

Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castillo
Secretary

FILE

June 24, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Milind Dange, Vice President
Product Development & Engineering
Sea Ray Boats, Inc.
200 Sea Ray Boulevard
Merritt Island, FL 32954

Re: Cape Canaveral Plant Permit Application 0090093-007-AC, Building 101

Dear Mr. Dange:

On May 26, 2004 the Department received your air construction permit application to allow fiberglass boat repairs at the Cape Canaveral Plant in Building 101. The following additional information is needed for the continued processing of this application:

1. On page 9 of the application, please explain why the entire facility emissions of volatile organic compounds (VOCs), hazardous air pollutants (HAPs), and styrene are classified as "SM" (synthetic minor) when the facility is designated as major source of air pollutants on page 8 of the application. If this is an error, please submit a corrected application page with the appropriate pollutant classification code listed.
2. On page 9 of the application, a facility-wide emissions cap is requested for VOCs, HAPs, and styrene. However, if a facility-wide emissions cap is requested, application section II.B. EMISSIONS CAPS (on page 10) must be completed. This section was not completed. Please complete this section on page 10, or submit a corrected page 9.
3. There is no identification of fugitive emissions as required on page 11 under "Additional Requirements for Air Construction Permit Application". Please explain what repair activities might generate fugitive particulate emissions, such as drilling, sawing, or sanding, and what precautions will be taken to control any fugitive emissions.
4. Item 2 on page 14 of the application, the "Description of Emissions Units Addressed in the Section", states only "Fiberglass Boat Repair." Since the requested name for the emissions unit is "Building 101", please provide a description of the entire building and the intended use of each of the following areas: south side; north side; and north side covered area. If there are exhaust vents on the north side of the building that will not be used, a statement of this should also be included.
5. Section III.C. EMISSION POINT (STACK/VENT) INFORMATION on page 17 of the application was listed as "NA" because "All emission will occur inside a building." However, since the building is listed as the emission unit, please describe the building stacks/vents or other identifiable locations (e.g., open doors) at which pollutants are discharged to the atmosphere. Please provide the dimensions of the open doorways on each end of the south side of the building.

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Mr. Milind Dange, Vice President
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6. Please provide a building diagram for Building 101 and identify any emissions points such as, fan exhaust stacks, vents, and doors, etc. Please include the entire building.

7. On page 18, of the application, please provide Source Classification Codes (SCC) for this process. There are general Surface Coating Application SCCs for paints and adhesives in the range of 4-02-001-01 to 4-02-007-10 that might be applicable. The SCC for Acetone as a solvent is 4-02-009-02. The SCCs for Fiberglass Resin Products range from 3-08-007-20 to 3-08-007-24.

8. The requested capacity is to repair 60 boats per year. However, as stated in section 2.0 of Part II (Additional Requirements Comments), "...individual repairs vary greatly due to the type and extent of water damage." Please request appropriate material usage limits instead of a request for a limit on the number of boats prepared. These material usage limits should correspond to the annual VOC and HAPs emissions limits requested, and should be broken into logical categories such as, production resins, tooling resins, pigmented gel coats, clear gel coats, tooling gelcoats, adhesives, solvents, and paints, etc. Please also indicate how these materials will be applied such as atomized spray, non-atomized spray, hand layup, etc.

As a reminder, rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.


Within 45 days of receipt of this letter, please submit all requested information to me at the Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If you have any questions regarding this request for additional information, please contact me at (850) 921-9534 or Cindy.Phillips@dep.state.fl.us.

Sincerely,



Cindy L. Phillips, P.E.
Bureau of Air Regulation

C: Ken Kosky, P.E., Golder Assoc.
Randy Clunie, Sea Ray Boats
Len Kozlov, FDEP-CD
Tom Mulligan, FDEP-CD

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1. Article Addressed to: Mr. Milind Dange, Vice President Product Development & Engineering Sea Ray Boats, Inc. 200 Sea Ray Boulevard Merritt Island, Florida 32954	B. Received by (Printed Name) <u>P. SZAPOR</u> C. Date of Delivery <u>6/28</u>
2. Article Number <u>7000 1670 0013 3110 3445</u> <i>(Transfer from service label)</i>	D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below <div style="text-align: center;">  </div>
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Mr. Milind Dange, Vice President
Street, Apt. No., or PO Box No
200 Sea Ray Boulevard
City, State, ZIP+4
Merritt Island, Florida 32954

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See Reverse for Instructions