TITLE V AIR PERMIT APPLICATION

Proposed Dougherty Manufacturing Facility
Airpark Road
Edgewater, Florida 32132

Prepared for:

R. J. Dougherty Associates, Inc.

167 Bell Ave.

Oakhill, FL 32759

Prepared by:

Nelson Engineering Co.
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February 17, 2000

Title V Air Permit Application
R. J. Dougherty Associates, Inc.
Summary of Attached Information

General Information: R. J. Dougherty Associates, Inc. (RJDA) is proposing to build a new facility on Air Park Road in Edgewater, FL to manufacture boats and boat parts. The manufacturing process uses fiberglass reinforced plastics (FRP) and includes using uncured resins, a setting catalyst, and fiberglass material to produce a hardened plastic product that comprises the boat and/or boat parts.

Styrene is emitted in the manufacturing process from the use of resin and gel coat. It is expected that styrene emissions from this facility will exceed the Title V threshold of 10 tons per year.

Appendix 1 Figures

- Figure 1: Location Map
- Figure 2: Plot (Site) Plan
- Figure 3: Process Flow Diagram
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Appendix 2 Fugitive Emissions

- A. Precautions to Prevent Unconfined Particulate Emissions
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- C. Detailed Description of Control Equipment
- D. Operation and Maintenance Plan

Appendix 4 List of Proposed Exempt Activities

Appendix 5 Paper Copy of DEP Form 62-210.900(1) Printed from ELSA

Notes to Project:

1. R.J. Dougherty and Associates (RJDA) is not affiliated with Dougherty Marine Partnership (aka Edgewater Power Boats) of Edgewater, Florida.
2. A storm water permit application (#40-127-63323-1) has been submitted to St. Johns River Water Management District.

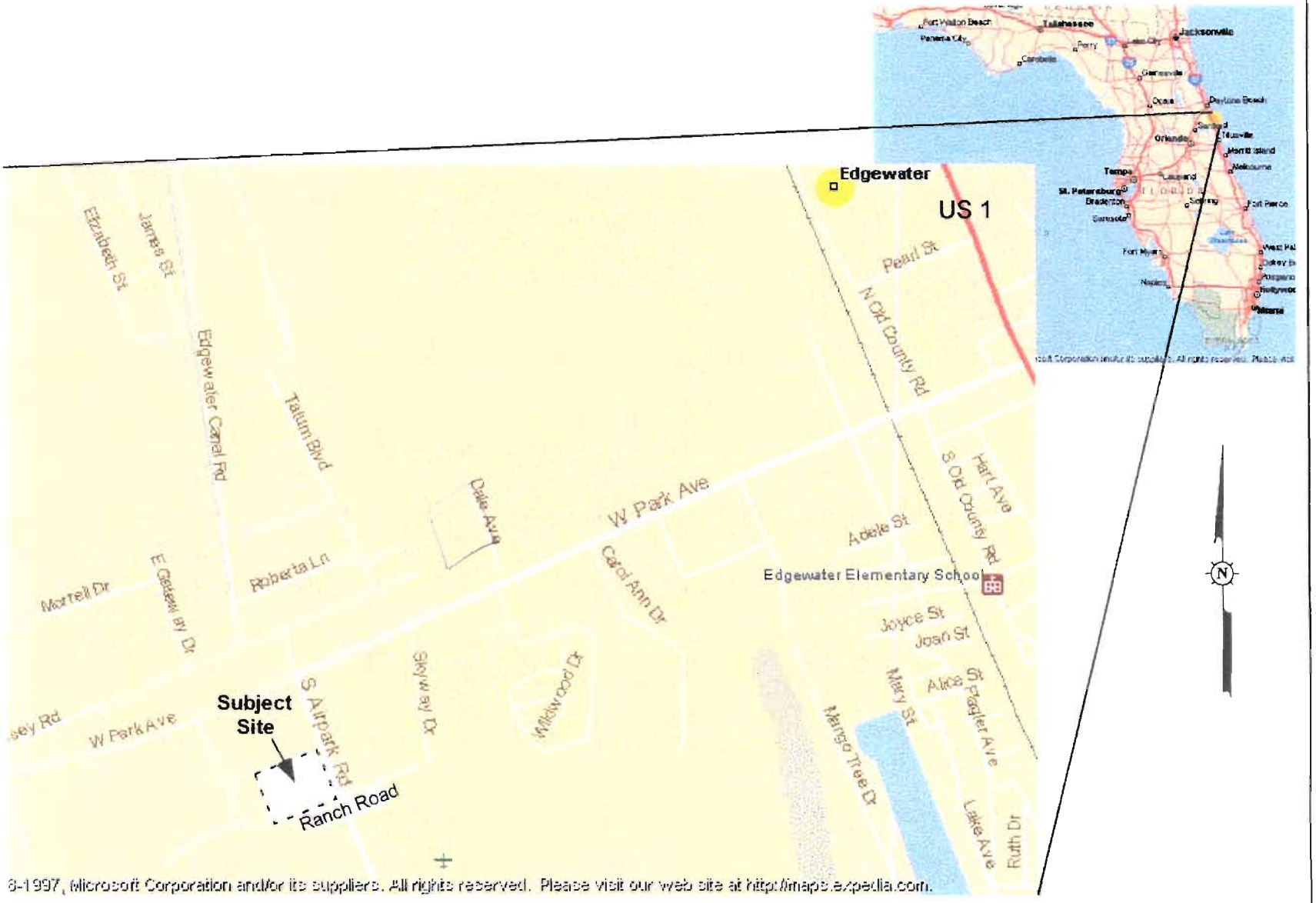

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Figure 1: Vicinity Map

New Dougherty Facility
Volusia County

Customer: R.J. Dougherty and Associates	Engr: Seringer	Scale: 1" = 0.25 mile
Date: November 9, 1999	Dwg No: IND-090-001	Rev: New

1270163-001

1

SHEET 1 OF 2

PROPOSED POULTRY MANUFACTURING FACILITY

SITE PLAN

EAST VOLUSIA ENGINEERING, INC.
435-B1 AIR PARK ROAD EDGEWATER, FL 32132 (904) 423-6986

AIR PARK ROAD

651.75'

490.00'

60.00'

EXISTING WATER ELEV: 6.0 11/17/99

Place hay bales or silt fence to protect wetland from erosion. See Notes attached for Figure 9.

ENDWALL - INV. 5.0' SOD BACK & SIDES @ 4:1 TO 1 SLOPE TO EXISTING GRADE

RIP-RAP

50 L.F. 14"X23" RCP (FIELD VERIFY LENGTH & ROUTE TO MINIMIZE IMPACT ON TREES)

CONTROL STRUCTURE
TYPE F INLET TOP 7.5'
OUTLET INVERT 5.0'
2" ORIFICE INVERT @ 6.25'
BOTTOM OF STRUCTURE @ 5.0'
P.T. WOOD SKIMMER TOP 8.0' BOTTOM 7.0'

TOP OF BERM SAME ELEV AS TOP OF CURB TYPICAL

WET DETENTION BOTTOM ELEV. 5.0'
VOLUME @ 7.5 = 120,102 C.F. VOLUME @ 6.25 = 80,269 C.F.
SLOPE SIDES 4:1 TO ELEV. 8.0 SOD ABOVE WATER LINE WITH ARGENTINE BAHIA

150' AVG. WIDTH

104 L.F. VINYL SHEET PILING

RIP-RAP FROM OUTLET ELEV. 10 WATER LEVEL

6' CHAIN LINK FENCE

SOD FROM ELEV. 11.5' TO EXIS. GRADE @ MAX. SLOPE 4:1 OR 3:1

END OF CURB TOP ELEV 11.5

5' SODDED MARGIN FOR FUTURE ROOF-OVER

CONC. PAVING

45' (50' USED FOR STORMWATER SYSTEM DESIGN)

EAVE HEIGHT 24'

BLDG. "C" ASSEMBLY AREA - VOLUME = 563,300 C.F.
FINISH FLOOR ELEVATION 12.50

MONOSLOPE ROOF PEAK 35'

1:12 SLOPE

TYPE F CURB

12' X 40' LOADING

6" 4000 PSI CONC. OVER SUB-GRADE COMPACTED TO 98% MAXIMO 1:80 MP. 3 PLCS.

CONCRETE FOR FUTURE ROOF-OVER

ROOFOVER

OPEN

OFFICE

BLDG. "A" LAMINATING AREA - VOLUME = 563,300 C.F.
FINISH FLOOR ELEVATION 12.50

RECYCLE CONTAINER

TYPE E CB & C.I. GRATE TOP ELEV. 11.50 IE 8.5 18" SUMP

6" REINFORCED CONCRETE PAD WITH BROOM FINISH

40' TANKS

SWALE 2 - SLOPE BANKS @ 4:1 TO 1 FROM ELEV. 11.5 TO EXIS. GRADE. SOD SLOPE WITH ARGENTINE BAHIA. DO NOT DISTURB SOIL INSIDE DRIP LINE OF EXIS. TREES

SWALE 2 BOTTOM @ EXIS. GRADE ELEV. 8.5. STORAGE VOLUME = 0 C.F.

SWALE 1 BOTTOM @ ELEV. 9.0 VOLUME @ 11.5 = 31,275 C.F.

SWALE 1 BOTTOM @ ELEV. 9.0 VOLUME @ 11.5 = 31,275 C.F.

COMPRESSOR SHED CHAIN LINK FENCE 3 SIDES

TYPE F CURB TYPICAL @ LANDSCAPE ISLANDS ALSO

6" COMPACTED SHELL

LANDSCAPE AREA

LANDSCAPE TYPICAL

CONC. PAVING

HDAP WALKWAY

HDAP

WHEEL STOPS TYPICAL REAR ITEMS ONLY

4" CURBING

SANITARY SEWER MH

POWER POLE (TYPICAL)

AERIAL UTILITY LINE (TYPICAL)

BACKFLOW PREVENTER FIRE HYDRANT, FIRE DEPT. CONNECTION, METER

END OF TYPE F CURB

6" COMPACTED SHELL

Place hay bales to prevent erosion to road swale as needed.

TYPE E CB & C.I. OR STEEL GRATE TOP ELEV. 10.5 IE 9.50 18" SUMP

EXIS. ASPHALT PAVEMENT

4' HIGH MASONRY WALL 3 PLCS.

1' HIGH LETTERS "RUDA" ON WALL

6" DIA., YELLOW (25" MIN.) TYP.

24" WHITE TYP

30" OCTAGONAL STOP SIGN.

