

MAVERICK BOAT COMPANY
3054 Industrial 31st Street
Fort Pierce, FL 34946

Facility ID No.: 1110086-002
St. Lucie County

Title V Air Operation Permit
DRAFT Permit No.: 1110086-002-AV

Florida Department of Environmental Protection
Southeast District Office, Air Program
PO Box 15425, West Palm Beach, Florida, 33416
(Street address: 400 North Congress Avenue
West Palm Beach, Florida, 33401)
Telephone: 561-681-6600
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Initial Title V Air Operation Permit
Maverick Boat Company
DRAFT Permit No.: 1110086-002-AV

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ISSUED TO:

Maverick Boat Company
3054 Industrial 31st Street
Fort Pierce, FL 34946

<i>DRAFT Permit Number:</i>	1110086-002-AV
<i>Effective Date:</i>	
<i>Expiration Date:</i>	
<i>Renewal Application Due Date:</i>	

Responsible Official:

David Kesar
Vice President

PROJECT:

Project: Title V Air Operation Permit
Facility ID Number: 1110086
Facility Description: A Fiberglass Boat Building Facility (SIC # 3732)
Location: 3054 Industrial 31st Street, Fort Pierce, St. Lucie County, Florida
Lat./Long.: 27°29'21" N / 80°21'20" W
UTM: Zone 17; 563.66 Km. E; 3040.61 Km. N

This is permit number 1110086-002-AV to operate a Title V air pollution source.

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.

Executed in West Palm Beach, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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

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**SECTION I
FACILITY INFORMATION**

Subsection A. Facility Description

Maverick Boat Company is a fabricator of fiberglass, fishing boats. The facility is a major source of HAPs (styrene) according to the permit application.

Subsection B. Emission Units Summary

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

Regulated Emissions Unit:

Emissions Unit Number	Emissions Unit Description
001	A Fiberglass Boat Building Facility

This permit also addresses the following insignificant air pollution activities, based on the information provided by the applicant to the Department:

Insignificant Activity Description
Air compressor vents
Boat engine exhausts
Warehouse and other non-manufacturing area exhaust vents
Woodshop power equipment exhausts

Subsection C. Relevant Documents Not a Part of This Permit

The documents listed below are not a part of this permit, but are relevant to this permitting action. These documents are on file with the permitting authority:

Initial Title V Permit Application received.....	<i>July 29, 1998</i>
Additional Information Request dated:.....	<i>August 04, 1998</i>
Additional Information Response received:.....	<i>September 01, 1998</i>
Additional Information Request dated:.....	<i>September 29, 1998</i>
Additional Information Response received:.....	<i>October 19, 1998</i>

Subsection D. Permit Appendices

The documents listed below provide necessary supplementary information applicable to this permitting action.

Appendix A:	<i>Abbreviations, Acronyms, Rule Citations, & ID Numbers</i>
Appendix C:	<i>Certification of Compliance Report</i>
Appendix H:	<i>Permit History/Transfers</i>
Appendix TV:	<i>Title V Conditions</i>
Appendix G:	<i>Department Guidance Memo DARM -PER/GEN -37</i>

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

SECTION II FACILITY-WIDE CONDITIONS

The conditions in this section generally apply to all emission units and activities associated with this facility and to the facility as a whole. Some of these conditions duplicate conditions described elsewhere in this permit, but are provided here also for ease of understanding.

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 Federal Enforceability: All terms and conditions of this Title V permit are enforceable by the EPA and citizens under the Clean Air Act (CAA) except where otherwise noted. [Rule 62-210.200, F.A.C., Definitions - Federally Enforceable; and 40 CFR 70.6(b), Permit Content - Federally Enforceable Requirements]
- 1.3 Title V Core Conditions: The owner or operator shall be aware of, and operate in accordance with, the attached Title V Core Conditions, Appendix Title V. [Rules 62-4, 62-103, 62-204, 62-210, 62-213, 62-256, 62-257, 62-281 and 62-296, F.A.C.]

Note: Appendix TV; Title V Core Conditions, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or when otherwise appropriate.

- 1.4 Renewal of This Permit Required: An application for renewal of this operation permit must be submitted to the Department of Environmental Protection, Southeast District Office, Air Program **at least 60 days prior** to the expiration date of this permit. To apply for an operation permit, the applicant shall submit the appropriate application form in quadruplicate, the appropriate application fee, all required compliance test results, and such additional information as the Department may by law require. [F.A.C. Rule 62-4.030, 62-4.050, and 62-4.220]

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. [F.A.C. Rule 62-296.320(2)]
- 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. [F.A.C. Rule 62-296.320(4)(b)]
- 2.3 Volatile Organic Compounds/Organic Solvents Emissions: [F.A.C. Rule 62-296.320(1)]

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.

2.4 Unconfined Emissions of Particulate Matter: [F.A.C. Rule 62-296.320(4)(c)]

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.
- Enclosure or covering of conveyor systems.
- Substitution of powdery materials with granular or pelletized materials, where possible.

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. [F.A.C. Rule 62-210.650]

3.2 Excess Emissions: [F.A.C. Rule 62-210.700]

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.

