Maritec Industries, Incorporated
Groveland Facility
Facility ID No.**:** 0694826
Lake County

Title V Air Operation Permit Renewal

FINAL Permit Project No.: 0694826-005-AV

Permitting and Compliance Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

Telephone: 407/893-3334
Fax: 407/897-5963

Title V Air Operation Permit Renewal

FINAL Permit No.: 0694826-005-AV

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40 CFR 63, Subpart VVVV

Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:
Maritec Industries, Incorporated
20150 Independence Boulevard
Groveland, Florida 34736

FINAL Permit No.: 0694826-005-AV
Facility ID No.: 0694826
SIC Nos.: 37
Project: Title V Air Operation Permit Renewal

Attention: Robert Ackerbloom, President

The purpose of this permit is to renew the Title V Air Operation Permit and incorporate 40 CFR 63 Subpart VVVV. The existing facility is located at 20150 Independence Boulevard, Groveland, Lake County; UTM Coordinates: Zone 17-421.88 km East and 3168.13 km North; Latitude: 28° 38' 22" North and Longitude: 81° 48' 56" West.

STATEMENT OF BASIS: This 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 and 62-214. 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.

Referenced attachments made a part of this permit:
APPENDIX I-1, LIST of INSIGNIFICANT EMISSION UNITS and/or ACTIVITIES
APPENDIX TV-6, TITLE V CONDITIONS (version dated 6/23/06)
APPENDIX 40 CFR 63 Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

Effective Date:	**December 26, 2007**
Renewal Application Due Date:	**January 30, 2012**
Expiration Date:	**July 30, 2012**

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

James N. Bradner

James N. Bradner, P.E.
Program Administrator
Air Resources Management

JNB/**jar**

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www.dep.state.fl.us

Section I. Facility Information.

Subsection A. Facility Description.

Fiberglass boatbuilding operation; styrene based resin and gelcoat application, with associated activities including mold building/repair/maintenance, assembly, and finishing.

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

Based on the Title V Air Operation Permit Renewal application received June 27, 2007, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Groveland Facility

Please reference the Permit No., Facility ID No., and appropriate Emission Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History/ID Number Changes
Statement of Basis

These documents are on file with the permitting authority:
Application for initial Title V Operation Permit received January 22, 2002.
Initial Title V Operation Permit issued July 22, 2002.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06), is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,
The permittee shall 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]

5. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) 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.]

6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emission Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)©1., 3. &4., F.A.C., reasonable precautions to prevent unconfined emissions of unconfined particulate matter at this facility include the following requirements:

a) Chemical or water application to unpaved roads and unpaved yard areas;
b) Paving and maintenance of roads, parking areas and yards;
c) Landscaping or planting of vegetation; and
d) Other techniques, as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the following office:

Florida Department of Environmental Protection
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334; Fax: 407/897-5963

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Compliance Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

11. Certification of Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Annual Statements

12. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]
{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}

13. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year **on or before March 1** of the following year and submitted to Orange County Environmental Protection Division.
[Rule 62-210.370(3), F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-210.370(3) F.A.C. (see Condition 24. of APPENDIX TV-6, TITLE V CONDITIONS.)}

14. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).
[Rule 62-4.090, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.420(1)(a)3., 62-213.420(1)(b)1., 2., 3. & 4., 62-213.430(3), F.A.C. and 40 CFR 70.7(f) (see Conditions 35. and 38. of APPENDIX TV-6, TITLE V CONDITIONS.)}

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No./Brief Description
001 Groveland Facility

Fiberglass boatbuilding operation; styrene based resin and gelcoat application, with associated activities including mold building/repair/maintenance, assembly, and finishing.

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. The emission unit is permitted to operate continuously.
[Rule 62-4.160(2) and Rule 62-210.200 - (PTE), F.A.C.]

Emission Limitations and Standards

A2. Visible emissions from the facility shall not exceed 20% opacity.
[Rule 62-296.320(4)(b)1, F.A.C.]

A3. Emissions Unit Operating Rate Limitation After Testing. See specific condition No. **A9**.
[Rule 62-297.310(2), F.A.C.]

A4. Emissions: Total VOC, total HAP, and each HAP emission rates shall be less than 50 tons per twelve consecutive months, updated monthly.
[Rule 62-210.200 – PTE), F.A.C.]

Recordkeeping and Reporting Requirements

A5. Visible emission limit is described in Facility Wide Conditions, No. 3, page 4.
[Rule 62-296.320(4)(b)1., F.A.C.]

A6. Each stack (spray gelcoat booths and grinding booths) shall demonstrate compliance with its visible emission limit in accordance with DEP Method 9 prior to permit expiration date. The test period shall be a minimum of 30 minutes.
[Rules 62-297.401, 62-297.310(4)(a)2., and 62-297.310(7)(a)4.a., F.A.C.]

A7. DEP Method 9. The provisions of EPA Method 9 (40CFR60, Appendix A) are adopted by reference with the following exceptions:

a) EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
b) EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

1) For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
2) For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.
In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401, F.A.C.]

A8. The owner or operator shall notify the air compliance section of this office, at least 15 days prior to the date on which each formal compliance test is due to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
[Rule 62-297.310(7)(a)9., F.A.C.]

A9. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2)& (2) (b), F.A.C.]

A10. In order to demonstrate compliance with conditions number **A4.**, the permittee shall maintain a log at the facility. The log at a minimum shall contain the following:

<u>Monthly</u>
a) month
b) 12 consecutive months total pounds of resin and gel coat material used.
c) 12 consecutive months total of total VOC, total HAP, and each HAP emission rate.
[Rule 62-213.440(1)(b)2.b.,F.A.C.]

Note: A consecutive 12-month 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-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12 month total can be maintained each month.
[Rule 62-4.070(3), F.A.C.]

A11. Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept which includes sufficient information to determine compliance. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the

facility for at least 5 years and made available to the Department. The monthly logs shall be completed by the end of the following month.
[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

A12. Volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coatings, and inks, using EPA Reference Method 24 and 24A, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings". The documents shall be kept at the facility for at least five years and made available to the Department.
[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

A13. One copy of the required test report shall be filed with the Air Resources compliance section of this office as soon as practical but no later than 45 days after the last test is completed.
[Rules 62-297.310(8), F.A.C.]

40 CFR 63, Subpart VVVV

A14. The emissions unit(s) in this subsection are subject to the applicable requirements contained in 40 C.F.R. 63, Subpart A, which is incorporated by reference and attached to this permit.
[Rule 62-4.070(3), F.A.C.]

A15. The facility is subject to the applicable requirements contained in 40 C.F.R. 63, Subpart VVVV, which is incorporated by reference and attached to this permit. The company will maintain records to show compliance with Subpart VVVV. Rule 63.5701 allows three methods to comply with open molding emission limit; a) maximum achievable control technology model point averaging (emission averaging) option, b) compliant material option, or c) add-on control device.
[Rule 62-4.070(3), F.A.C.]