Seabring Marine Industries, Inc.
Monterey Boats – Williston Airport Plant

Facility ID No.: 0750082
Levy County

Title V Air Operation Permit Renewal

PROPOSED Permit Project No.: 0750082-010-AV

Permitting Authority:
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: 904/807-3300
Fax: 904/448-4363

Title V Air Operation Permit Renewal

PROPOSED Permit No.: 1070082-010-AV

Table of Contents

Section **Page Number**

Placard Page 1

I. Facility Information .....…. ….2
A. Facility Description.
B. Summary of Emissions Unit ID No(s). and Brief Description(s).
C. Relevant Documents.

II. Facility-wide Conditions ..... 3 - 5

III. Emissions Unit(s) and Conditions
A. Fiberglass Boat Operation.....……..…... 6 -17

B. Fiberglass Boat Operation.....……....18-22

C. Fiberglass Boat Operation…….23-24

Permittee:
Seabring Marine Industries, Inc.
Williston Airport Plant
1579 SW 18th Street
Williston, Florida 32696

PROPOSED Permit Renewal No.: 0750082-010-AV
Facility ID No.: 0750082
SIC Nos.: 37
Project: Title V Air Operation Permit Renewal

The purpose of this permit is for to renew the Title V Air Operation Permit No. 0750082-007-AV, issued on June 19, 2002 and to incorporate Air Construction Permit No. 0750082-011-AC. This existing facility is located at 1579 SW 18th Street, Williston, Levy County, Florida; UTM Coordinates: Zone 17, 356.9 km East and 3249.2 km North; Latitude: 29° 21' 55.6" North and Longitude: 82° 28' 27.5" West.

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.

Referenced attachments made a part of this permit:
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-5, TITLE V CONDITIONS version dated 03/28/05

Effective Date: [ARMS Day 55]
Renewal Application Due Date: [Month day, year]
Expiration Date: [Month day, year]

DRAFT

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK: lm

Section I. Facility Information.

Subsection A. Facility Description.

Seabring Marine Industries, Inc. is a fiberglass boat manufacturing facility. Process operations include construction of fiberglass, woodworking and material storage and handling.

The facility has relocated from its previous location in Archer, Alachua County to its present location in Williston, Levy County.

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 July 29, 2005, 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	Fiberglass boat operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – gelcoat booth stack, EP2 and EP3 - two (2) small parts grinding booth stacks, and EP4 – woodworking area dust collector stack and EP5 – parts cutting and grinding area cyclone stack. There are numerous horizontal building exhaust fans in the plant. The facility has two lamination buildings.

Subsection C. Relevant Documents.

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

These documents are provided to the permittee for information purposes only:
Table 1-1: Summary of Air Pollutant Standards and Terms
Table 2-1: Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Statement of Basis

These documents are on file with the permitting authority:
Initial Title V Air Operation Permit issued March 19, 2001
Title V Air Operation Permit Revision issued June 19, 2002
Application for a Title V Air Operation Permit Renewal received July 29, 2005

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

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-5, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-5, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. [Not federally enforceable.] General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall 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).
a. 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,
b. 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. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions 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.]

6. 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.

1. All solvents and raw material are stored and handled in appropriate containers equipped with tight fitting lids.
2. Good housekeeping and training personnel in their respective task(s) at the facility.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 0750033-001-AC]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-5, TITLE V CONDITIONS):

Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: the application of dust suppressants, the paving and maintenance of roads, parking areas and yards, the use of hoods, fans, filters, and similar equipment to contain, capture and or/ vent particulate matter.
[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit 0750033-001-AC]

8. When appropriate, any recording, 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. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., 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-5, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Northeast District Office.

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, FL 32256
Telephone: 904/807-3300
Fax: 904/448-4363

11. 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 and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

12. Certification by 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.]

Section III. Emission Unit(s) and Conditions

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
-001	Fiberglass boat operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – gelcoat booth stack, EP2 and EP3 - two (2) small parts grinding booth stacks, and EP4 – woodworking area dust collector stack and EP5 – parts cutting and grinding area cyclone stack. There are numerous horizontal building exhaust fans in the plant.

{Permitting note(s): This emissions unit(s) is regulated under: NESHAP - 40 CFR 63 Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; Rule 212.400(5), F.A.C., This facility shall also comply with the General Provisions of 40 CFR 63 Subpart A, as applicable.