4.0 **Compliance Testing Requirements**

4.1 Test Notification: Unless otherwise specified in this permit, the Department of Environmental Protection, Southeast District Office, Air Program shall be notified in writing of expected compliance test dates at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner. [F.A.C. Rule 62-297.340(1)]

4.2 Testing at Capacity: Compliance testing shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emissions unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional

compliance testing to regain the authority to operate at the permitted capacity. [F.A.C. Rule 62-297.310(2)]

- 4.3 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. [F.A.C. Rule 62-297.310(7)(b)]

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. [F.A.C. Rule 62-210.700(6)]

- 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. [F.A.C. Rule 62-4.130]

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

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

6.0 Other Requirements

6.1 Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:

- a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
- b. certification forms and/or RMPs according to the promulgated rule schedule.

[40 CFR 68]

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**SECTION III
EMISSIONS UNIT(S) AND CONDITIONS.**

Subsection A. This section addresses the following emissions unit.

Emissions Unit Number	Emissions Unit Description
001	A Fiberglass Boat Building Facility

The following specific conditions apply to the emissions unit(s) listed above:

- 1.0 **Essential Potential to Emit (PTE) Parameters
Emission Limiting Standards and Operation Restrictions**
- 1.1 HAPs Emissions: Total HAPs emissions (including Styrene) from the facility shall not exceed **80 tons** in any consecutive 12-month period. The emissions are based on the quantity of material used during any consecutive-twelve month period. [Requested by permittee]
- 1.2 Total VOC Emissions: Total emissions of VOCs (including Styrene) from the facility shall not exceed **90 tons** in any consecutive 12-month period. [Requested by permittee]
- 1.3 Emission Factors: The facility emissions shall be determined as described in conditions 3.1 and 3.2 below. The total emissions of styrene in any given month, which are included in total HAPs and VOC emissions, shall be determined by multiplying the quantity of each styrene containing material used (in tons) during the month, times the percentage of styrene in the material (expressed as a decimal fraction), times the following emission factors, and summing the individual styrene emissions for each material. [F.A.C. Rule 62-4.070(3), and the Department Guidance memo DARM -PER/GEN -37]

<i>Material</i>	<i>Monomer %</i>		
	35	38	42
<i>Resin Non-Spray Lay-up</i>	0.11	0.11	0.12
<i>Resin Spray Lay-up</i>	0.16	0.18	0.20
<i>Gel Coat</i>	0.48	0.51	0.54

- 1.4 Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.]
- 2.0 **Test Methods and Procedures
Compliance Monitoring Requirements**
- 2.1 Material Usage: The owner or operator shall monitor the usage of all resins and gelcoats at the referenced emission unit. [F.A.C. Rule 62-4.070(3)]
- 2.2 VOC Content: The owner or operator shall determine the VOC content of all resins and gelcoats. [F.A.C. Rule 62-4.070(3)]

- 2.3 HAP Content: The owner or operator shall determine the total and individual HAP contents of all resins and gelcoats. [F.A.C. Rule 62-4.070(3)]
- 2.4 The permittee applied for a construction permit based on emissions of 90 tons/year of VOCs and 80 tons/year of HAPs. In order to demonstrate compliance during the first year of record keeping, the facility shall not exceed 7.5 tons/ month of VOC and 6.7 tons per month of HAPs. The records shall be available for inspection until December 1999. Thereafter, the facility shall not exceed 80 tons of HAPs per 12-month rolling total and 90 tons VOC per 12-month rolling total. [F.A.C. Rule 62-4.070(3)]

3.0 **Reporting and Record Keeping Requirements**

- 3.1 VOC Emissions: The permittee shall record and maintain the following information: [F.A.C. Rule 62-4.070(3)]
- a. The VOC content for each material containing or emitting VOCs.
 - b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emission unit.
 - c. The total monthly VOC emission rates for each material, calculated from the monthly material utilization rates and the VOC content, (except for styrene emissions which shall be calculated pursuant to condition 1.3 above) calculated for the preceding month no later than 15th of the next month.
 - d. A rolling consecutive 12-month total emission rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

- 3.2 Total HAP Emissions (including Styrene): The permittee shall record and maintain the following information:
[F.A.C. Rule 62-4.070(3)]

- a. The total HAP (including Styrene) contents for each material containing or emitting HAPs.
- b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emission unit.
- c. Total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the total HAP content (except for styrene emissions which shall be calculated pursuant to condition 1.3 above), calculated for the preceding month no later than 15th of the next month.
- d. A rolling consecutive 12-month total emission rate for total HAPs, calculated from the monthly totals for the previous twelve calendar months.

- 3.3 AOR Supplemental Information: Annual operation reports required in Part II of this permit shall estimate emissions using the methodology required in conditions 1.3, 3.1 and 3.2 of this part of this permit. The AORs shall include the following supplemental information that was recorded in the previous calendar year: [F.A.C. Rule 62-4.070(3)]

- The attached summary form (Appendix S) showing the emissions of VOCs, and Styrene from the facility.

- B.3.6 Semiannual Certification of Compliance Report: The permittee shall provide a written report to the Department of Environmental Protection, Southeast district office on a semiannual basis which certifies the current compliance status with respect to the conditions of this permit. The reports shall be completed and submitted to the Department on or before the deadline specified below. (See Appendix C)

<i>Reporting Period</i>	<i>Report Deadline</i>
1st Period: January through December of previous year	January 31 st.
2 nd Period: July through December of previous year, and January through June of current year	July 31 st.

The responsible official shall certify each report to be true, accurate, and complete based on the information submitted and belief formed after the reasonable inquiry.

[Rule 62-213.420(4) and 62-213.440(1)(b)(3), F.A.C.]