

Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

July 17, 1989

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Cronkhite:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for the after-the-fact construction of a fiberglass boat plant and development facility at Merritt Island, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/JR/s

Attachments

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

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permits by:

Sea Ray Boats, Inc.
Sea Ray Drive
Merritt Island, FL 32953

DER File Nos. AC 05-165270
AC 05-165271

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits (copies attached) for the proposed projects as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Sea Ray Boats, Inc., applied on May 19, 1989, to the Department of Environmental Regulation for after-the-fact permits to construct a fiberglass boat plant and development facility in Merritt Island, Brevard County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits are required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permits. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

C. Collins, Central Dist.
G. E. Cantelou, Jr., P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on July 17, 1989.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Martha Illie July 17, 1989
Clerk Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Sea Ray Boats, Inc., for after-the-fact construction of a fiberglass boat building plant and development facility in Merritt Island, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's

final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The applications are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Sea Ray Boats, Inc.
Brevard County
Merritt Island, Florida

Fiberglass Boat Plant and Development Facility
Permit Numbers:
AC 05-165270
AC 05-165271

Florida Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Quality Management
Central Air Permitting

July 17, 1989

I. Application Information

A. Applicant

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

B. Request

The Department received applications on May 19, 1989, for permits to construct a fiberglass boat plant and development facility at the applicant's site in Merritt Island, Florida. The applications were deemed complete on June 16, 1989.

C. Location/Classification

The applicant's boat plant and development facility (SIC Code 3732) is located off State Road 3 near the Canaveral Port Authority in Merritt Island. Latitude and longitude of the boat plant are 28°24'32" N and 80°42'23"W, respectively, while the latitude and longitude of the development facility are 28°24'22"N and 80°42'08"W, respectively.

II. Project Description/Emissions

Fiberglass pleasure boats are manufactured by the applicant using an airless mold injection method. Laminations of resin and fiberglass are applied over gel coat before the wooden and foam structural parts are installed. After lamination the boats are extracted from their molds and trimmed of excess material. Upholstered parts are then prepared and used in the final assembly along with parts manufactured elsewhere.

Fiberglass boat manufacturing generates particulate emissions (sawdust from wood working and fiberglass from grinding). A new high efficiency dust collection system is being installed in the boat plant to replace existing dust control equipment. It will recover essentially all of the particulate emitted.

Fiberglass boat manufacturing also generates hydrocarbon (VOC/OS: volatile organic compounds/organic solvents) emissions from various operations (i.e., molding, clean-up, etc.). The potential VOC/OS emissions from the boat plant and development facility are projected to be 176 tons per year. Because the majority of the fiberglass industry in Florida have been using dilution air to purge production buildings of their VOC/OS emissions (toxic) with no additional controls, the Department is approaching the point at which control strategies are going to be imposed to reduce, if not eliminate, these emissions. Therefore,

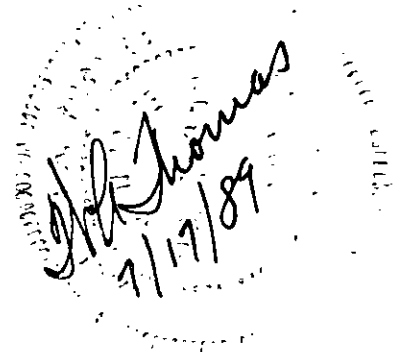
in an attempt to minimize impacts, the Department is going to require that the applicant submit a conceptual plan and potential course of action that will provide the Department with reasonable assurance that objectionable odors and toxic air pollutants in quantities that could exceed acceptable ambient concentrations will not be discharged off of the facility's property boundary or where the public has access, whichever is closest, pursuant to Florida Administrative Code (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/options that might be retrofitted/installed to reduce or eventually eliminate emissions of VOC/OS from each type of operation, associated time and cost analyses, and VOC/OS substitutes.

