

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 *CF*

DATE: November 7, 1990

SUBJ: Amendments to Construction Permits AC 05-165270 and -271  
Sea Ray Boats, Inc.

Attached for your approval and signature is a letter extending expiration dates and modifying emission limits for the above referenced construction permits.

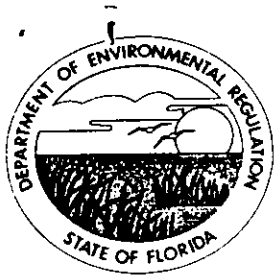
The Bureau recommends approval of this amendment.

CF/JR/plm

Attachment

*OK / Thank you*  
*AB*  
*11-9-90*  
*Signed*  
*11/8/90*

*688*  
*This looks*  
*OK BJA*



# 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

November 8, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Cronkhite:

The Department received your September 13, 1990, request for an extension of the expiration dates and revision of emission limits for the construction permits referenced below. The request is acceptable and the following shall be changed:

<u>PROJECT</u>	<u>FROM</u>	<u>TO</u>
AC 05-165270	September 30, 1990	December 31, 1990
AC 05-165271	September 30, 1990	December 31, 1990

Specific Condition No. 4 (AC 05-165270):

FROM:

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

Mr. John A. Cronkhite  
Page 2

TO:

Hydrocarbon emissions (VOC) shall not exceed the following calculated values and total VOC emissions from the facility shall not exceed 60.7 lbs/hr, 971.2 lbs/day (30 day average), and 105.6 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)	258.9	0.06	15.5
Styrene (Gel Coat)	49.3	0.30	14.8
Methyl Methacrylate	94.8	0.05	4.7
Toluene	9.5	0.08	0.8
1,1,1-Trichloroethane	9.5	0.68	6.4
Acetone	11.6	1.00	11.6
Paints (Misc.)	16.8	0.41	6.9

Specific Condition No. 4 (AC 05-165271):

FROM:

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

TO:

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:

Mr. John A. Cronkhite  
Page 3

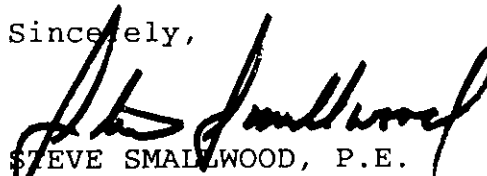
	Utilization Rate lbs/hr	Emission Factor	Emissions lbs/hr
Styrene (Resin-AME)	10.2	0.06	0.6
Styrene (Resin-RCI)	40.8	0.06	2.5
Styrene (Gel coat)	6.4	0.30	1.9
Methyl Methacrylate	18.3	0.05	0.9
1,1,1-Trichloroethane	0.6	0.68	0.4
Acetone	19.8	1.00	19.8
Toluene	0.6	0.08	0.05
Misc.	0.1	1.00	0.1

Attachment to be Incorporated:

Letters from Sea Ray Boats, Inc. dated September 13, 1990 requesting a change in the expiration dates and emission limits.

A copy of this letter must be attached to the above construction permits and shall become a part of these permits.

Sincerely,



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

SS/JR/plm

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



RECEIVED

DEC 31 1990

December 27, 1990 DER-BAQM

Mr. John Reynolds  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Sea Ray Boats, Inc.  
Completeness Summary Air Pollution Sources  
A005-165270  
Merritt Island Plant  
Merritt Island, Florida

Dear Mr. Reynolds:

Please reference the letter of Mr. Steve Smallwood dated November 8, 1990. We respectfully request the correction of a typographic error in Specific Condition No. 4 (AC 05-165271) stating 105.6 tons/year to 116.5 tons/year (60.7 lbs/hr X 3840 hrs/year).

If you require additional information, please advise.

Yours truly,

A handwritten signature in dark ink, appearing to read "GEC", is written over the typed name.

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

GEC/sc

Enclosures

cc: Mr. John Turner, Orlando



RECEIVED

SEP 17 1990

September 13, 1990

DER-BAQM

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

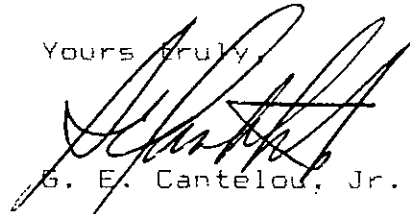
RE: AC05-165271  
Sea Ray Boats, Inc.  
Product Development & Engineering  
Merritt Island, Florida

Dear Mr. Fancy:

We respectfully request and extension on the expiration date while the permit applications are being considered.

