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DIVISION OF AIR RESOURCE MANAGEMENT

TRANSMITTAL

**Date:** October 12, 2012      **Project No.:** 123-87674  
**To:** Jeffery Koerner      **Company:** FDEP  
**From:** Sal Mohammad      **Address:** 2600 Blair Stone Road  
    Tallahassee, FL 32399  
**RE: PERMIT APPLICATIONS FOR MERRITT ISLAND COMPLEX AND CAPE CANAVERAL PLANT**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Federal Express ( <u>priority</u> , standard, 2-day, 3-day) | <input type="checkbox"/> U.S. Mail     |
| <input type="checkbox"/> UPS  | <input type="checkbox"/> Courier       |
| <input type="checkbox"/> DHL  | <input type="checkbox"/> Hand Delivery |
| <input type="checkbox"/> Email _____  | <input type="checkbox"/> Other _____   |

Quantity	Item	Description
3	Bound copies	Permit application for Merritt Island Complex
3	Bound copies	Permit application for Cape Canaveral Plant

Notes:

Title V revision application for the Merritt Island Boat Building Complex (Facility ID No. 0090093) to remove the Cape Canaveral Plant from the complex. A separate application is submitted for the Cape Canaveral Plant. Both applications should be processed concurrently.

Please advise us if enclosures are not as described.

ACKNOWLEDGEMENT REQUIRED:

- Yes       No

Y:\Projects\2012\123-87674 SRB MI AC\T101212\_674.docx



# APPLICATION FOR AIR PERMIT FOR THE CAPE CANAVERAL PLANT

**Sea Ray Boats, Inc.  
Merritt Island, Florida**

**Prepared For:** Sea Ray Boats, Inc.  
1200 Sea Ray Drive  
Merritt Island, FL 32953

**Submitted By:** Golder Associates Inc.  
6026 NW 1st Place  
Gainesville, FL 32607 USA

**Distribution:** 3 copies – FDEP Tallahassee  
1 copy – FDEP Orlando  
2 copies – Sea Ray Boats, Inc.  
1 copy – Golder Associates Inc.

**October 2012**

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**APPLICATION FOR AIR PERMIT**

**LONG FORM**



# Department of Environmental Protection **RECEIVED**

Division of Air Resource Management

OCT 15 2012

## APPLICATION FOR AIR PERMIT - LONG FORM

DIVISION OF AIR RESOURCE MANAGEMENT

### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

**Air Operation Permit** – Use this form to apply for:

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

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>Sea Ray Boats, Inc.</b>	
2. Site Name: <b>Cape Canaveral Plant</b>	
3. Facility Identification Number: <b>0090238</b>	
4. Facility Location... Street Address or Other Locator: <b>1200 Sea Ray Drive</b> City: <b>Merritt Island</b> County: <b>Brevard</b> Zip Code: <b>32953</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Mr. Randy Clunie, EHS Director</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Sea Ray Boats, Inc.</b> Street Address: <b>100 Sea Ray Circle</b> City: <b>Vonore</b> State: <b>TN</b> Zip Code: <b>37885</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(423) 884-6631 ext.3103</b> Fax: <b>(423) 884-6701</b>	
4. Application Contact E-mail Address: <b>Randy.Clunie@searay.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application: <b>10-15-2012</b>	3. PSD Number (if applicable):
2. Project Number(s): <b>0090238-01-AC</b>	4. Siting Number (if applicable):

**0090238-002-AV**

## APPLICATION INFORMATION

### Purpose of Application

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

#### **Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

#### **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 the purpose of requesting a separate air construction and initial air operating permit for the Cape Canaveral Plant, which is currently operating under Title V Permit No. 0090093-015-AV that was combined with the Product Development and Engineering Plant, and the Sykes Creek Plant. There are no changes to the Cape Canaveral Plant. The permit application also requests a facility-wide cap on VOC and HAPs emissions from the Cape Canaveral Plant.**

# APPLICATION INFORMATION

## Scope of Application

<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>	<b>AirPermit Processing Fee</b>
	Wood Shop / UV Wood Coating and Curing	AC1D	N/A

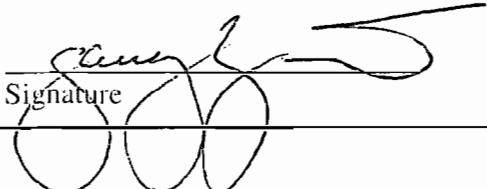
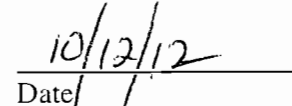
### Application Processing Fee

Check one:  Attached - Amount: \$ \_\_\_\_\_  Not Applicable

**APPLICATION INFORMATION**

**Owner/Authorized Representative Statement**

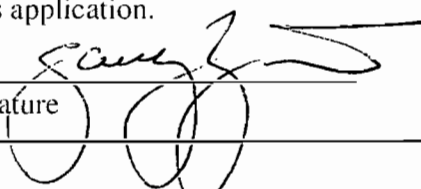
**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name : <b>Gary Zimmer, Vice President of Operations, Recreational Boat Group</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>Sea Ray Boats, Inc.</b> Street Address: <b>350 Sea Ray Drive</b> City: <b>Merritt Island</b> State: <b>FL</b> Zip Code: <b>32953</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(321) 459-2930</b> ext. <b>5638</b> Fax: <b>(321) 452-6158</b>
4. Owner/Authorized Representative E-mail Address: <b>garry.zimmer@searay.com</b>
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>   Signature  Date

## APPLICATION INFORMATION

### Application Responsible Official Certification

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

1. Application Responsible Official Name: <b>Gary Zimmer, Vice President of Operations, Recreational Boat Group</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> 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. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>Sea Ray Boats, Inc.</b> Street Address: <b>350 Sea Ray Drive</b> City: <b>Merritt Island</b> State: <b>FL</b> Zip Code: <b>32953</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(321) 459-2930</b> ext. <b>5638</b> Fax: <b>(321) 452-6158</b> ext.
5. Application Responsible Official E-mail Address: <b>garry.zimmer@searay.com</b>
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 <u>10/12/12</u>



# APPLICATION INFORMATION

## Professional Engineer Certification

1. Professional Engineer Name: <b>Kennard F. Kosky</b> Registration Number: <b>14996</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates Inc.**</b> Street Address: <b>6026 NW 1st Place</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32607</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352)336-5600</b> ext. <b>21156</b> Fax: <b>(352)336-6603</b>
4. Professional Engineer E-mail Address: <b>Ken_Kosky@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, 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.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, 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 <input type="checkbox"/>, 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.</i> <i>(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 <input type="checkbox"/>, 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.</i>  Signature: <u><i>Kennard F. Kosky</i></u> Date: <u>10/12/12</u> (seal)

\* 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 <b>17</b> East (km) <b>531.83</b> North (km) <b>3142.3</b>		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) <b>28°24'24.2"N</b> Longitude (DD/MM/SS) <b>80°40'30.2"W</b>	
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>24</b>	6. Facility SIC(s): <b>2434, 2435, 2436, 2439, 2452, 2499, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, 2431 and others</b>
7. Facility Comment : <b>The Cape Canaveral Plant consists of a wood shop/UV wood coating and UV curing operation contained in Buildings 102 and 103.</b>			

#### Facility Contact

1. Facility Contact Name: <b>Jim Anderson, Cape Canaveral Wood Shop Manager</b>			
2. Facility Contact Mailing Address... Organization/Firm: <b>Sea Ray Boats, Inc.</b> Street Address: <b>1200 Sea Ray Drive</b> City: <b>Merritt Island</b> State: <b>FL</b> Zip Code: <b>32953</b>			
3. Facility Contact Telephone Numbers: Telephone: <b>(321) 459-1714</b> ext. Fax: <b>(321) 449-5221</b>			
4. Facility Contact E-mail Address: <b>jim.anderson@searay.com</b>			

#### 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 E-mail Address:			

**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. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input type="checkbox"/> Title V Source	
4. <input type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:  <p>The Cape Canaveral plant is currently authorized under Title V Permit No. 0090093-015-AV. Based on the emissions potential, the Cape Canaveral Plant is a minor source of air pollutants including HAPs.</p> <p>As part of the combined facility under Title V Permit No. 0090093-015-AV, the Cape Canaveral Plant previously was subject to 40 CFR 63, Subpart VVVV, National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing. However, the Cape Canaveral Plant has not conducted operations as a fiberglass boat repair facility since 2009. Emissions from the Cape Canaveral Plant were always below the major source thresholds for HAP emissions.</p>	

**List of Pollutants Emitted by Facility**

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
VOC	B	N
PM	B	N
PM10	B	N
HAP	B	N

**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's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
VOC	Y			30	OTHER
HAPS	Y			9	OTHER

