

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

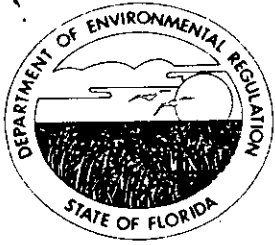
TO: Steve Smallwood
FROM: Clair Fancy *I signed for Steve as he is on vacation*
DATE: June 20, 1990
SUBJ: Modification of Permit Number: AC 05-151435
Sea Ray Boats, Inc.

Attached for your approval and signature is a letter modifying the emission factors of Sea Ray Boat's permit for their Sykes Creek boat plant. The new factors more accurately reflect the actual emissions from the facility.

I recommend your approval and signature.

CF/JR/plm

Attachment



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

June 20, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John A. Cronkhite
Sr. Vice President/General Counsel
Sea Ray Boats, Inc.
2600 Sea Ray Blvd.
Knoxville, TN 37914

Dear Mr. Cronkhite:

Re: Revised Emission Factors - Sykes Creek Facility
(Permit No. AC 05-151435)

The above permit is amended as stated below to reflect the revised emission factors in your letter dated May 7, 1990:

Present Specific Condition No. 4:

4. Hydrocarbon emissions (VOC) shall not exceed the following calculated values and total VOC emissions from the facility shall not exceed 30 lbs/hr, 480 lbs/day (30 day average), and 57.5 tons/year. Compliance shall be demonstrated by applying the following raw material utilization rates and emission factors over a 90-day period:

	Utilization Rate lbs/hr	Emission Factor	Emissions lbs/hr
Styrene (Resin)	119.5	0.06	7.17
Styrene (Gel Coat)	14.9	0.30	4.46
Methyl Methacrylate	49.5	0.05	2.48
MEKP	4.7	0.10	0.47
1,1,1-Trichloroethane	3.5	0.60	2.10
Acetone	6.25	1.00	6.25
Bottom Paint	11.7	0.60	7.02

New Specific Condition No. 4:

4. Hydrocarbon emissions (VOC) shall not exceed the following calculated values and total VOC emissions from the facility shall not exceed 30 lbs/hr, 480 lbs/day (30 day average), and 57.5 tons/year. Compliance shall be demonstrated by applying the following raw material utilization rates and emission factors over a 90-day period.

Mr. John A. Cronkhite
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June 20, 1990

New Specific Condition No. 4 cont'd:

	Utilization Rate lbs/hr	Emission Factor	Emissions lbs/hr
Styrene (Resin)	119.5	0.06	7.17
Styrene (Gel Coat)	14.9	0.30	4.46
Methyl Methacrylate	49.5	0.05	2.48
MEKP	4.7	0.10	0.47
1,1,1-Trichloroethane	3.5	0.67	2.34
Acetone	6.3	1.00	6.30
Bottom Paint	11.7	0.60	7.02

Present Specific Condition No. 8:

8. By January 31, 1990, Sea Ray Boats shall submit a conceptual plan and potential course of action that will provide the Department with reasonable assurance that objectionable odors and toxic air pollutants in quantities that could exceed acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan should contain at a minimum, but not be limited to, various control system strategies that might be installed to reduce or eventually eliminate emissions of VOC/OS from each type of operation, associated time and cost analyses, and VOC/OS substitutes.

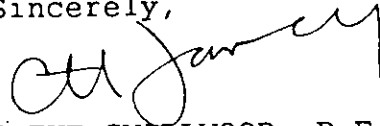
New Specific Condition No. 8:

8. By January 31, 1991, Sea Ray Boats shall submit a conceptual plan and potential course of action that will provide the Department with reasonable assurance that objectionable odors and toxic air pollutants in quantities that could exceed acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to F.A.C. Rules 17-2.200 and 17-2.620(1) and (2). The plan should contain at a minimum, but not be limited to, various control system strategies that might be installed to reduce or eventually eliminate emissions of VOC/OS from each type of operation, associated time and cost analyses, and VOC/OS substitutes.

Mr. John A. Cronkhite
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This amendment letter shall become attachment No. 3 to your construction permit AC 05-151435.

Sincerely,



for STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/JR/plm

c: C. Collins, Central District
G. E. Cantelou, Jr., P.E.

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: John A. Cronkhite Sr. Vice Pres. / Gen. Counsel Sea Ray Boats, Inc. 2600 Sea Ray Blvd. Knoxville, TN 37914	4. Article Number P 256 396 105
5. Signature - Address X <i>[Signature]</i>	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X <i>[Signature]</i>	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery 6-25	8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 *U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 256 396 105
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

U.S.G.P.O. 1989-234-555

Step 1 Name John A Cronkhite	
Street and No. Sea Ray Boats	
P.O., State and ZIP Code 2600 Sea Ray Blvd.	
Postage Knoxville TN	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date 6-22-90 AC 05-151435	

PS Form 3800, June 1985



RECEIVED

MAY 17 1990

DER-BAQM

May 7, 1990

Mr. Clair Fancy
Chief Bureau of Air Regulation
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: AC05-151435
Sea Ray Boats, Inc.
Sykes Creek Plant
Merritt Island, Florida

Dear Mr. Fancy:

Please accept this letter as a formal request for two modifications to the referenced construction permit.

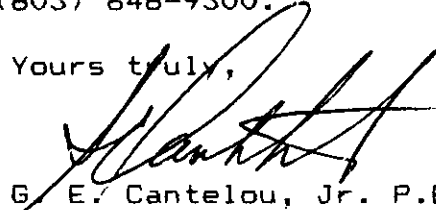
We have had discussions with Mr. Collins and Mr. Turner of the DER district office and are advised that we should have our construction permit modified to cover an exceedance discovered due to an underestimate of carpet glue required in the manufacture of certain models of boats. Be advised that our original estimates (those contained in the construction permit application) were based entirely on theory since these boats had not been built before, and the actual use the glue was about ten percent greater than originally projected.

We therefore request that the facilities permitted emission rate of 1,1,1-trichloroethane be modified to 2.34 #/hr over an 8 hour period instead of 2.10 #/hr over a 16 hour period (permitted rate).

We also request that Specific Condition #8's due date be extended, since it was our intent to produce an air model using the parameters of the operation permit to demonstrate acceptable ambient concentrations.

Thank you for your considerations. If you have any questions, please call me at (803) 648-9300.

Yours truly,


G. E. Cantelou, Jr. P.E.

cc: J. Reynolds
C. Collins
B. Andrews

401 Park Ave. S.W. / P.O. Box 3102 / Aiken, S.C. 29802 / (803) 648-9300

CANTELOU ASSOCIATES

ENGINEERING - PLANNING

401 Park Ave. S.W. / P.O. Box 3102 / Aiken, S.C. 29802



Mr. Clair Fancy
Chief Bureau of Air Regulation
FL Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL. 32399-2400