III. Rule Applicability

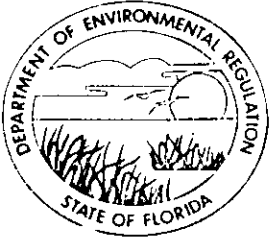
The construction permit applications are subject to review under Chapter 403, Florida Statutes, and F.A.C. Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for all of the regulated air pollutants. Since the boat plant and development facility are classified as minor (total emissions less than 250 TPY), they are not subject to the new source review requirements of Rule 17-2.500. Applicable rules are (1) F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements; (2) F.A.C. Rule 17-2.610, General Particulate Emission Limiting Standards; and (3) F.A.C. Rule 17-2.620, General Pollutant Emission Limiting Standards.

IV. Conclusion

Based on the information provided by Sea Ray Boats, Inc., the Department has reasonable assurance that the boat plant and development facility, as specified herein, and subject to the conditions proposed herein, will not cause or contribute to a violation of an ambient air quality standard, PSD increment, or any other technical provisions of Chapter 17-2 of the Florida Administrative Code.



A circular stamp is partially visible, containing the text "DEPARTMENT OF ENVIRONMENTAL PROTECTION" around the perimeter. Overlaid on the stamp is a handwritten signature that appears to read "J. P. Thomas" and the date "7/17/89".



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

PERMITTEE:
Sea Ray Boats, Inc.
Sea Ray Drive
Merritt Island, FL 32953

Permit Number: AC 05-165270
Expiration Date: March 31, 1990
County: Brevard
Latitude/Longitude: 28°24'32"N
80°42'23"W
Project: Fiberglass Boat Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the after-the-fact construction of a facility to produce fiberglass boats. This facility is located near the Canaveral Port Authority in Merritt Island, Brevard County, Florida. The UTM coordinates of this site are Zone 17, 529 km E and 3,142 km N.

The source shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachment:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on May 19, 1989.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165270
Expiration Date: March 31, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165270
Expiration Date: March 31, 1990

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165270
Expiration Date: March 31, 1990

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165270
Expiration Date: March 31, 1990

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The plant shall be allowed to operate for up to 3,840 hours per year.

3. Visible emissions from the dust collection system shall not be greater than 5% opacity and compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165270
Expiration Date: March 31, 1990

SPECIFIC CONDITIONS:

4. Hydrocarbon emissions (VOC) shall not exceed the following calculated values and total VOC emissions from the facility shall not exceed 65.5 lbs/hr, 1048 lbs/day (30 day average), and 125.8 tons/year. Compliance shall be demonstrated by applying the following raw material utilization rates and emission factors:

	Utilization Rate lbs/hr	Emission Factor	Emissions lbs/hr
Styrene (Resin)	272.5	0.06	16.4
Styrene (Gel Coat)	37.7	0.30	11.3
Methyl Methacrylate	125.7	0.05	6.3
Methylene Chloride	2.5	0.30	0.8
Aromatic Hydrocarbon	21.9	0.16	3.5
1,1,1-Trichloroethane	2.5	0.60	1.5
Acetone	24.4	1.00	24.4
Xylene	21.9	0.06	1.3

5. Nonvolatile acetone substitutes shall be used to the maximum extent practicable to further reduce the quantity of acetone consumed.

6. No air pollutants shall be discharged which cause or contribute to an objectionable odor (F.A.C. Rule 17-2.620(2)).

7. The dust collector compliance test shall be conducted within 90 days after this permit is issued and the results reported to the Department's Central District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the test.

8. VOC compliance shall be demonstrated over a 90-day period and the results reported to the Department's Central District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the commencement of the 90-day compliance demonstration period.

9. Six months from the date of the construction permit, 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/options that might be retrofitted/installed to reduce or eventually eliminate emissions of VOC/OS from each type of operation, associated time and cost analyses, and VOC/OS substitutes.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165270
Expiration Date: March 31, 1990

SPECIFIC CONDITIONS:

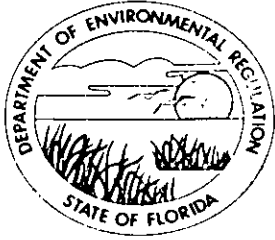
10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

11. An application for an operation permit must be submitted to the Central District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. 17-4.220).