SIGHT TRIANGLE 85' EACH SIDE

WOOD POST (TYPICAL) REMOVE POSTS & GATE WITHIN EASEMENT

GUY POLE

6" COMPACTED SHELL OR ASPH. DRIVEWAY

60' INGRESS/EGRESS & UTILITY EASEMENT KNOWN AS RANCH ROAD

50' OCTAGONAL STOP SIGN

MATCH EXIS. GRADE AT PROPERTY LINE

MATCH EXIS. GRADE AT EASEMENT LINE

651.75'

NOTES

1. Parcel I.D. part of 7431-00-00-0120 and 7344-08-00-0140. See survey by Harpster Engineering & Surveying, Inc. for legal description.
2. 7.55 acres not including driveway easement known as Ranch Road.
3. Building coverage = 84,000 s.f. @ buildout (26.3%).
4. Impervious = 155,142 s.f. @ buildout (48.0%) included in stormwater calculations.
5. Project area = 358,463 s.f. (see Environmental Resources Permit Application by Nelson Engineering Co.)
6. Zoning County I-1 Industrial Park
7. Parking required = 1 per employee
8. Parking provided = 84 including 4 handicap
9. Employees (initial) = 38.
10. Employees within 12 months of Certificate of Occupancy = 70.
11. Start of construction immediately on receipt of Development Order. Completion June 30, 2000.
12. Structure is SBCCI Type IV.
13. The contractor shall review and maintain a copy of the St. Johns River Water Management District permit at the construction site.
14. Erosion control shall be installed prior to any construction, including land clearing.
15. All areas to be disturbed shall have hay bales and/or silt fences around perimeter or other erosion control to prohibit erosion and sediment from discharging off site. See detail sheet.
16. Stormwater retention and detention facilities shall be constructed prior to the placement of any impervious surfaces.
17. Existing entrance at Ranch Road easement shall be used as construction entrance.
18. Prior to construction, sitework subcontractor shall submit a plan for approval by the Engineer and General Contractor showing implementation of temporary and permanent erosion and sediment control measures as shown on the drawings.
19. Existing trees on the site that are to be retained shall be protected by tree barricades.
20. Building and parking lot corners and radius points shall be staked by a registered surveyor prior to placement of formwork.
21. Flood zone "C" per community panel # 125155 0535 dated 2 July, 1992.
22. Water retention areas shall not be changed without prior approval of City and St. Johns River Water Management District.

SYMBOLS

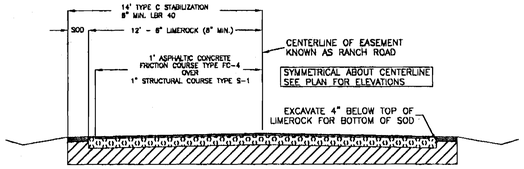
UE	Underground electric
A/U	Aerial utility
EXIS.	Existing
CONC.	Concrete
ASPH.	Asphalt
ELEV.	Elevation
S.F.	Square Feet
C.F.	Cubic Feet
E.J.	Expansion Joint
COV	Covered or Cover
A/C	Air conditioner unit
GR	Grade
+ 9.24	Existing elevation
—10—	Contour elevation
	Runoff flow direction
15.10	Proposed elevation
	Water valve
	Fire hydrant
W/M	Water meter
×	New chain link fence
—×—	Existing chain link fence
C.I.	Cast iron

REVISION RECORD			ORIGINAL DWG. BY: J. MARTIN
SYM.	BY	DATE	DRAWING NOT VALID WITHOUT EMBOSSED SEAL OF ENGINEER
1	JEM	2/16/00	DATE: 10 JAN, 2000
			ORIGINAL CKD. BY:
			DATE:
			SCALE: 1"=50'

LOCATION MAP (N.T.S.)

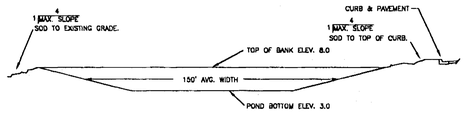
WEST PARK AVE.
454 ACROSS STREET NORTH RESIDENCY
AIR PARK ROAD
U.S. 1 (ORDENWOOD)
INDIAN RIVER I.B.V.

1270163-001 (2)



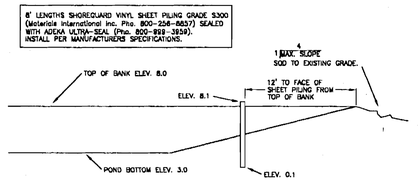
TYPICAL SECTION FOR RANCH ROAD

(N.T.S.)



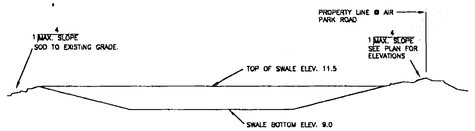
SECTION A-A @ WET DETENTION POND

(N.T.S.)



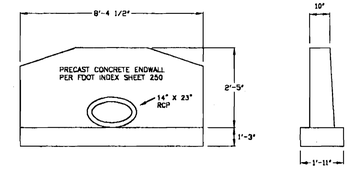
SECTION D-D @ WET DETENTION POND

(N.T.S.)



EAST - WEST SECTION B-B @ SWALE 1

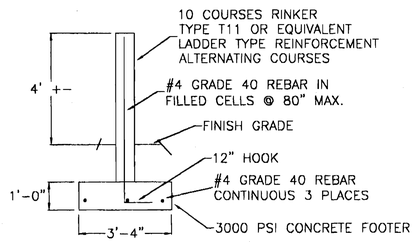
(N.T.S.)



ENDWALL

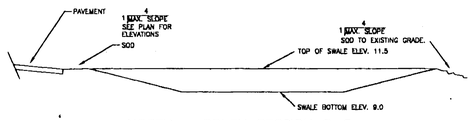
~~HEADWALL~~ DETAIL AT OUTFALL TO WETLAND

(N.T.S.)



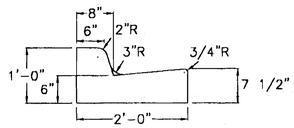
TYPICAL SECTION FOR CURVED MASONRY WALL

(N.T.S.)



NORTH - SOUTH SECTION C-C
@ NORTHWEST CORNER OF SWALE 1

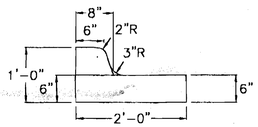
(N.T.S.)



PROVIDE CONTRACTION JOINTS AT 10' CENTERS (MAX).

TYPE F CURB AT CONCRETE PAVING

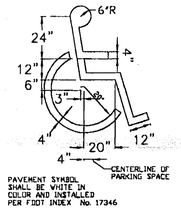
(N.T.S.)



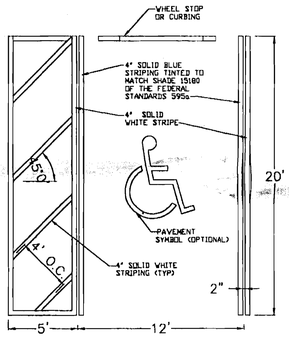
PROVIDE CONTRACTION JOINTS AT 10' CENTERS (MAX).

TYPE F CURB AT ASPHALT PAVING

(N.T.S.)



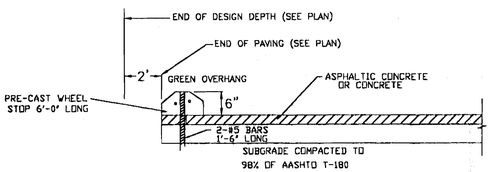
SUPPLEMENTAL PLATE WITH 1" SERIES C BLUE= LEGEND AND A 1/2" BLUE= BORDER ON A WHITE BACKGROUND. NOR BLACK (UNINCORPORATED AREA)



PARKING SPACE

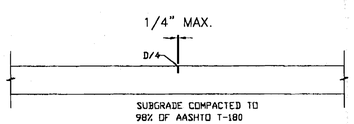
NOTES

1. TOP PORTION OF FTP-25 SHALL HAVE A REFLECTIVE BLUE BACKGROUND WITH WHITE REFLECTIVE SYMBOL AND BORDER. BOTTOM PORTION SHALL HAVE A REFLECTIVE WHITE BACKGROUND WITH BLACK OPAQUE LEGEND AND BORDER.
2. PERPENDICULAR AND DIAGONAL HANDICAPPED PARKING STALLS WILL BE 12 FT. WIDE AND 20'LONG WITH A 5 FT. WIDE ACCESS AISLE ADJACENT TO EACH STALL. THE 5 FT. WIDE ACCESS AISLE MAY BE SHARED BY TWO ADJACENT HANDICAPPED PARKING STALLS.
3. PARALLEL HANDICAPPED PARKING STALLS WILL BE 12 FT. WIDE AND 22 FT. LONG WITH A 5 FT. WIDE ACCESS AISLE ADJACENT TO EACH STALL.
4. ALL HANDICAPPED PARKING STALLS, 5 FT. SIDE ACCESS AISLS, HANDICAPPED RAMPS AND ACCESSIBLE ROUTES MUST BE PAVED.
5. ALL HANDICAPPED RAMPS SHALL BE A MINIMUM OF 44" WIDE EXCLUSIVE OF THE FLARED SIDES WITH A MAXIMUM SLOPE OF 12%. RAMPS TO BE CONSTRUCTED IN ACCORDANCE WITH FDOT INDEX No. 304.
6. ONE FTP-25 OR FTP-25 SIGN WITH SUPPLEMENTAL SIGN IS REQUIRED FOR EACH HANDICAPPED PARKING STALL.
7. BOTTOM EDGE OF SIGN TO BE 7'-0" ABOVE PAVEMENT.
8. BLUE STRIPING SHALL BE TINTED TO MATCH SHADE 15180 OF THE FEDERAL STANDARDS 595a.



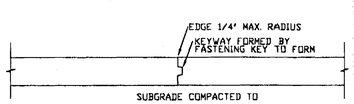
WHEEL STOP - PAVED PARKING (UNPAVED SIMILAR)

(N.T.S.)



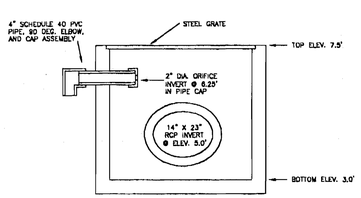
SAWED JOINT DETAIL

(N.T.S.)



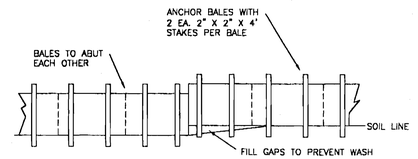
CONSTRUCTION JOINT DETAIL

(N.T.S.)

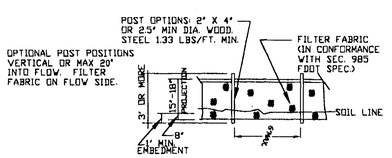


CONTROL STRUCTURE - TYPE F INLET

(N.T.S.)