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

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. The hours of operation are not restricted (24 H/D; 7 D/W; 52 W/Y; 8760 H/Y) per calendar year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; FINAL Title V Permit No. 0750082-005-AV]

Operational and Work Practices

A.2. Method of Operation (Exhaust Fans). A lamination area exhaust fan shall be run at all times, including nights and weekends (with the exception of when plant operations are to be ceased for one week or greater), in order to prevent the build-up of odor causing pollutants. The Department may require the running of additional fan(s), if deemed necessary.
[FINAL Title V Permit No. 0750082-005-AV]

A.3. Method of Operation (Exhaust Fans). The gelcoat area exhaust fan(s) shall be run during all gelcoat activities.
[FINAL Title V Permit No. 0750082-005-AV]

Resin and gel coat mixing operations:

A.4. Resin and Gel Coat Mixing Containers. All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
[40 CFR 63.5731]

A.5. Resin and Gel Coat Mixing Container Work Practice Exemption. The work practice standard in Specific Condition No. A.4. does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
[40 CFR 63.5731(b)]

Resin and Gel Coat Application Equipment Cleaning Operations:

A.6. Resin and Gel Coat Application Equipment Cleaning. For the routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. No organic HAP content limit applies when removing cured resin or gel coat from application equipment.
[40 CFR 63.5734(a)]

A.7. Organic HAP-containing Solvent Storage. The permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat[1] in containers with covers. The covers shall have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR Part 63, Subpart T.

[1]*Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.*
[40 CFR 63.5734(b)]

Carpet and Fabric Adhesive Operations

A. 8. Carpet and Fabric Adhesives Organic HAP Content. The permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.
[40 CFR 63.5740(a)]

Emission Limitations and Standards

{Permitting Note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.9. Volatile Organic Compounds. Total VOC emissions (including HAPs) shall not exceed 228 tons per year.
[FINAL Title V Permit No. 0750082-005-AV]

A.10. Styrene emissions shall be calculated as 11% of the available monomer for the resins; 48% of the available monomer for the pigmented and base gelcoats; and, 51% of the available monomer for the tooling gelcoats. The total styrene content of each material shall be calculated based on the maximum weight percent stated in the MSDS for that particular material.

[FINAL Title V Permit No. 0750082-005-AV; Air Construction Permit No. 0750082-011-AC]

A.11. Visible Emissions. Visible emissions from Emission Point 04 shall not exceed 5% Opacity.
[Rule 62-297.620(4); FINAL Title V Permit No. 0750082-005-AV]

A.12. Total Organic HAP Emissions. Total Organic HAP Emissions from the following open molding operations shall be limited as stated in **Specific Condition No. A.13**.:

Production resin
Pigmented gel coat
Clear gel coat
Tooling resin
Tooling gel coat

[40 CFR 63.5698(a)]

A.13. Total Organic HAP Emissions. Total Organic HAP Emissions shall be limited to the limit specified by the following equation, based on a 12-month rolling average:

$$\text{HAP Limit} = \left[46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})\right]$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

M_R = **mass of production resin** used in the past 12 months, excluding any materials exempt under **Specific Condition A.14.,** megagrams.

M_{PG} = **mass of pigmented gel coat** used in the past 12 months, excluding any materials exempt under **Specific Condition A.14.,** megagrams.

M_{CG} = **mass of clear gel coat** used in the past 12 months, excluding any materials exempt under **Specific Condition A.14**., megagrams.

M_{TR} = **mass of tooling resin** used in the past 12 months, excluding any materials exempt under **Specific Condition A.14**., megagrams.

M_{TG} = **mass of tooling gel coat** used in the past 12 months, excluding any materials exempt under **Specific Condition A.14**., megagrams.

[40 CFR 63.5698(b)]

A.14. The following materials are exempt from the open molding emission limit specified in **Specific Condition A.13.:**

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

[40 CFR 63.5698(d)]

Compliance Methods:

A.15. The permittee shall use one or more of the following options, (a) through (b), to meet the emission limit in **Specific Condition No. A.13.** :

(a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.*

(1) Demonstrate that emissions from the open molding resin and gel coat operations that are averaged meet the emission limit in Specific Condition No. A.13. using the procedures described in **Specific Condition Nos. B.7. through B.11**. Compliance with this option is based on a 12-month rolling average.

(2) Those operations and materials not included in the emissions average must comply with (b) of this section.

(b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2. Compliance with this option is based on a 12-month rolling average.

