



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronic Mail – Received Receipt Requested

Mr. Jeffrey Gray, CEO and Managing Director
Vectorworks, Inc.
805 Marina Road
Titusville, Florida 32796

Re: Draft Air Construction Permit No.: 0090127-012-AC
DRAFT/PROPOSED Title V Air Operation Permit Revision No.: 0090127-011-AV
Revision to Title V Air Operation Permit No.: 0090127-010-AV

Dear Mr. Gray:

Enclosed is the **draft/proposed permit** package to construct an emission unit and to revise the Title V air operation permit for Vectorworks Marine, LLC. This facility is located in Brevard County at 805 Marina Road, Titusville, FL. The permit packages include the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes since the last Title V renewal.
- The **draft construction permit and the draft/proposed Title V air operation permit revision**, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the **draft construction permit and the draft/proposed permit**; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because the Title V permit is being processed as a combined draft/proposed permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the following address: oquendo.ana@epamail.epa.gov.

If you have any questions, please contact the Project Engineer, Ms. Natrevia Gradney, by telephone at 407-897-2933 or by email at Natrevia.Gradney@dep.state.fl.us.

Sincerely,

Caroline D. Shine
District Air Program Administrator

11/9/11
Date

Enclosures
CDS/ng/ta

WRITTEN NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION

*In the Matter of an
Application for Permits by:*

Vectorworks, Inc.
805 Marina Road
Titusville, Florida 32796

Responsible Official:
Mr. Jeffrey Gray, CEO and Managing Director

Draft Air Construction Permit No. 0090127-012-AC
DRAFT/PROPOSED Title V Air Operation Permit
Revision No. 0090127-011-AV
Facility ID No. 0090127
Vectorworks Marine, LLC
Brevard County, Florida

Applicant: The applicant for the projects is Vectorworks, Inc. The applicant's responsible official and mailing address are:

Mr. Jeffrey Gray, CEO and Managing Director
Vectorworks, Inc., Vectorworks Marine, LLC
805 Marina Road
Titusville, Florida 32796

Facility Location: The applicant operates the existing Vectorworks Marine, LLC, which is located in Brevard County at 805 Marina Road, Titusville, Florida.

Project: The applicant applied on September 08, 2011 to the Department for a major source air construction permit and a Title V air operation permit revision. The revision is a change to Title V Air Operation Permit No. 0090127-010-AV. An additional emissions unit (Adhesive Mixing/Packaging and Related Activities) will be constructed and added to the existing Title V Air Operation Permit; however, the VOC/HAP emissions limitation will remain the same.

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Department of Environmental Protection's Air Resource Section in the Central District Office is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767. The Permitting Authority's telephone number is 407/897-2931.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue a draft Air Construction Permit and a draft Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a draft permit and subsequent final permit in accordance with the

Vectorworks, Inc.
Vectorworks Marine, LLC

Permit Nos. 0090127-011-AV and 0090127-012-AC
Air Construction Permit and Title V Permit Revision

WRITTEN NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION

conditions of the draft permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed draft air construction permit issuance action for a period of 14 days from the date of publication of this Public Notice. Written comments should be provided to the Permitting Authority. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement

WRITTEN NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION

of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

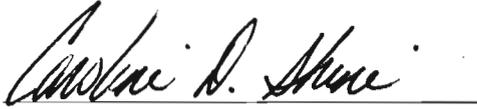
Mediation: Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: oqueando.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C., 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

WRITTEN NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION

Executed in Orlando, Florida.



