific Conditions
 Part III -- Emission Unit Specific Conditions
 Appendix A -- General Conditions

CONSTRUCT: This permit addresses the following air pollution emission unit(s):

Emissions Unit Number	Emissions Unit Description
001	Fiberglass boatbuilding, resin and gelcoat application, miscellaneous solvents, and related assembly/cleanup activities

SIGNIFICANT DATES:

Public Notice of Intent Published: ^
 Application deemed complete: May 28, 1999
 Application for Non-Title V Status Received: May 26, 1999
 Application deemed complete: March 31, 1999
 Additional Information Received: March 25, 1999
 Request for Additional Information: March 24, 1999
 Application for Title V Status Received: March 12, 1999

PERMIT HISTORY:

There have been no previous air permits issued for this emission source.

PART II -- FACILITY-WIDE SPECIFIC CONDITIONS

Conditions in this part generally apply to all emission units and activities covered under this permit.

1.0 Administrative Requirements

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Florida Department of Environmental Protection, Southeast District Office, Air Program at PO Box 15425, West Palm Beach, Florida, 33416 (street address 400 North Congress Avenue, West Palm Beach, Florida, 33401, phone 561/681-6600).
- 1.2 Citation Format: In this permit, references to F.A.C. Rule 62-xxx refer to rules promulgated under Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.
- 1.3 Specific and General Conditions: The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160, F.A.C.]
- 1.4 Applicable Regulations: This facility is subject to regulation of Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297, and 40 CFR 63. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state or local permitting requirements or other regulations.

- 1.5 Other Permits: This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from this Department or other departments or agencies.
- 1.6 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous waste in accordance with all applicable Federal, State, and Local regulations.
- 1.7 Extension of This Permit: The expiration date of this construction permit may be extended upon request of the owner or operator and submission of the appropriate fee to the Department of Environmental Protection, Southeast District Office, Air Program at least 60 days prior to the expiration date of this permit.
[Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

2.0 General Pollutant Emission Limiting Standards

- 2.1 Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
- 2.2 General Visible Emissions Standard: Unless otherwise specified by permit or rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity.
[Rule 62-296.320(4)(b), F.A.C.]

2.3 Volatile Organic Compounds/Organic Solvents Emissions:

No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

Such controls include the following:

- Tightly cover or close all VOC containers when they are not in use.
 - Tightly cover all open tanks which contain VOCs when they are not in use.
 - Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition.
 - Confine rags used with VOCs to tightly-closed, fire-proof containers when not in use.
 - Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
- [Rule 62-296.320(1), F.A.C.]

2.4 Unconfined Emissions of Particulate Matter:

No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

Reasonable precautions include the following:

- Paving and maintenance of roads, parking areas and yards.
- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.

- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - Landscaping or planting of vegetation.
 - Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - Confining abrasive blasting where possible.
 - Substitution of powdery materials with granular or pelletized materials, where possible.
- [Rule 62-296.320(4)(c), F.A.C.]

3.0 Operation Requirements

- 3.1 Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]

3.2 Excess Emissions:

Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceeds two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700, F.A.C.]

4.0 Compliance Testing Requirements

- 4.1 Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in Rules 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7)(b), F.A.C.]

5.0 Reporting and Record Keeping Requirements

- 5.1 Report Excess Emissions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]
- 5.2 Report Plant Operation Problems: If the owner or operator is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the owner or operator from any liability for failure to comply with Department rules.
[Rule 62-4.130, F.A.C.]
- 5.3 Retain Records: All records required by this permit shall be kept by the owner or operator and made available for Department inspection for a minimum of five (5) years from the date of such records.
[Rule 62-4.070(3), F.A.C.]

- 5.4 Compliance Test Reports: Compliance test reports shall be submitted to the Department of Environmental Protection, Southeast District Office, Air Compliance Section, as soon as practical, but no later than 45 days after the last sampling run of each test is completed. [F.A.C. Rule 62-297.310(8)(a) &(b)]

Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA or DEP Method 9 test, shall include the following information and other information as necessary to make a complete report required pursuant to F.A.C. Rule 297.310(8)(c):

- The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
- The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- All measured and calculated data required to be determined by each applicable test procedure for each run.
- The detailed calculations for one run that relate the collected data to the calculated emission rate.
- The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

- 5.5 Annual Report Required: On or before March 1 of each calendar year, a completed DEP Form 62-210.900(5), Annual Operations Report (AOR) Form for Air Pollutant Emitting Facility, shall be submitted to the Department of Environmental Protection, Southeast District Office, Air Program. **Included with this report shall be any additional reports, if any, required by this permit in Part III – Emission Unit Specific Conditions.** [Rule 62-4.070(3), F.A.C.]

