

Department of Environmental Protection

FILE

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

AUG 04 1998

2220331 756 8/19

Mr. David Kesar
Vice President
Maverick Boat Company, Inc.
3054 Industrial 31st Street
Fort Pierce, FL 34986

Re: Modification of the Existing Permit -- 1110086-001-AF

Dear Mr. Kesar:

The Department is in the receipt of the Title V Application for Maverick Boat Company. The facility is requesting to increase the emissions of styrene and this change constitutes a "Modification". Such modification needs a preconstruction review according to Florida Rules 62-4, 62-210, and 62-213 F.A.C. Please submit a construction permit application as soon as possible.

If you have any questions, please call me at 561-681-6657.

Sincerely

Laxmana Tallam

Laxmana Tallam
Permitting Engineer

cc: Banks Clark, P.E.
Environment, Safety and Health, Inc.
9256 Southeast Venus Street
Hobe Sound, FL 33455



Environment, Safety and Health™
partnering with business, industry and hospitals

September 11, 1998

Laxmana Tallam - Permitting Engineer
Air Quality Section
Florida DEP - Southeast District
PO Box 15425
West Palm Beach, Florida 33416
Fax: 561-681-6790

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SEP 14 1998
DEPT OF ENV PROTECTION

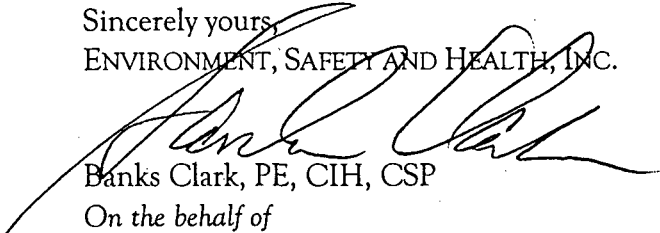
Subject: Maverick Boat Company - Air Permit

Dear Mr. Tallam:

This letter is pursuant to the telephone conversation between you and me this morning. On the behalf of the Maverick Boat Company located at 3054 Industrial 31st Street in Fort Pierce, I request that your office proceed immediately with the concurrent review-approval process for both a DEP Air Construction Permit and a Title V Air Operating Permit. You are requested to use the application and supporting information currently submitted to your office for the purposes of reviewing-approving both the Air Construction Permit and the Title V Air Operating Permit.

If you have any questions, please call me. Thank you.

Sincerely yours,
ENVIRONMENT, SAFETY AND HEALTH, INC.


Banks Clark, PE, CIH, CSP

On the behalf of
Maverick Boat Company

cc: David Kesar, Vice President - Maverick Boat Company
Fax: (561) 466-9467

9256 Southeast Venus Street
Hobe Sound, Florida 33455
ph: (561) 545-9622 fx: (561) 545-9682
e-mail: work4u@magg.net



Department of Environmental Protection

FILE

SEP 29 1998

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary
September 29, 1998

CERTIFIED MAIL

David Kesar
Vice President
Maverick Boat Company
3054 Industrial 31st Street
Fort Pierce, FL 34946

220331778 9/29

Re: Request for Additional Information Regarding Title V Permit Application
File No. 1110086-002-AV

Dear Mr. Kesar:

Your Title V permit application for the Maverick Boat Company is received on July 29th, 1998. The requested additional information, regarding the submission of construction permit application, was received on September 01, 1998. Pursuant to my conversation with Mr. Clark, P.E., it is my understanding that the facility wishes to increase the styrene emissions limit. In order to continue processing your application, the Department will need the following additional information pursuant to Rules 62-213.420(1)(b)3., F.A.C. and 62-4.070(1), F.A.C.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please submit the detailed calculations regarding the new limit for styrene, and VOC emissions
2. Please estimate the fee for construction permit application based on the new limit (potential) for VOC/styrene emissions. Estimation of fee shall be done according to Rule 62-4.050(4)(a) F.A.C.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1).

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900(1).

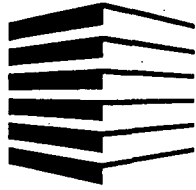
The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please contact Laxmana Tallam at 561-681-6657.