7. Facility-Wide or Multi-Unit Emissions Cap Comment:  
**Facility-wide emissions limit requested by Sea Ray Boats.**

## C. FACILITY ADDITIONAL INFORMATION

### Additional Requirements for All Applications, Except as Otherwise Stated

<p>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)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <b>SR-FI-C1</b> <input type="checkbox"/> Previously Submitted, Date: _____</p>
<p>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)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <b>SR-FI-C2</b> <input type="checkbox"/> Previously Submitted, Date: _____</p>
<p>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)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <b>SR-FI-C3</b> <input type="checkbox"/> Previously Submitted, Date: _____</p>

### Additional Requirements for Air Construction Permit Applications

<p>1. Area Map Showing Facility Location:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)</p>
<p>2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL):</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <b>Part B</b> _____</p>
<p>3. Rule Applicability Analysis:</p> <p><input checked="" type="checkbox"/> Attached, Document ID: <b>Part B</b> _____</p>
<p>4. List of Exempt Emissions Units:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)</p>
<p>5. Fugitive Emissions Identification:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>

### C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

#### Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:  
 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 Onsite 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

**C. FACILITY ADDITIONAL INFORMATION (CONTINUED)**

**Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program**

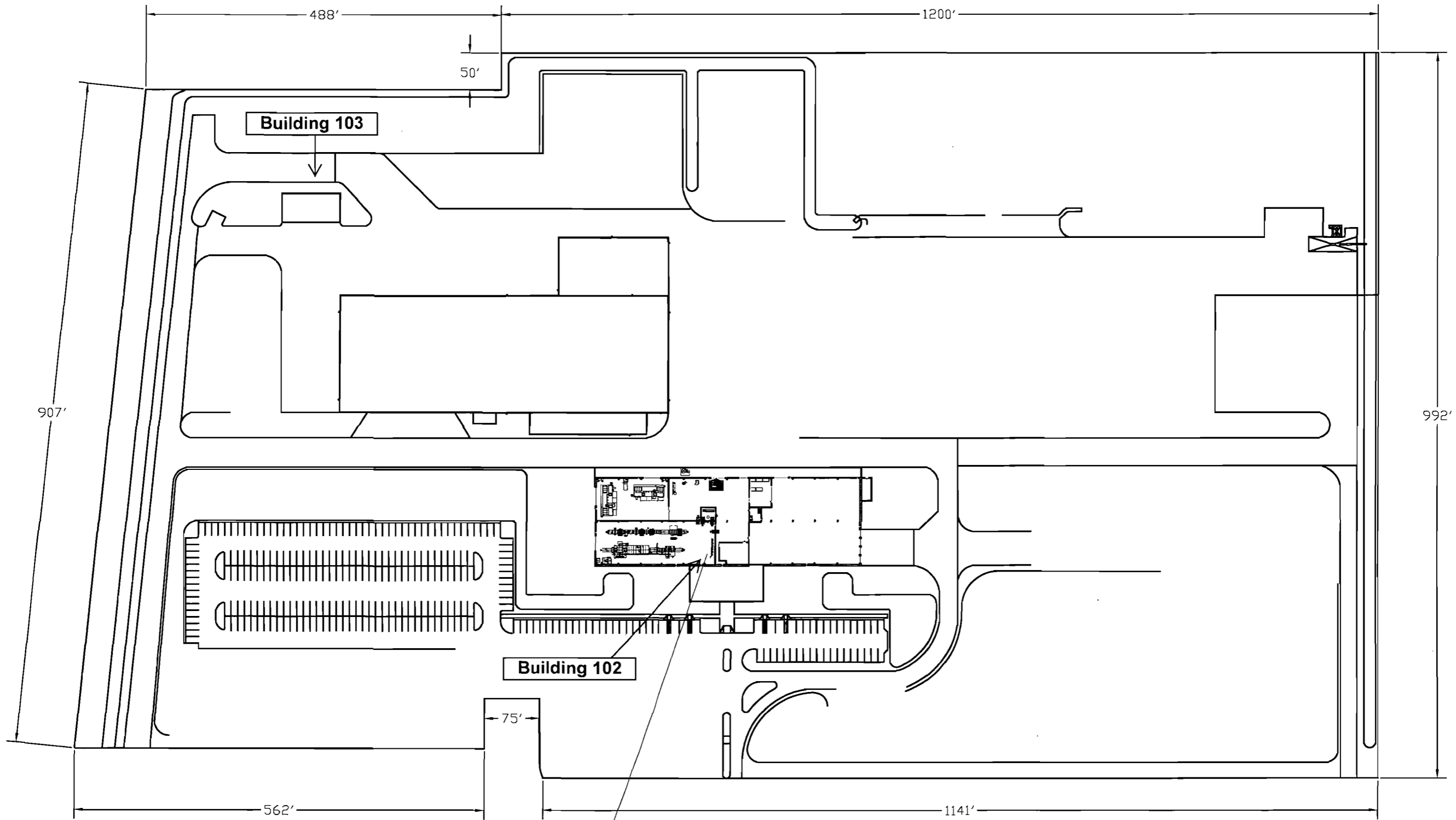
1. Acid Rain Program Forms: Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable (not an Acid Rain source) Phase II NO <sub>x</sub> Averaging Plan (DEP Form No. 62-210.900(1)(a)1.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
2. CAIR Part (DEP Form No. 62-210.900(1)(b)): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable (not a CAIR source)

**Additional Requirements Comment**



**ATTACHMENT SR-FI-C1**  
**FACILITY PLOT PLAN**

Drawing file: 10387636\_A001\_SR-FI-C1.dwg Jan 05, 2011 - 9:18am



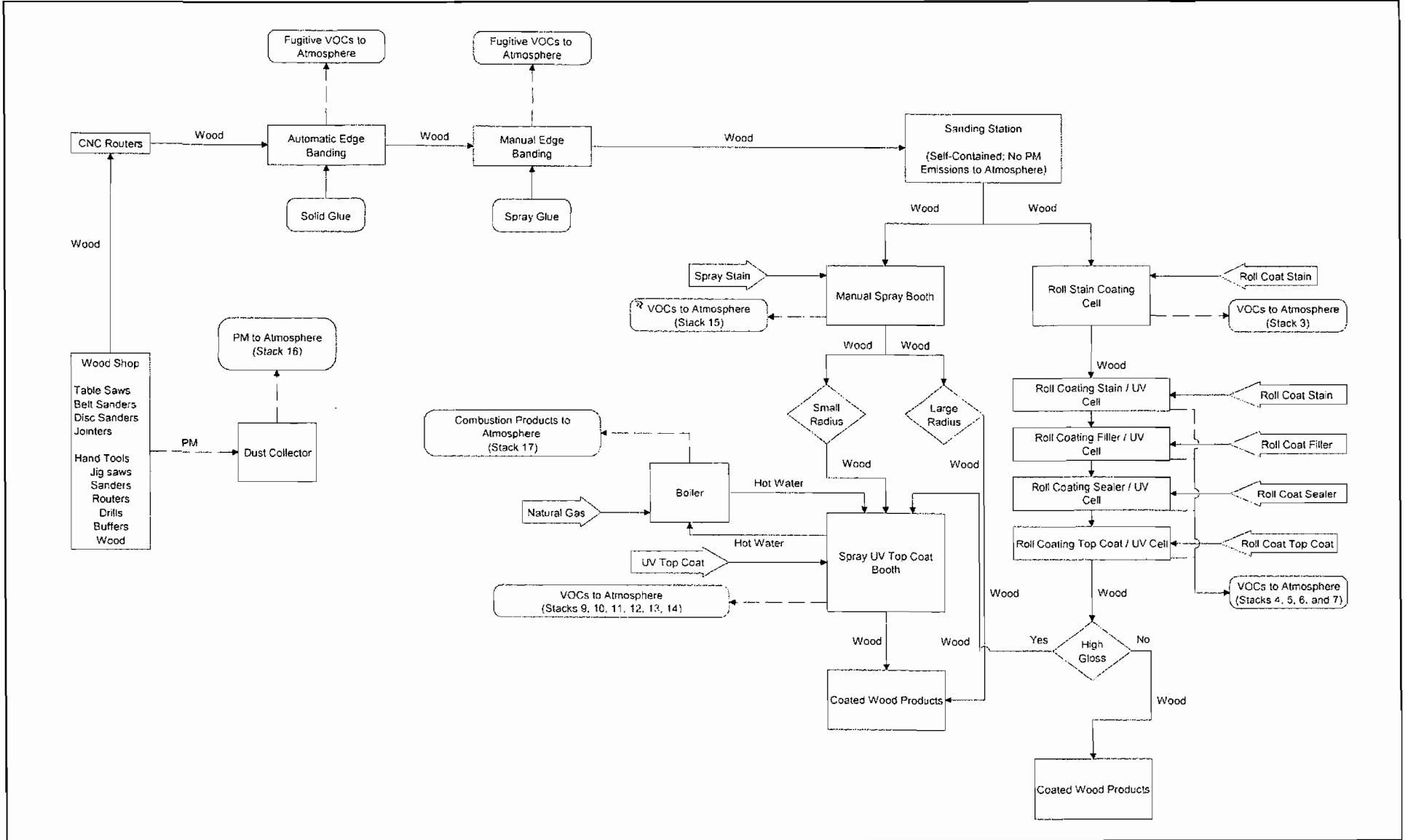
UV WOOD COATING  
LINE

REFERENCES: BASE DRAWING ATTACHMENT SR-FI-C1 SITE PLAN PERMITTING. CREATED BY STEVEN W. TILLEY II, SEA RAY BOATS MANUFACTURING, DATED JULY 11, 2006, DRAWING NAME CAPE CANAVERAL.DWG

