

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

July 25, 1998

Laxmana Tallam
Air Quality - Permitting
Florida DEP - Southeast District
400 North Congress Avenue
West Palm Beach, Florida 33401
Telephone: (561) 681-6600

RECEIVED
JUL 29 1998

Reference: Maverick Boat Company

Subject: Title V Air Operating Permit Application

DEPT. OF ENV. PROTECTION

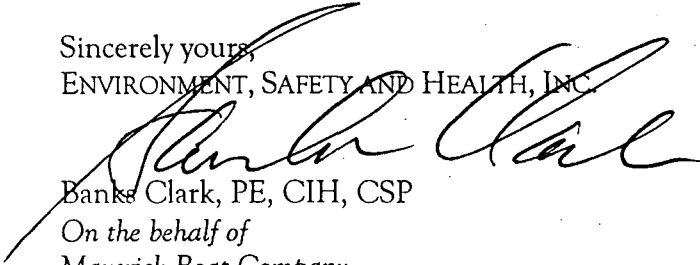
Dear Mr. Tallam:

Please find the enclosed four copies of an application for a Title V Air Operating Permit for the Maverick Boat Company located at 3054 Industrial 31st Street in Fort Pierce.

As we discussed by telephone, the Maverick Boat Company currently possesses a FESOP. Increased production levels have increase styrene emissions to the extent that the Facility is now a Title V major source due to the emission of a single HAP (styrene) more than 10 tons/year. For this reason, the Facility now submits application as a Title V major source.

Please call me if you require additional information or wish to discuss questions. Thank you.

Sincerely yours,
ENVIRONMENT, SAFETY AND HEALTH, INC.


Banks Clark, PE, CIH, CSP

On the behalf of
Maverick Boat Company

cc without attachments: Tom Tittle, Air Quality - Enforcement
Florida DEP - Southeast District

David Kesar, Vice President
Maverick Boat Company

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

DIVISION OF AIR RESOURCES MANAGEMENT
APPLICATION FOR AIR PERMIT - LONG FORM

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I. APPLICATION INFORMATION

DEPT. OF ENV. PROTECTION

Identification of Facility Addressed in This Application

1. Facility Owner/Company Name : Maverick Boat Company	
2. Site Name : Maverick Boat Company	
3. Facility Identification Number :	<input checked="" type="checkbox"/> Unknown
4. Facility Location : Maverick Boat Company Street Address or Other Locator : 3054 Industrial 31st Street City : Fort Pierce County : Saint Lucie Zip Code : 34946	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

I. Part 1 - 1

DEP Form No. 62-210.900(1) - Form

Effective : 3-21-96

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : David Kesar
Title : Vice President

2. Owner or Authorized Representative or Responsible Official Mailing Address :

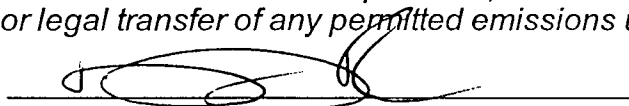
Organization/Firm : Maverick Boat Company
Street Address : 3054 Industrial 31st Street
City : Fort Pierce
State : FL Zip Code : 34946-8630

3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (561)465-0631 Fax : (561)489-2168

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., 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 units.*


Signature


Date

* Attach letter of authorization if not currently on file.

I. Part 2 - 1

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type
001	Fiberglass Boat Manufacturing Facility	ACID

Purpose of Application and Category

Category I : All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain :

- Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

- Initial air operation permit under Chapter 62-213, F.A.C., 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 :

- Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed :

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

Current construction permit number :

Operation permit to be revised :

- Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application.

Operation permit to be revised/corrected :

-] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit.

Operation permit to be revised :

Reason for revision :

Category II : All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain :

-] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s) :

-] Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed :

-] Air operation permit revision for a synthetic non-Title V source.