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

Yours truly,



G. E. Canteiou, Jr. P.E.

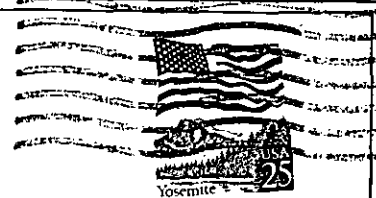
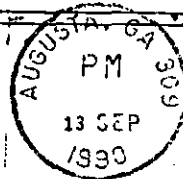
GEC/sc

*J. Reynolds*  
*C. Collins, C. Dist*

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

**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. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to: John A. Cronkhite, Sr. U.P. Sea Ray Boats, Inc. 2600 Sea Ray Blvd. Knoxville, TN 37914	4. Article Number P 256 396 231
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	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>SM-COS</i>	
7. Date of Delivery <i>11-16-90</i>	

PS Form 3811, Apr. 1989      \*U.S.G.P.O. 1989-238-815      **DOMESTIC RETURN RECEIPT**

P 256 396 231  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

U.S.G.P.O. 1989-234-585

Sent to	<i>John Cronkhite</i>
Street and No.	<i>Sea Ray Boats</i>
R.O. State and ZIP Code	<i>Knoxville, TN</i>
Postage	\$
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	\$
Postmark or Date	<i>11-14-90</i> <i>AC 05-165270</i> <i>11 271</i>

PS Form 3800, June 1985





RECEIVED  
SEP 14 1990  
DER-BAQM

September 13, 1990

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

RE: AC05-165270  
Sea Ray Boats, Inc., Merritt Island Facility  
Merritt Island, Florida

Dear Mr. Fancy:

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

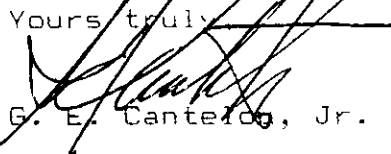
The construction permit application was based on to initial estimates of the materials to produce boats at the referenced facility, due to production variances these estimates need to be modified. For example, the glue originally intended for use had contents of 60% 1,1,1-trichloroethane and 30% Methylene Chloride, the actual glue now in use is a product consisting of 68% 1,1,1-trichloroethane and 8% Toluene.

We request the following modifications:

- 1) The modifications reflected on the sheets marked "Revised per modification request" reflect the actual usage.
- 2) That all styrene emissions (contained in resin & gelcoat) be grouped together to determine compliance.
- 3) Compliance be determined on a ninety day average of utilization.

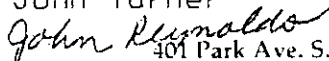
If you find this request for modification acceptable please substitute page four, Exhibit "A", and Exhibit "D" marked "REVISED" in the permit application.

We also respectfully request and extension on the expiration date while the permit applications are being considered. Thank you for your considerations. If you have any questions, please call me at (803) 648-9300.

Yours truly,  
  
G. E. Canteio, Jr. P.E.

GEC/sc

cc: John Turner



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

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL PACKAGE TRACKING NUMBER

8056407660

8056407660

RECIPIENT'S COPY

Date: 9-13-90

From (Your Name) Please Print: PETE CANTELOU  
 Company: CANTELOU ASSOCIATES  
 Street Address: 101 PARK AVE SW  
 City: GAINESVILLE State: FL ZIP Required: 32601

Your Phone Number (Very Important): (803) 648-9300  
 Department/Floor No: 2

To (Recipient's Name) Please Print: MR. CLAIR FANCY  
 Company: FLA. DEPT. OF ENVIRONMENTAL C  
 Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip \* Codes):  
 2600 BLAIRSTONE ROAD  
 City: TALLAHASSEE State: FL ZIP Required: 32399-2400

Recipient's Phone Number (Very Important): (904) 488-1111  
 Department/Floor No:

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)

IF HOLD FOR PICK-UP, Print FEDEX Address Here  
 Street Address:  
 City: State: ZIP Required:

PAYMENT 1  Bill Sender 2  Bill Recipient's FedEx Acct No 3  Bill 3rd Party FedEx Acct No 4  Bill Credit Card  
 5  Cash

SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING	PACKAGES	WEIGHT in Pounds Only	YOUR DECLARED VALUE	DATE	Federal Express Usa Basic Charges
Priority Overnight Service (Delivery by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 16 <input type="checkbox"/> FEDEX LETTER 12 <input checked="" type="checkbox"/> FEDEX PAK * 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Service (Formerly Standard Air) (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY SERVICE † Delivery commitment may be later in some areas	Standard Overnight Service (Delivery by next business afternoon) 51 <input type="checkbox"/> 56 <input type="checkbox"/> FEDEX LETTER * 52 <input type="checkbox"/> FEDEX PAK * 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE Heavyweight Service (for Extra Large or any package over 150 lbs.) 70 <input type="checkbox"/> HEAVYWEIGHT ** 80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT ** † Declared Value Limit \$100 ** Call for delivery schedule	1 <input type="checkbox"/> HOLD FOR PICK-UP (if in Box #) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) (CSS not available for Dangerous Goods Shipments) 5 <input type="checkbox"/> CONSTANT SURVEILLANCE SVC. (CSS) (Extra charge) (Release Signature Not Applicable) 6 <input type="checkbox"/> DRY ICE _____ lbs 7 <input type="checkbox"/> OTHER SPECIAL SERVICE _____ 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)	Total Total Total	DIM SHIPMENT (for weight & extra charges) <input type="checkbox"/> Regular Size <input type="checkbox"/> Extra Large <input type="checkbox"/> Call Ship	Emp No Date <input type="checkbox"/> Cash Receipt <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg To Del <input type="checkbox"/> Chg To Hold Street Address City State Zip Received By Date/Time Received FedEx Employee Number Release Signature FedEx Emp No	Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 11/89 PART #119501 EXLM 003 FORMAT #014 <b>014</b> © 1989 F.E.C. PRINTED IN U.S.A.	



RECEIVED

SEP 11 1990

September 7, 1990 DER-BAQ...

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

RE: AC05-165271  
Sea Ray Boats, Inc.  
Product Development & Engineering  
Merritt Island, Florida

Dear Mr. Fancy:

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

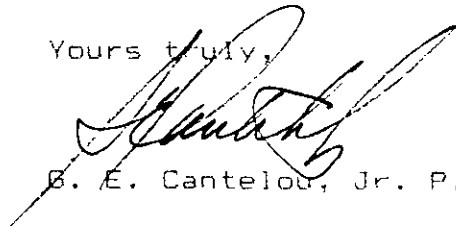
Since P. D. & E. engineers and builds prototypes and does not manufacture a specific line of boats, the original estimates on the construction permit were based entirely on theory. We request the following modifications:

- 1) The permit be revised to group all styrene emissions (contained in resin & gelcoat) together regardless of brand to determine compliance. Various types and combinations of resins and gelcoats are used.
- 2) Due to an underestimate on the amount of glue used we request that the facilities permitted emission rate of 1,1,1-trichloroethane/toluene be modified to 0.63 #/hr which would modify emissions to 0.43 #/hr for 1,1,1-trichloroethane and 0.05 #/hr for toluene.

If you find this request for modification acceptable please substitute page four, Exhibit "A", and Exhibit "D" marked "REVISED" in the permit application.

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

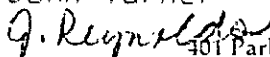
Yours truly,



B. E. Cantelou, Jr. P.E.

GEC/sc

cc: John Turner



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



RECEIVED

SEP 11 1990

September 7, 1990 DER-BAC

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

RE: AC05-165271  
Sea Ray Boats, Inc.  
Product Development & Engineering  
Merritt Island, Florida

Dear Mr. Fancy:

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- 2) Due to an underestimate on the amount of glue used we request that the facilities permitted emission rate of 1,1,1-trichloroethane/toluene be modified to 0.63 #/hr which would modify emissions to 0.43 #/hr for 1,1,1-trichloroethane and 0.05 #/hr for toluene.

*No.  
different emission  
factors*

If you find this request for modification acceptable please substitute page four, Exhibit "A", and Exhibit "D" marked "REVISED" in the permit application.

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

Yours truly,

B. E. Cantelou, Jr. P.E.

GEC/sc

cc: John Turner

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