REV	DATE	DES	REV_DESC	CADD	CHK	RW
Δ	01/01/01	XXX				
PROJECT						
SEA RAY BOATS CAPE CANAVERAL FACILITY						
TITLE						
SITE PLAN						
PROJECT No. 10387636			FILE No. 10387636 A001			
DESIGN	EK	01/04/11	SCALE	NTS	REV.	0
CADD	NRL	01/05/11	<b>SR-FI-CI</b>			
CHECK						
REVIEW						



**ATTACHMENT SR-FI-C2**  
**PROCESS FLOW DIAGRAM**



Attachment SR-FI-C2  
Process Flow Diagram

Y:\Projects\2012\123-87674 SRB MI AC\AC\Final\Atts\FI\SR-FI-C2.docx

Source: Sea Ray, 2012.



**ATTACHMENT SR-FI-C3**

**PRECAUTIONS TO PREVENT EMISSIONS OF  
UNCONFINED PARTICULATE MATTER**

**ATTACHMENT SR-FI-C3**  
**PRECAUTIONS TO PREVENT EMISSIONS OF**  
**UNCONFINED PARTICULATE MATTER**

Reasonable precautions shall be taken according to 62-296.320(4)(c)3 to prevent emissions of unconfined particulate matter at this facility by:

1. Paving and maintenance of roads, parking areas and yards.
2. Removal of particulate matter from work areas by vacuum or hand sweeping to prevent particulate matter from becoming airborne.
3. Landscaping or planting of vegetation.
4. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.

## EMISSIONS UNIT INFORMATION

Section [1]

Wood Shop/UV Wood Coating and Curing

### 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 an initial, revised or renewal 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. 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 an 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 or 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. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes 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.

# EMISSIONS UNIT INFORMATION

Section [1]

Wood Shop/UV Wood Coating and Curing

## 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:

**Wood Shop/UV Wood Coating and Curing**

3. Emissions Unit Identification Number:

4. Emissions Unit Status Code: <b>A</b>	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: <b>24</b>
--	--------------------------------	--------------------------	--

8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit

9. Package Unit:

Manufacturer:

Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

**The wood shop and UV wood coating and curing operation at the Cape Canaveral Plant is contained in buildings 102 and 103. These operations consist of a woodworking shop, a UV wood coating line, an automatic spray booth, a manual spray booth, a Joe Hill Custom system dust collector, stacking and laminar air ovens, and a 1.26 MMbtu/hr Copper-Fin II (Model CHN126) boiler.**



**EMISSIONS UNIT INFORMATION**

**Section [1]**

**Wood Shop/UV Wood Coating and Curing**

**Emissions Unit Control Equipment/Method:** Control **1** of **1**

1. Control Equipment/Method Description:

**Dust Collector (018) and enclosures (054) for control of PM/PM<sub>10</sub> emission from woodworking operation.**

2. Control Device or Method Code: **018, 054**

**Emissions Unit Control Equipment/Method:** Control \_\_\_\_ of \_\_\_\_

1. Control Equipment/Method Description:

2. Control Device or Method Code:

**Emissions Unit Control Equipment/Method:** Control \_\_\_\_ of \_\_\_\_

1. Control Equipment/Method Description:

2. Control Device or Method Code:

**Emissions Unit Control Equipment/Method:** Control \_\_\_\_ of \_\_\_\_

1. Control Equipment/Method Description:

2. Control Device or Method Code:

**EMISSIONS UNIT INFORMATION**

Section [1]

Wood Shop/UV Wood Coating and Curing

**B. EMISSIONS UNIT CAPACITY INFORMATION**

(Optional for unregulated emissions units.)

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Process or Throughput Rate: <b>30 TPY</b>
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: <b>24 hours/day</b> <b>7 days/week</b> <b>52 weeks/year</b> <b>8,760 hours/year</b>
6. Operating Capacity/Schedule Comment:  <b>The maximum Process or Throughput of 30 TPY includes the VOC content of the coatings, adhesives, and solvents used in the Woodworking Shop and Ultraviolet (UV) Wood Coating Line.</b>

**EMISSIONS UNIT INFORMATION**

**Section [1]**

**Wood Shop/UV Wood Coating and Curing**

**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: <b>See Attachment</b>		2. Emission Point Type Code: <b>3</b>	
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: <b>3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, and 17</b>			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>38 feet</b>	7. Exit Diameter: <b>1.83 feet</b>	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: <b>30,000 acfm</b>	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: <b>There are 14 stacks associated with the proposed project (one for the boiler, one for the PM/PM<sub>10</sub> dust collector, and 12 for the UV Coating Line). See Attachment SR-EU1-C15 for a summary of stack parameters for this project.</b>  <b>Stack parameters represent dust collector stack No. 16.</b>			

**EMISSIONS UNIT INFORMATION**

Section [1]

Wood Shop/UV Wood Coating and Curing

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type):  <b>Petroleum and Solvent Evaporation; Surface Coating Application – General; Paint: Solvent-base</b>		
2. Source Classification Code (SCC): <b>4-02-001-01</b>		3. SCC Units: <b>Tons VOCs Applied</b>
4. Maximum Hourly Rate:	5. Maximum Annual Rate: <b>30</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: <b>Includes the VOCs contained in the coatings, solvents, and adhesives to be used in the Ultraviolet Wood Coating Line.</b>		

**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:		

**EMISSIONS UNIT INFORMATION**

**Section [1]**

**Wood Shop/UV Wood Coating and Curing**

**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			NS
PM	018, 054		NS
PM10	018, 054		NS
HAP			NS

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

**(Optional for unregulated emissions units.)**

**Complete a Subsection F1 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 operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

1. Pollutant Emitted: <b>VOC</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour <b>30 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: <b>See Comment</b>  Reference:		7. Emissions Method Code: <b>2</b>	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                                  To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: <b>Potential emissions based on facility-wide emission cap requested by applicant.</b>			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 ALLOWABLE EMISSIONS**

**Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**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):	

**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):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
 (Optional for unregulated emissions units.)

Complete a Subsection F1 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 operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

1. Pollutant Emitted: <b>PM/PM10</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>2.1 lb/hour                      9.3 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: <b>0.01 grains/dscf</b>  Reference: <b>Manufacturer's Information</b>		7. Emissions Method Code: <b>5</b>	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: <b>Estimation of Dry Standard Exhaust Flow from 30,000 acfm @ 90°F and 15% moisture:</b>  <b>Flow (dscfm) = 30,000 acfm x (460° + 68°)R / (460° + 90°)R</b> <b>X 0.85 CF Dry Air / 1 CF Air ~25,000 dscfm</b>  <b>Hourly: 25,000 dscfm x 60 min/hr x 0.01 gr/dscf</b> <b>X 1 lb/7,000 gr = 2.1 lb/hr</b>  <b>Annual: 2.1 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 9.3 TPY</b>			
11. Potential, Fugitive, and Actual Emissions Comment: <b>Includes PM/PM<sub>10</sub> emissions for the dust collector controlling emissions from the Wood Shop, only.</b>			



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 ALLOWABLE EMISSIONS**

**Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**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):	

**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):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
 (Optional for unregulated emissions units.)