Sincerely,

Laxmana Tallam
Air Permitting Engineer

cc: Banks Clark, P.E.,
Environment, Safety and Health, Inc.
9256 Southeast Venus Street
Hobe Sound, FL 33455
Conserve and Manage Florida's Environment and Natural Resources



Environment, Safety and Health™
partnering with business, industry and hospitals

September 30, 1998

Laxmana Tallam, Air Permitting Engineer
Air Quality
Florida Dept of Environmental Protection
PO Box 15425
West Palm Beach, Florida 33416
FAx: (561) 681-6790

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OCT 1 1998
DEPT. OF ENV. PROTECTION

Reference: DEP File Number 1110086
Maverick Boat Company

Subject: Requested Emission Limits

Dear Mr. Tallam:

The purpose of this letter is to request amendment to the present applications to construct and to operate air emission sources for the Maverick Boat Company (Facility) located at 3054 Industrial 31st Street in Fort Pierce. This request is pursuant to the discussions conducted in your office between you, Tom Tittle, and Banks Clark on Monday, September 28, 1998.

Background. The Facility has submitted applications for a DEP Air Construction Permit and a Title V Air Operation Permit. In order better to assure that continued Facility growth will not precipitate the need to modify the permits within the foreseeable future, the Facility requests to extend the permitted styrene emission limit beyond that originally requested.

Request. The Facility requests the following emission limits:

Styrene Emission not to exceed 80 tons/year
Volatile Organic Compounds not to exceed 90 tons/year

9256 Southeast Venus Street
Hobe Sound, Florida 33455
ph: (561) 545-9622 fx: (561) 545-9682
e-mail: work4u@magg.net

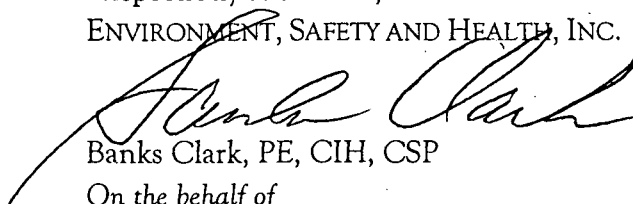


Further, the Facility requests that the permit application be amended to recognize continuous emission unit operation:

*24 hours/day, 7 days/week, 52 weeks/year
or 8,760 hours/year*

Please call Banks Clark at 561-545-9622 to discuss questions. Thank you for your assistance.

Respectfully submitted,
ENVIRONMENT, SAFETY AND HEALTH, INC.



Banks Clark, PE, CIH, CSP
On the behalf of
Maverick Boat Company

cc: David Kesar, Vice President
Maverick Boat Company
Fax: (561) 489-2168

MAVERICK BOAT COMPANY, INC.

Friday, February 04, 2000

Lennon Anderson
Florida DEP - Southeast District
Air Quality section
P.O. Box 15425
West Palm Beach, FL 33416

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FEB - 7 2000

DEPT OF ENV PROTECTION
WEST PALM BEACH

Dear Mr. Anderson:

This letter is in response to your request to visit our Facility on March 9.

We have attempted in every way to be complete and responsive in securing our Title V Operating Permit. We recently hosted a facility visit by Mr. Tom Tittle - DEP Southeast District Air Section. Presumably, this visit satisfied the Department's needs regarding our permit application. We are now concerned that the Department may be holding approval for our permit hostage in order to perform research for purposes not directly related either to our facility or the applicable regulatory requirements.

We wish to fully meet our regulatory obligation and will fully cooperate to do so. To this end, we will cooperate as necessary. However, before proceeding with your visit, we would like to understand better the regulatory basis and authority for your request. Will you please provide this information?

Thank you for your understanding. Please call with any questions.

Sincerely,



David M. Kesar
Vice President

Manufacturers of high quality light tackle fishing craft.