PART III – EMISSION UNIT SPECIFIC CONDITIONS

This part of this permit addresses the following emission units:

Emissions Unit Number	Emissions Unit Description
001	Fiberglass boatbuilding, resin and gelcoat application, miscellaneous solvents, and related assembly/cleanup activities

1.0 Emission Limiting Standards and Operation Restrictions

- 1.1 Capacity: The maximum raw material usage rates combined shall not exceed 213 tons (less acetone) of resin, gelcoat, catalyst, putty, foam and other material usage per consecutive 365-day period.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]
- 1.2 Visible Emissions: Visible emissions shall not exceed 5.0% opacity at any time.
[Requested by Applicant, dated May 25, 1999]
- 1.3 VOC Emissions: Emissions of volatile organic compounds (VOCs), including hazardous air pollutants "HAPs", shall not exceed 24.0 tons in any consecutive 365-day period.
[Rule 62-4.070(3), F.A.C.; Limit requested by applicant, dated May 25, 1999]
- 1.4 Total HAP Emissions: Total emissions of all hazardous air pollutants (HAPs) shall not exceed 24.0 tons in any consecutive 365-day period.
[Rule 62-4.070(3), F.A.C.; Limit requested by applicant, dated May 25, 1999]
- 1.5 Individual HAP Emissions: HAP emissions of any single hazardous air pollutant (HAP) shall not exceed 9.5 tons in any consecutive 365-day period.
[Rule 62-4.070(3), F.A.C.]
- 1.6 Styrene Emissions: Emissions of styrene shall not exceed 9.5 tons in any consecutive 365-day period.
[Rule 62-4.070(3), F.A.C.; Limit requested by applicant, dated May 25, 1999]
- 1.7 Boats Manufactured: The total number of boats manufactured shall not exceed 96 boats in any consecutive 12-month period. For the initial 12 months, the number of boats manufactured shall not exceed 8 boats in any month.
[Rule 62-4.070(3), F.A.C.]

2.0 Compliance Monitoring and Testing Requirements

- 2.1 Visible Emission Test Required: The owner or operator shall test the referenced emission unit(s) for visible emissions by EPA Method 9. Visible emission tests shall be thirty sixty minutes in duration. The visible emissions test shall be performed during one run of the particulate test.
[Rules 62-4.070(3) and 62-297, F.A.C.; Limit requested by applicant, dated May 25, 1999]
- 2.2 VOC Content: The owner or operator shall determine the VOC content of all materials, coatings, solvents, and shall monitor the usage of such materials at the referenced emission unit(s).
[Rule 62-4.070(3), F.A.C.]
- 2.3 HAP Content: The owner or operator shall determine the total and individual HAP contents of all materials, coatings, solvents, and shall monitor the usage of such materials at the referenced emission unit(s).
[Rule 62-4.070(3), F.A.C.]
- 2.4 Material Usage: The owner or operator shall monitor the usage of all material (i.e., resin, gelcoat, catalyst, putty, filler, etc.) at the referenced emission unit(s).
[Rule 62-4.070(3), F.A.C.]

3.0 Reporting and Record Keeping Requirements

3.1 VOC Emissions: The permittee shall record and maintain the following information:

- a. The VOC content for each material containing or emitting VOCs.
- b. The material utilization rate on a daily basis, for all materials containing or emitting VOCs used at the referenced emission unit(s).
- c. The total daily VOC emission rates for each material, calculated from the daily material utilization rates and the VOC content, calculated for the preceding day no later than the end of each subsequent business day.
- d. A rolling consecutive 365-day total emission rate for VOCs, calculated from the daily totals for the previous 365 days.
- e. The permittee shall compare each calculated 365 day total VOC emission rate to the emission limit of specific condition 1.3.

[Rule 62-4.070(3), F.A.C.]

3.2 Individual & Total HAP Emissions: The permittee shall record and maintain the following information:

- a. The individual and total HAP contents for each material containing or emitting HAPs.
- b. The material utilization rate on a daily basis, for all materials containing or emitting HAPs used at the referenced emission unit(s).
- c. The individual and total daily HAP emission rates for each material, calculated from the daily material utilization rates and the individual and total HAP content, calculated for the preceding day no later than the end of subsequent business day.
- d. A rolling consecutive 365-day total emission rate for individual and total HAPs, calculated from the daily totals for the previous 365 days.
- e. The permittee shall compare each calculated 365-day individual and total HAP emission rates to the emission limits of specific condition 1.4, 1.5 and 1.6, respectively.

[Rule 62-4.070(3), F.A.C.]

3.3 Material Usage: The owner or operator shall record and maintain records on a rolling consecutive 365-basis for the usage of all material (i.e., resin, gelcoat, catalyst, putty, filler, etc.) in tons and shall compare each 365 day total to the material usage limit in specific condition 1.1.

[Rule 62-4.070(3), F.A.C.]

3.4 Boats Manufactured: The owner or operator shall record and maintain records of the number of boats manufactured on a rolling consecutive 12-month basis and shall compare each 12-month and monthly total to the boat limits in specific condition 1.7.

[Rule 62-4.070(3), F.A.C.]

Executed in West Palm Beach, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Isidore Goldman, P.E. Date
District Air Program Administrator
Southeast District

IG/la

cc: Clair Fancy, P.E., Chief, Bureau of Air Regulation, DEP
Doug Neeley, Chief, Air Programs Branch, U.S. EPA, Region IV (Attn.: Gracy Danois)
Tom John, P.E., TJE

DRAFT

Dakota Yachts Industries, Inc.
Page 8 of 8

Permit Number 0850131-001-AC

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to § 120.52(7), F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

Date