Complete a Subsection F1 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 operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

1. Pollutant Emitted: <b>Total HAPs</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour    9 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor:  Reference:		7. Emissions Method Code: <b>2</b>	
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From:    To:		
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years		
10. Calculation of Emissions: <b>Potential emissions based on facility-wide emission cap requested by applicant.</b>			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete Subsection F2 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:	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):	

**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):	

**EMISSIONS UNIT INFORMATION**

**Section [1]  
Wood Shop/UV Wood Coating and Curing**

**G. VISIBLE EMISSIONS INFORMATION**

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

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance: <b>Visible Emissions Testing using FDEP Method 9.</b>	
5. Visible Emissions Comment:  <b>Rule 62-296.320(4)(b)1, F.A.C. General visibility emission limiting standard.</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_ of \_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions:                      %                      Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

**EMISSIONS UNIT INFORMATION**

**Section [1]  
Wood Shop/UV Wood Coating and Curing**

**H. CONTINUOUS MONITOR INFORMATION**

**Complete Subsection H 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:	<input type="checkbox"/> Rule <input type="checkbox"/> 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:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**EMISSIONS UNIT INFORMATION**  
**Section [1]**  
**Wood Shop/UV Wood Coating and Curing**

**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) <input checked="" type="checkbox"/> Attached, Document ID: <u>SR-FI-C2</u> <input type="checkbox"/> 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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> 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) <input checked="" type="checkbox"/> Attached, Document ID: <u>SR-EU1-I3</u> <input type="checkbox"/> 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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> 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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> 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: <input checked="" type="checkbox"/> Attached, Document ID: <u>See Part B</u> <input type="checkbox"/> Not Applicable



**ATTACHMENT SR-EU1-C15**  
**STACK PARAMETERS**



**ATTACHMENT SR-EU1-C15  
SUMMARY OF STACK PARAMETERS**

<b>Stack Identifier</b>	<b>Stack Description</b>	<b>Stack Height Above Grade (ft)</b>	<b>Stack Diameter or Vent Dimensions (ft)</b>	<b>Stack Exhaust Flow (acfm)</b>	<b>Stack Exhaust Temperature (deg. F)</b>	<b>Stack Orientation</b>
3	Roll Coat Application Brushes	38	0.83	10,000	90	Vertical
4	Roll Coat UV Cure No. 1	38	0.67	3,000	150	Vertical
5	Roll Coat UV Cure No. 2	38	0.67	3,000	150	Vertical
6	Roll Coat UV Cure No. 3	38	0.67	3,000	150	Vertical
7	Roll Coat UV Cure No. 4	38	0.67	3,000	150	Vertical
9	Automatic Spray booth	38	2.00	7,500	90	Vertical
10	Stacking Oven	38	0.83	7,500	90	Vertical
11	Laminar Air Oven	38	0.83	7,500	90	Vertical
12	Spray Cure UV No. 1	38	0.67	3,000	150	Vertical
13	Spray Cure UV No. 2	38	0.67	3,000	150	Vertical
14	Spray Cure UV No. 3	38	0.67	3,000	150	Vertical
15	Manual Spray Booth	38	3.50	30,000	90	Vertical
16	Dust Collection	38	1.83	30,000	90	Vertical
17	Boiler	38	1.17	700	500	Vertical

**ATTACHMENT SR-EU1-I3**  
**DETAILED DESCRIPTION OF CONTROL EQUIPMENT**



**Donaldson.**  
*Filtration Solutions*

Donaldson Company, Inc.  
 Industrial Air Filtration  
 2705 SW 130<sup>th</sup> Court  
 Oklahoma City, OK  
 73170-2110

Tel 405-692-7154  
 Fax 405-692-7162  
 e-mail: jhendric  
 @mail.donaldson.com  
 www.Donaldson.com  
 www.torit.com

**SeaRay Boats**  
 Attn: David Dulaney  
 Vonore, TN

August 18, 2006

Reference Emission guarantee for one (1) Donaldson Torit<sup>®</sup> 232RFW10 Dust Collector with high body inlet  
 Equipment One (1) Donaldson Torit<sup>®</sup> 232RFW10 Dust Collector with Donaldson Torit<sup>®</sup> Dura-Life™ filter bags  
 Application Wood Working (8 hours/day and 5 days/week)  
 Dust Sawdust  
 Inlet Loading 1 gr/dscf  
 Air Volume 30,000 ACFM  
 Gas Stream Maximum temperature of 95°F, minimum of ten degrees temperature differential between the dry bulb and wet bulb temperatures  
 Collector Location Outdoors  
 Collector Exhaust Outdoors

The Donaldson Torit<sup>®</sup> 232RFW10 Dust Collector with 232 bags (10' in length) has a net filtration area of 3018 square feet which offers an air-to-media ratio of 10:1. Based on the RF Collector being installed and operated in accordance with the RF Installation, Operation, and Maintenance Manual; accepted industrial ventilation practices; and under the conditions stated above, we are offering the following emission guarantee utilizing Donaldson Torit<sup>®</sup> Dura-Life™ filter bags.

*Emission:* The maximum average emissions in the discharge gas stream from the above Donaldson Torit<sup>®</sup> 232RFW10 Collector using Donaldson Torit<sup>®</sup> Dura-Life™ filter bags will not exceed 0.01 grains per dry standard cubic foot over the life of the media. This guarantee ends after 10 years (acceptable emission performance will be proven by that time).

[The emissions portion of this warranty requires that all emission testing be performed by a qualified testing agency agreed upon by Donaldson Company and SeaRay Boats. Such testing will be performed in accordance with recognized testing procedures, agreed upon by both Donaldson Company and SeaRay Boats. Fees for the testing will be the responsibility of SeaRay Boats]

*Pressure Drop:* Average pressure drop not to exceed 6 inches of water gauge on a continual basis as measured across the Donaldson Torit Dura-Life™ filter bags and the tube sheet of the Donaldson Torit<sup>®</sup> 232RFW10 Collector listed above.

During the warranty period, Donaldson Company reserves the right to make any modifications, adjustments or take other necessary corrective actions, at Donaldson's expense, should the guarantee not be met by equipment malfunction due to defects in materials and/or workmanship as supplied by Donaldson Company. In no event shall Donaldson Company be liable for incidental, special or consequential damages resulting from nonconformity. Failure to use genuine Donaldson replacement parts or changes to the original system, either process or engineering, will cancel this guarantee.

Regards,

Jim Hendrick  
 Regional Sales Director

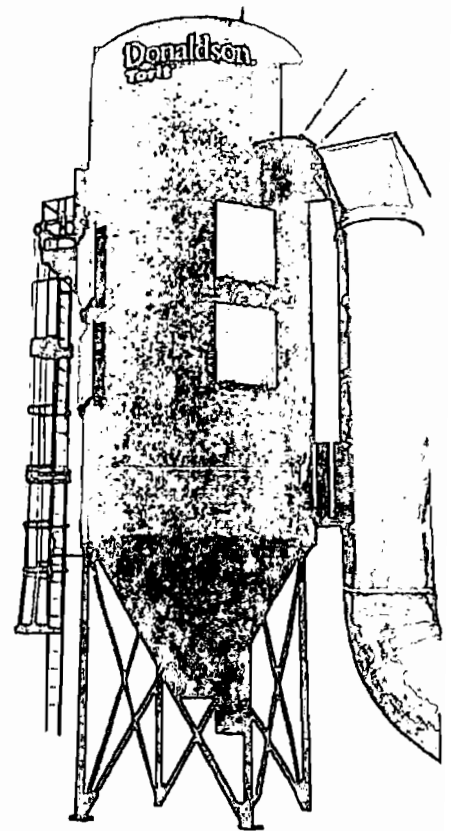
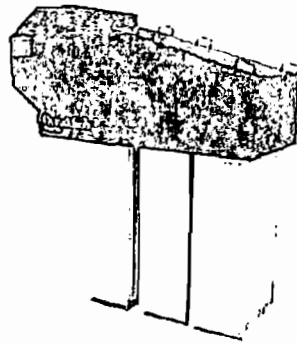
Guarantee Number: 06HT0803

**Introducing  
the BIGGEST  
advancement  
in baghouse  
technology  
ever!**

**Lasts  
2 to 3  
times  
longer**

## Dura-Life™ Bags

- Breakthrough technology only from Donaldson® Torit®
- Winner of 2002 Media of the Year Award—*Filtration + Separation*
- Winner of 2003 Vaaler Award, Filtration & Separation Category—*Chemical Processing*
- Dura-Life bags last 2-3 times longer than standard 16 oz. polyester bags
- Dura-Life bags are standard on all Donaldson Torit baghouses
- Dura-Life bags are available as replacement for all brands of baghouse collectors

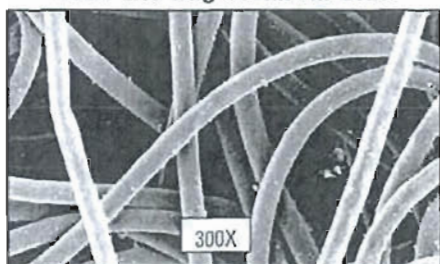


# The Proven Performance of Dura-Life™

**Dura-Life — A breakthrough for bag users.** Polyester bags have historically been produced with a needling process that creates large pores where dust can embed into the fabric, inhibiting cleaning and reducing bag life. Dura-Life bags are engineered with a unique hydroentanglement process that uses water to blend the fibers, resulting in:

- More uniform material with smaller pore size
- Better surface loading of dust that prevents penetration deep into the media
- Improved pulse cleaning and lower operating pressure drop
- Bags with longer life and greater value