[40 CFR 63.5701]

A.16. The Permittee shall meet the requirements of **Specific Condition B.0.** through **B.15.,** if using the Emissions Averaging Option to meet the emission limit in **Specific Condition No. A.13.**

A.17. The Permittee shall meet the requirements of **Specific Conditions Nos. C.0.** through **C.5**., if using the Compliant Materials Option to meet the emission limit in **Specific Condition No. A.13**.

A.18. Organic HAP Content of Cleaning Solvents Determination. The Permittee shall determine and record the organic HAP content of the cleaning solvents subject to the requirements of **Specific Condition Nos. A.6. and A.7.** using the methods stated in **Specific Condition No. A.20**.
[40 CFR 63.5737(a)]

A.19. Onsite Recycled Cleaning Solvents. For those cleaning solvents recycled onsite, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in **Specific Condition No. A.20.** for demonstrating compliance with organic HAP content limits.
[40 CFR 63.5737(b)]

A.20. Organic HAP content Determination Method. The permittee shall use one of the following options, (1) through (6) to determine the organic HAP content for each material used in open molding resin and gel coat operations or carpet and fabric adhesive operations.

(1) *Method 311 (appendix A to 40 CFR part 63)*. The permittee may use Method 311 for determining the mass fraction of organic HAP. The procedures specified in (1)(i) and (ii) shall be used when determining organic HAP content by Method 311.
  (i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).
  (ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).

(3) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)*. The permittee may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

A.20. continued:

(4) *Alternative method*. The permittee may use an alternative test method for determining mass fraction of organic HAP if prior approval is obtained by the Administrator. The procedures in § 63.7(f) shall be followed in order to submit an alternative test method for approval.

(5) *Information from the supplier or manufacturer of the material*. The permittee may rely on information other than that generated by the test methods specified in paragraphs (1) through (4) above, such as manufacturer's formulation data, according to paragraphs (5)(i) through (iii) below.

(i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (1) through (4) above exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then use the measured organic HAP content to determine compliance.

(iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (1) through (4) above is less than 2 percentage points higher than the value for total organic HAP content
provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then use the measured organic HAP content to determine compliance.

(6) *Solvent blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP, which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the values for organic HAP content that are listed in Table 5 or 6 may be used. Table 6 may be used only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 and only whether the blend is either aliphatic or aromatic is known. However, if test results indicate higher values than those listed in Table 5 or 6, then the test results must be used for determining compliance.

[40 CFR 63.5758(a)]

A.21. Carpet and Fabric Adhesives Organic HAP Content Methods. The permittee shall determine and record the organic HAP content of the carpet and fabric adhesives using the methods in **Specific Condition No. A.20.** to demonstrate compliance with the emission limit in **Specific Condition No. A.8.**
[40 CFR 63.5740(b)]

Inspections:

A.22. Resin and Gel Coat Mixing Container Inspection. To demonstrate compliance with the work practice standard in **Specific Condition No.A.4.,** the permittee shall visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
[40 CFR 63.5731(c)]

A. 23. Organic HAP-Containing Solvents Containers. The permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps no less than once per month. The permittee shall keep records of the monthly inspections and any repairs made to the covers.
[40 CFR 63.5737(c)]

Recordkeeping Requirements:

A.24. Recordkeeping. Compliance with the limits stated in **Specific Condition Nos. A. 9. and A.10.** shall be determined by recording the following data for each material used that contains Styrene, or VOC.

Quantity	
• Gallons of Material Used (Plant usage logs shall be maintained)	
Emissions Factors	
• Density of Material in Pounds per Gallon (Manufacturer specification's data shall be maintained)	• Pollutant Factor (Percentage by Weight)
Emissions	
• Total Cumulative VOC Emissions (Tons) • Total Cumulative Styrene Emissions (Tons) • Total HAP Emissions (Tons)	

*Styrene emissions shall be determined using the same method as stated in **Specific Condition A.25.***

A.25. Recordkeeping-Styrene. Styrene emissions shall be determined using the following equations:

Emissions, in tons = Amount of material x styrene monomer content (percent/100)
x emission factor (percent/100, from the table below)
x ton/2000 pounds

Application Method	NVS Monomer 35%	NVS Monomer 38%	NVS Monomer 42%	NVS Monomer 45%	NVS Monomer 50%
Resin Non-Spray Lay-up	11%	11%	12%	12%	13%
Tooling/Pigmented/ Based Gelcoats	48%	51%	54%	56%	---

The applicable emission factor shall be interpolated from the above table, in conjunction with the percent of available non-vapor suppressed (NVS) monomer in the resin/gelcoat.