Issued this _____ day
of _____, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

Sea Ray Boats, Inc.
Sea Ray Drive
Merritt Island, FL 32953

Permit Number: AC 05-165271
Expiration Date: March 31, 1990
County: Brevard
Latitude/Longitude: 28°24'22"N
80°42'08"W

Project: Development Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the after-the-fact construction of a facility to develop prototypes for new fiberglass boats. This facility is located near the Canaveral Port Authority in Merritt Island, Brevard County, Florida. The UTM coordinates of this site are Zone 17, 529 km E and 3,142.3 km N.

The source shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachment:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on May 19, 1989.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165271
Expiration Date: March 31, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165271
Expiration Date: March 31, 1990

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165271
Expiration Date: March 31, 1990

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Sea Ray Boats

Permit No. AC 05-165271
Expiration Date: March 31, 1990

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The plant shall be allowed to operate for up to 3,840 hours per year.

3. Visible emissions from the dust collection system shall not be greater than 5% opacity and compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

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SPECIFIC CONDITIONS:

4. Hydrocarbon emissions (VOC) shall not exceed the following calculated values and total VOC emissions from the facility shall not exceed 26.2 lbs/hr, 420 lbs/day (30 day average), and 50.5 tons/year. Compliance shall be demonstrated by applying the following raw material utilization rates and emission factors:

	Utilization Rate lbs/hr	Emission Factor	Emissions lbs/hr
Styrene (Resin-AME)	10.2	0.06	0.6
Styrene (Resin-RCI)	40.8	0.06	2.5
Styrene (Gel coat)	6.4	0.30	1.9
Methyl Methacrylate	18.3	0.05	0.9
1,1,1-Trichloroethane	0.2	0.68	0.1
Acetone	20.1	1.00	20.1
Toluene	0.2	0.08	0.02
Misc.	0.1	1.00	0.1

5. Nonvolatile acetone substitutes shall be used to the maximum extent practicable to further reduce the quantity of acetone consumed.

6. No air pollutants shall be discharged which cause or contribute to an objectionable odor (F.A.C. Rule 17-2.620(2)).

7. VOC Compliance shall be demonstrated over a 90-day period and the results reported to the Department's Central District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the commencement of the 90 day compliance demonstration period.

8. The dust collector compliance test shall be conducted within 90 days after this permit is issued and the results reported to the Department's Central District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the test.

9. Six months from the date of the construction permit, 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/options that might be retrofitted/installed to reduce or eventually eliminate emissions of VOC/OS from each type of operation, associated time and cost analyses, and VOC/OS substitutes.

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SPECIFIC CONDITIONS:

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

11. An application for an operation permit must be submitted to the Central District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. 17-4.220).

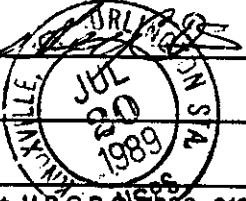
Issued this _____ day
of _____, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

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. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge)		2. <input type="checkbox"/> Restricted Delivery (Extra charge)	
3. Article Addressed to: Mr. John A. Cronkhite Sr. Vice President/General Counsel Sea Ray Boats, Inc. 2600 Sea Ray Blvd. Knoxville, TN 37914		4. Article Number P 938 762 621	
		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	
Always obtain signature of addressee or agent and DATE DELIVERED.			
5. Signature - Addressee X <i>[Signature]</i>		8. Addressee's Address (ONLY if requested and fee paid)	
6. Signature - Agent X			
7. Date of Delivery			



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

P 938 762 621

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to Mr. John A. Cronkhite, Sea Ray Boats	
Street and No. 2600 Sea Ray Drive	
P.O., State and ZIP Code Knoxville, TN 37914	
Postage	S
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 Mailed: 7-17-89 Permit: AC 05-165270 AC 05-165271	

PS Form 3800, June 1985