**Dura-Life Bag-Clean Air Side**



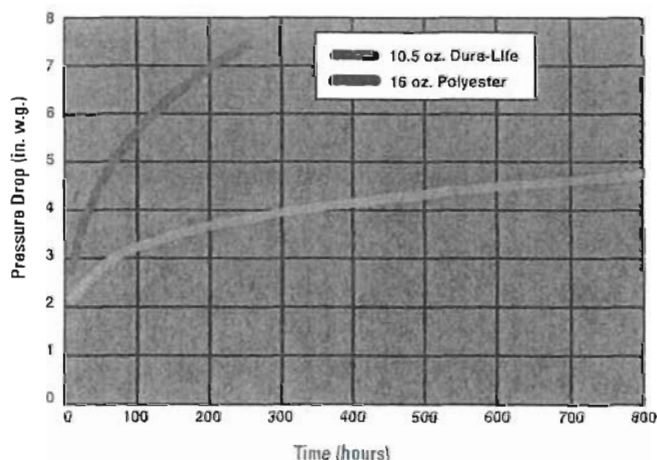
**Polyester Bag-Clean Air Side**



*These photos were taken with a scanning electron microscope of bag media used in a collector that was filtering fly ash. The bags were removed after 2,700 hours of use. Air-to-media ratio was 4.5 to 1. Pressure drop after 2700 hours of operation was 6 in. on polyester bags and 2 in. on Dura-Life.*

**Dura-Life bags last 2-3 times longer than standard polyester.** Pressure drop increases at a faster rate with polyester bags due to dust embedding in the media, shortening bag life and forcing more frequent bag changes. Dura-Life bags, with surface loading of dust and better pulse cleaning, perform far longer than polyester bags when replacing due to excessive pressure drop.

**Better Surface Loading Results in Longer Bag Life**

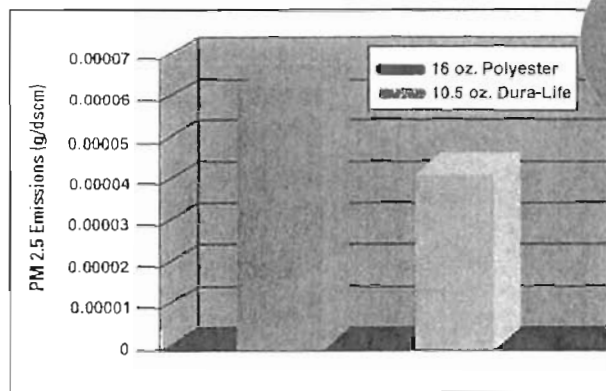


*These results were derived in accelerated lab tests, which correlate to field tests results, showing that Dura-Life will provide 2-3 times more life than standard 16 oz. polyester bags when replacing bags due to pressure drop.*

# Dura-Life™ Improves the Bottom Line

**Dura-Life clears the air better.** Durapex media used in Dura-Life bags has been shown to produce lower emissions than the 16 oz. polyester material used in most standard bags. Dura-Life's Durapex media is more efficient at capturing dust, even 2.5 micron or smaller particles, reducing the amount of dust that escapes into the air. This helps to keep the workplace and environment cleaner. Dura-Life's Durapex media has been tested and received EPA PM 2.5 performance verification from the Environmental Technology Verification (ETV) Program via ASTM D 6830-02.

**Dura-Life Media Provides Lower Emissions than Standard Polyester**



Dura-Life provides 30% fewer emissions



*These flat sheet results are based on independent lab tests using ASTM D 6830-02 per EPA PM 2.5 performance verification from the Environmental Technology Verification (ETV) Program comparing Durapex media from PGI vs. standard 16 oz. polyester.*

**Dura-Life bags are the clear choice for savings.** With Dura-Life, there are fewer bag changes, resulting in labor and replacement bag savings and less production downtime. Unique Dura-Life technology traps dust on the surface of the bag, allowing dust to be easily pulsed off during cleaning resulting in lower pressure drop and annual energy savings.

**Labor and Bag Cost Savings Due to Fewer Bag Changes**

Labor and Bag Cost Savings of \$3,328 or more per Dura-Life change-out

Number of Dura-Life Bags	Maintenance & Bag Cost Savings
484	\$3,328
376	\$2,585
276	\$1,898
232	\$1,595
156	\$1,073
124	\$853
72	\$495

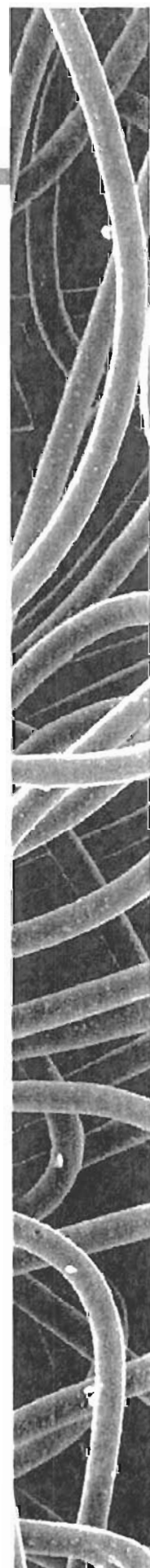
*These calculations are based on the following assumptions: standard polyester bags are replaced annually; Dura-life bags provide twice the life of standard polyester bags, time-and-a-half labor rate equals \$45/hr. including benefits, and a three-person crew can replace 40 bags/hr. Labor and bag cost savings can further increase with larger collectors.*

Annual Energy Savings of \$5,148 or more

**Annual Energy Savings Due to Reduced Pressure Drop**

	Standard Polyester Bags	Dura-Life Bags
Filter Bags	484	484
Operating Delta P	5"	3"
ACFM	57,000	57,000
Motor	125 HP	125 HP
Break HP	55.4	33.2
Annual Energy Use	\$12,848	\$7,705

*This is one example; energy savings can further increase with larger collectors. These energy savings are calculated based on the following assumptions: Baghouse collector runs 2 shifts per day, 5 days a week (4,000 hours per year) and energy costs are 7 cents per kilowatt hour.*



# Make a Change to the Better

**DURA-LIFE™**  
Twice The Life Filter Bags

**Outlasts,  
Outperforms  
& Outvalues**

*Can't think of a good reason to change your brand of bags? Donaldson Torit just provided the reason – Dura-Life\* bags that outlast, outperform and outvalue standard polyester.*

- Advanced hydroentanglement technology extends bag life
- Maintenance costs are reduced with longer bag life
- Energy savings result from lower pressure drop
- Smaller particles are captured with greater efficiency
- Lower emissions help provide a cleaner workplace and environment



2005 Readers' Choice Award Winner  
Power and Bulk Engineering, February 2005



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www.donaldsontorit.com



\* Dura-Life bags are made with Durapex™ (patent pending) media manufactured by Polymer Group, Inc.

Information in this document is subject to change without notice.

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*DISCLAIMER: Donaldson Company Inc cannot be held responsible for modifications of this document from its original version. Specifications are subject to change without notice, so confirm you are working from the most current version. Current specifications are available on the Donaldson Tech Info Center (DTIC).*

## Product Specification Sheet Dura-Life™ Polyester, Revision 1

Filter bag media shall be hydro-entangled polyester fibers for enhanced dust release, increased efficiency, and low pressure drop.

Minimum removal efficiency shall be 99.9% by mass.\*

Maximum continuous operating temperature shall be 275°F (135°C), with brief surge temperature excursions to 300°F maximum.

The bag media shall have:

- A base weight of 10.5 oz/square yd, a Frazier permeability of 25-35 cfm at 0.50 "wg and a thickness of 0.060"-0.080" for self supported media
- or-
- A base weight of 10 oz/square yd, a Frazier permeability of 25-35 cfm at 0.50 "wg and a thickness of 0.060"-0.080" for scrim supported media.

Workmanship and structural integrity shall be guaranteed for a minimum of 2,000 hours of operation.

Bag media properties shall conform to the following specifications:

Physical Property	Specification
Surface Treatment/Finish	None
Subject to Hydrolysis	Yes
Chemical Resistance	Fair

The filters shall be Donaldson<sup>®</sup> Tori<sup>®</sup> Dura-Life bags as manufactured by Donaldson Company, Inc.

Note: all Donaldson filter bags are available in a wide variety of top and bottom configurations. Special additions such as ground wires, abrasion cuffs, expansion rings, etc. are also available

\* Efficiency is affected by system velocity, contaminant size and shape, atmospheric conditions, dust cake porosity and filter pressure drop. Results will vary according to your specific operating parameters.



**PART B**

# Sea Ray Boats Cape Canaveral Facility

## Regulatory Applicability Analysis—NESHAPs

The following analysis addresses National Emission Standards for Hazardous Air Pollutants (NESHAPs) that could potentially apply to Sea Ray Boats' operations at the Cape Canaveral site located at 1200 Sea Ray Drive, Merritt Island, Brevard County, Florida. The Department requested this analysis for inclusion as part of the air permit application.