HAY BALE INSTALLATION



SILTATION FENCING DETAILS

EROSION CONTROL OPTIONS

SHEET 2 OF 2

PROPOSED DOUGHERTY MANUFACTURING FACILITY
SITE PLAN

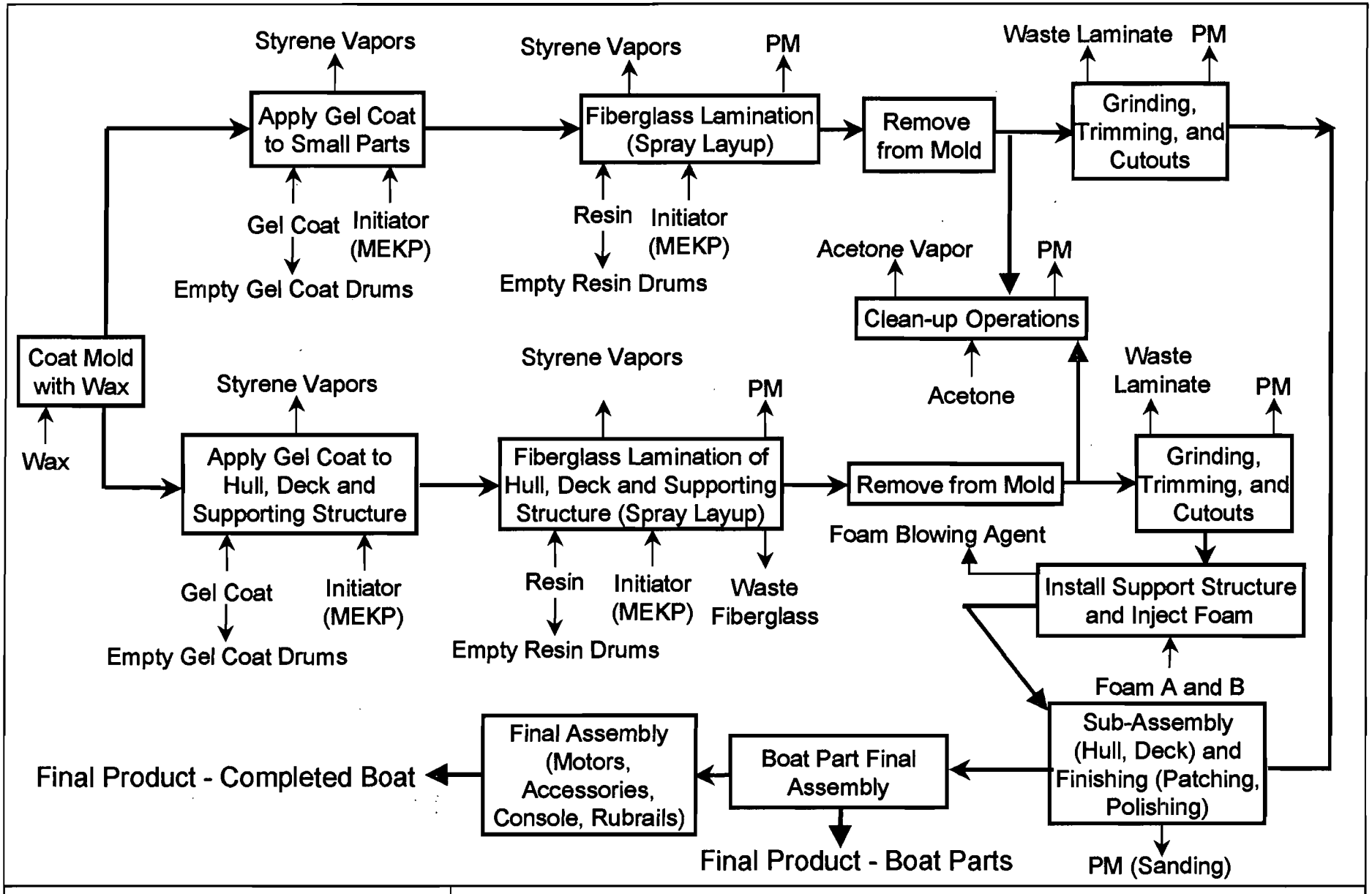
EAST VOLUSIA ENGINEERING, INC.
435-B1 AIR PARK ROAD EDGEWATER, FL 32132 (904) 423-6986

REVISION RECORD | ORIGINAL DWG. BY: J. MARTIN | DRAWING NOT VALID WITHOUT EMBOSSED SEAL OF ENGINEER

SYM.	BY	DATE
1	REVISED PER COMMENTS	2/15/00

ORIGINAL CKD. BY: | DATE: 10 JAN. 2000 | DATE: | SCALE: NOTED

SP_162DRWG.pwg



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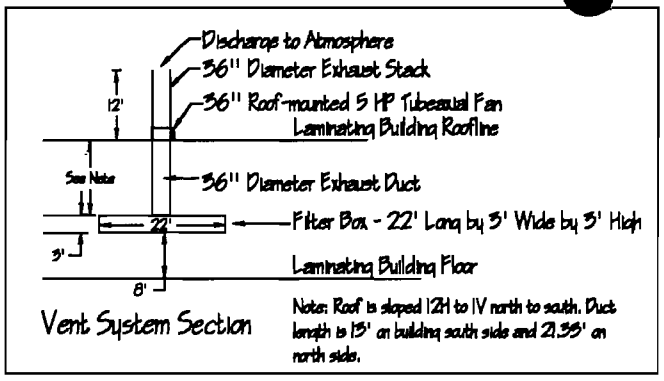
Titusville, FL 32780
(407)269-1113 Fax (407)269-0506
e-mail: nelsengr@digital.net Website: http://www.digital.net/nelsengr

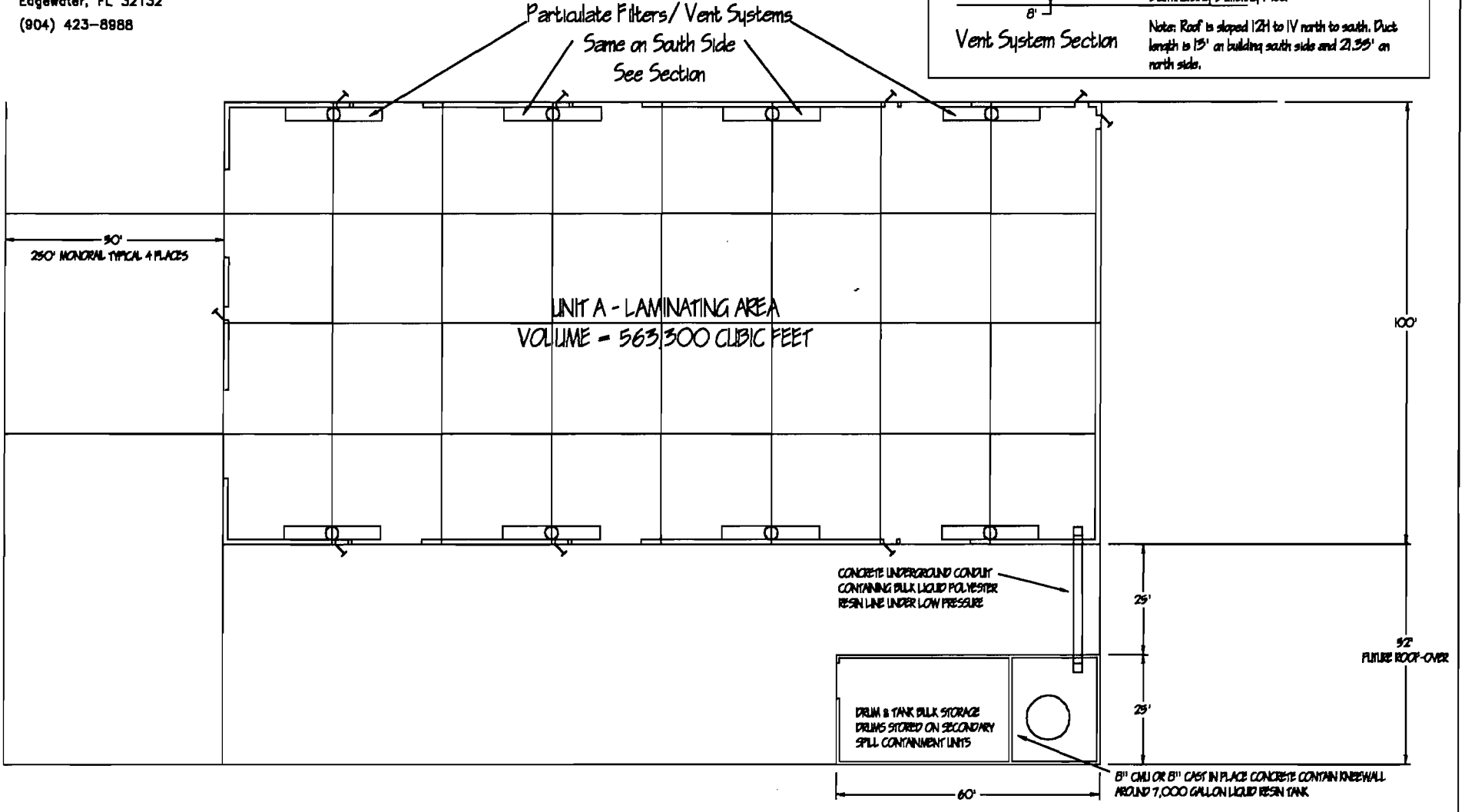
Figure 3: Process Flow Diagram

Engr: C. Seringer	Customer:R.J. Dougherty Associates, Inc.		Scale: None
	Date: 2/16/00	Dwg No: IND-091-013	Rev: 1

Facility Plan:

East Volusia Engineering
435-81 Air Park Road
Edgewater, FL 32132
(904) 423-8888





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Website: http://www.NelsonEngrCo.com

Figure 4: Vent System Details
Proposed Dougherty Facility
Edgewater, FL

Customer: R. J. Dougherty Associates, Inc.

Engineer: C. Seringer

Date: 2/16/00

Drawing Number: IND-091-014

Scale: 1.5" = 50"

Rev. 0

Appendix 2
Title V Permit Application
R. J. Dougherty Associates, Inc.

Part A. Precautions to Prevent Unconfined Particulate Matter Emissions

Citation:
62-296.320 General Pollutant Emission Limiting Standards
(4)(c) Unconfined Emissions of Particulate Matter
3. Reasonable precautions include the following:
d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.