Maverick

HEWES

PATHFINDER

3054 Industrial 31st Street, Fort Pierce, Florida 34946
561-465-0631 Fax 561-489-2168 • Maverickboats.com, Hewes.com



Environment, Safety and HealthSM

partnering with business, industry and hospitals

Fax Transmission

Thursday, February 24, 2000

To: **Lennon Anderson - Permitting**
FL DEP - SE District Air Quality Section
 Fax: **561-681-6790**

From: **Banks Clark, PE, CIH, CSP**
Principal

Subject: **Permit Status - Maverick Boat Company (DEP File No 1110086)**

Mr. Anderson, I wish to determine the status of the Maverick Boat Company application for a Title V Air Operation Permit.

The facility has operated under an Air Construction Permit since December 1998. The facility received a draft Title V Permit 1110086-002-AV in January 1999. At your request, we submitted a MACT Determination letter to you in September 1999. We have not received a request for further information regarding our permit application. Presumably, you have all information necessary for your review. However, we have not yet received a finalized Air Operation Permit.

We understand that our Air Construction Permit expires after one year. It is important that we receive our finalized Air Operation Permit in order to conform to EPA-DEP requirements. Unless there is a reason for further delay, we wish to receive the finalized permit now. If there is a reason for further delay, please inform us immediately.

Please call Banks Clark (877-230-8327) with any questions. Thank you.

Cc: David Kesar - Maverick Boat Company (fax: 561-489-2168)

Environment, Safety and Health, LC
 9256 Southeast Venus Street
 Hobe Sound, Florida 33455
 Telephone: 877-230-8327
 Facsimile: 877-230-8328
 Email: BClark@ESHpartnering.com
 Web site: ESHpartnering.com



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

FEB 29 2000

RECEIVED

MAR 03 2000

BUREAU OF AIR REGULATION

CERTIFIED MAIL: P 109-463-067

Mr. David Kesar
Vice President
Maverick Boat Company
3054 Industrial 31 Street
Fort Pierce, FL 34946

Facility ID No. 1110086
St. Lucie County

Dear Mr. Kesar:

In response to your February 4th letter and Mr. Clark Banks February 24th letter regarding permit status, please review the enclosed Maximum Achievable Control Technology (MACT) determination.

If you have any questions, please contact me at 561/681-6632.

Sincerely,

Lennon Anderson
Air Permitting Engineer

cc: Ms. Cindy Phillips, PE, DARM Tallahassee
Mr. Banks Clark, PE, ESH

-DRAFT-

DETERMINATION OF
MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT)

Maverick Boat Company

3054 Industrial 31st Street
Fort Pierce

St. Lucie County

Facility ID No. 1110086

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

February 29, 2000

-DRAFT-
MACT DETERMINATION

**DETERMINATION OF MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT)
MAVERICK BOAT COMPANY**

On November 18, 1997, Maverick Boat Company (MBC) received a Federally Enforceable State Operating Permit (FESOP) to limit the facility's emissions of hazardous air pollutants (HAPs) to below the 12/25 ton per year (TPY) major source threshold. The facility is located at 3054 Industrial 31st Street, Fort Pierce, St. Lucie County. The FESOP application stated that the facility was a "natural non-Title V major source" (i.e., naturally minor source) of HAPs (9.3 TPY styrene, 18.2 TPY total HAPs) that operated 3120 hours per year.

On September 1, 1998, MBC applied to increase the permitted limit of styrene emissions from 9.3 TPY to 80 TPY and increase the permitted limit on hours of operation from 3120 hours/year to 8760 hours/year. On November 18, 1997, a construction permit was issued to MBC to allow this increase in styrene emissions and hours of operation. However, that permit did not clarify how it was possible for MBC to increase the styrene emissions by 760% simply by increasing the hours of operation by 180%.