Caroline D. Shine
District Air Program Administrator

11/9/11

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this WRITTEN INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION (including the combined PUBLIC NOTICE, the Draft Air Construction Permit and the DRAFT/PROPOSED Title V Air Operation Permit package) or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Jeffrey Gray, Vectorworks Marine, LLC: grayj@vectorworksmarine.com

Mr. Kurtis A. Hopf, P.E., Vectorworks Marine, LLC: khopf@vectorworksmarine.com

Mr. Thomas Mulligan, P.E., Geotechnical and Environmental Consultants, Inc.: tjmulligan@g-e-c.com

Ms. Katy Forney, U.S. EPA Region 4: forney.kathleen@epamail.epa.gov

Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov

Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Clerk Stamp

FILING on this date, pursuant to Section 120.52, F.S., with the designated Department clerk, receipt of which is hereby acknowledged.


(Clerk)

11/10/11
(Date)



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Vectorworks, Inc.
805 Marina Road
Titusville, Florida 32796

Vectorworks Marine, LLC

Facility ID No. 0090127

PROJECT

Project Nos. 0090127-011-AV and 0090127-012-AC
Application for Title V Air Operation Permit Revision and Air Construction Permit
Projects Name: Adhesive Mixing/Packaging

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

October 6, 2011 and November 2, 7, and 8, 2011

Prepared by Jeffrey Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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. Jeffrey Gray, CEO and Managing Director
Vectorworks, Inc.
805 Marina Road
Titusville, Florida 32796

B. Professional Engineer:

Mr. Thomas J. Mulligan, P.E.
Geotechnical and Environmental Consultants, Inc.
919 Lake Baldwin Lane
Orlando, Florida 32814

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

C. Project Location:

Vectorworks Marine, LLC
 805 Marina Road
 Titusville, Florida 32796

D. Projects Summary:

The projects will add an additional emission unit (Adhesive Mixing/Packaging and Related Activities). The facility-wide VOC/HAP emission limit will remain the same.

E. Application Information:

Application Received on: 09/08/2011
 Application Complete: 09/08/2011

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 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
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.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Subject to:	Y/N	Comments
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	– EU No. 001 is subject to 40 CFR 63, Subpart A, VVVV, and WWWW. – EU No. 002 is subject to 40 CFR 63 Subpart WWWW; however, it is excluded from any of the requirements in the subpart.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is a major source of hazardous air pollutants.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required for EU No. 001.

III. Summary of Emissions

Pollutant	EU No.	Potential Emissions (tpy)	Allowable Emissions (tpy)
VOC	001	Approximately 49.99	See Total VOC below
	002	Approximately 12.00	See Total VOC below
	Total	61.99	Less than 50.0
Total HAP	001	49.99	See Total HAP below
	002	Approximately 8.00	See Total HAP below
	Total	Approximately 57.99	Less than 50.0
Individual HAP (Styrene)	001	49.99	Less than 50.0
	002	Approximately 8.00 (mostly methyl methacrylate)	Less than 50.0
	Total	57.99	Less than 50.0
VE	001 and 002		20%

The new emission unit (EU 002) will increase the potential to emit for the facility by 12.0 tons of VOC approximately and 8.0 tons of total HAP approximately. The facility limit for VOC/HAP emissions will remain the same.

Pollutant	EU No.	Anticipated Actual Emissions (tpy)
VOC (mostly methyl ethyl ketone (MEK))	002	12.0
Total HAP (mostly methyl methacrylate)	002	8.0

IV. Federal NSPS and/or NESHAP Provisions

- A. NESHAP Subpart A – General Provisions (Emission Unit 001)
- B. NESHAP Subpart VVVV – Boat Manufacturing (Emission Unit 001)
- C. NESHAP Subpart WWWW – Reinforced Plastic Composites Production (Emission Unit 001-subject to requirements and Emission Unit 002-not subject to the requirements)

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Note: All of the internal combustion engines as listed in Appendix I meet the definition of nonroad engines (40 CFR 1068.30), as long as each portable engine at the site does not remain at a specific location (a location is any single site at a building, structure, facility, or installation) at the facility for more than twelve consecutive months; therefore, the engines are not subject to 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ.

