



October 12, 2012

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DIVISION OF AIR
RESOURCE MANAGEMENT

Via Electronic Submittal

Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399
Jeff.Koerner@dep.state.fl.us

RE: **Cape Canaveral** - Application for Air Construction Permit and
New Title V Air Operation Permit for Wood Coating Operations;
and — **Project Nos. 0090238-001 AC / 0090238-002 AV**
Sykes Creek/PD&E - Request for Revision of Title V Air
Operation Permit for Existing Fiberglass Boat Manufacturing
Facility (Merritt Island Complex; Facility No. 0090093) — **Project No - 0090093-016 AV**

Dear Jeff:

Sea Ray Boats, Inc., sincerely appreciates your cooperation and assistance over the last few weeks, and based on our discussions is hereby submitting an application to the Department for issuance of an air construction permit and a new Title V air operation permit for its Cape Canaveral wood coating operations and a separate application for revision of the current Title V air operation permit for its Sykes Creek and PD&E fiberglass boat manufacturing facility (referred to as the Merritt Island Complex; Facility No. 0090093).

We appreciated meeting with you, Brian Accardo, Justin Green, and Caroline Shine (via telephone) on September 18, 2012, regarding our wood coating operations at the Cape Canaveral site, as well as our follow-up discussions to develop a path forward. Those discussions have been helpful and productive, and we look forward to working with you and others within the Department over the next few weeks to complete the permitting actions for the Cape Canaveral site and the Sykes Creek/PD&E facility.

As we have discussed, Sea Ray's wood coating operations at the Cape Canaveral site were originally authorized by the Department under an air construction permit issued in 2006 and have been ongoing since early 2007. The wood coating operations occur within Building 102 and Sea Ray has additional storage in Building 103 at the Cape Canaveral site. As we discussed during our meeting, Sea Ray Boats is seeking the Department's concurrence that going forward and upon issuance of a new air construction permit, Sea Ray's wood coating operations at the Cape Canaveral site may be considered a separate facility (no longer combined with the

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Sykes Creek and PD&E facility located approximately 1.3 miles away) and a minor (area) source. Sea Ray is proposing site-specific limits on its emissions of volatile organic compounds (VOCs) and individual and combined hazardous air pollutants (HAPs) to ensure minor (area) source status for its wood coating operations at the Cape Canaveral site. As suggested by the Department, Sea Ray is also requesting that that a Title V permit be issued in parallel with the air construction permit because these wood coating operations are existing and Sea Ray is not requesting authority for any additional construction activities.

Based on our discussions with you and others at the Department, we understand that the Department will include specific language in the Cape Canaveral permits to clarify and confirm that from the time of permit issuance moving forward Sea Ray's Cape Canaveral wood coating operations will be considered a separate facility from the Sykes Creek/PD&E facility (referred to as the Merritt Island Complex) and will also be considered a minor (area) source for VOCs and HAPs based on the new limits being established. The Department will also include language to clarify and confirm that the *only* reason a Title V permit is being required is because the boat manufacturing NESHAP (40 CFR 63 Subpart VVVV) applied to boat repair operations that occurred at the Cape Canaveral site in the past, Subpart VVVV will apply to the Cape Canaveral site in the future if boat manufacturing operations are undertaken regardless of the area source status, and therefore the site is considered a Title V source. A Title V permit is required only because of the Subpart VVVV applicability and not because of the site's potential emissions.

As suggested by the Department, Sea Ray is also submitting the enclosed application requesting a Title V air operation permit revision for the existing Sykes Creek and PD&E facility, referred to as the Merritt Island Complex, Facility ID No. 0090093. Specifically, Sea Ray is requesting that the current Sykes Creek/PD&E Title V permit be revised to omit all references to the Cape Canaveral wood coating operations. As an attachment to the application, Sea Ray has included a marked-up version of the current Title V permit to clarify the specific changes being requested. New language to be added to the permit is shown with underlining and requested deletions are shown with strike-throughs.

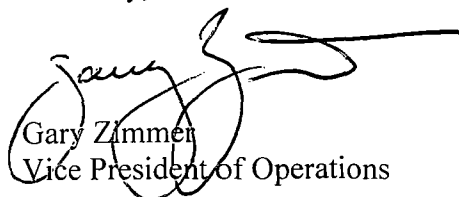
As required by the Department's rules, we will send three copies of the entire application, including one with original signature pages, via overnight delivery, to your offices in Tallahassee. One hard copy will be sent overnight to the District's office in Orlando. If you would like any additional copies, please do not hesitate to let us know.

Thank you in advance for your review and consideration of the attached applications. If you or others at the Department have any questions or need any additional information to process the applications, please contact our Director of Environmental Health and Safety, Randy Clunie, immediately so he can follow-up with the requested information. He can be reached at randy.clunie@searay.com or 423-884-6631, ext # 3103.

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As we have discussed, Sea Ray is hoping to begin selling the wood products manufactured at the Cape Canaveral site to markets other than boat manufacturers in the near future, although those sales will not begin until after the Department has issued the new air construction permit for that site establishing its separate facility and minor (area) source status. We look forward to working closely with the Department over the next few weeks in an effort to expedite issuance of the requested permits to the extent possible. Thank you again for your cooperation and assistance.

Sincerely,



Gary Zimmer
Vice President of Operations

cc: Brian Accardo, DEP, brian.accardo@dep.state.fl.us
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