Operation permit to be revised :

Reason for revision :

Category III : All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain :

I. Part 4 - 2

-] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any :

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

Current operation permit number(s) :

-] Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one :

[] Attached - Amount : \$0.00 [X] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations : Maverick Boat Company currently possesses a FESOP based upon the emission of less than 8 tons/years styrene. Despite multiple measures designed to reduce styrene emissions, increased production levels have caused styrene emissions to exceed the FESOP limitation. The Facility now exceeds the threshold necessary for obtaining a Title V Permit. The purpose of this application is to obtain a Title V Air Operating Permit allowing styrene emission in excess of 10 tons/year.
2. Projected or Actual Date of Commencement of Construction :
3. Projected Date of Completion of Construction :

Professional Engineer Certification

1. Professional Engineer Name : Ellis Banks Clark Registration Number : 41612
2. Professional Engineer Mailing Address : Organization/Firm : Environment, Safety and Health, Inc Street Address : 9256 Southeast Venus Street City : Hobe Sound State : FL Zip Code : 33455
3. Professional Engineer Telephone Numbers : Telephone : (561)545-9622 Fax : (561)545-9682

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 pollutant 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

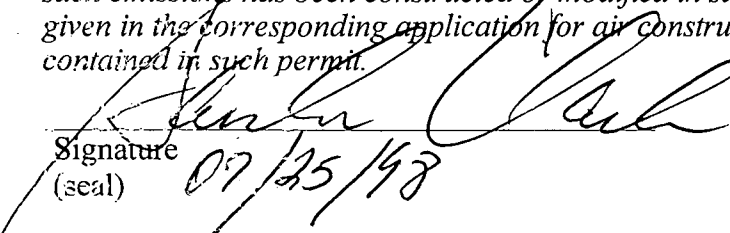
(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions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

Signature
(seal)


07/25/98

Date

07/25/98

* Attach any exception to certification statement.

I. Part 6 - 1

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

Application Contact

1. Name and Title of Application Contact :

Name : David Kesar
Title : Vice President

2. Application Contact Mailing Address :

Organization/Firm : Maverick Boat Company
Street Address : 3054 Industrial 31st Street
City : Fort Pierce
State : FL Zip Code : 34946-8630

3. Application Contact Telephone Numbers :

Telephone : (561)461-0885 Fax : (561)489-2168

Application Comment

The purpose of this application is to obtain a Title V Air Operation Permit based upon the emission of a single HAP (styrene) in excess of 10 tons/year.



**Emission Summary
Maverick Boat Company**

Month	styrene		other HAPs/VOCs	non-Hap VOCs
	resin	gelcoat		
December 1997	19573.96	2668.19	1815.25	992.34
January 1998	4052.44	11449.71	1979.54	700.28
February 1998	4643.92	19264.84	3017.67	1197.82
March 1998	5411.7	21841.48	2745.59	944.99
April 1998	21815.25	2819.83	1652.38	722.25
May 1998	19686.98	2779.59	176.93	129
6-Month Usage (lbs)	75184.3	60823.6	11387.4	4686.7
Usage (tons/year)	75.2	60.8	11.4	4.7
Emission Factor	11% ^{Note 1}	41% ^{Note 2}	100%	100%
Emission (tons/year)	8.3	24.9	11.4	4.7
Total Styrene (tons/year)	33.2			
Total HAPs (tons/year)	44.6			
Total VOCs (tons/year)	49.3			

Note 1: The Facility predominately uses two resin products. One resin product contains 35% styrene and represents 81% of the resin used by the Facility. The other resin product contains 43.5% styrene and represents 19% of the resin used by the Facility. Therefore, the average styrene content in resin is 36.6% (35% x 81% + 43.5% x 19%).

Based upon interim styrene emission factors for boat manufacturing (DARM-PER/GEN-37), the emission factor for resin which is non-spray layup is 11% for resins containing between 35% and 38% styrene. Therefore, the emission factor for resin containing 36.6% styrene is 11%.

Note 2: The Facility predominantly uses three gelcoat products. The styrene content in these products averages 30% styrene.

Based upon interim styrene emission factors for boat manufacturing (DARM-PER/GEN-37), the emission factor for gelcoat is 48% for material containing 35% styrene. Therefore, the emission factor for gelcoat containing 30% styrene is 41% (48% x 30%/35%).