The new emission unit (EU 002) is not subject to 40 CFR 63 Subpart VVVV because it does not include one of the following activities:

- (a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
- (b) Closed molding resin operations.
- (c) Resin and gel coat mixing operations.
- (d) Resin and gel coat application equipment cleaning operations.
- (e) Carpet and fabric adhesive operations.
- (f) Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

The new emission unit (EU 002) is not subject **to the requirements** of 40 CFR 63 Subpart WWWW. Mixing is part of the **affected source** under the subpart; however, the operation (**repair or production materials that do not contain resin or gelcoat**) is excluded from the requirements in this subpart (Subpart WWWW). See below.

63.5790 What parts of my plant does this subpart cover?

(a) This subpart applies to each new or existing affected source at reinforced plastic composites production facilities.

(b) **The affected source consists of all parts of your facility engaged in the following operations:** Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, **mixing**, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.

(c) **The following operations are specifically excluded from any requirements in this subpart:** application of mold sealing and release agents; mold stripping and cleaning; repair of parts that you did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations (such as hobby shops on military bases); prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; **repair or production materials that do not contain resin or gel coat**; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply.

The new emission unit is not subject to 40 CFR 63 Subpart CCCCCC-NESHAP: Area Source Standards for Paints and Allied Products Manufacturing because the facility does not process, use, or generate materials containing the following HAP: benzene, methylene chloride, and compounds of cadmium, chromium, lead, and nickel.

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).

STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 0090127-011-AV

APPLICANT

The applicant for this project is Vectorworks, Inc. The applicants' responsible official and mailing address are:

Mr. Jeffrey Gray, CEO and Managing Director
Vectorworks, Inc., Vectorworks Marine, LLC
805 Marina Road
Titusville, Florida 32796

FACILITY DESCRIPTION

The applicant operates Vectorworks Marine, LLC, which is located at 805 Marina Road, Titusville, Florida.

Vectorworks Marine, LLC manufactures Computer Numerical Control (CNC) plugs and conducts open and closed molding operations for boat manufacturing, fiberglass boats varying in size and purpose, and non-boat manufacturing related reinforced plastic composites. The facility consists of four main buildings: (1) Offices, (2) Machining and Office, (3) Infusion Molding and Large Lamination, and (4) Lamination and Assembly.

The primary activity in the Machining and Office Building is the machining of CNC plugs and open molding operations. The spray application of polyurethane foam and limited lamination using resins, putties, and fillers also take place in this building. Emissions in this building are channeled through a 2-ft diameter exhaust fan and exit an exhaust stack terminating 40-ft above ground level.

The Infusion Molding and Large Lamination Building is the site of lamination and gelcoating of large parts and molds. Infusion (closed) molding is the primary activity in this building. Emissions in this building are channeled through a 2-ft diameter exhaust fan and exit an exhaust stack terminating 40-ft above ground level.

The Lamination and Assembly Building is the site of lamination and gelcoating of smaller pieces and the assembly of boats. Infusion (closed) molding is the primary activity in this building. Emissions in this building are channeled through two (2) exhaust fans with filters to eliminate particulate emissions prior to exhaustion to the atmosphere.

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 incorporate the terms and conditions of major source air construction permit no. 0090127-012-AC.

STATEMENT OF BASIS

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued [May 01, 2006]

Application for a Title V Air Operation Permit Revision received [February 28, 2008]

Title V Air Operation Permit Revision issued [September 08, 2008]

Title V Air Operation Permit Renewal issued [April 27, 2011]

Application for a Major Source Air Construction Permit and a Title V Air Operation Permit Revision received [September 08, 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 not 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 an emission unit (EU 001) that is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

- 40 CFR 63 Subpart VVVV (NESHAP: Boat Manufacturing); and
- 40 CFR 63 Subpart WWWW (NESHAP: Reinforced Plastic Composites Production).

(Note: The facility will demonstrate compliance with the MACT for both activities by use of the "averaging/point value" method.)

EU 002 (Adhesive Mixing/Packaging and Related Activities) is subject to 40 CFR 63 Subpart WWWW; however, the Emission Unit is not subject to any of the requirements in this subpart.