[FINAL Title V Permit No. 0750082-005-AV]

A.26. VOC, Styrene, Recordkeeping. The information required by **Specific Condition A.25**. shall be recorded and maintained at the facility.
[Rules 62-4.070(3); 62-213.440, F.A.C.]

A.27. Resin and Gel Coat Mixing Container Recordkeeping. The permittee shall keep records of which mixing containers are subject **Specific Condition Nos. A.4., and A.5.** The permittee shall maintain records of the results of the inspections, including a description of any repairs or corrective actions taken.
[40 CFR 63.5731(d)]

A.28. Records. The permittee shall maintain the records stated below:

(1) A copy of each notification and report that is submitted to comply with 40 CFR 63 Subpart VVVV.

(2) All documentation supporting any notification or report that is submitted.

(3) For facilities not controlled by an add-on control device: The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the permittee shall also record the amounts of each applied by atomized and nonatomized methods.

A. 28. continued:

(4) For facilities with an add-on control device: The records specified in § 63.10(b) relative to control device startup, shut down, and malfunction events; control device performance tests; and continuous monitoring system performance evaluations.
[40 CFR 63.5767]

A.29. Records – Form. The permittee shall maintain records that are readily available and in a form so that they can be easily inspected and reviewed. The records may be on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
[40 CRR. 63.5770(a) and (d)]

A.30. Records –Duration. The permittee shall maintain each record for a period of 5 years following the date that each record is generated. The record shall be maintained onsite for at least 2 years after the date that the record is generated and may be maintained offsite for the remaining 3 years.
[40 CFR 63.5770(b) and (c)]

Notification Requirements:

A.31. The permittee shall submit all applicable notifications in Table 7 to the Administrator and the Northeast District Office by the dates specified in the table. The notifications are described more fully in 40 CFR part 63, Subpart A, General Provisions, referenced in Table 8.
[40 CFR 63.5761(a)]

A.32. If any information submitted in any notification is changed, the permittee shall submit the changes in writing to the Administrator within 15 calendar days after the change.
[40 CFR 63.5761(b)]

Reporting Requirements:

A.33. Reporting. A report of the data required by **Specific Condition A.24.** shall be submitted to the Northeast District Office on a semi-annual basis. These reports shall be postmarked no later than the 60th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - June	September 1
July-December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the July-December semi-annual report.

[FINAL Title V Permit No. 0750082-005-AV]

A.34. The permittee shall submit the applicable reports stated in **Specific Condition Nos. A.35.-A.40. by the dates in A.36. through A.39.**[1]

[1] Unless a different schedule for submission of reports has been approved by the Administrator pursuant to 40 CFR 63.10(a).
[40 CFR 63.5764(a)]

A.35. First Compliance Report Period -Organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions. The first compliance report must cover the period beginning 12 months after issuance of Construction Permit No. 0750082-008-AC and ending on June 30th.
[40 CFR 63.5764(b)(1)]

A.36. First Compliance Report Submittal Date. The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period stated in **Specific Condition A. 35**.
[40 CFR 63.5764(b)(2)]

A.38. Subsequent Compliance Report Periods. Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
[40 CFR 63.5764(b)(3)]

A.39. Subsequent Compliance Report Submittal Dates. Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
[40 CFR 63.5764(b)(4)]

A.40. The compliance report shall include the information specified below in (1) through (7) of this section.

(1) Company name and address.
(2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
(3) The date of the report and the beginning and ending dates of the reporting period.
(4) A description of any changes in the manufacturing process since the last compliance report.
(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
(6) If during the reporting period compliance was reached with the emission limits and work practice standards, a statement shall be included to that effect.

A.40 continued:

(7) If during the reporting period a deviation from an emission limit or work practice standard occurred, the information listed in (7)(i) through (iv) of this section shall be included in the semiannual compliance report.

(i) A description of the operation involved in the deviation.

(ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.

(iii) A description of any corrective action taken to minimize the deviation and the actions taken to prevent it from happening again.

(iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

[40 CFR 63.5764(c)]

Test Methods and Procedures

{Permitting Note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.41. Visible Emissions**.** The test method for visible emissions shall be EPA Method 9, as incorporated in Chapter 62-297, F.A.C. The testing frequency shall be annually.
[Rule 62-297.310(7)(a)4.]

