AIR CONSTRUCTION PERMIT APPLICATION
FOR THE
CAPE CANAVERAL REPAIR FACILITY
SEA RAY BOATS, INC.
BREVARD COUNTY, FLORIDA

Prepared For:

Sea Ray Boats, Inc.
1200 Sea Ray Drive
Merritt Island, Florida 32953

Prepared By:

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

May 2004

0437569-0200

DISTRIBUTION:
4 Copies – FDEP
1 Copy – Sea Ray – Cape Canaveral
1 Copy – Sea Ray - Knoxville
1 Copy – Golder Associates Inc.

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PERMIT APPLICATION

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **Sea Ray Boats, Inc**
2. Site Name: **Cape Canaveral Plant**
3. Facility Identification Number: **0090093**
4. Facility Location...:
   Street Address or Other Locator: **1200 Sea Ray Drive**
   City: **Merritt Island** County: **Brevard** Zip Code: **32953**
5. Relocatable Facility? ☐ Yes ☒ No
6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Mr. Randy Clunie, EHS Director**
2. Application Contact Mailing Address...
   Organization/Firm: **Sea Ray Boats, Inc.**
   Street Address: **2600 Sea Ray Boulevard**
   City: **Knoxville** State: **TN** Zip Code: **37914**
3. Application Contact Telephone Numbers...
   Telephone: **(865) 971-6241** ext. Fax: **(865) 971-6434**
4. Application Contact Email Address: **Randy.Clunie@searay.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	5-26-04
2. Project Number(s):	0090093-007-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

☒ Air construction permit.

Air Operation Permit

☐ Initial Title V air operation permit.
☐ Title V air operation permit revision.
☐ Title V air operation permit renewal.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

☐ Air construction permit and Title V permit revision, incorporating the proposed project.
☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This application is for a minor source air construction permit to allow boat repair to be conducted at the Cape Canaveral Plant. See Part II.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	Building 101	AC1F	NA

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
   Mr. Milind Dange, Vice President of Product Development & Engineering
2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **Sea Ray Boats, Inc.**
   Street Address: **200 Sea Ray Boulevard**
   City: **Merritt Island** State: **FL** Zip Code: **32954**
3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(321) 452-9876** ext. Fax: **(321) 453-5609**
4. Owner/Authorized Representative Email Address: **milind.dange@searay.com**
5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. 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 and all other requirements identified in this application to which the facility is subject. 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 the facility or any permitted emissions unit.

   Signature

   5/25/04
   Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
   - ☐ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
   - ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
   - ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
   - ☐ The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

4. Application Responsible Official Telephone Numbers...
   Telephone: ( ) - ext. Fax: ( ) -

5. Application Responsible Official Email Address:

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

   Signature Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Kennard F. Kosky**
   Registration Number: **14996**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Golder Associates Inc.****
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext.**545** Fax: **(352) 336-6603**
4. Professional Engineer Email Address: **kkosky@golder.com**
5. 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 pollution 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.

(3) If the purpose of this application is to obtain a Title V 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 plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal 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.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Kennard F. Kosky — Signature

5/24/04 — Date

(seal) KFK

* Attach any exception to certification statement.

** **Board of Professional Engineers Certificate of Authorization #00001670**

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone **17** East (km) **531.85** North (km) **3114.15**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **37**	6. Facility SIC(s): **3732**
7. Facility Comment : **The Cape Canaveral Plant was determined to be part of Sea Ray Boats Merritt Island facilities, that consist of the Merrit Island Plant, Production Development and Engineering (PD&E) Plant and Sykes Creek Plant. The Cape Canaveral Plant was perviously issued an Air Construction/PSD Permit No. 0090093-003-AC; PSD-FL-274.**			