Grinding, trimming, and sanding operations will take place in the west end of the Laminating Building (Unit A). The operations generate particulate matter. A ventilation system, described in Appendix 3, Section C, contains particulate filters that will remove much of the airborne particulate matter. Most of the particulate matter inside the building will not be airborne and will be routinely swept up and disposed of as a solid waste, thus fulfilling the reasonable precaution described above.

Part B. Fugitive Emission Identification

All air emissions from fiberglass boat and boat part manufacturing are fugitive emissions. The Process Flow Diagram (Figure 3 in Appendix 1) shows the sources of all the emissions. Appendix 4 quantifies the exempt source emissions (particulate matter, miscellaneous styrene, and methyl ethyl ketone). Styrene emissions calculations are contained in the permit application Emissions Unit Detail Information section. All styrene and methyl ethyl ketone emissions are generated in the east end of the Laminating Building (Unit A on the Plot Plan, Figure 2, Appendix 1). Particulate matter is generated in the west end of the Laminating Building, as described in Part A above.

Appendix 3
Title V Permit Application
R. J. Dougherty Associates, Inc.
Supplemental Information for Construction Permit

A. Description of Operation

R. J. Dougherty Associates, (RJDA) Inc. builds fiberglass boats and boat parts. To allow expansion of their current operations, RJDA is proposing to build a new facility on Air Park Road in Edgewater, Florida. The facility site plan is shown as Figure 2 in Appendix 1. The process flow diagram (Figure 3, Appendix 1) details the operational steps, materials used, and wastes generated. The major raw materials are resin, which is delivered in bulk and stored in a tank, and gel coat, which is delivered and stored in 55 gallon drums.

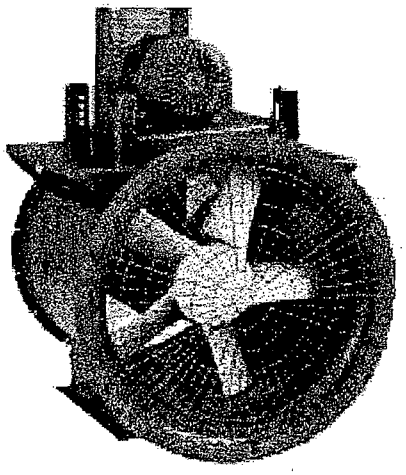
Project Description

To facilitate increased production rates, a new facility will be built on Air Park Road. Resin and gel coat processing will take place in the Lamination Building (Unit A as shown on the Plot Plan in Appendix 1). Styrene, a component of gel coat and resin and a Hazardous Air Pollutant, will be emitted from the Laminating Building in quantities greater than 10 tons per year. Thus, a Title V Air Permit is required.

B. Detailed Description of Control Equipment

The Laminating Building will be equipped with a ventilation system. Eight vent ducts, four on north and south sides of the building, will be installed. Each vent duct will be equipped with a 6500 cubic feet per minute (cfm) tube-axial fan (with a five (5) horsepower motor) mounted on the roof. The vent fans are 36 inches in diameter and approximately two (2) feet high. A 36 inch diameter duct will extend below the fan through the roof into the building. A particulate filter box, 22 feet long by three (3) feet wide by three (3) feet high, attaches to the duct at a height of eight (8) feet above the floor.

The fan housing is approximately two (2) feet high. Ten (10) feet of 36 inch diameter exhaust stack will be attached to the fan discharge. Figure 4 (Appendix 1) shows the locations of the filters and exhaust ducts in the Laminating Building and also contains a detail drawing of the fan system. Air will exhaust from the stacks at ambient temperature and at 900 feet per minute. A typical tube-axial fan is shown below.



C. Operation and Maintenance Plan

The fans will be operating when laminating and trimming, grinding, or sanding operations are occurring in the Laminating Building (Unit A). Preventive maintenance on the fans and motors will be conducted per the manufacturer's instructions. Inspections will be conducted at least once per year, or more frequently if recommended by the manufacturer, and required repairs will be made. One fan at a time may be taken out of service for maintenance purposes only. The particulate filters must be changed per the manufacturer's recommendations. Used filters must be disposed of properly. The roll-up doors and all other doors on the building must normally remain closed, unless the door is in use.

Appendix 4
Title V Permit Application
R. J. Dougherty Associates, Inc.
List of Proposed Exempt Activities

List of process or production units and other pollutant-emitting eligible for exemption in accordance with the criteria of Rule 62-213.430(6), F.A.C. and requested to be exempted pursuant to Rule 62-213.420(3)(m), F.A.C.:

1. Particulate Matter

   Exemption Limit: 5 tons per year

   Operations such as grinding, sanding, and trimming are performed in the manufacture of fiberglass boats and boat parts. Figure 3 in Appendix 1 shows the process areas where particulate matter (PM) is emitted. Grinding, sanding, and trimming are performed in the west end of the Laminating Building (Unit A).

   Emission Calculation:
   Basis:
   - 75 linear feet of fiberglass/hr undergoes PM-producing operations
   - 3000 hours per year of operation (conservative assumption; sanding, grinding, trimming are not always in process when facility is operating)
   - 1/2 inch of material undergoes PM-producing operations per linear foot (very conservative estimate)
   - 3/16 inch depth is removed in PM-producing operations
   - fiberglass particulates density = 122 lbs/ft3
   - 50% of particles become airborne (conservative estimate since the majority of the particles are swept up and disposed as solid waste)
   - Assume particulate filters are 50% efficient (conservative)

   3000 hours/year X 75 ft/hour X .5/12 ft X 3/16/12 ft X 50% X 122 lbs/ft3 X 50% = 4468 lbs/year = 2.2 TPY

2. Other Styrene Emissions

   Other products, such as deck and hull putty and transom pour, contain styrene and are used in small quantities in fiberglass boat and boat part manufacture. Total styrene emissions from these sources is estimated at less than 200 lbs/year.

3. VOC Emissions: Methyl Ethyl Ketone Peroxide (MEKP)

   1.5 % MEKP is added to the resin and the gel coat as a catalyst. MEK, a VOC, is 3% of MEKP. The majority of the MEKP catalyzes and sets the resin with the MEKP being contained in the final cured hard product (fiberglass reinforced plastic).

   Emission Calculation:

   Even on a worst case condition, if all the MEK remained volatile were emitted the emissions would be:

   750,000 lbs/year resin and gel coat used X .015 (% of MEKP used as a catalyst to set the resin) X .03 (% of MEK to MEKP) = 338 lbs/year MEK emitted.

Department of
Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Identification of Facility Addressed in This Application

1. Facility Owner/Company Name : R. J. Dougherty Associates, Inc.
2. Site Name : Airpark Road Facility
3. Facility Identification Number : [X] Unknown
4. Facility Location : R. J. Dougherty Associates Air Park Road Manufacturing Facility Street Address or Other Locator : 500 block of Air Park Road City : Edgewater County : Volusia Zip Code : 32132
5. Relocatable Facility? [ ] Yes [X] No 6. Existing Permitted Facility? [ ] Yes [X] No

Owner/Authorized Representative or Responsible Official

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

Name : Stephen Dougherty
Title : Vice President

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

Organization/Firm : R. J. Dougherty Associates, Inc.
Street Address : 167 Bell Ave.
City : Oak Hill
State : FL Zip Code : 32759

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

Telephone : (904)345-4234 Fax : (904)345-4233

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

2-18-00
Date

* Attach letter of authorization if not currently on file.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type
No Id	Spray Lay-up and Gelcoat Application	

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.

[X] 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 Fule 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 :

[X] 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 :

[X] Attached - Amount : $2000.00 [ ] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations : Construct a manufacturing building for spray lay-up and gelcoat application operations for building boats a boat parts.
2. Projected or Actual Date of Commencement of Construction :
3. Projected Date of Completion of Construction :

Professional Engineer Certification

1. Professional Engineer Name : Carolyn S. Seringer Registration Number : 52097
2. Professional Engineer Mailing Address : Organization/Firm : Nelson Engineering Co. Street Address : 3655 Belle Arbor Circle City : Titusville State : FL Zip Code : 32780
3. Professional Engineer Telephone Numbers : Telephone : (321)269-1113 Fax : (321)269-0506

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 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

2/17/00
Date

(seal)

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact :

Name : Stephen Dougherty
Title : Vice President

2. Application Contact Mailing Address :

Organization/Firm : R. J. Dougherty Associates, Inc.
Street Address : 167 Bell Ave.
City : Oak Hill
State : FL Zip Code : 32759

3. Application Contact Telephone Numbers :

Telephone : (904)345-4234 Fax : (904)345-4233

Application Comment

Projected Construction Start Date: 3/15/00
Projected Construction Completion Date: 6/16/00
Initial Start-up Date: 7/15/00
(Program would not accept 2000 dates)

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility, Location, and Type

1. Facility UTM Coordinates : Zone : 17 East (km) : North (km) :
2. Facility Latitude/Longitude : Latitude (DD/MM/SS) : 28 58 48 Longitude (DD/MM/SS) : 80 55 42

3. Governmental Facility Code :	4. Facility Status Code :	5. Facility Major Group SIC Code :	6. Facility SIC(s) :
0	C	37	3732

7. Facility Comment :

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Contact

1. Name and Title of Facility Contact :

   Stephen Dougherty
   VIce President

2. Facility Contact Mailing Address :

   Organization/Firm : R. J. Dougherty and Associates, Inc
   Street Address : 167 Bell Ave
   City : Oak Hill State : FL Zip Code : 32759

3. Facility Contact Telephone Numbers :

   Telephone : (904)345-4234 Fax : (904)345-4233

Facility Regulatory Classifications

1. Small Business Stationary Source?	Y
2. Title V Source?	Y
3. Synthetic Non-Title V Source?	N
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	N
5. Synthetic Minor Source of Pollutants Other than HAPs?	N
6. Major Source of Hazardous Air Pollutants (HAPs)?	Y
7. Synthetic Minor Source of HAPs?	N
8. One or More Emissions Units Subject to NSPS?	N
9. One or More Emission Units Subject to NESHAP?	Y
10. Title V Source by EPA Designation?	N
11. Facility Regulatory Classifications Comment : EPA intends to promulgate a fiberglass boat industry MACT pursuant to section 112(d).	

B. FACILITY REGULATIONS

Rule Applicability Analysis

B. FACILITY REGULATIONS

List of Applicable Regulations

CHAPTER 62-4, F.A.C.: PERMITS

CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR

CHAPTER 62-204, F.A.C.: STATE IMPLEMENTATION PLAN

CHAPTER 62-212, F.A.C.,: STATIONARY SOURCES - PRECONSTRUCTION REVIEW

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
H163	A

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 1

1. Pollutant Emitted :	H163
2. Requested Emissions Cap :	(lbs/hour) 40.0000 (tons/year)
3. Basis for Emissions Cap Code :	OTHER
4. Facility Pollutant Comment :	Based on doubling production capacity in new facility.

D. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location :	Figure 1, App 1
2. Facility Plot Plan :	Figure 2, App 1
3. Process Flow Diagram(s) :	Figure 3, App 1
4. Precautions to Prevent Emissions of Unconfined Particulate Matter :	App 2, Part A
5. Fugitive Emissions Identification :	App 2, Part B
6. Supplemental Information for Construction Permit Applicat	App 3

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt	App 4
8. List of Equipment/Activities Regulated under	NA
9. Alternative Methods of Operation :	NA
10. Alternative Modes of Operation (Emissions	NA
11. Identification of Additional Applicable	NA
12. Compliance Assurance Monitoring	NA
13. Risk Management Plan Verification :	NA
14. Compliance Report and Plan :	NA
15. Compliance Certification (Hard-copy Requir	NA

III. EMISSIONS UNIT INFORMATION

A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one :

[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one :

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[ ] 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.

[X] 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.

Emissions Unit Information Section 1

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section : Spray Lay-up and Gelcoat Application		
2. Emissions Unit Identification Number : [X] No Corresponding ID [ ] Unknown		
3. Emissions Unit Status Code : C	4. Acid Rain Unit? [ ] Yes [X] No	5. Emissions Unit Major Group SIC Code : 37
6. Emissions Unit Comment :		

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Emissions Unit Control Equipment 1

1. Description : Emissions are reduced by using low styrene gel coat and resin, when possible. Some parts are also made in closed molds.
2. Control Device or Method Code : 102

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

Emissions Unit Details

1. Initial Startup Date :		
2. Long-term Reserve Shutdown Date :		
3. Package Unit : Manufacturer :		Model Number :
4. Generator Nameplate Rating :	MW	
5. Incinerator Information : Dwell Temperature : Dwell Time : Incinerator Afterburner Temperature :		Degrees Fahrenheit Seconds Degrees Fahrenheit

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate :	mmBtu/hr	
2. Maximum Incinerator Rate :	lb/hr	tons/day
3. Maximum Process or Throughput Rate :	750000	lbs/yr
4. Maximum Production Rate :		
5. Operating Capacity Comment : Based on using 750,000 lbs/yr of resin and gel coat.		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule :		
	10 hours/day	6 days/week
	50 weeks/year	3,000 hours/year

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

Rule Applicability Analysis

List of Applicable Regulations

CHAPTER 62-4 F.A.C. - PERMITS

CHAPTER 62-210 F.A.C. - STATIONARY SOURCES - GENERAL REQUIREMENTS

CHAPTER 62-103 F.A.C. - RULES OF ADMINISTRATIVE PROCEDURE

CHAPTER 296 F.A.C. - STATIONARY SOURCES - EMISSION STANDARDS

CHAPTER 62-213 F.A.C. - OPERATION PERMITS FOR MAJOR SOURCES

CHAPTER 62-204 F.A.C. - STATE IMPLEMENTATION PLAN

CHAPTER 62-212 F.A.C. - PRECONSTRUCTION REVIEW

E. EMISSION POINT (STACK/VENT) INFORMATION

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Emission Point Description and Type :

1. Identification of Point on Plot Plan or Flow Diagram :	Lamination Building	
2. Emission Point Type Code :	3	
3. Descriptions of Emission Points Comprising this Emissions Unit : Eight (8) stacks with fans vent the lamination building.		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common : Eight (8) vent stacks on lamination building.		
5. Discharge Type Code :	V	
6. Stack Height :	36	feet
7. Exit Diameter :	3.00	feet
8. Exit Temperature :	85	°F
9. Actual Volumetric Flow Rate :	6,500	acfm
10. Percent Water Vapor :		%
11. Maximum Dry Standard Flow Rate :		dscfm
12. Nonstack Emission Point Height :		feet
13. Emission Point UTM Coordinates : Zone : 17 East (km) : North (km) :		
14. Emission Point Comment : The vent stacks on the north side of the building (4 stacks) will discharge at 44.33 feet above the ground; the vent stacks on the south side (4 stacks) will discharge at 36 feet above ground.		

F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Segment Description and Rate : Segment 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Resin and Gel Coat Application	
2. Source Classification Code (SCC) : 30101899	
3. SCC Units : lbs/pound styrene used	
4. Maximum Hourly Rate :	5. Maximum Annual Rate : 2.46
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur :	8. Maximum Percent Ash :
9. Million Btu per SCC Unit :	
10. Segment Comment :	

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

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

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Pollutant Potential/Estimated Emissions : Pollutant 1

1. Pollutant Emitted : **H163**
2. Total Percent Efficiency of Control : %
3. Potential Emissions : lb/hour 40.0000000 tons/year
4. Synthetically Limited? [ ] Yes [X] No
5. Range of Estimated Fugitive/Other Emissions: 3 25.00 to 100.00 tons/year
6. Emissions Factor 20 Units : % Reference : DARM-PER/GEN37
7. Emissions Method Code : 5
8. Calculations of Emissions : 600,000 lbs of resin * 42% Styrene * 20% (Em. Factor) = 50400 lb/yr 150,000 lbs gel coat *35% Styrene * 48% (Em. Factor) = 25200 lb/yr Total Styrene Emissions = 75600 lb/yr = 40 TPY
9. Pollutant Potential/Estimated Emissions Comment : Closed mold process emissions reductions were not taken into account.

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Emissions Unit Information Section _____

Pollutant Information Section _____

Allowable Emissions _____

1. Basis for Allowable Emissions Code :
2. Future Effective Date of Allowable Emissions :
3. Requested Allowable Emissions and Units :
4. Equivalent Allowable Emissions : lb/hour tons/year
5. Method of Compliance :
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section _____

Visible Emissions Limitation : Visible Emissions Limitation _____

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

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

[ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code :		
PM :	SO2 :	NO2 :
4. Baseline Emissions :		
PM :	lb/hour	tons/year
SO2 :	lb/hour	tons/year
NO2 :		tons/year
5. PSD Comment :		

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Supplemental Requirements for All Applications

1. Process Flow Diagram :	Figure 3 App1
2. Fuel Analysis or Specification :	NA
3. Detailed Description of Control Equipment :	Part C App3
4. Description of Stack Sampling Facilities :	NA
5. Compliance Test Report :	
6. Procedures for Startup and Shutdown :	NA
7. Operation and Maintenance Plan :	Part D App3
8. Supplemental Information for Construction Permit Application :	App 3
9. Other Information Required by Rule or Statue :	NA

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operations :
11. Alterntive Modes of Operation (Emissions Trading) :

12. Identification of Additional Applicable Requirements :	
13. Compliance Assurance Monitoring Plan :	
14. Acid Rain Application (Hard-copy Required) :	
NA	Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
NA	Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
NA	New Unit Exemption (Form No. 62-210.900(1)(a)2.)
NA	Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)

Title V Air Permit Application
R. J. Dougherty Associates, Inc.
Summary of Attached Information

General Information: R. J. Dougherty Associates, Inc. (RJDA) is proposing to build a new facility on Air Park Road in Edgewater, FL to manufacture boats and boat parts. The manufacturing process uses fiberglass reinforced plastics (FRP) and includes using uncured resins, a setting catalyst, and fiberglass material to produce a hardened plastic product that comprises the boat and/or boat parts.

Styrene is emitted in the manufacturing process from the use of resin and gel coat. It is expected that styrene emissions from this facility will exceed the Title V threshold of 10 tons per year.

Appendix 1 Figures

Figure 1: Location Map

Figure 2: Plot (Site) Plan

Figure 3: Process Flow Diagram

Figure 4: Vent System Details

Appendix 2 Fugitive Emissions

A. Precautions to Prevent Unconfined Particulate Emissions

B. Fugitive Emissions Identification

Appendix 3 Supplemental Information for Construction Permit

A. Description of Operation

B. Description of Project

C. Detailed Description of Control Equipment

D. Operation and Maintenance Plan

Appendix 4 List of Proposed Exempt Activities

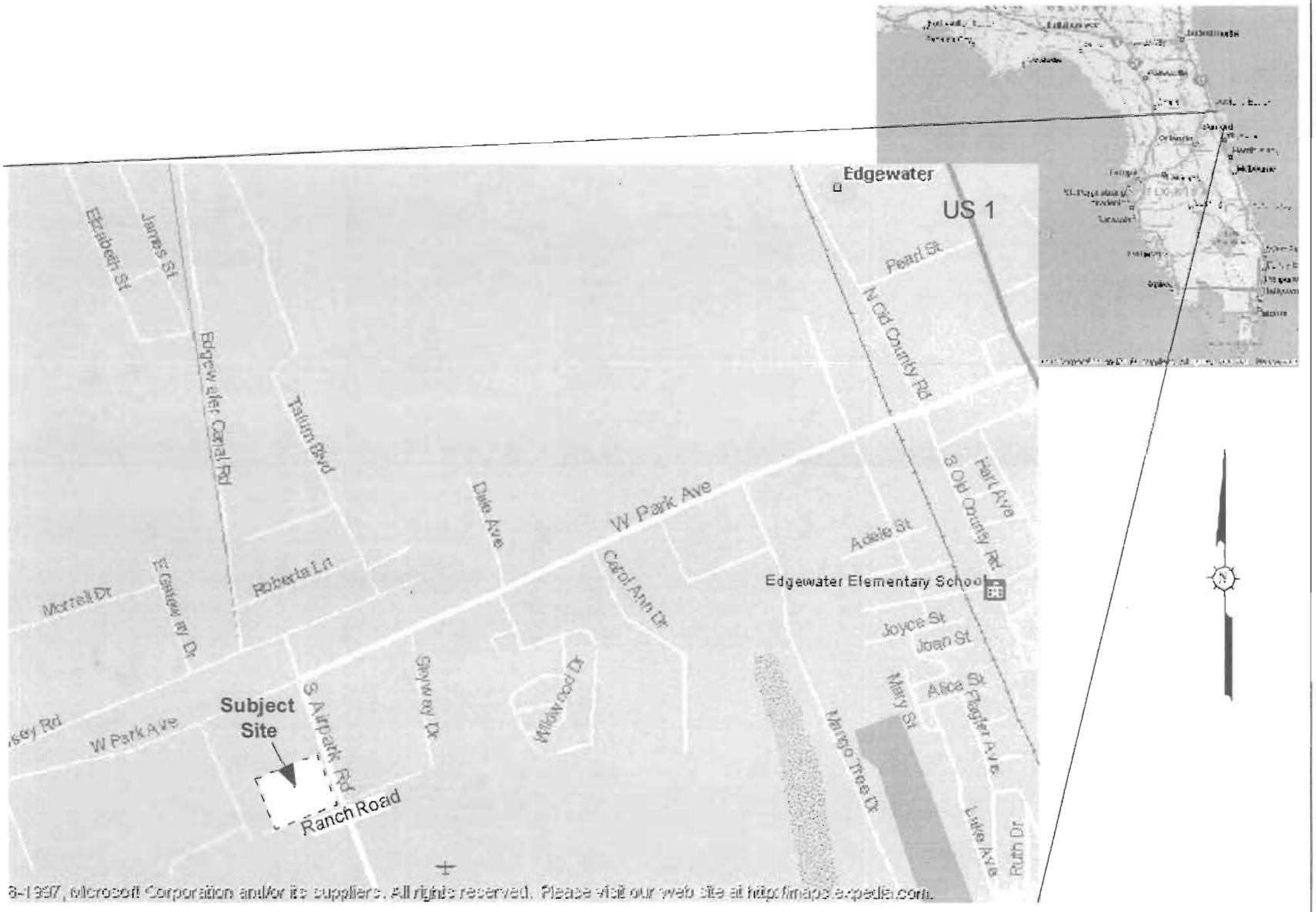
Appendix 5 Paper Copy of DEP Form 62-210.900(1) Printed from ELSA

Notes to Project:

1. R.J. Dougherty and Associates (RJDA) is not affiliated with Dougherty Marine Partnership (aka Edgewater Power Boats) of Edgewater, Florida.
2. A storm water permit application (#40-127-63323-1) has been submitted to St. Johns River Water Management District.