A.42. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling port shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations, which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

A.42 continued:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
-001	Fiberglass boat operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – gelcoat booth stack, EP2 and EP3 - two (2) small parts grinding booth stacks, and EP4 – woodworking area dust collector stack and EP5 – parts cutting and grinding area cyclone stack. There are numerous horizontal building exhaust fans in the plant.

{Permitting note(s): This emissions unit(s) is regulated under: NESHAP - 40 CFR 63 Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; Rule 212.400(5), F.A.C., This facility shall also comply with the General Provisions of 40 CFR 63 Subpart A, as applicable.

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

B.0. Conditions B.1. through B.15. shall become effective should the permittee use the Emissions Averaging Option to meet the emission limit in **Specific Condition No. A.13**. [Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

{Permitting Note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.1. Emissions Averaging Option. The permittee shall demonstrate compliance by performing the following steps (1) through (5) of this section.

(1) Use the methods specified in **Specific Condition No. A.20.** to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in **Specific Condition Nos. B.7. – B.11**. to show that the organic HAP emissions do not exceed the limit in Specific Condition No. .A.13.

(3) Keep records as specified below in (3)(i) through (iv) for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Amount of material used per month.

(iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in **Specific Condition Nos. B.8 through B.12**

B.1. continued:

(4) Prepare and submit the implementation plan described in Specific Condition Nos. B. 2. through B. 6. to the Administrator and keep it up to date.
(5) Submit semiannual compliance reports to the Administrator as stated in **Specific Condition No. A.34.**
[40 CFR 63.5704(a)]

Recordkeeping and Reporting Requirements

B.2. Implementation Plan. If using the emissions averaging option to meet the emission limit in **Specific Condition No. A.13**, the permittee must prepare an implementation plan.
[40 CFR 63.5707(a)]

B.3. Implementation Plan Requirements. The implementation plan stated in Specific Condition No. B.2.. shall describe the steps that will be taken in order to bring the open molding operations stated in **Specific Condition No. A.12**. into compliance with 40 CFR 63 Subpart VVVV. For each operation included in the emissions average, the implementation plan must include the elements listed below in (1) through (3) of this section.

(1) A description of each operation included in the average.
(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit stated in **Specific Condition No. A.13**.

[40 CFR 63.5704(b)]

B.4. Implementation Plan Submittal. The permittee shall submit the implementation plan to the Administrator with the notification of compliance status stated in Specific Condition Nos. A.31and A.32.
[40 CFR 63.5704(c)]

B.5. The permittee shall keep the implementation plan on site and provide it to the Administrator when asked.
[40 CFR 63.5704(d)]

B.6. Should the implementation plan be revised, the permittee shall submit the revised plan with the next semiannual compliance report stated in **Specific Condition No. A.38**.
[40 CFR 63.5704(e)]

B.7. Recordkeeping. Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the issuance date of Construction Permit No. 0750082-008-AC.
[40 CFR 63.5710(a)]

B.8. Recordkeeping. At the end of the twelfth month after the issuance date of Construction Permit No. 0750082-005-AC, and at the end of every subsequent month, use the following equation to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in **Specific Condition No. A.13**. calculated for the same

12-month period. (Include terms in the equation in **Specific Condition No. A.13**. and the following equation for only those operations and materials included in the average.)

HAP emissions $=[(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})+(PV_{TR})(M_{TR})+(PV_{TG})(M_{TG})]$

Where:

HAP emissions =	Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.
PV_R =	Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.
M_R =	Mass of production resin used in the past 12 months, megagrams.
PV_{PG} =	Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.
M_{PG} =	Mass of pigmented gel coat used in the past 12 months, megagrams.
PV_{CG} =	Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.
M_{CG} =	Mass of clear gel coat used in the past 12 months, megagrams.
PV_{TR} =	Weighted-average MACT model point value for tooling resin used in he past 12 months, kilograms per megagram.
M_{TR} =	Mass of tooling resin used in the past 12 months, megagrams.
PV_{TG} =	Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.
M_{TG} =	Mass of tooling gel coat used in the past 12 months, megagrams.

