Wellcraft Marine Corporation
Sarasota Fiberglass Boat Manufacturing Operations
Facility ID No.: 0810073
Manatee County

Title V Air Operation Permit Renewal
FINAL Permit No.: 0810073-007-AV

(*Renewal of Initial Title V Air Operation Permit No. 0810073-002-AV, as revised by Title V Permit Revision No. 0810073-005-AV)*

Permitting Authority:
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619
Telephone: 813/744-6100
Fax: 813/744-6458

Title V Air Operation Permit Renewal
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Permittee:
Wellcraft Marine Corporation
1651 Whitfield Avenue
Sarasota, FL 34243

FINAL Permit No.: 0810073-007-AV
Facility ID No.: 0810073
SIC Nos.: 37, 3732
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit and incorporate construction permit Nos. 0810073-006-AC and 0810073-008-AC. This existing facility consists of the fiberglass boat manufacturing operations at the following locations:

Site 1 - 7150 15th Street East, Sarasota, Manatee County
UTM: 17-349.2 E 3034.1 N **Latitude:** 27°25'06" **Longitude**: 82°32'26"

Site 6 - 1651 Whitfield Avenue, Sarasota, Manatee County
UTM: 17-347.1 E 3033.6 N **Latitude:** 27°25'07" **Longitude**: 82°33'44"

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 U-1, List of Unregulated Emissions Units and/or Activities
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
APPENDIX TV-4, TITLE V CONDITIONS (version dated 4/30/99)
Appendix 40 CFR 63 Subpart VVVV (Boat Manufacturing NESHAP (MACT)
Appendix 40 CFR 63 Subpart GGGGG (Site Remediation NESHAP (MACT))
Attachment A-2005, Building 6D New Ventilation System and Layout
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/7/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/7/96)

Title V Permit Effective Date: 07/17/2005
Renewal Application Due Date: 01/18/2010
Expiration Date: 07/17/2010

FLORIDA DEPT. OF ENVIRONMENTAL PROTECTION

_____
Joel A. Smolen
Acting District Air Program Administrator

Section I. Facility Information.

Subsection A. Facility Description.

This facility, the Wellcraft Marine Corporation Sarasota Fiberglass Boat Manufacturing Operations consists of two separate sites (Site 1 and Site 6) and multiple buildings, manufactures fiberglass boats. The regulated emissions unit is the fiberglass boat manufacturing operations at both sites. It includes resin application (spray layup technique*), gelcoat application (airless assisted spray guns*), application of styrene-based putties, fillers, etc., mold care/preparation, solvent clean up, and product assembly. Production lamination and gelcoating activities take place in Buildings 1A, 1B, 1C, and Building 6D (Lamination Building). Engineering activities which include mold design, construction, and repair (involving lamination and gelcoating) may occur in various buildings at Sites 1 and 6. Mold maintenance and repair may occur throughout the facility. *(* Note: Resin and gelcoat application methods/equipment are not limited to these techniques.)*

Also included in this permit are miscellaneous unregulated/ insignificant emissions units and/or activities related to boat manufacturing. These include painting, various woodworking shops, and cutting shaping and sanding of fiberglass and foam. Particulate matter emissions from these activities are controlled by portable “shop-vac” type vacuum dust collectors as needed and “good housekeeping” procedures.

Based on the Title V permit renewal application received November 8, 2004, 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 Manufacturing Operations
002	Soil/Groundwater Treatment Operations - Conducted under an approved Remedial Action Plan (RAP), administered by the Department’s Waste Management Program.

Unregulated Emissions Units and/or Activities

003	Woodworking Shops (3)

Please reference the Permit No. and appropriate E.U. ID No. on all correspondence, test report submittals, applications, etc.

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/ID Number Changes
Statement of Basis

These documents are on file with permitting authority:
Application for Title V permit renewal received 11/08/05
Application for an air construction modification permit received 01/20/05 (Project 0810073-008-AC)

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Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.
(Permitting note: APPENDIX TV-4, 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. 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. An objectionable odor is 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.
[Rules 62-210.200 (Definitions) and 62-296.320(2), F.A.C.; permits 1050047-004-AC]

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 3346
Merrifield, VA 22116-3346
Telephone: 703/816-4434

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. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

6. 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.]