### Background

When Sea Ray initially proposed fiberglass boat manufacturing operations for the Cape Canaveral site in 1999, the Department determined that the Cape Canaveral site was a single facility with Sea Ray's existing Merritt Island, Sykes Creek, and PD&E facility located approximately 1.2 miles away based on its regulatory definition of "facility" and the facts existing at that time. While Sea Ray was authorized to construct fiberglass boats at the Cape Canaveral site under the terms and conditions in the Department's final permit issued in 2000, Sea Ray did not complete construction under that permit and has never constructed fiberglass boats at the Cape Canaveral site. Because Sea Ray did not conduct boat manufacturing operations at the Cape Canaveral site under that initial permit, the Subpart VVVV NESHAP applicable to fiberglass boat manufacturing did not apply to the Cape Canaveral due to those operations.

Sea Ray subsequently submitted an air construction permit application in 2004 to authorize repairs on fiberglass boats at the Cape Canaveral site. The potential hazardous air pollutant (HAP) emissions from these operations were well under the major source thresholds of 10 TPY (for individual HAPs) and 25 TPY (for all HAPs combined). In fact, the maximum HAPs emitted in any year due to these boat repair operations was 0.207 TPY (emitted in 2008). The boat manufacturing NESHAP, Subpart VVVV, applies only to major sources of HAPs. Because the Department continued to treat the Cape Canaveral site as part of the Merritt Island, Sykes Creek, and PD&E facility, which was major for HAPs, the Department considered the Cape Canaveral site to be major for HAPs. As a major HAP source, the Department applied the boat manufacturing NESHAP to the Cape Canaveral boat repair operations. Sea Ray conducted boat repair work at the Cape Canaveral site from late 2004 through 2009. Those operations are no longer authorized at the Cape Canaveral site, and Sea Ray has no current or future plans to conduct boat repair operations at that site.

Sea Ray currently conducts wood coating operations at the Cape Canaveral site. Those operations occur in Building 102 at the Cape Canaveral site, 1200 Sea Ray Drive. The Department first approved these operations through issuance of an air construction permit in

2006. As provided in Sea Ray's air permit application for these wood coating operations, the potential HAP emissions from these operations are well under the 10 and 25 TPY thresholds for major source status. Because the Department continued to consider the Cape Canaveral site to be a single facility with the Merritt Island, Sykes Creek, and PD&E facility located approximately 1.2 miles away, and because that facility was a major source for HAPs, the Department considered the Cape Canaveral site to be major for HAPs. No NESHAP requirements, however, were established under that permit applicable to the wood coating operations.

Under the 2006 air construction permit, Sea Ray installed new wood coating equipment at the site and began operating the equipment in 2007. This equipment was new and was not relocated from Sykes Creek, Merritt Island, or PD&E. From the time Sea Ray began operations in 2007 to present, all coated wood products manufactured by Sea Ray at the Cape Canaveral site have been used in the fiberglass boat manufacturing process, specifically for the interiors of boats being manufactured at Sea Ray's Sykes Creek facility, PD&E facility, and Palm Coast facility (Flagler County), and also at the Brunswick Boat Group's Hatteras/Cabo facility in North Carolina. Sea Ray has identified immediate business opportunities to expand its sales of coated wood products for use in other markets. Sea Ray has not and will not enter these other markets, however, until after the Department issues the requested air construction permit establishing the Cape Canaveral site's separate facility and minor source status. Once the Cape Canaveral site is considered to be a separate facility and its minor source status is established, Sea Ray may begin selling its coated wood products for use in other markets.

As part of the application for an air construction permit to establish the separate facility and minor source status for the Cape Canaveral site, the Department requested Sea Ray's confirmation as to the applicability of any NESHAPs from 1999 to present, and also following issuance of the requested air construction permit (as an area source). An analysis of the potentially applicable NESHAPs follows.

### **Brief Summary**

While NESHAP Subpart VVVV would have applied to the planned fiberglass boat manufacturing operations authorized in 2000, because the facility never operated and boats were never constructed at the Cape Canaveral site, that NESHAP did not apply due to the operations authorized in 2000.

From 2004 through 2009, Sea Ray repaired fiberglass boats at the Cape Canaveral site. Under the air construction permit and subsequent Title V permit revisions, the Department applied Subpart VVVV, the boat manufacturing NESHAP, to those operations. Those operations ceased in 2009, are no longer authorized by the Department, and Sea Ray has no current or future plans to conduct boat repair work at the Cape Canaveral site. The

Department considered Subpart VVVV to apply from 2004 through 2009 to the boat repair work at the Cape Canaveral site. Because this NESHAP has applied at the Cape Canaveral site, due to the boat repair operations, the Department has explained its position that even if the site becomes an area source in the future, this NESHAP will continue to apply to any Sea Ray boat manufacturing operations at the Cape Canaveral site under EPA's "once in always in" policy for NESHAPs.

From 2006 through present (October 2012), Sea Ray has conducted wood coating operations at the Cape Canaveral site. No NESHAP has applied to these operations in the past or current, as explained in greater detail below.

Once the requested air construction permit is issued to establish the Cape Canaveral site as a separate facility and an area (minor) source for HAPs, Sea Ray intends to continue its wood coating operations, although the end market use for the products may change. As explained in greater detail below, no NESHAP will apply to these operations in the future.

## Detailed Analysis

### **NESHAP 40 CFR 63 Subpart VVVV – Boat Manufacturing**

- **Overview:** This NESHAP applies to major sources of HAPs that build fiberglass recreational boats with resin and gel coat operations. 40 C.F.R. § 63.5680. "Boat manufacturing facilities" include facilities manufacturing hulls or decks from fiberglass or building molds to make fiberglass hulls or decks. *Id.* at § 63.5779. Facilities manufacturing only parts of boats (such as hatches, seats, or lockers) are not considered boat manufacturing facilities under this subpart. *Id.*

This subpart does not apply to wood coatings. "Wood coatings" are those applied to wooden parts and surfaces of boats, such as paneling, cabinets, railings, and trim. *Id.* Wood coatings include, but are not limited to, primers, stains, sealers, varnishes, and enamels. Polyester and vinylester resins or gel coats applied to wooden parts to encapsulate them or bond them to other parts are not wood coatings. *Id.* The EPA explicitly stated wood surface coating operations and wood furniture used on boats and large yachts should not be regulated under this NESHAP. *See* Office of Air Quality Planning and Standards, U.S. Env'tl. Prot. Agency, EPA-HQ-OAR-2004-0391-0005, Boat Manufacturing National Emission Standards for Hazardous Air Pollutants, Public Comments and Responses, 9-10 (2001).

- **Applicability: Applicable from 2004 through 2009.** While Subpart VVVV applies only at major HAP sources, and Sea Ray's boat repair operations were not major for HAPs, the Department considered the boat repair operations at the Cape Canaveral site to be part of the Merritt Island facility which was major for HAPs. The Department therefore considered the Cape Canaveral site to be major for HAPs, and the Department considered boat repair operations to fall within boat manufacturing operations covered under Subpart VVVV. The Department applied Subpart VVVV to the Cape Canaveral site boat repair operations from 2004 through 2009.

Subpart VVVV, however, does not apply to wood coating for parts and surfaces used in the boat manufacturing process. Subpart VVVV would therefore not apply to current and future wood coating operations at the Cape Canaveral site. Subpart VVVV has not applied to wood coating operations since initially authorized by the Department in 2006 and it would not apply in the future (unless the NESHAP is revised to address wood coating operations).

Based on the Department's explanation of EPA's once-in, always-in policy for NESHAPs, the Department would apply Subpart VVVV to fiberglass boat manufacturing operations undertaken by Sea Ray at the Cape Canaveral site in the future, even if the site were an area source for HAPs. Sea Ray has no current or future plans for fiberglass boat manufacturing operations at the Cape Canaveral site.

#### **NESHAP 40 CFR 63 Subpart II – Shipbuilding and Ship Repair (Surface Coating)**

- **Overview:** Subpart II addresses surface coating at shipbuilding and ship repair operations at major sources for HAPs. 40 C.F.R. § 63.780. “Ships” are vessels used for military or commercial operations, which includes cruise ships but excludes pleasure crafts. *Id.* at § 63.782. “Pleasure crafts” are vessels used by individuals for noncommercial, nonmilitary, and recreational purposes that are less than 20 meters in length, including vessels rented exclusively to or chartered by individuals for such purposes. *Id.* This subpart does not apply to operations using less than 200 liters of coating per year and does not apply to fiberglass lay-up coatings.
- **Applicability: Not applicable.** Sea Ray has never built ships at the Cape Canaveral site, nor has Sea Ray ever supplied coated wood products manufactured at the Cape Canaveral site for use in ships. This NESHAP has therefore not applied in the past. In the future, this NESHAP will not apply because the Cape Canaveral site will be an area source for HAPs.