Appendix 1

Figures



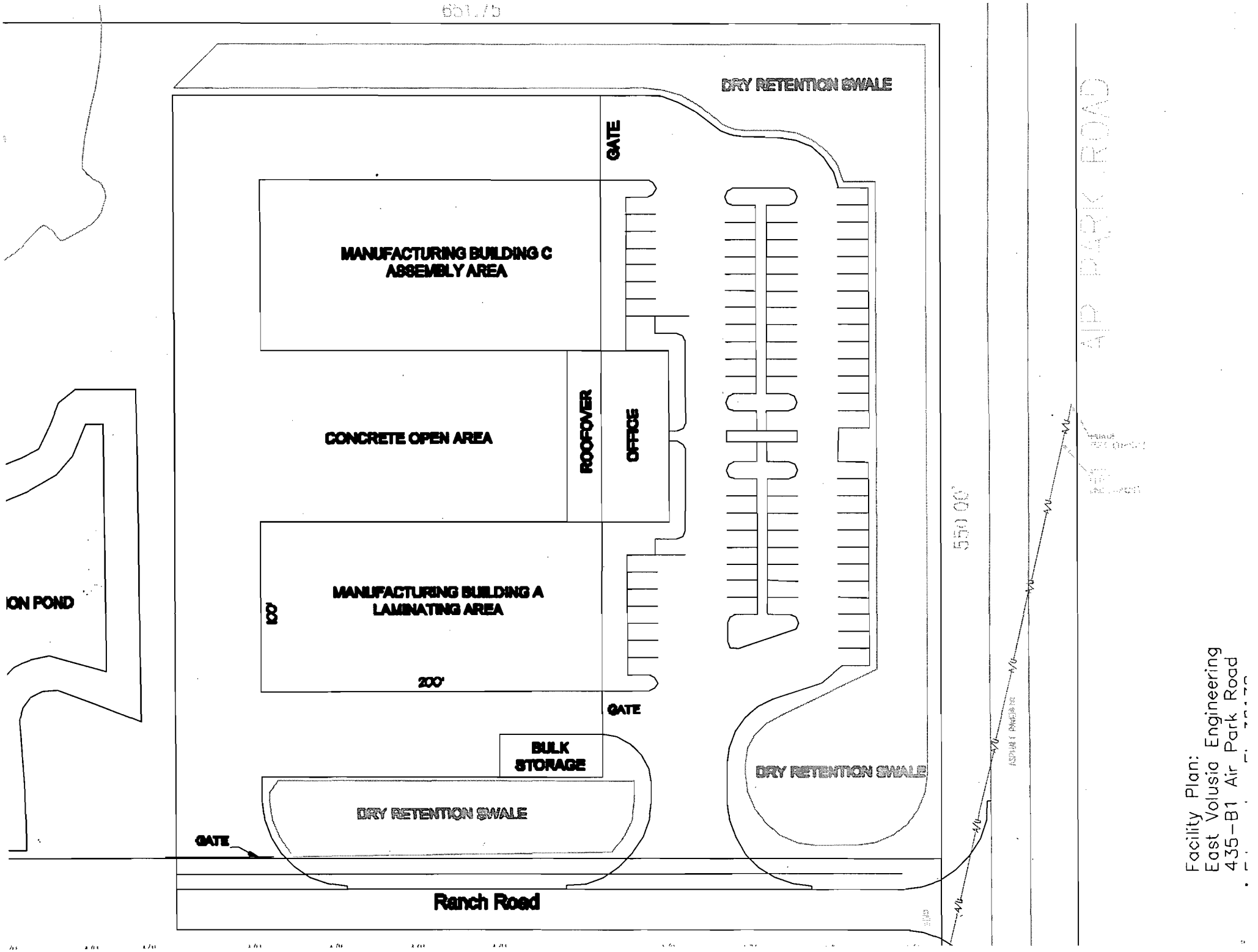
Nelson Engineering Co.

Figure 1: Vicinity Map

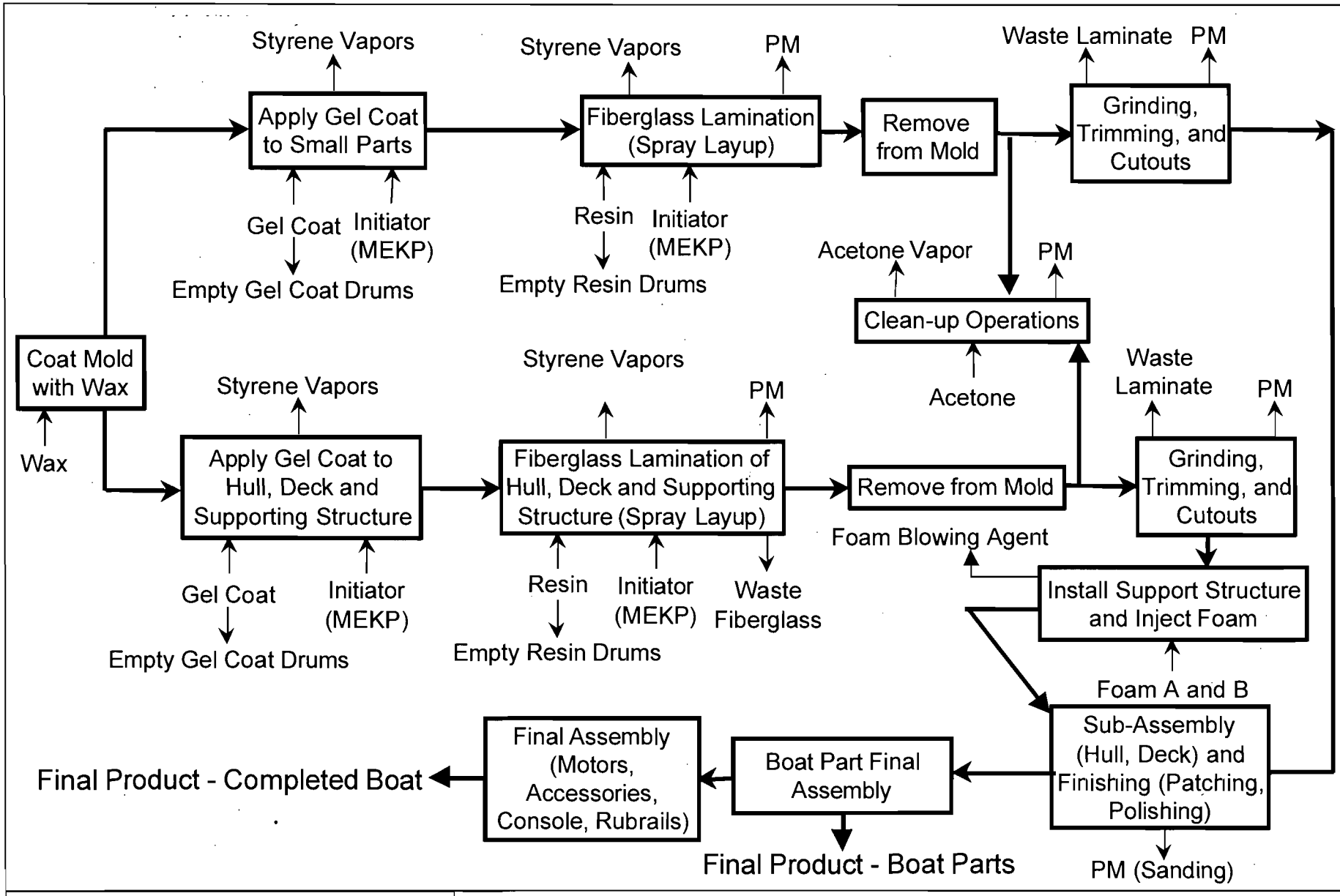
New Dougherty Facility
Volusia County

Customer: R.J. Dougherty and Associates	Engr: Seringer	Scale: 1" = 025 mile
Date: November 9, 1999	Dwg No: IND-090-001	Rev: New

BEST AVAILABLE COPY



Facility Plan:
East Volusia Engineering
435-B1 Air Park Road



Nelson Engineering Co.

Figure 3: Process Flow Diagram

Engr: C. Seringer	Customer:R.J. Dougherty Associates, Inc.		Scale: None
	Date: 2/16/00	Dwg No: IND-091-013	Rev: 1

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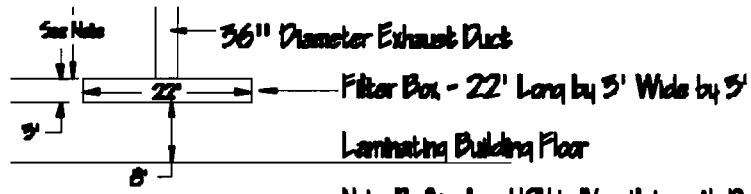


Vent System Section

Note: Roof is sloped 12H to 1V north to south. Di
length is 13' on building south side and 21.33' o
north side.