[40 CFR 63.5710(b)]

B.9. Recordkeeping. At the end of every month, use the following equation to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^{n} (M_i \, PV_i)}{\sum_{i=1}^{n} (M_i)}$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, PV_{TR}, and PV_{TG}) included in the average, kilograms of HAP per megagram of material applied.
M_i = mass of resin or gel coat i used within an operation in the past 12 months, megagrams.
n = number of different open molding resins and gel coats used within an operation in the past 12 months.
PV_i = the MACT model point value for resin or gel coat i used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.
[40 CFR 63.5710(c)]

B.10. Recordkeeping. The permittee shall use the equations in Table 3 to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.
[40 CFR 63.5710(d)]

B.11. Recordkeeping. If the organic HAP emissions, as calculated in **Specific Condition No. B.8**., are less than the organic HAP limit calculated in **Specific Condition No. A.13**. for the same 12-month period, then you are in compliance with the emission limit in Specific Condition No. A.14.13. for those operations and materials included in the average.
[40 CFR 63.5710(e)]

Filled Resins:

B.12. Filled Resin Usage. If including a filled resin in the emissions averaging procedure described in **Specific Condition No. B.1**., then use the value of PVF calculated using the equation in **Specific Condition B.13**. for the value of PV i in the equation in **Specific Condition No. B.9**.
[40 CFR 63.5714(d)]

B.13. Filled Resin Usage. When using either a filled production resin or filled tooling resin, the permittee must demonstrate compliance for the filled material on an as-applied basis using the following equation:

$$PV_F = PV_u \times \frac{(100 - \%Filler)}{100}$$

Where:

PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3.

% Filler = The weight-percent of filler in the as applied filled resin system.
[40 CFR 63.5714(a)]

B.14. Filled Resin as a Production Resin Compliance Determination. If the filled resin is used as a production resin and the value of PV_F calculated by the equation in **Specific Condition No. B.12**. does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
[40 CFR 63.5714(b)]

B.15. Filled Resin as a Tooling Resin Compliance Determination. If the filled resin is used as a tooling resin and the value of PV_F calculated by the equation in **Specific Condition No. B.12**. does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
[40 CFR 63.5714(c)]

Section III. Emissions Unit(s) and Conditions.

Subsection C. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
-001	Fiberglass boat operation, which generates emissions from laying up fiberglass, woodworking, and materials storage and handling. Emission Points are identified as follows: EP1 – gelcoat booth stack, EP2 and EP3 - two (2) small parts grinding booth stacks, and EP4 – woodworking area dust collector stack and EP5 – parts cutting and grinding area cyclone stack. There are numerous horizontal building exhaust fans in the plant.

{Permitting note(s): This emissions unit(s) is regulated under: NESHAP - 40 CFR 63 Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; Rule 212.400(5), F.A.C., This facility shall also comply with the General Provisions of 40 CFR 63 Subpart A, as applicable.

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

C.0. Conditions C.1. through C.5. shall become effective should the permittee use the Compliant Materials Option to meet the emission limit in **Specific Condition No. A.13**.
[Rule 62-4.070(3), F.A.C.]

C.1. Compliant Materials Option. The permittee shall demonstrate compliance by performing the following steps (1) through (4) of this section.

(1) Use the methods specified in **Specific Condition No. A.20**. to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in **Specific Condition No. C.4**. to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2.

(3) Keep records as specified below in (3)(i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.

(iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in Specific Condition No. C.4.

(4) Submit semiannual compliance reports to the Administrator as specified in **Specific Condition A.34**.
[40 CFR 63.5704(b)]

C.2. Recordkeeping. Compliance using the organic HAP content requirements listed in Table 2 is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on the issuance date of Construction Permit No. 0750082-005-AC. If using filled material (production resin or tooling resin), the permittee shall comply according to the procedure described in **Specific Condition No. B.12. – B.15**.
[40 CFR 63.5713(a)]

C.3. Recordkeeping. At the end of the twelfth month after the issuance date of Construction Permit No. 0750082-008-AC, and at the end of every subsequent month, the permittee shall review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2, then in the facility has reached compliance with the emission limit stated in **Specific Condition A.13**. for that 12-month period for that operation. In addition, the permittee is not required to complete the weighted-average organic HAP content calculation contained in **Specific Condition No. C.**4. for that operation.
[40 CFR 63.5713(b)]

C.4. Recordkeeping. At the end of every month, the permittee shall use the following equation to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\text{Weighted-Average HAP Content (\%)} = \frac{\prod_{i=1}^{n} (M_i \, HAP_i)}{\prod_{i=1}^{n} (M_i)}$$

Where:

M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.
HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in **Specific Condition No. A.22**. to determine organic HAP content.
n = number of different open molding resins or gel coats used in the past 12 months in an operation.
[40 CFR 63.5713(c)]

C.5. Recordkeeping. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2, then the facility has reached compliance with the emission limit stated in **Specific Condition No. A.13**.