During the Title V Operation Permitting process it appeared to Department permitting staff that it was probable that MBC had triggered the requirement for a case-by-case Maximum Achievable Control Technology (MACT) Determination in accordance with Rule 62-204.800(10)(d)2, F.A.C. Department permitting staff requested that MBC propose a Maximum Achievable Control Technology for their process. MBC submitted their proposed MACT on September 29, 1999. Department permitting staff tried unsuccessfully over a period of months to schedule a meeting with representatives of MBC at their facility to discuss what changes had been made at the facility to accomplish a 760% increase in styrene emissions at a facility that was previously a "natural non-Title V major source" of HAPs. Unfortunately, representatives of MBC have been unavailable for a meeting with Department permitting staff, though they have requested that the Department expedite their request for a Title V Operation Permit. Accordingly, it is assumed that MBC did trigger the requirement for a case-by-case MACT Determination.

MACT DETERMINATION PROCEDURE:

The U.S. Environmental Protection Agency (USEPA) is currently developing NESHAP MACT standards for the boat manufacturing industry. These standards are expected to be proposed in February 2000 and promulgated sometime in 2001. Until a NESHAP is promulgated, the Department is required by its rules to develop a case-by-case determination of Maximum Achievable Control Technology (MACT) for new major sources of HAP.

The provisions of 40 CFR 63, Subpart B, Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j), were adopted as Rule 62-204.800(10)(d)2, F.A.C. Section 112(g) requires the case-by-case MACT determination mentioned above. Following is the definition of case-by-case MACT pursuant to Section 112(g) for new sources of hazardous air pollutants:

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MACT DETERMINATION

Maximum Achievable Control Technology (MACT) emission limitation for new sources means "the emission limitation which is not less stringent than the emission limitation achieved by the best controlled similar source, and which reflects the maximum degree of reduction in emissions that the permitting authority, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable by the constructed source."

Similar source means "a stationary source or process that has comparable emissions and is structurally similar in design and capacity to a constructed or reconstructed source such that the source could be controlled using the same control technology."

The regulations state that in making the MACT Determination, the Department should give consideration to:

- (a) Any Environmental Protection Agency proposed relevant emission standard pursuant to section 112(d) or section 112(h) of the Act or an adopted presumptive MACT determination for the source category which includes the constructed or reconstructed major source.
- (b) Available information as defined in 40 CFR 63.41. *Available information* means, for purposes of identifying control technology options for the affected source, information contained in the following information sources as of the date of the approval of the MACT determination by the permitting authority:
 - (1) A relevant proposed regulation, including all supporting information;
 - (2) Background information documents for a draft or proposed regulation;
 - (3) Data and information available for the Control Technology Center developed pursuant to Section 113 of the Act;
 - (4) Data and information contained in the Aerometric Informational Retrieval System including information in the MACT data base;
 - (5) Any additional information that can be expeditiously provided by the Administrator; and
 - (6) For the purpose of determinations by the permitting authority, any additional information considered available by the permitting authority.

MACT PROPOSED BY MAVERICK BOAT COMPANY:

MBC submitted a proposed MACT on September 29, 1999. In this MACT they stated that they are reducing air emissions as follows:

"Vacuum-Forming Technology. The Facility pioneered the replacement of traditional fiberglass fabricated deck appurtenances with vacuum-formed appurtenances. Traditionally, fiberglass boat fabrication includes the forming of ice-fish boxes and small control consoles from fiberglass. Such fabrication requires the same application of styrene-based resins and gelcoating as the boat hull.

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MACT DETERMINATION

The Facility has introduced a vacuum-forming technology which forms deck appurtenances by vacuum shaping heated sheets of plastic into the appropriate deck appurtenances. This innovative technology displaces a portion of resin-gelcoating activity; thereby, eliminating the associated styrene emissions.

Resin Application Technique. The Facility has adapted non-atomized application techniques for resin. Compared to traditionally-used atomized spray techniques, the Facility's improvements have significantly reduced the styrene emissions associated with the applications of production resins.

Reduced-Styrene Resin. The Facility attempts to use low-styrene resins to the extent allowed by boat type and design. More than 80% of the resin used by the Facility contains no more than 35% styrene. This performance is demonstrated in the current year-to-date resin usage summarized in the following table:

Resin Styrene Content	Resin Usage – January through August 1999
	<i>Note: does not consider emission factors; therefore does not equal emission</i>
≤ 35% styrene content	93.7 tons
≥ 35% styrene content	13.9 tons

Due to the quality and design requirements for the Facility's finished product and limitation in available resin technology, the Facility cannot use low-styrene resins for all applications. The resin styrene content may vary in the future for product quality reasons."