Facility Contact

1. Facility Contact Name: **Milind Dange, Vice President of Product Development & Engineering**
2. Facility Contact Mailing Address... Organization/Firm: **Sea Ray Boats, Inc.** Street Address: **200 Sea Ray Drive** City: **Merritt Island** State: **FL** Zip Code: **32953**
3. Facility Contact Telephone Numbers: Telephone: **(321) 452-9876** ext. Fax: **(321) 453-5609**
4. Facility Contact Email Address: **milind.dange@searay.com**

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. ☒ Title V Source	
4. ☒ Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☒ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☐ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☒ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: **The Sea Ray facilities located in Merrit Island are subject to the NESHAPS for Boat Manufacturing (40 CFR Part 63 Subpart VVVV).**	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Volatile Organic Compounds-VOCs	**SM**	**Y**
Total Hazardous Air Pollutants (HAPS)	**SM**	**Y**
H163 - Styrene	**SM**	**Y**

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:____ ☒ Previously Submitted, Date:____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:____ ☐ Previously Submitted, Date:____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:____ ☐ Previously Submitted, Date:____

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: ☐ Attached, Document ID:____ ☒ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: ☒ Attached, Document ID:**See Part II**
3. Rule Applicability Analysis: ☒ Attached, Document ID:**See Part II**
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:____ ☐ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
   ☐ Attached, Document ID:____ ☐ Not Applicable (revision application)
2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
   ☐ Attached, Document ID:____
   ☐ Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
   ☐ Attached, Document ID:____
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
   ☐ Attached, Document ID:____
   ☐ Equipment/Activities On site but Not Required to be Individually Listed
   ☐ Not Applicable
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:____ ☐ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID:____ ☐ Not Applicable

Additional Requirements Comment

See Part II.

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☒ 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.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (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.

☒ 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.

2. Description of Emissions Unit Addressed in this Section: **Fiberglass Boat Repair**

3. Emissions Unit Identification Number: **002**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		**7/1/04**	**37**	☐ Yes ☒ No

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **The Cape Canaveral Plant will be used to repair Brunswick Corporation boats that have been distributed to dealers.**

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
2. Control Device or Method Code(s):

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate:	million Btu/hr
4. Maximum Incineration Rate:	pounds/hr tons/day
5. Requested Maximum Operating Schedule:	
hours/day	days/week
weeks/year	**8,760**hours/year
6. Operating Capacity/Schedule Comment: **The amount of materials used during boat repairs will be variable. The maximum number of boats repairs in any consecutive 12 month period will be 60.**	

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **NA**		2. Emission Point Type Code: **4**
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **F**	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)
15. Emission Point Comment: **All emission will occur inside a building.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Transportation Equipment**		
2. Source Classification Code (SCC): **314**	3. SCC Units: **NA**	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **The boats being repaired have been previously distributed to dealers.**		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC			EL
HAPS			EL
H163			EL

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour **3.1** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **See Part II** Reference: **See Part II**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **See Part II**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **The emissions of total HAPS will be limited to 1.1 tons/year and a single HAP (styrene) will be limited to less than 0.5 tons/year.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **Other**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **3.1 tons/year VOC**	4. Equivalent Allowable Emissions: lb/hour **3.1** tons/year
5. Method of Compliance: **Recordkeeping**	
6. Allowable Emissions Comment (Description of Operating Method): **Total HAPS and Styrene will be limited to 1.1 tons/year and less than 0.5 tons/year, respectively.**	

Allowable Emissions Allowable Emissions _____ of _____

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

Allowable Emissions Allowable Emissions _____ of _____

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

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

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

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

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

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☒ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☒ Not Applicable

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ Previously Submitted, Date: _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☒ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute
   ☐ Attached, Document ID: **See Part II** ☐ Not Applicable

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID: _____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements
   ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: _____ ☐ Not Applicable
4. Alternative Modes of Operation (Emissions Trading)
   ☐ Attached, Document ID: _____ ☐ Not Applicable
5. Acid Rain Part Application
   ☐ Certificate of Representation (EPA Form No. 7610-1)
      ☐ Copy Attached, Document ID: _____
   ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Not Applicable

Additional Requirements Comment

See Part II.