Particulate Filters/ Vent Systems
Same on South Side
See Section

UNIT A - LAMINATING AREA
VOLUME = 563,300 CUBIC FEET

CONCRETE UNDERGROUND CONDUIT
CONTAINING BULK LIQUID POLYESTER
RESIN LINE UNDER LOW PRESSURE

DRUM & TANK BULK STORAGE
DRUMS STORED ON SECONDARY
SPILL CONTAINMENT UNITS

8" CMU OR 8" CAST IN PLACE CONCRETE CONTAIN KNEEWALL
AROUND 7,000 GALLON LIQUID RESIN TANK

25'

25'

60'

Appendix 2

Fugitive Emissions

Appendix 2
Title V Permit Application
R. J. Dougherty Associates, Inc.

Part A. Precautions to Prevent Unconfined Particulate Matter Emissions

Citation:
62-296.320 General Pollutant Emission Limiting Standards
(4)(c) Unconfined Emissions of Particulate Matter
3. Reasonable precautions include the following:
d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.

Grinding, trimming, and sanding operations will take place in the west end of the Laminating Building (Unit A). The operations generate particulate matter. A ventilation system, described in Appendix 3, Section C, contains particulate filters that will remove much of the airborne particulate matter. Most of the particulate matter inside the building will not be airborne and will be routinely swept up and disposed of as a solid waste, thus fulfilling the reasonable precaution described above.

Part B. Fugitive Emission Identification

All air emissions from fiberglass boat and boat part manufacturing are fugitive emissions. The Process Flow Diagram (Figure 3 in Appendix 1) shows the sources of all the emissions. Appendix 4 quantifies the exempt source emissions (particulate matter, miscellaneous styrene, and methyl ethyl ketone). Styrene emissions calculations are contained in the permit application Emissions Unit Detail Information section. All styrene and methyl ethyl ketone emissions are generated in the east end of the Laminating Building (Unit A on the Plot Plan, Figure 2, Appendix 1). Particulate matter is generated in the west end of the Laminating Building, as described in Part A above.

Appendix 3

Supplemental Information for Construction Permit

Appendix 3
Title V Permit Application
R. J. Dougherty Associates, Inc.
Supplemental Information for Construction Permit

A. Description of Operation

R. J. Dougherty Associates, (RJDA) Inc. builds fiberglass boats and boat parts. To allow expansion of their current operations, RJDA is proposing to build a new facility on Air Park Road in Edgewater, Florida. The facility site plan is shown as Figure 2 in Appendix 1. The process flow diagram (Figure 3, Appendix 1) details the operational steps, materials used, and wastes generated. The major raw materials are resin, which is delivered in bulk and stored in a tank, and gel coat, which is delivered and stored in 55 gallon drums.

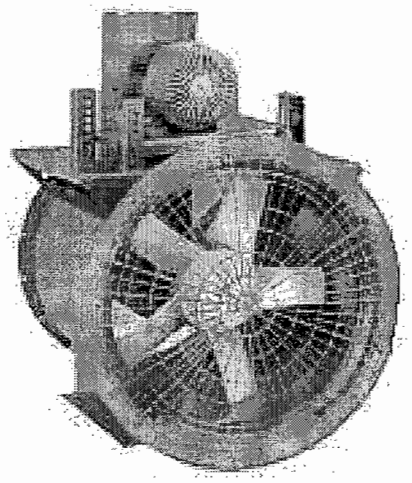
Project Description

To facilitate increased production rates, a new facility will be built on Air Park Road. Resin and gel coat processing will take place in the Lamination Building (Unit A as shown on the Plot Plan in Appendix 1). Styrene, a component of gel coat and resin and a Hazardous Air Pollutant, will be emitted from the Laminating Building in quantities greater than 10 tons per year. Thus, a Title V Air Permit is required.

B. Detailed Description of Control Equipment

The Laminating Building will be equipped with a ventilation system. Eight vent ducts, four on north and south sides of the building, will be installed. Each vent duct will be equipped with a 6500 cubic feet per minute (cfm) tube-axial fan (with a five (5) horsepower motor) mounted on the roof. The vent fans are 36 inches in diameter and approximately two (2) feet high. A 36 inch diameter duct will extend below the fan through the roof into the building. A particulate filter box 22 feet long by three (3) feet wide by three (3) feet high, attaches to the duct at a height of eigh (8) feet above the floor.

The fan housing is approximately two (2) feet high. Ten (10) feet of 36 inch diameter exhaust stack will be attached to the fan discharge. Figure 4 (Appendix 1) shows the locations of the filters and exhaust ducts in the Laminating Building and also contains a detail drawing of the fan system. Air will exhaust from the stacks at ambient temperature and at 900 feet per minute. A typical tube-axial fan is shown below.



C. Operation and Maintenance Plan

The fans will be operating when laminating and trimming, grinding, or sanding operations are occurring in the Laminating Building (Unit A). Preventive maintenance on the fans and motors will be conducted per the manufacturer's instructions. Inspections will be conducted at least once per year, or more frequently if recommended by the manufacturer, and required repairs will be made. One fan at a time may be taken out of service for maintenance purposes only. The particulate filters must be changed per the manufacturer's recommendations. Used filters must be disposed of properly. The roll-up doors and all other doors on the building must normally remain closed, unless the door is in use.

Appendix 4

List of Proposed Exempt Activities

Appendix 4
Title V Permit Application
R. J. Dougherty Associates, Inc.
List of Proposed Exempt Activities

List of process or production units and other pollutant-emitting eligible for exemption in accordance with the criteria of Rule 62-213.430(6), F.A.C. and requested to be exempted pursuant to Rule 62-213.420(3)(m), F.A.C.:

1. Particulate Matter

   Exemption Limit: 5 tons per year

   Operations such as grinding, sanding, and trimming are performed in the manufacture of fiberglass boats and boat parts. Figure 3 in Appendix 1 shows the process areas where particulate matter (PM) is emitted. Grinding, sanding, and trimming are performed in the west end of the Laminating Building (Unit A).

   Emission Calculation:
   Basis:
   - 75 linear feet of fiberglass/hr undergoes PM-producing operations
   - 3000 hours per year of operation (conservative assumption; sanding, grinding, trimming are not always in process when facility is operating)
   - 1/2 inch of material undergoes PM-producing operations per linear foot (very conservative estimate)
   - 3/16 inch depth is removed in PM-producing operations
   - fiberglass particulates density = 122 lbs/ft3
   - 50% of particles become airborne (conservative estimate since the majority of the particles are swept up and disposed as solid waste)
   - Assume particulate filters are 50% efficient (conservative)

   3000 hours/year X 75 ft/hour X .5/12 ft X 3/16/12 ft X 50% X 122 lbs/ft3 X 50% = 4468 lbs/year = 2.2 TPY

2. Other Styrene Emissions

   Other products, such as deck and hull putty and transom pour, contain styrene and are used in small quantities in fiberglass boat and boat part manufacture. Total styrene emissions from these sources is estimated at less than 200 lbs/year.

3. VOC Emissions: Methyl Ethyl Ketone Peroxide (MEKP)

   1.5 % MEKP is added to the resin and the gel coat as a catalyst. MEK, a VOC, is 3% of MEKP. The majority of the MEKP catalyzes and sets the resin with the MEKP being contained in the final cured hard product (fiberglass reinforced plastic).

   Emission Calculation:

   Even on a worst case condition, if all the MEK remained volatile were emitted the emissions would be:

   750,000 lbs/year resin and gel coat used X .015 (% of MEKP used as a catalyst to set the resin) X .03 (% of MEK to MEKP) = 338 lbs/year MEK emitted.

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Emissions Unit Information Section 1

ELSA INFO

Spray Lay-up and Gelcoat Application

Supplemental Requirements for All Applications

1. Process Flow Diagram :	Figure 3 App1
2. Fuel Analysis or Specification :	NA
3. Detailed Description of Control Equipment :	Part C App3
4. Description of Stack Sampling Facilities :	NA
5. Compliance Test Report :	NA
6. Procedures for Startup and Shutdown :	NA
7. Operation and Maintenance Plan :	Part D App3
8. Supplemental Information for Construction Permit Application :	App 3
9. Other Information Required by Rule or Statue :	NA

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operations :
11. Alterntive Modes of Operation (Emissions Trading) :

Department of
Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Identification of Facility Addressed in This Application

1. Facility Owner/Company Name :
   R. J. Dougherty Associates, Inc.

2. Site Name :
   Airpark Road Facility

3. Facility Identification Number : * [X] Unknown

4. Facility Location :
   R. J. Dougherty Associates Air Park Road Manufacturing Facility

   Street Address or Other Locator : 500 block of Air Park Road
   City Edgewater County : Volusia Zip Code : 32132

5. Relocatable Facility?
   [ ] Yes [X] No

6. Existing Permitted Facility?
   [ ] Yes [X] No

Owner/Authorized Representative or Responsible Official

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

Name : Stephen Dougherty
Title : Vice President

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

Organization/Firm : R. J. Dougherty Associates, Inc.
Street Address : 167 Bell Ave.
City : Oak Hill
State : FL Zip Code : 32759

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

Telephone :(904)345-4234 Fax : (904)345-4233

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the non-Title V sour*

_____ _____
Signature Date

* Attach letter of authorization if not currently on file.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type
No Id *	Spray Lay-up and Gelcoat Application +	

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 o

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

[X] 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 Fule 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 :

[X] 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.

Category IV : All Non-Federally Enforceable Air Operation

This Application for Air Permit is submitted to o

[ ] Initial air operation permit for one or more existing, but previously unpermitted, emissions units.

[ ] Initial air operation permit for one or more newly constructed or modified

Current construction permit number :

[ ] Air operation permit revision to address one or more newly constructed or modified emissions units.

Current construction permit number :

Operation permit to be revised :

[ ] Air operation permit renewal.

