

STATEMENT OF BASIS

Title V Air Operation Permit Revision Permit No. 0090093-015-AV

APPLICANT

The applicant for this project is Sea Ray Boats, Incorporated. The applicant's responsible official and mailing address are:

Mr. Randy Serfozo, General Manager
Sea Ray Boats, Incorporated, Merritt Island Complex
350 Sea Ray Drive
Merritt Island, FL 32953-4185

FACILITY DESCRIPTION

The applicant operates the Merritt Island Complex, which is located at 200, 350, and Buildings 102 and 103 of 1200 Sea Ray Drive, Merritt Island, Florida.

The fiberglass boat production consists of the following processes:

- mold maintenance
- gelcoat application
- gelcoat holding
- lamination (resin, fiberglass, man-made synthetics, and wood application)
- lamination holding
- parts extraction from molds
- parts cutting and grinding
- parts inspection and repair
- wood shop
- upholstery
- assembly
- test, final finish, inspection, and delivery
- repairs to existing boats
- bottom painting

The pollution control device for the P.D.E. Plant Small Parts/Wood Shop consists of a Torit Dust Collector, model 30-15.

The pollution control device for the P.D.E. Plant Cutting/Grinding Booth (Fabric Enclosure) consists of three Industrial Maid Air Cleaners or equal dust control device. Each of these three banks of air filters consist of pre-filters, pleated filters, and bags filters in series.

The pollution control devices for the Sykes Creek Plant Wood Shop consist of a Joe Hills Custom System (JHC), a dust collection and clean air recirculation system.

The pollution control device for the grinding operations at the Sykes Creek Plant consists of a portable Dust Collector, model DC5000 or a JBI Incorporated, or equal, permanent dust control device.

The pollution control device for the Cape Canaveral Plant Wood Shop consists of a JHC dust collection system.

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Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility to reflect recent sales of 2 of the 4 plants and lowering the VOC emission limit by 100 tons per consecutive 12-months period.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued **March 18, 1998**
Title V Air Operation Permit Renewal issued **April 03, 2002**
Title V Air Operation Permit Revision issued **December 29, 2005**
Title V Air Operation Permit Renewal issued **October 30, 2006**
Title V Air Operation Permit Revision issued **March 31, 2009**
Application for a Title V Air Operation Permit Renewal received **February 22, 2011**
Title V Air Operation Permit Renewal issued **September 07, 2011**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

- Facility is subject to 40 CFR 63, Subpart VVVV, Boat Manufacturing, and will comply with the subpart and maintain records of material usage to demonstrate compliance.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

PROJECT REVIEW

The following changes were made as part of this revision:

1) Specific Condition **A.5.** was changed:

FROM: VOC Emissions. The maximum **facility-wide** VOC emissions, including hazardous air pollutants (HAPs), shall not exceed ~~426.0~~ tons per any consecutive 12-months period.

TO: VOC Emissions. The maximum **facility-wide** VOC emissions, including hazardous air pollutants (HAPs), shall not exceed 326.0 tons per any consecutive 12-months period.

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2) Facility Description was changed in the Statement of Basis and the Title V permit to reflect to recent sales of 2 of the 4 plants.

CONCLUSION

This project revises Title V air operation permit No. 0090093-013-AV, which was issued on September 07, 2011. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.