"The Facility currently uses non-atomized techniques for the application of production resins. The Facility largely uses low-styrene (< 35% styrene content) resins – but cannot eliminate altogether those resins containing greater amounts of styrene due to quality requirements and limitations in currently available technology.

MACT Proposal for Maverick Boat Company (by MBS)

The Facility proposes a MACT standard consisting of the following elements:

- **Non-Fiberglass Construction – Where Feasible and Appropriate.** The Facility proposes to continue the construction of deck appurtenances using vacuum-forming techniques where feasible to its operation and appropriate for its product. In general, such fabrication technique is feasible as currently used and is consistent with product quality standards.
- **Non-Atomized Resin Application.** The Facility will avoid the use of atomized spray application for production resins.
- **Low-Styrene Resin – 80% of Combined Resin Usage.** On the basis of a twelve-month rolling average, the Facility will limit 80% of its combined production resin usage to resins with no greater than 35% styrene content."

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MACT DETERMINATION

PROBABLE MACT DETERMINATION BY EPA:

The USEPA is currently still working on the proposed MACT for boat manufacturing sources. However, based upon statements by USEPA representatives, the proposed MACT for new and reconstructed sources is expected to include:

1. The use of production resins that contain a maximum weighted average of 35% total HAP content, based on Manufacturer's Safety Data Sheets (MSDS), with compliance determined on a 3-month rolling average;
2. The use of non-atomizing application equipment for production resins;
3. The use of base gel coats and pigmented gel coats that contain a maximum weighted average of 33% total HAP content, based on MSDS, with compliance determined on a 3-month rolling average;
4. The use of clear gel coats that contain a maximum weighted average of 48% total HAP content, based on MSDS, with compliance determined on a 3-month rolling average;
5. The use of sprayed tooling resins, used for repair of molds, that contain a maximum weighted average of 30% total HAP content, based on MSDS, with compliance determined on a 3-month rolling average;
6. The use of non-atomized tooling resins, used for making and repair of molds, that contain a maximum weighted average of 39% total HAP content based on MSDS, with compliance determined on a 3-month rolling average;
7. The use of tooling gel coats, used for making and repair of molds, that contain a maximum weighted average of 40% total HAP content, based on MSDS, with compliance determined on a 3-month rolling average;
8. No control of hazardous air pollutants emitted from mold sealing, releasing, stripping, and repair materials;
9. No control of hazardous air pollutants emitted from wood coating ;
10. The use of resin and gel coat cleaning solvents that contain no HAP;
11. The use of carpet and fabric adhesives that contain no HAP;
12. The use of the highest styrene content in calculations when MSDS ranges are used.

MACT DETERMINATION:

Background information documents posted on the United Air Toxics Website include Draft Data Summary Tables. The Production Resin Draft Summary Table lists Bombardier Motor Corp. of America as the best controlled fiberglass boat manufacturing facility. Bombardier uses a thermal oxidizer to control emissions from atomized spray application of resin. The table notes that Bombardier uses a resin with a weighted average of 42.0 % HAP in "neat resin plus", and notes that for the thermal oxidizer, 100% capture and 95% control are assumed. "Neat resin plus" is defined as the neat resin plus and HAP that is added to the resin at the facility (fillers not

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MACT DETERMINATION

included). The question arises as to whether Maverick Boat Company is similar to Bombardier because Bombardier makes personal watercraft instead of boats.

The Production Resin Draft Summary Table lists Corsair Marine as the second best controlled fiberglass boat manufacturing facility. Corsair Marine located in Chula Vista, California, uses low styrene content materials and vacuum bagging to manufacture trimarans, 3-part catamarans. Vacuum bagging reduces HAP emissions by 45 percent. Maverick Boat Company does not use vacuum bagging. However, Maverick Boat Company uses vacuum-forming technology to form deck appurtenances, such as ice-fish boxes and small control consoles. Vacuum shaping heated sheets of plastic into deck appurtenances displaces a portion of resin-gelcoating activity and eliminates the associated styrene emissions.

