



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

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

Merritt Island Complex

Facility ID No. 0090093

PROJECT

Project No. 0090093-015-AV
Application for Title V Air Operation Permit
Project Name: Title V Air Operation Permit Revision

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

May 1, 2012

Prepared by Jeffrey Rustin, P.E.

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GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources – Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Randy Serfozo, General Manager
Sea Ray Boats, Inc.
350 Sea Ray Drive
Merritt Island, Florida 32953

B. Professional Engineer:

N/A (Department opened existing permit.)

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C. Project Location:

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

D. Project Summary:

The Department opened the existing Title V air operation permit to revise the facility description to reflect two recent property sale transactions and lower the facility VOC limit from 426.0 tons per year to 326.0 tons per year. This is a revision of Title V air operation permit No. 0090093-013-AV. The existing facility consists of fiberglass boat manufacturing operations at the Product and Development Engineering Plant, the Sykes Creek Plant, and the Buildings 102 and 103 of the Cape Canaveral Plant.

Additional Information relating to project:

Project Description: Vectorworks Merritt Island, LLC proposed to use **Building 101**, previously owned and operated by Sea Ray Boats, Inc. and located at Sea Ray Boats Cape Canaveral Plant, 1200 Sea Ray Drive, Merritt Island, FL for its new boat manufacturing facility. Vectorworks Merritt Island, LLC purchased Buildings **101, 102, and 103** from Sea Ray Boats, Inc. during the first quarter of 2012. Sea Ray Boats plans to lease **Buildings 102 and Building 103** from Vectorworks Merritt Island, LLC, and continue to be responsible for emissions and activities. These responsibilities are clarified under Title V Administrative Permit Correction (Project No. 0090093-014-AV) and this Title V Administrative Permit Revision (Project No. 0090093-015-AV).

The Vectorworks Merritt Island, LLC initial construction permit (No. 0090235-001-AC) authorizes the construction of this new boat facility. It allows for the construction of related activities, installation of equipment, and related activities at this building. It will operate the activities of Building 101 and will be responsible for its emissions and recordkeeping activities. The responsibilities covered by Construction Permit No. 0090235-001-AC will also be cover in a future initial Title V Air Operation Permit.

Sea Ray Boats, Inc. owns and operates the remaining boat-manufacturing complex located in Merritt Island, Florida. According to the facility's Title V air permit (Permit No. 0090093-013-AV), the facility, which is generally referred to as the Merritt Island Complex, consists of four plants: (1) Merritt Island Plant located at 200 Sea Ray Drive, (2) Product Development and Engineering (PD & E) located at 200 Sea Ray Drive, (3) Sykes Creek Plant located at 350 Sea Ray Drive, and (4) the Cape Canaveral Plant located at 1200 Sea Ray Drive which has now been sold to Vectorworks. In 2010, Sea Ray Boats discontinued production at another portion of the Merritt Island Plant located

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at 100 Sea Ray Drive and permanently closed it during the first part of 2011. It sold this property to Arnott, Inc., Air Suspension Products during the third quarter of 2011.

E. Application Information:

Department opened project on May 1, 2012.

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	Not exempt from general permitting requirements.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Resin and gel coating operations could be a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Resin and gel coating operations are a source of VOC and odors.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS - 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS - 40 CFR 63)	Y	Facility is subject to 40 CFR 63, Subparts A and VVVV.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is a major source of hazardous air pollutants.

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Subject to:	Y/N	Comments
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (lbs/hr., tpy, lbs/ton, etc., as applicable)	Allowable Emissions (lbs/hr., tpy, lbs/ton, opacity, etc.)
VOC	Total	326.0 tpy	326.0 tpy
HAPs	Total	326.0 tpy (assuming worst case, all VOCs are HAPs)	N/A
VE	Facility		20%

V. Federal NSPS and/or NESHAP Provisions

- A. NESHAP Subpart A – General Provisions
- B. NESHAP Subpart VVVV – Boat Manufacturing

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).