#### **NESHAP 40 CFR 63 Subpart JJ – Wood Furniture Manufacturing Operations**

- **Overview:** Subpart JJ covers manufacturers of wood furniture and components at major sources for HAPs. *Id.* at § 63.800. “Wood furniture” means any product made of wood, a wood product, or engineered wood that is manufactured at any facility engaged either in part or in whole, in the manufacture of wood furniture or wood furniture components. *Id.* at § 63.801. “Wood furniture component” means any part used in the manufacture of wood furniture, including, for example, laminated tops. *Id.* This NESHAP specifically includes surface coating of millwork and trim for cabinets. Surface coating operations meeting applicability criteria for Subparts MMMM (Misc. Metal Parts), PPPP (Plastic Parts), QQQQ (Wood Building Products), or RRRR (Metal Furniture) are exempt from complying with this subpart.
- **Applicability: Not applicable.** As stated above, Sea Ray's coated wood products manufactured at the Cape Canaveral site have been used exclusively for the interiors of boat cabins. EPA guidance clarified that Subpart JJ does not apply to coated wood products used for interior boat cabins. *See*

John B. Rasnic, U.S. Env'tl. Prot. Agency, Boat Building – Opinion Regarding the Applicability of 40 CFR 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, Doc. No. 4846828995 (1998); Office of Air Quality Planning and Standards, U.S. Env'tl. Prot. Agency, EPA-HQ-OAR-2004-0391-0005, Boat Manufacturing National Emission Standards for Hazardous Air Pollutants, Public Comments and Responses, 10 (2001) (specifically rejecting comment that Subpart JJ apply to wood furniture in boats). Subpart JJ has therefore not applied to Sea Ray's wood coating operations at the Cape Canaveral site in the past. In the future, Subpart JJ will not apply because it applies only at major sources, and the Cape Canaveral site will be an area source for HAPs.

#### **NESHAP 40 CFR 63 Subpart DDDD – Plywood and Composite Wood Products**

- **Overview:** This NESHAP applies to plywood and composite wood products (PCWP) manufacturing facilities. 40 C.F.R. § 63.2230. "PCWP manufacturing facilities" are facilities that manufacture dry veneer or manufacture plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.), generally with resin under heat and pressure, to form a panel, engineered wood product or that manufacture dry veneer. *Id.* at § 63.2292. "Plywood" means a panel product consisting of layers of wood veneers hot pressed together with resin, including panels made by hot pressing veneers to a substrate such as particleboard, medium density fiberboard, or lumber. *Id.* Laminates applied to PCWP after pressing of the substrate is covered by Subpart QQQQ (Wood Building Products), not this subpart. *See* Office of Air Quality Planning and Standards, U.S. Env'tl. Prot. Agency, EPA-HQ-OAR-2004-0391-0005, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products Manufacturing, Background Information for Final Standards, 2-29 (2004). Miscellaneous finishing operations for PCWP such as sanding, sawing, patching, and edge sealing are covered by this subpart, unless already subject to Subpart QQQQ (Wood Building Products). *Id.* at 2-8. Resin preparation associated with PCWP manufacturing is specifically subject to Subpart DDDD and not Subpart HHHHH (Misc. Coating). *Id.* at 2-5 to 2-8. Operations using urea-formaldehyde resins are covered by this subpart, not Subpart JJ (Wood Furniture Manufacturing). *Id.* at 2-32 to 2-33.
- **Applicability: Not applicable.** Though Sea Ray applies surface coating to plywood and composite wood products, Sea Ray does not manufacture plywood, bond wood material with resin under heat or pressure, manufacture dry veneer, laminate, or prepare resins at the Cape Canaveral site. No resin preparation occurs at the facility. Subpart DDDD has not applied to the wood coating operations at the Cape Canaveral facility in the past. In the future, this NESHAP will not apply because the Cape Canaveral site will be an area source for HAPs.

#### **NESHAP 40 CFR 63 Subpart IIII – Surface Coating of Automobiles and Light-duty Trucks**

- **Overview:** For facilities that are major source for HAPs, this NESHAP applies to coating operations for new motor vehicle bodies or parts intended for use in new automobiles, light-duty trucks, or new other motor vehicles. 40 C.F.R. § 63.3080. "Coating" means a material including sealants, adhesives, and primers applied to a substrate for decorative, protective, or functional purposes. *Id.* at § 63.3176. "Coating operations" are equipment used to apply coating to a substrate and to dry or

cure the coating. *Id.* A single coating operation always includes at least the point at which a coating is applied and all subsequent points in the affected source where organic HAP emissions from that coating occur. The Surface Coating of Automobiles and Light-Duty Trucks NESHAP excludes surface coating operations subject to any other NESHAP as of June 25, 2004.

- Applicability: **Not applicable.** Sea Ray has not conducted activities related to automobiles or light-duty trucks at any time in the past at the Cape Canaveral site, and therefore Subpart IIII has not applied. In the future, this NESHAP will not apply because the Cape Canaveral site will be an area source for HAPs.

#### **NESHAP 40 CFR 63 Subpart MMMM – Surface Coating of Miscellaneous Metal Parts and Products**

- Overview: This NESHAP applies to the coating of metal parts in products such as motor vehicle parts and accessories, sporting goods, recreational vehicles, extruded aluminum structural components, and heavy duty trucks, among others, at major HAP sources. 40 C.F.R. § 63.3880. This NESHAP excludes surface coating of metal components at operations that meet applicability criteria for the following subparts: JJ (Wood Furniture Manufacturing), RRRR (Metal Furniture Surface Coating), QQQQ (Wood Building Products Surface Coating), II (Shipbuilding and Ship Repair), VVVV (Boat Manufacturing), or IIII (Automobiles and Light-Duty Trucks). Under certain circumstances, coating operations meeting applicability criteria of this subpart and Subpart IIII (Automobiles and Light-Duty Trucks) may choose which NESHAP to comply with.
- Applicability: **Not applicable.** Sea Ray has not coated metal parts at the Cape Canaveral site at any time in the past, and therefore Subpart MMMM has not applied. In the future, this NESHAP will not apply because the Cape Canaveral site will be an area source for HAPs.

#### **NESHAP 40 CFR 63 Subpart PPPP – Surface Coating of Plastic Parts and Products**

- Overview: Subpart PPPP applies to coating operations for plastic parts at sources that are major for HAPs. *Id.* at § 63.4480. “Plastic part and product” means any piece or combination of pieces of which at least one has been formed from one or more resins. Such pieces may be solid, porous, flexible or rigid. *Id.* at § 63.4581. Plastic parts and products under this NESHAP include motor vehicle parts and accessories for automobiles, trucks, and recreational vehicles; sporting and recreational goods; and household and other consumer products, among others. This NESHAP excludes certain surface coating of plastic components at operations that meet applicability criteria for the following subparts: JJ (Wood Furniture Manufacturing), RRRR (Metal Furniture Surface Coating), QQQQ (Wood Building Products), II (Shipbuilding and Ship Repair), and VVVV (Boat Manufacturing, specifically fiberglass boats and boat parts).
- Applicability: **Not applicable.** Sea Ray has applied bottom coating to fiberglass boats at the Cape Canaveral site in the past as part of the authorized boat repair operations. Those coating operations are specifically excluded from Subpart PPPP. Subpart PPPP has never applied to Sea Ray’s operations at the Cape Canaveral site. In the future, this NESHAP will not apply because the Cape Canaveral site will be an area source for HAPs.

### **NESHAP 40 CFR 63 Subpart QQQQ – Surface Coating of Wood Building Products**

- **Overview:** Subpart QQQQ concerns operations coating wood building products using, for example, roll coaters or curtain coaters for finishing or laminating. *Id.* at § 63.4680. “Wood building products” means any product that is more than 50% wood or wood fiber by weight and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building. *Id.* at § 63.4781. This subpart applies to facilities that are both major sources of HAP and use more than 4,170 liters (1,100 gallons) of coating per year. Commercial manufacturers that use less than 1,100 gallons (4,170 liters) per year of surface coatings on wood building products are not required to achieve emissions reductions under this subpart. This NESHAP specifically excludes certain surface coating processes subject to Subpart DDDD (Plywood and Composite Wood Product Manufacturing). These include, for example, edge seals applied to a reconstituted wood product or plywood, anti-skid coatings applied to reconstituted wood products, and surface coating that occurs during the manufacture of fiberboard. In addition, this NESHAP excludes surface coating that occurs during the manufacture of prefabricated homes and mobile/modular homes, and surface coating of wood furniture subject to Subpart JJ (Wood Furniture Manufacture). Finally, if this NESHAP applies and 95% or more of the total surface coating used could also be subject to a different NESHAP, the affected sources may comply with that NESHAP for the entire affected source.
- **Applicability: Not applicable.** Subpart QQQQ has not applied to Sea Ray’s operations at the Cape Canaveral site in the past because Sea Ray’s coated wood products were used only in the boat manufacturing process and not in residential, commercial, or institutional buildings. In the future, this NESHAP will not apply because the Cape Canaveral site will be an area source for HAPs.