PART II

APPLICATION FOR AIR CONSTRUCTION PERMIT
SEA RAY BOATS, INC. – CAPE CANAVERAL PLANT

1.0 INTRODUCTION

Sea Ray Boats, Inc. (Sea Ray) owns a plant located at 1200 Sea Ray Drive, Merritt Island, Brevard County, Florida. The plant was constructed under an air construction permit and Prevention of Significant Deterioration (PSD) issued by Florida Department of Environmental Protection (FDEP) as a fiberglass boat manufacturing plant (DEP File No. 0090093-003-AC; PSD-FL-274). The fabrication and lamination building (identified as Emission Unit 001 and Building 101) was constructed but equipment necessary for the fabrication and lamination of fiberglass boats was never installed and the plant was never operated. The FDEP was notified by Sea Ray that the plant would not be used to manufacture fiberglass boats as authorized in the original air construction/PSD permit. In November 2003, Sea Ray requested and FDEP issued an exemption to allow the plant to be used to repair fiberglass boats. This air construction permit application is submitted to the FDEP to obtain formal authorization of the fiberglass boat repair operation. The sections that follow provide a summary description of theboat repair operations, as well as addressing rule applicability.

2.0 DESCRIPTION OF ACTIVITY

The Cape Canaveral Plant will be used to perform water-related repairs on existing Brunswick Boat Group boats. These boats have been in service for various periods and there is a need to remove water and make repairs. The water damage is generally between the exterior and the interior portions of the hull near and below the waterline. During the construction of the hull, mats of thin balsa wood are laid in patterns and impregnated with fiberglass resin. The balsa wood layer is between the fiberglass exterior and interior portions of the hull. The combined fiberglass and balsa wood layer produces a structurally strong hull. This balsa layer is where the water must either be removed or the water damage that has already occurred must be repaired.

The procedure will involve first placing the boats in the large Cape Canaveral building that has sufficient space to house the boat away from any rainfall. Moisture meters and infrared imaging devices are used to determine where the moisture is inside the laminate of each boat. It also determines the point of ingress of the water into the boat. Once this is complete, the determination is made of where and how many holes are necessary to vent and draw the moisture out of the laminate using high-pressure vacuum technology. The drying process is monitored closely to determine that

sufficient moisture has been removed. If the vacuum system is not drying the laminate sufficiently, a determination is made whether to remove a larger section of the laminate or remove the wet core completely and replace with new laminate. Replacing laminate is more time consuming than using only the vacuum system. The bulk of the repairs involve the use of resins and putties to repair the structural components of the hull. Where needed, gel coats (bilge and/or exterior) are applied. Where needed, gunks are applied. Where carpet and other coverings are removed to expose water damage, adhesives are used to replace the coverings. Although rare, stringer(s) may occasionally be replaced within a boat. Bottom paints are used, as necessary, to complete the final repairs on the exterior portions of the hull at and below the waterline. Prior to returning the boats to the dealers/customers, the boats would be detailed and cleaned with waxes, buffing compound, polishing compounds, and various cleaners. The overall repairs can take several days to over a month, depending upon the amount of repairs necessary.

These processes will result in minor emissions of volatile organic compounds (VOCs), total hazardous air pollutants (HAPs), and the maximum amount for a single HAP (i.e., styrene). Table 1 presents the calculations for repairing 60 boats. The maximum annual VOC, total HAPs, and styrene emissions are 3.09, 1.091, and 0.496 tons per year (TPY), respectively. The calculations are based on typical average repairs, but individual repairs vary greatly due to the type and extent of water damage. Unlike the production of boats, individual repairs are uncertain since the total extent of the damage cannot be determined precisely from measurements. The emission activity is separate and distinct from the current operations at the Merritt Island Facility that consist of boat manufacturing.