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 were changes as part of this revision:

- 1) Emission Unit 002-Adhesive Mixing/Packaging and Related Activities was added as part of this revision; however, the facility-wide VOC/HAP emissions limitation will remain the same.

CONCLUSION

This project revises Title V air operation permit No. 0090127-010-AV, which was issued on April 27, 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.

Vectorworks, Inc.
Vectorworks Marine, LLC
Facility ID No. 0090127
Brevard County

Title V Air Operation Permit Revision

Permit No. 0090127-011-AV
(Revision of Title V Air Operation Permit No. 0090127-010-AV)



Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: (407) 897-2931
Fax: (850) 412-0455

Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: (407) 897-2931
Fax: (850) 412-0455

Title V Air Operation Permit Revision

Permit No. 0090127-011-AV

Table of Contents

<u>Section</u>	<u>Page Number</u>
I. Facility Information.	
A. Facility Description.	2
B. Summary of Emissions Units.	2
C. Applicable Regulations.	2
II. Facility-wide Conditions.	3
III. Emissions Units and Conditions.	
A. EU 001, Lamination/Gelcoating Operations.	5
B. EU 002, Adhesive Mixing/Packaging Operations.....	10
IV. Appendices.	12
Appendix A, Glossary.	
Appendix I, List of Insignificant Emissions Units and/or Activities.	
Appendix ICE, Requirements for Internal Combustion Engines.	
Appendix NESHAP, Subpart A – General Provisions.	
Appendix NESHAP, Subpart VVVV – Boat Manufacturing.	
Appendix NESHAP, Subpart WWWW – Reinforced Plastic Composites Production.	
Appendix RR, Facility-wide Reporting Requirements.	
Appendix TR, Facility-wide Testing Requirements.	
Appendix TV, Title V General Conditions.	
Referenced Attachments.	At End
Table H, Permit History.	

DRAFT/PROPOSED PERMIT

PERMITTEE:

Vectorworks, Inc.
805 Marina Road
Titusville, Florida 32796

Permit No. 0090127-011-AV
Vectorworks Marine, LLC
Facility ID No. 0090127
Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility. The Vectorworks Marine, LLC is located in Brevard County at 805 Marina Road, Titusville, Florida. UTM Coordinates are: Zone 17, 518.01 East and 3166.10 North. Latitude is: 28° 37' 24" North; and, Longitude is: 80° 48' 50" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: TBD

Renewal Application Due Date: September 15, 2015

Expiration Date: April 27, 2016

(Draft/Proposed)

Caroline D. Shine
District Air Program Administrator
Central District

CDS/jr/ng

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

Vectorworks Marine, LLC manufactures Computer Numerical Control (CNC) plugs and conducts open and closed molding operations for boat manufacturing, fiberglass boats varying in size and purpose, and non-boat manufacturing related reinforced plastic composites. The facility consists of four main buildings: (1) Offices, (2) Machining and Office, (3) Infusion Molding and Large Lamination, and (4) Lamination and Assembly.

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

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Lamination/Gelcoating Operations
002	Adhesive Mixing/Packaging and Related Activities

Subsection C. Applicable Regulations.

Based on the Title V air operation permit revision application received September 08, 2011, this facility is a major source of hazardous air pollutants (HAP).

A summary of applicable regulations is shown in the following table.

Regulation	EU No.
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart VVVV, Boat Manufacturing	001
40 CFR 63, Subpart WWWW, Reinforced Plastic Composites Production	001 and 002
EU 002 is subject to 40 CFR 63 Subpart WWWW, but the emission unit is excluded from the requirements in this subpart.	

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions shall include the following:

- a) Tightly cover or close all VOC containers when they are not in use;
- b) Tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use;
- c) Maintain all piping, valves, fittings, etc. in good operating condition;
- d) Prevent excessive air turbulence across exposed VOCs; and
- e) Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling, or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Frequent sweeping of outside areas.
- b) Maintain filters in good working order.

SECTION II. FACILITY-WIDE CONDITIONS.

- c) Removal of generated particulate matter from buildings or work areas to prevent particulate from becoming airborne.
- d) Enclosure or covering of activities or equipment where necessary to prevent unconfined particulate matter emissions in excess of 20 percent opacity.
- e) Removal of generated particulate matter from paved and unpaved roads and parking areas to prevent re-entrainment.
- f) Application of water to paved and unpaved roads and parking areas if a visible particulate plume is observed to extend more than 15 feet from the point of origin.

[Rule 62-296.320(4)(c), F.A.C.; and, proposed by applicant in Title V air operation permit application received August 13, 2010.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

- FW6.** Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]
- FW7.** Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site:
<http://www.dep.state.fl.us/air/emission/tvfee.htm>.
[Rule 62-213.205, F.A.C.]
- FW8.** Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]
- FW9.** Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:
- a) Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
 - b) Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
- [40 CFR 68]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
001	<p>Lamination/Gelcoating Operations</p> <p>The primary activity in the Machining and Office Building is the machining of CNC plugs and open molding operations. The spray application of polyurethane foam and limited lamination using resins, putties, and fillers also take place in this building. Emissions in this building are channeled through a 2-ft diameter exhaust fan and exit an exhaust stack terminating 40-ft above ground level.</p> <p>The Infusion Molding and Large Lamination Building is the site of lamination and gelcoating of large parts and molds. Infusion (closed) molding is the primary activity in this building. Emissions in this building are channeled through a 2-ft diameter exhaust fan and exit an exhaust stack terminating 40-ft above ground level.</p> <p>The Lamination and Assembly Building is the site of lamination and gelcoating of smaller pieces and the assembly of boats. Infusion (closed) molding is the primary activity in this building. Emissions in this building are channeled through two (2) exhaust fans with filters to eliminate particulate emissions prior to exhaustion to the atmosphere.</p>

Essential Potential to Emit (PTE) Parameters

- A.1. Hours of Operation.** This emission unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C.; Construction Permit 0090127-012-AC]

Emission Limitations and Standards

- A.2. Visible Emissions.** Visible emissions shall not exceed 20 percent opacity.
[Rule 62-296.320(4)(b)1, F.A.C.]
- A.3. VOC/HAP Emissions.** The maximum **facility-wide** VOC/HAP emissions shall not exceed the following:

Pollutant	Emissions (tons per any consecutive 12-month period)
Total VOC	Less than 50.0
Combined HAP	Less than 50.0
Single HAP	Less than 50.0

- a. Styrene emissions shall be determined using the following equation:

$$\text{Emissions (tons)} = \frac{Ms \times EF}{2000 \text{ lb/ton}}$$

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

where:

Ms = amount of styrene containing material used (in tons)
 EF = emission factor (lb/ton) for styrene monomer content (from table below)

The applicable styrene emission factor shall be obtained (interpolated/extrapolated, if applicable) from the following table, in conjunction with the percent of available non-vapor suppressed (NVS) styrene monomer in the resin/gelcoat:

% Monomer	Resin** Hand (Non-Spray) Layup	Resin** Mechanical Atomized Spray Layup	Resin Mechanical Nonatomized* Spray Layup	Gel Coat** Mechanical Atomized Spray Layup	Gelcoat Mechanical Nonatomized* Spray Layup
18	39	51	39	138	67
19	41	54	41	148	70
20	43	58	43	158	79
21	45	61	45	168	88
22	48	64	47	178	97
23	50	68	49	189	106
24	52	71	51	200	115
25	55	75	54	211	124
26	57	78	56	221	133
27	59	82	58	233	142
28	62	86	60	244	151
29	64	90	62	256	160
30	67	94	64	269	169
31	69	97	66	281	178
32	71	102	68	295	187
33	74	105	71	308	196
34	77	112	74	322	205
35	80	118	77	336	214
36	83	127	80	354	223
37	86	136	83	371	232
38	90	146	86	390	241
39	92	156	89	408	250
40	95	166	93	427	259
41	98	176	96	446	268
42	100	187	99	466	278
43	112	192	102	477	287
44	117	202	105	495	296
45	122	212	108	513	305
46	127	221	111	532	314
47	133	232	115	551	323
48	138	242	118	571	332

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

% Monomer	Resin** Hand (Non- Spray) Layup	Resin** Mechanical Atomized Spray Layup	Resin Mechanical Nonatomized* Spray Layup	Gel Coat** Mechanical Atomized Spray Layup	Gelcoat Mechanical Nonatomized* Spray Layup
49	143	252	121	590	341
50	148	263	124	609	350

* *Nonatomized* means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, and pressure fed resin rollers. In addition, the device must be operated according to the manufacturer’s directions, including instructions to prevent the operation of the device at excessive spray pressures.

** *The emission factors in these columns are based on a weighted average using the following assumptions:*

- *Using the Unified Emission Factors - 20% by weight of the facility's usage of resins and gelcoats are for reinforced plastic composites production for items such as hatches and doors, but not for hulls and decks.*
- *Using the National Marine Manufacturer Association's Factors – 80% by weight of the facility's usage of resins and gelcoats are for items such as decks and hulls.*

[Rules 62-4.070(3), 62-210.200(PTE), and 62-213.440(1)(b)2, F.A.C.; Construction Permit 0090127-006-AC]

Test Methods and Procedures

A.4. Test Methods. Required tests shall be performed in accordance with the following reference methods:

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

[Rules 62-297.310(7)(a)3. and 62-297.401, F.A.C.]

A.5. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

A.6. Compliance Tests Prior To Renewal. Compliance tests shall be performed for EU 001, once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Condition **A.2.**
[Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Recordkeeping and Reporting Requirements

A.7. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority: *(Include here reports that are specific to the unit based on state rule, federal rule or AC permit, and that are not already covered by Appendix RR.)*

Report	Reporting Deadline	Related Condition(s)
A Notification of Compliance Status as specified in §63.9(h)	No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date.	Subpart VVVV
A Notification of Compliance Status as specified in §63.9(h)	No later than 30 calendar days after your facility's compliance date.	Subpart WWWW
Compliance report	Semiannually according to the requirements in §63.5910(b).	Subpart VVVV, Subpart WWWW
An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan	By fax or telephone within 2 working days after starting actions inconsistent with the plan. By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§63.10(d)(5)(ii)).	Subpart VVVV, Subpart WWWW

[Rule 62-213.440, F.A.C.]

A.8. Other Reporting Requirements. See Appendix NESHAP A, VVVV, WWWW, and Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

A.9. Monthly Recordkeeping Requirements. In order to demonstrate compliance with Specific Condition No. **A.3.**, the permittee shall maintain a monthly log at the facility for a period of at least 5 years from the date the data is recorded and made available to the Department upon request. The log shall contain the following:

- a. Facility Name, Facility ID No. (i.e., 0090127);
- b. Month and year of record;

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

- c. The consecutive 12-month totals of Total VOC emissions, combined HAP emissions, and single HAP emissions, in tons;
- d. The consecutive 12-month totals of the usage of gel-coats, resins, and other VOC/HAP containing materials;
- e. The total for each month of the usage of gel-coats, resins, and other VOC/HAP containing materials; and
- f. The VOC/HAP content of each gel-coat and resin applied.

The monthly logs shall be completed by the end of the following month. Calculations performed to demonstrate compliance shall be based on the maximum achievable control technology (MACT) model point value (emission averaging) option, as described in §63.5710.

Note: A consecutive 12 months total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total. Facilities or emission units that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months total can be maintained each month.

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

- A.10. Additional Recordkeeping Requirements: Records specified in Specific Condition No. A.9. above, must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations and available for review on site by the Department.**

[Rule 62-4.070(3), F.A.C.]

Other Requirements

- A.11. Federal Rule Requirements.** In addition to the specific conditions listed above, Emissions Unit No. 001 is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions, 40 CFR 63, Subpart VVVV – Boat Manufacturing, and 40 CFR 63, Subpart WWWW – Reinforced Plastic Composites Production. The conditions of both Subpart VVVV and Subpart WWWW are incorporated into this permit (attached and part of this permit, See Section IV. Appendices).

[Rule 62-213.440, F.A.C.; and Construction Permits 0090127-006-AC and 0090127-009-AC]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
002	<p>Adhesive Mixing/Packaging and Related Activities</p> <p>The adhesive mixing and packaging takes place in a separate subsection of the Lamination and Assembly Building. Adhesive components are placed into closed mixers having capacities ranging from 100 to 500 gallons. After mixing, the mixing pot is then raised above a 55-gallon drum or a dispenser cartridge and a cylinder forces the mixture out of the pot in controlled volumes. Emissions are routed to the atmosphere through a 2-ft. diameter, approximately 10,000 cubic ft. per minute stack.</p>

B.1. Hours of Operation. This emission unit may operate continuously (8,760 hours/year).
 [Rule 62-210.200(PTE), F.A.C.; Construction Permit 0090127-012-AC]

Emission Limitations and Standards

B.2. Visible Emissions. Visible emissions shall not exceed 20 percent opacity.
 [Rule 62-296.320(4)(b)1, F.A.C.]

B.3. VOC/HAP Emissions. The maximum **facility-wide** VOC/HAP emissions shall not exceed the following:

Pollutant	Emissions (tons per any consecutive 12-month period)
Total VOC	Less than 50.0
Combined HAP	Less than 50.0
Single HAP	Less than 50.0

B.4. Monthly Recordkeeping Requirements. In order to demonstrate compliance with Specific Condition No. **B.3.**, the permittee shall maintain a monthly log at the facility for a period of at least 5 years from the date the data is recorded and made available to the Department upon request. The log shall contain the following:

- a. Facility Name, Facility ID No. (i.e., 0090127);
- b. Month and year of record;
- c. The consecutive 12-month totals of Total VOC emissions, combined HAP emissions, and single HAP emissions, in tons;
- d. The consecutive 12-month totals of the usage of adhesive(s), in tons;
- e. The total for each month of the usage of adhesive(s); in tons;

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

- f. The VOC/HAP content of adhesive(s).

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12 months total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total. Facilities or emission units that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months total can be maintained each month.

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

- B.5. Additional Recordkeeping Requirements: Records specified in Specific Condition No. B.4. above, must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations and available for review on site by the Department. [Rule 62-4.070(3), F.A.C.]**

Other Requirements

- B.6. Federal Rule Requirements. In addition to the specific conditions listed above, Emissions Unit No. 002 is also subject to 40 CFR 63 Subpart WWWW–Reinforced Plastic Composites Production; however, Emission Unit No.002 is **excluded from any requirements in this subpart.****

[Rule 62-204.800(11)(b)79., F.A.C.; and §63.5790(b), §63.5790(c), and §63.5787 of 40 CFR 63 Subpart WWWW]

{Permitting Note: **Repair or production materials that do not contain resin or gel coat** (§63.5790(c)) are excluded from any requirements of the subpart. Additionally, the EU 002 operations are not associated with the manufacture of reinforced plastic composite parts.}

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.

Appendix I, List of Insignificant Emissions Units and/or Activities.

Appendix NESHAP, Subpart A - General Provisions.

Appendix NESHAP, Subpart VVVV - Boat Manufacturing.

Appendix NESHAP, Subpart WWWW - Reinforced Plastic Composites Production.

Appendix RR, Facility-wide Reporting Requirements.

Appendix TR, Facility-wide Testing Requirements.

Appendix TV, Title V General Conditions.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History