Operation permit to be renewed :

Application Processing Fee

Check one :

[X] Attached - Amount : $2000.00 [ ] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations : Boat Manufacturer
2. Projected or Actual Date of Commencement of Construction :
3. Projected Date of Completion of Construction :

Professional Engineer Certification

1. Professional Engineer Name : Carolyn S. Seringer Registration Number : 52097
2. Professional Engineer Mailing Address : Organization/Firm : Nelson Engineering Co. Street Address : 3655 Belle Arbor Circle City : Titusville State : FL Zip Code : 32780
3. Professional Engineer Telephone Numbers : Telephone : (321)269-1113 Fax : (321)269-0506

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 has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

_____ _____

Signature Date

(seal)

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact :

Name : Stephen Dougherty
Title : Vice President

2. Application Contact Mailing Address :

Organization/Firm : R. J. Dougherty Associates, Inc.
Street Address : 167 Bell Ave.
City : Oak Hill
State : FL Zip Code : 32759

3. Application Contact Telephone Numbers :

Telephone : (904)345-4234 Fax : (904)345-4233

Application Comment

Projected Construction Start Date: 3/15/00
Projected Construction Completion Date: 6/16/00
Initial Start-up Date: 7/15/00
(Program would not accept 2000 dates)

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility, Location, and Type

1. Facility UTM Coordinates : Zone : 17 East (km) : North (km) :			
2. Facility Latitude/Longitude : Latitude (DD/MM/SS) : 28 58 48 Longitude (DD/MM/SS) : 80 55 42			
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 :			
DEP Facility Comment			

Facility Contact

1. Name and Title of Facility Contact : Stephen Dougherty VIce President
2. Facility Contact Mailing Address : Organization/Firm : R. J. Dougherty and Associates, Inc Street Address : 167 Bell Ave City : Oak Hill State : FL Zip Code : 32759
3. Facility Contact Telephone Numbers : Telephone : (904)345-4234 Fax : (904)345-4233

Property Boundary

UTM Coordinates :

Zone : + East : km + North : km +

Building Identification

Identification of Building on Plot Plan or Flow Diagram :

+

Building Height : FT +

Building Boundary

UTM Coordinates :

Zone : + East : km + North : km +

Facility Contact

1. Name and Title of Facility Contact :

Name : Stephen Dougherty
Title : VIce President

2. Facility Contact Mailing Address :

Organization/Fir R. J. Dougherty and Associates, Inc
Street Addres 167 Bell Ave
City Oak Hill
State : FL Zip Code : 32759

3. Facility Contact Telephone Numbers :

Telephone : (904)345-4234 Fax : (904)345-4233

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

Facility Regulatory Classifications

1. Small Business Stationary Source?	Y
2. Title V Source?	Y
3. Synthetic Non-Title V Source?	N
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	N
5. Synthetic Minor Source of Pollutants Other than HAPs?	N
6. Major Source of Hazardous Air Pollutants (HAPs)?	Y
7. Synthetic Minor Source of HAPs?	N
8. One or More Emissions Units Subject to NSPS?	N
9. One or More Emission Units Subject to NESHAP?	Y
10. Title V Source by EPA Designation?	N
11. Facility Regulatory Classifications Comment : EPA intends to promulgate a fiberglass boat industry MACT pursuant to section 112(d).	
Ozone SIP Facility :	+
Annual Operating Report Required :	+

B. FACILITY REGULATIONS

Rule Applicability Analysis

B. FACILITY REGULATIONS

List of Applicable Regulations

CHAPTER 62-4, F.A.C.: PERMITS

CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR

CHAPTER 62-204, F.A.C.: STATE IMPLEMENTATION PLAN

CHAPTER 62-212, F.A.C.,: STATIONARY SOURCES - PRECONSTRUCTION REVIEW

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
H163	A

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 1

1. Pollutant Emitted :	H163
2. Requested Emissions Cap :	(lbs/hour) 40.0000 (tons/year)
3. Basis for Emissions Cap Code :	OTHER
4. Facility Pollutant Comment :	Based on doubling production capacity in new facility.

E. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location :	Figure 1, App 1
2. Facility Plot Plan :	Figure 2, App 1
3. Process Flow Diagram(s) :	Figure 3, App 1
4. Precautions to Prevent Emissions of Unconfined Particulate Matter :	App 2, Part A
5. Fugitive Emissions Identification :	App 2, Part B
6. Supplemental Information for Construction Permit Application :	App 3

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities :	App 4
8. List of Equipment/Activities Regulated under Title VI :	NA
9. Alternative Methods of Operation :	NA
10. Alternative Modes of Operation (Emissions Trading) :	NA
11. Identification of Additional Applicable Requirements :	NA
12. Compliance Assurance Monitoring Plan :	NA
13. Risk Management Plan Verification :	NA
14. Compliance Report and Plan :	NA
15. Compliance Certification (Hard-copy Required) :	NA

III. EMISSIONS UNIT INFORMATION

A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application +

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one :

[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one :

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[ ] 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.

[X] 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.

Emissions Unit Information Section 1

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section : * Spray Lay-up and Gelcoat Application Description of Emissions Unit for AIRS Tracking : + Spray Lay-up and Gelcoat Application		
2. Emissions Unit Identification Number : * [X] No Corresponding ID [ ] Unknown		
3. Emissions Unit Status Code : C *	4. Acid Rain Unit? [ ] Yes [X] No *	5. Emissions Unit Major Group SIC Code : 37 +
6. Emissions Unit Comment : DEP Emissions Unit Comment : Similar-Emissions Unit Identification Numbers for Fee Purposes : +		

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

Emissions Unit Control Equipment 1

1. Description : Emissions are reduced by using low styrene gel coat and resin, when possible. Some parts are also made in closed molds.
2. Control Device or Method Code : 102 *

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

Emissions Unit Details

1. Initial Startup Date :	
2. Long-term Reserve Shutdown Date :	
3. Package Unit : Manufacturer :	Model Number :
4. Generator Nameplate Rating :	MW
5. Incinerator Information : Dwell Temperature : Dwell Time : Incinerator Afterburner Temperature :	Degrees Fahrenheit Seconds Degrees Fahrenheit
Emissions Unit Type Code : 37 +	
Ozone SIP Base Emissions Unit : +	

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate :	mmBtu/hr	
2. Maximum Incinerator Rate :	lb/hr	tons/day
3. Maximum Process or Throughput Rate :	750000	lbs/yr
4. Maximum Production Rate :		
5. Operating Capacity Comment : Based on using 750,000 lbs/yr of resin and gel coat.		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule :	
10 hours/day	6 days/week

	50 weeks/year	3,000 hours/year

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

Rule Applicability Analysis

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

List of Applicable Regulations

CHAPTER 62-4 F.A.C. - PERMITS

CHAPTER 62-210 F.A.C. - STATIONARY SOURCES - GENERAL REQUIREMENTS

CHAPTER 62-103 F.A.C. - RULES OF ADMINISTRATIVE PROCEDURE

CHAPTER 296 F.A.C. - STATIONARY SOURCES - EMISSION STANDARDS

CHAPTER 62-213 F.A.C. - OPERATION PERMITS FOR MAJOR SOURCES

CHAPTER 62-204 F.A.C. - STATE IMPLEMENTATION PLAN

CHAPTER 62-212 F.A.C. - PRECONSTRUCTION REVIEW

C. EMISSION POINT (STACK/VENT) INFORMATION

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Emission Point Description and Type :

1. Identification of Point on Plot Plan or Flow Diagram :	Lamination Building
2. Emission Point Type Code :	3 *
3. Descriptions of Emission Points Comprising this Emissions Unit :	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common : Eight (8) vent stacks on lamination building.	
5. Discharge Type Code :	V
6. Stack Height :	36 feet
7. Exit Diameter :	3.00 feet
8. Exit Temperature :	85 °F *
9. Actual Volumetric Flow Rate :	6,500 acfm
10. Percent Water Vapor :	%
11. Maximum Dry Standard Flow Rate :	dscfm
12. Nonstack Emission Point Height :	feet
13. Emission Point UTM Coordinates : Zone : 17 East (km) :	North (km) :
Good Engineering Practice Height :	+
14. Emission Point Comment :	

The vent stacks on the north side of the building (4 stacks) will discharge at 44.33 feet above the ground; the vent stacks on the south side (4 stacks) will discharge at 36 feet above ground.

F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

Segment Description and Rate : Segment 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Resin and Gel Coat Application	
2. Source Classification Code (SCC) : 30101899 *	
3. SCC Units : lbs/pound styrene used	
4. Maximum Hourly Rate :	5. Maximum Annual Rate :
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : Percent Sulfur Limit : +	8. Maximum Percent Ash :
9. Million Btu per SCC Unit :	
10. Segment Comment :	

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

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

low solvent coatings

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1
Spray Lay-up and Gelcoat Application

Pollutant Detail Information : Pollutant 1

1. Pollutant Emitted : **H163** *

2. Total Percent Efficiency of Control : %

3. Potential Emissions :
lb/hour 40.000000 tons/year

4. Synthetically Limited?
[ ] Yes [X] No

5. Range of Estimated Fugitive/Other Emissions: 3
25.00 to 100.00 tons/year

6. Emissions Factor :
Reference : DARM-PER/GEN37
Unit Code : % **

7. Emissions Method Code : 5 *

8. Calculations of Emissions :
600,000 lbs of resin * 42% Styrene * 20% (Em. Factor) = 50400 lb/yr 42,000
150,000 lbs gel coat *35% Styrene * 48% (Em. Factor) = 25200 lb/yr 22,770
Total Styrene Emissions = 75600 lb/yr = 40 TPY 64,770 32

9. Pollutant Potential/Estimated Emissions Comment :

Closed mold process emissions reductions were not taken into account.

Emissions Unit Information Section

Pollutant Information Section

Allowable Emissions

1. Basis for Allowable Emissions Code :	*	
2. Future Effective Date of Allowable Emissions :		
3. Requested Allowable Emissions and Units : Allowable Emissions Unit :	*	*
4. Equivalent Allowable Emissions :	lb/hour	tons/year
5. Method of Compliance :		
Compliance Method Code : +*	Compliance Test Frequency :	+*
Fequency Base Date : +		
Regulation :		+*
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :		

Emissions Unit Information Section _____

Pollutant Information Section _____

Allowable Emissions Information Section _____

Test Methods

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section _____

Visible Emissions Limitation : Visible Emissions Limitation _____

1. Visible Emissions Subtype : *
2. Basis for Allowable Opacity : *
3. Requested Allowable Opacity : Normal Conditions : % Exceptional Conditions : % Maximum Period of Excess Opacity Allowed : min/hour
4. Method of Compliance :
5. Visible Emissions Comment : Compliance Test Frequency : + Frequency Base Date : + COM Required : + Regulation : +*

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section _____

Continuous Monitoring System Continuous Monitor _____

1. Parameter Code : *	2. Pollutant(s):
3. CMS Requirement	CMS Requirement Code : +
4. Monitor Information Manufacturer : Model Number Serial Number	
5. Installation Date :	
6. Performance Specification Test Date :	
7. Continuous Monitor Comment :	
Performance Specification Test Status : + Certification Date (DD-MON-YYYY) : +	

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

Emissions Unit Information Section 1

Spray Lay-up and Gelcoat Application

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

[ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code :		
PM :	SO2 :	NO2 :
4. Baseline Emissions :		
PM :	lb/hour	tons/year
SO2 :	lb/hour	tons/year
NO2 :		tons/year
5. PSD Comment :		

12. Identification of Additional Applicable Requirements :
13. Compliance Assurance Monitoring Plan :
14. Acid Rain Application (Hard-copy Required) :

NA	Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
NA	Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
NA	New Unit Exemption (Form No. 62-210.900(1)(a)2.)
NA	Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)