The HAP limits for ship marine coatings as listed in Subpart II can be reasonably applied to boat marine coatings, such as bottom coatings, on the basis of the similar source definition applicable to 112(g) case-by-case MACT determinations. Marine coatings for ships have emissions comparable to emissions from marine coatings for boats. Ships and boats are structurally similar in design and capacity such that the source could be controlled using the same control technology, i.e., low-HAP marine coatings. The Antifoulant Coatings Draft Summary Table found on the United Air Toxics Website, indicates that the ship antifoulant coating HAP limits contained in Subpart II can be met by boat manufacturers as well.

After reviewing the applicant's proposed MACT, information from EPA, information concerning facilities permitted in other states, and existing NESHAP standards, the Department has made the determination that Maximum Achievable Control Technology (MACT) for this facility shall be:

1. the use of production resins that contain a maximum weighted average of 35% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
2. the use of non-atomizing application equipment for production resins; Maverick Boat Company shall submit an operation and maintenance plan and operator training plan including but not limited to equipment calibration methods to achieve maximum HAP reduction;
3. the use of base gel coats and pigmented gel coats that contain a maximum weighted average of 33% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
4. the use of clear gel coats that contain a maximum weighted average of 48% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
5. the use of sprayed tooling resins, used for making and repairing molds, that contain a maximum weighted average of 30% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
6. the use of non-atomized tooling resins, used for making and repair of molds, that contain a maximum weighted average of 39% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;

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MACT DETERMINATION

7. the use of tooling gel coats, used for making and repair of molds, that contain a maximum weighted average of 40% total HAP content, based on Manufacturer's Safety Data (MSD) Sheets, with compliance determined on a 3-month rolling average;
8. no control of hazardous air pollutants emitted from mold sealing, releasing, stripping, and repair materials;
9. no control of hazardous air pollutants emitted from coating processes for exterior wood parts.
10. the use of bottom coatings and any other exterior coatings (except for wood parts) that are compliant with 40 CFR 63 Subpart II - NESHAPs for Shipbuilding and Ship Repair (Surface Coating);
11. the use of resin and gel coat cleaning solvents that contain no HAPs. An exception is the use of solvent cleaning machines which comply with the requirements of 40 CFR 63 Subpart T- Halogenated Solvent Cleaning;
13. the use of the highest styrene content in calculations when Manufacturer's Safety Data (MSD) Sheets with styrene content ranges are used.
14. The use of vacuum-forming technology for forming deck appurtenances.

Recordkeeping and Reporting Requirements:

15. Maverick Boat Company shall compile records on a monthly basis and maintain those records for a minimum of 5 years. At a minimum, these records shall include:
 - a. the identification of all coatings used (resins, gel coats, marine coatings, adhesives, etc.),
 - b. certification of the as-supplied HAP/VOC content of each batch of coating,
 - c. the volume of each coating applied,
 - d. amount of thinner used, and
 - e. determination of compliance with the appropriate HAP limit.
16. Within 60 days following the end of each 6-month period after startup, Maverick Boat Company, shall submit a semi-annual compliance report.

PROVISION FOR FUTURE USEPA SECTION 112(D) MACT DETERMINATION

At such time as the USEPA promulgates final regulations in 40CFR63 establishing standards for the Boat Manufacturing Industry, and the Department adopts such standards into its rules, the permittee may provide reasonable assurances of its ability to comply with the "new source" standards and may then, for purposes of MACT compliance, comply with any less restrictive specific provision of the promulgated MACT for "new" sources rather than the more restrictive specific provisions of the case-by-case MACT.

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MACT DETERMINATION

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

Cindy L. Phillips, P.E.
Air Toxics/Title III Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400
850/921-9534
Cindy.Phillips@dep.state.fl.us

Recommended By:

Approved By:

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

Howard L. Rhodes, Director
Division of Air Resources Management

Date:

Date: