

STATEMENT OF BASIS

Sea Ray Boats, Inc.
Palm Coast Division

Facility ID No.: 0350003
Flagler County

Title V Air Operation Permit Renewal
Draft Permit Project No.: 0350003-008-AV

The initial Title V Air Operation Permit, No. 0350003-003-AV, was issued/effective on October 5, 1998. A Permit Revision was issued/effective on June 11, 1999. This Title V Air Operation Permit Renewal 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 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.

Sea Ray Boats, Inc. is a fiberglass boat manufacturing facility involving Lamination, Fabrication and Assembly processes that include, but not limited to, the following:

- Gel coating & open molding resin operations
- Closed molding resin operations
- Carpet and fabric adhesive applications
- Adhesive applications of bonding parts, structural adhesive applications
- Solvents for surface wipedown, cleaning & flushing of application equipment
- Surface coating and painting
- Sawing, routing and fabricating of wood and plastic components
- Hole cutting, trimming, and grinding of reinforced fiberglass parts
- parts repairing, and boat assembly stations
- Foam operations
- Resin storage tanks

The facility primarily uses non-atomized applicators for resin application; however, rollers are also used occasionally. Gelcoating is conducted using atomized applicators. The facility currently does not have any resin and gel coat mixing operations since they are buying the pre-mix bulk material from the suppliers. The facility does not have any add-on control device to control the HAPs and VOCs emissions from the boat manufacturing activities. However, the lamination building does have a single, 8-foot diameter, 75-foot high stack (Emissions point E54) with 300,000 acfm flow rate to reduce the odorous impact to the nearby area.

The facility is subject to the requirements of 40 CFR 63 Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. The facility

also has a VOC emissions cap of 249 tons in any consecutive 12-month period to escape prevention of significant deterioration (PSD) review.

Based on the Title V Air Operation Permit Revision application received on April 21, 2008, this facility is a major source of hazardous air pollutants (HAPs).