3.0 RULE APPLICABILITY

The Sea Ray Merritt Island Facility is classified as a Title V source (Final Permit No. 0090093-004-AV) and consists of the Merritt Island Plant, the Product and Development Engineering Plant (P.D.E), and the Sykes Creek Plant. These plants are located at 100, 200, and 350 Sea Ray Drive, respectively, and regulated as one emission unit. Beginning in August 22, 2004, the production plants are subject to the applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPS) codified in 40 CFR Part 63, Subpart VVVV. The facility has an emission limit for VOCs of 426 TPY.

The Cape Canaveral Plant is located at 1200 Sea Ray Drive about 1.2 miles east of the three other Merritt Island plants. The previous air construction/PSD permit for the Cape Canaveral Plant was

issued by FDEP as a major modification of an existing major PSD source. This air construction permit application for boat repairs is being requested as a minor modification of an existing major source. The amount of emissions increase being requested is below the thresholds for a generic exemption pursuant to Rule 62-210.300(3)(b) of 5 TPY for VOCs, 1.25 TPY for total HAPs, and 0.5 TPY for a single HAP.

While the applicability of NESHAPS Subpart VVVV may be questionable for the repair of boats based on the definitions in these regulations, Sea Ray is committed to use gel coats, resins, adhesives, and other materials that would comply with Subpart VVVV for this request. The materials used at the Cape Canaveral Plant during the boat repair will be used in the determination of compliance with Subpart VVVV for the Merritt Island Facility.

4.0 PROPOSED PERMIT CONDITIONS

Because this air construction is being requested as a minor modification to the existing Merritt Island Facility, permit conditions similar to that authorized in the current Title V Permit is being proposed. These proposed conditions are presented below:

Essential Potential to Emit (PTE) Parameters

B1. Capacity. The Cape Canaveral Plant is authorized to completely repair 60 Brunswick Corporation Boats per twelve consecutive months.
[Rule 62-210.200, (PTE), F.A.C.]

B2. Hours of Operation. The repairs can be conducted for 8,760 hours/year.
[Rule 62-210.200, (PTE), F.A.C.

Emission Limitations and Standards

B3. The emissions of volatile organic compounds (VOC/OS), HAPs and single HAP as defined in Chapter 62-213, F.A.C., from the sources at the facility shall not exceed 3.2 tons, 1.2 tons and 0.5 tons, respectively per twelve consecutive months.

Monitoring of Operations

B4. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

Recordkeeping and Reporting Requirements

B5. In order to demonstrate compliance with conditions no. B3, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

a) count of boats completely repaired

b) consecutive twelve month total of VOC and HAP emission rates

[Rules 62-4.070(3)]

B6. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSD sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request.

The log and documents shall be kept at the facility for at least five years and made available to the Department. The monthly log shall be completed by the end of the following month.

[Rules 62-4.070(3)]