### **NESHAP 40 CFR 63 Subpart RRRR – Surface Coating of Metal Furniture**

- **Overview:** For major sources of HAPs, this NESHAP addresses application of coating to metal substrate for furniture. *Id.* at § 63.4880. Examples of metal furniture include household, office, and institutional furniture; office and store fixtures; partitions; and shelving. The Surface Coating of Metal Furniture NESHAP specifically excludes metal components of wood furniture subject to Subpart JJ (Wood Manufacturing Operations). This NESHAP likewise does not apply to parts coated with a use beyond metal furniture, such as hinges, screws, or knobs.
- **Applicability: Not applicable.** Subpart RRRR has not applied to Sea Ray’s operations at the Cape Canaveral site in the past because Sea Ray has not coated metal parts or metal furniture. This NESHAP will not apply in the future because it applies only at major sources and the Cape Canaveral site will be an area source for HAPs.

### **NESHAP 40 CFR 63 Subpart HHHHH – Miscellaneous Coating Manufacturing**

- **Overview:** The Miscellaneous Coating Manufacturing NESHAP applies to owners or operators of facilities that are major source for HAPs and manufacture coating, where facilities include



equipment such as process vessels; storage tanks for feedstocks and products; components such as pumps, compressors, agitators, pressure relief devices, open-ended valves of lines; and wastewater tanks and transfer racks involved in the manufacture of coatings. *Id.* at § 63.7980. “Coating” means a material such as paint, ink, or adhesive intended to be applied to a substrate and consisting of a mixture of resins, pigments, solvents, and/or other additives, where the material is produced by a manufacturing operation where materials are blended, mixed, diluted, or otherwise formulated. *Id.* at § 63.8105. Coating does not include materials made in processes where a formulation component is synthesized by chemical reaction or separation activity and then transferred to another vessel where it is formulated to produce a material used as a coating, where the synthesized or separated component is not stored prior to formulation. *Id.* Typically, coatings include products described by North American Industry Classification System codes 325510 (Paint and Coating Manufacturing), 325520 (Adhesive and Sealant Manufacturing), and 325910 (Ink Manufacturing). Notably, coating manufacturing occurring under an affected source for any other NESHAP is excluded from the Miscellaneous Coating Manufacture NESHAP. *Id.*

- **Applicability: Not applicable.** Subpart HHHHHH has not previously applied to Sea Ray’s coating operations at the Cape Canaveral site. In the future, this NESHAP will not apply because it applies only at major HAP sources and the Cape Canaveral site will be an area source for HAPs.

#### **Area Source NESHAPs:**

The following is a list of area source NESHAPs potentially related to Sea Ray’s activities at the Cape Canaveral site. The paint stripping and miscellaneous surface coating NESHAP, Subpart HHHHHH, is the only area source NESHAP relevant to operations at the Cape Canaveral site. However, this NESHAP exempts surface coating of wood substrates and is inapplicable to the wood coated parts manufacturing at Cape Canaveral. Therefore, none of these NESHAPs will apply to the wood coating operations currently permitted for the Cape Canaveral site or planned for the Cape Canaveral site in the future.

#### **NESHAP 40 CFR 63 Subpart HHHHHH – Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

- **Overview:** This area source NESHAP HHHHHH establishes standards three types of sources. *Id.* at § 63.11170. First, the NESHAP addresses sources using chemical paint strippers containing methylene chloride. *Id.* at § 63.11170(a)(1). Second, the NESHAP addresses operations performing spray application of coatings to motor vehicles and mobile equipment at autobody shops and mobile operations. *Id.* at § 63.11170(a)(2). “Motor vehicle” means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles. *Id.* at § 63.11180. “Motor vehicle and mobile equipment surface coating” means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant. *Id.* Third, the NESHAP addresses operations performing spray application of coatings to a plastic and/or metal substrate on a part or product. *Id.*

at § 63.11170(a)(3). “Miscellaneous surface coating operations,” under this subpart specifically excludes surface coatings applied to wood, among several other substrates. *Id.* at § 63.11180.

- **Applicability: Not applicable.** Sea Ray’s Cape Canaveral facility (1) does not use chemical paint strippers containing methylene chloride, (2) is a parts manufacturing plant, and (3) intends to coat only wood products at the Cape Canaveral site. This area source NESHAP will not apply.

#### **NESHAP 40 CFR 63 Subpart QOOOOO – Wood Preserving Area Sources**

- **Overview:** This NESHAP covers wood preserving operations, where “wood preserving” means the pressure or thermal impregnation of chemicals into wood to provide resistant to attack by fungi, bacteria, insects, and marine borers. 40 C.F.R. § 63.11428. “Thermal treatment processes” involved in such preservation are non-pressurized processes where wood is exposed to a heated preservative. *Id.* at § 63.11433.
- **Applicability: Not applicable.** The wood coating operations at Cape Canaveral do not involve wood preservation, as the methods involved do not include pressurized or thermal impregnation of chemicals to provide resistance. Therefore, this area source NESHAP is not currently applicable, and there are no plans to engage in activities regulated by this NESHAP in the future.

#### **NESHAP 40 CFR 63 Subpart VVVVVV – Chemical Manufacturing Area Sources**

- **Overview:** This area source NESHAP addresses chemical manufacturing process units (CMPUs) that use as feedstocks or generate as byproducts the following HAPs: 1,3-butadiene, 1,3-dichloropropene, acetaldehyde, chloroform, ethylene dichloride, hexachlorobenzene, methylene chloride, quinoline, arsenic compounds, cadmium compounds, chromium compounds, lead compounds, manganese compounds, nickel compounds, and hydrazine. *Id.* at § 63.11494. “Chemical manufacturing process” means all equipment producing a product or isolated intermediate. *Id.* at § 63.11502. A process includes any combination of reaction, separation, or other activity, manufacture, or treatment used to produce a product or isolated intermediate. *Id.* Subpart VVVVVV applies only to CMPUs (1) using or generating the specified HAPs, (2) located at an area source, and (3) using the specified HAPs in excess of concentrations established for carcinogens (0.1%) and non-carcinogens (1.0%).
- **Applicability: Not applicable.** Sea Ray neither uses the specified HAPs in concentrations subject to this Subpart, nor emits those HAPs from the Cape Canaveral facility, and does not anticipate doing so in the future. Therefore, this NESHAP is not applicable.

#### **NESHAP 40 CFR 63 Subpart BBBB BBBB – Chemical Preparations Industry**

- **Overview:** The Chemical Preparations Industry area source NESHAP applies to owners and operators of chemical preparations facilities with at least one operation related to target HAP service. *Id.* at § 63.11579. “Target HAPs” are metal compounds for chromium, lead, manganese, and nickel. *Id.* at § 63.11588. “Chemical preparations operation” means the collection of mixing, blending, milling, and extruding equipment used to manufacture chemical preparations. *Id.* “Chemical

preparations” means a target HAP-containing product, or intermediate used in the manufacture of other products, manufactured in a process operation described by the NAICS code 325998 if the operation manufactures target HAP-containing products or intermediates other than indelible ink, India ink, writing ink, and stamp pad ink. *Id.*

- Applicability: **Not applicable**. Sea Ray does not meet the definition of a chemical preparation facility and does not anticipate beginning operations that would qualify it as such in the future. As such, this NESHAP is inapplicable.

#### **NESHAP 40 CFR 63 Subpart CCCCCC – Paints and Allied Products Manufacturing**

- Overview: Subpart CCCCCC is the NESHAP for area sources manufacturing paints and allied products and processing, using, or generating materials containing HAP. *Id.* at § 63.11599. “Paints and allied products manufacturing” means producing paints and allied products, used to leave a dried film of solid material on a substrate. *Id.* at § 63.11607. Typically, the manufacturing processes that produce these materials are described by SIC codes 285 or 289 and NAICS codes 3255 and 3259 and are produced by physical means, such as blending and mixing, as opposed to chemical synthesis means, such as reactions and distillation. However, paints and allied products manufacturing does not include manufacture of raw materials, such as resins, pigments, and solvents used in the production of paints and coatings, and does not include activities by end users of paints or allied products to ready those materials for application. For the purposes of this subpart, “material containing HAP” means a material containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight for carcinogens or 1.0 percent for non-carcinogens. *Id.* at § 63.11607.
- Applicability: **Not applicable**. Sea Ray does not manufacture products addressed by this NESHAP at its Cape Canaveral site, nor does intend to do so in the future. This NESHAP is therefore inapplicable.

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