STATEMENT OF BASIS

Vectorworks Marine, Inc.
Fiberglass Boat Manufacturing Facility
Facility ID No.: 0090127
Brevard County

Title V Air Operation Permit Revision
DRAFT Permit Project No.: 0090127-008-AV
Revision to Title V Air Operation Permit No.: 0090127-007-AV

The initial Title V Air Operation Permit, No. 0090127-007-AV was issued/effective May 1, 2006. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit revision is to incorporate the terms and conditions of air construction permit, No. 0090127-009-AC, which incorporates 40 CFR 63, Subpart WWWW (NESHAP: Reinforced Plastic Composites Production).

This facility consists of the following emission unit:

001 - Lamination/Gelcoating and Related Activities

The applicable emission limitation references are as follows:

a) Lamination/Gelcoating and Related Activities - VOC limit of 50 tons/yr per construction permit 0090127-006-AC

b) Facility-Wide - VOC (Volatile Organic Compound) limit of 50 tons/yr. per construction permit 0090127-006-AC, general VOC standard per Rule 62-296.320(1)(a), F.A.C., and general VE (Visible Emission) limit per Rule 62-296.320(4)(b)1., F.A.C.

Additionally, 40 CFR 63 Subpart VVVV (NESHAP: Boat Manufacturing) and 40 CFR 63, Subpart WWWW (NESHAP: Reinforced Plastic Composites Production) applies to the facility. The facility will demonstrate compliance with the MACT for both activities by use of the “averaging/point value” method.

CAM (Continuous Assurance Monitoring) does not apply.

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

Based on the Title V Air Operation Permit Revision application received February 28, 2008, this facility is a major source of hazardous air pollutants (HAPs).