Table 1. Cape Canaveral Repair Facility Annual Emissions Calculations

Description	Amount (pounds)	Chemical	VOC	HAP	Pecent	Amount Chemical (pounds)	Emission Factor	VOC Emissons (pounds)	HAP Emissions (pounds)	Styrene Emissions (pounds)
Gel Coats - Various Bilge Gel Coats	780	Styrene	X	X	27.09%	211.30	48%	101.425	101.425	101.425
	780	Ethyl Benzene	X	X	1.00%	7.80	48%	3.744	3.744	
Gel Coats - Various Artic White Gel Coats	3,810	Styrene	X	X	21.21%	808.10	48%	387.888	387.888	387.888
	3,810	Methyl Methacrylate	X	X	10.00%	381.00	100%	381.000	381.000	
	3,810	Other: VOC	X		1.00%	38.10	100%	38.100		
	3,810	Hydroquinone	X	X	0.10%	3.81	100%	3.810	3.810	
Resins	10,700	Styrene	X	X	34.00%	3,638.00	11%	400.180	400.180	400.180
Resin Based Bonding Puttys	3,810	Styrene	X	X	21.00%	800.10	11%	88.011	88.011	88.011
Resin Based Bonding Gunks	90	Styrene	X	X	17.00%	15.30	100%	15.300	15.300	15.300
Bonding Putty Filler	2,000	Other:VOC	X		17.10%	342.00	100%	342.000		
Catalysts	200	Other: VOC	X		2.00%	4.00	100%	4.000		
	200	Dimethyl Phthalate	X	X	43.00%	86.00	0%	0.086	0.086	
	200	Methyl Ethyl Ketone	X	X	2.00%	4.00	100%	4.000	4.000	
Dyes (Tracers)	500	Other: VOC	X		93.00%	465.00	100%	465.000		
Polyvinyl Alcohol (PVA)--Part-All #10	550	Other:VOC	X		37.00%	203.50	100%	203.500		
Adhesives - HAPs	200	Methyl Methacrylate	X	X	8.00%	16.00	100%	16.000	16.000	
	200	Dibutyl Phthalate	X	X	70.00%	140.00	0%	0.140	0.140	
	200	Other: VOC	X	X	10.00%	20.00	100%	20.000	20.000	
Adhesives and Sealants- VOCs only	500	Other: VOC	X		25.00%	125.00	100%	125.000		
Spray Adhesives	200	Other: VOC	X		66.00%	132.00	100%	132.000		
	200	Acetone			13.00%	26.00	100%			
Primers - Metal	430	Ethyl Benzene	X	X	5.00%	21.50	100%	21.500	21.500	
	430	xylene	X	X	40.00%	172.00	100%	172.000	172.000	
	430	Cumene	X	X	0.15%	0.65	100%	0.645	0.645	
	430	Other: VOC	X		55.00%	236.50	100%	236.500		
Primers - Etching Metal	400	Other: VOC	X		82.00%	328.00	100%	328.000		
Primers - Fiberglass	500	MDI	X	X	10.00%	50.00	100%	50.000	50.000	
	500	Methyl Isobutyl Ketone	X	X	55.00%	275.00	100%	275.000	275.000	
	500	Xylene	X	X	0.35%	1.75	100%	1.750	1.750	
	500	Cumene	X	X	0.15%	0.75	100%	0.750	0.750	
Bottom Paint	4,410	Ethylene Glycol Monobutyl Eth	X	X	5.00%	220.50	100%	220.500	220.500	
	4,410	Other: VOC	X		3.00%	132.30	100%	132.300		
Waxes, Buffing Compounds & Polishing Compounds	1,000	xylene	X	X	1.00%	10.00	100%	10.000	10.000	
	1,000	Other: VOC	X		99.00%	990.00	100%	990.000		
Cleaners - VOC/HAPs containing	150	various (no styrene)	X	X	6.00%	9.00	100%	9.000	9.000	
Cleaners - VOCs only	4,000	various	X		25.00%	1,000.00	100%	1,000.000		
Solvent & Thinner - Non-VOCs	7,050	Acetone			100.00%	7,050.00	100%			
							Total Emissions (pounds)	6,179.129	2,182.729	992.804
							Total Emissions (tons)	3.090	1.091	0.496

Golder Associates Inc.

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Golder Associates

TRANSMITTAL LETTER

To: Linda Granger
Sea Ray Boats, Inc.
Cape Canaveral Facility

Date: May 24, 2004
Project No.: 0437569-0200

Sent by: **nav**

- ☐ Mail
- ☐ Air Freight
- ☐ Hand Carried
- ☐ UPS
- ☒ Federal Express

Per: **KFK**

Quantity	Item	Description
6	**Bound Final**	**Boston Whaler Revision to Title V Air Operating Permit Application**

Remarks:

Please have Milind Dange sign page 4 where flagged and forward the 4 copies to Al Linero at FDEP. His address is:

Mr. Al Linero, P.E.
FDEP
111 South Magnolia Drive, Ste 4
Tallahassee, FL 32301

cc: **R. Clunie, Sea Ray Boats-Knoxville**

Y:\Projects\2004\0437569 SeaRay-BostonWhaler\4\4.1\T051704.doc

C. Phillips
J. Kaylor, CO