7. 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.

a. The appropriate area exhaust fans shall be operating whenever resin application or gelcoating is being done and shall remain operating for at least 2 hours after these operations have ceased.
b. All materials containing VOC shall be stored in closed containers and/or in small automatic closing safety cans.
c. Recoverable clean up solvents and miscellaneous VOC solvents used for clean up of tools and equipment (does not apply to non-recoverable VOC used in conjunction with rags, etc.) shall then be directed into containers that prevent evaporation into the atmosphere.
d. Work practice controls shall include limiting the amount of clean up solvents issued to employees. Employees shall use gloves, when practical, to reduce the need for clean up solvents used for hand washing.
e. Immediately attend to all spills of materials that may emit VOC emissions.
f. For each exhaust stack, there shall be no device which either reduces the vertical momentum of the stack gas, or reduces the vertical dispersion of the stack gas (this does not include butterfly valves).

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7. *(continued)*

g. All equipment, pipes, hoses, lids, fittings, etc., shall be operated and maintained in such a manner as to minimize leaks, fugitive emissions, and spills of materials. If applicable, this includes draining all VOC-containing fluids into closed containers during lengthy periods when materials are not in use.

(Note: See also Specific Condition No. A.6. for additional requirements that apply to Site 6, and/or Building 6D only.)
[Rule 62-296.320(1)(a), F.A.C.; permits 0810073-006-AC and 0810073-008-AC]

8. General Pollutant Emission Limiting Standards - Unconfined Emissions of Particulate Matter. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.310(3), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to be taken shall include the following:

a. Fiber filters shall be used to control overspray emissions from gelcoat operations.

b. The gelcoat area fiber filters shall be changed and maintained in accordance with the manufacturer's recommendations.

c. Portable “shop-vac” type vacuum collectors as needed and normal good housekeeping procedures shall be used to control particulate matter generated in the cutting, shaping, and sanding of fiberglass, wood, and foam.

[Rule 62-296.320(4)(c), F.A.C.; construction permit 0810073-006-AC]
(Permitting note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4., F.A.C. (see item No. 57. of APPENDIX TV-4, TITLE V CONDITIONS).)

9. 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.]

10. 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: The above condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-4, TITLE V CONDITIONS).)

11. Submittals to the Department - The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District.

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100; Fax: 813/744-6084

12. EPA Submittals - 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

13. 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.]

14. Ventilation System Maintenance - The ventilation systems for this facility shall be operated and maintained in accordance with the manufacturer's instructions.
[Rules 62-4.070(3), and 62-210.650, F.A.C.]

15. Plant Access Procedure - The permittee shall allow access to the premises by authorized Department personnel (which includes personnel of the Manatee County Environmental Management Department) within a reasonable time of arriving at the plant. Reasonable time is considered to be within 15 minutes* of the DEP and/or Manatee County personnel presenting the proper credentials to the plant security personnel at the plant entrance. The plant security personnel shall immediately contact a plant escort from a written plant entry contact list which shall contain at least four (4) contact names. If the first person on the list is not immediately available the second shall be called next, and so forth working down the list until contact is made. The written plant entry

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15. *(continued)*

procedure shall be posted at the entry gate guardhouse and plant security personnel shall be trained in its use.

* Note: It shall not be considered a violation of the permit if the 15-minute criterion is exceeded due to special or unavoidable circumstances (such as inoperative phone system).

[Rules 62-4.160(7), and 62-4.070(3), F.A.C.; as established in permit 0810091-004-AC]

16. Records **-** The following requirements apply to all records/logs required by this permit:

a. Daily logs shall be completed by the end of the next business day.

b. Monthly logs shall be completed by the end of the following month.

c. Supporting documentation (MSDS sheets, purchase orders, etc.) shall be kept for each material which includes sufficient information to determine VOC, styrene and HAP emissions.

d. The logs/records shall be kept at the facility for a minimum of 5 years and made available to the Department upon request.

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IMPORTANT NOTES TO PERMITTEE:

Annual Operating Report Requirement - see Appendix TV-4, item 24

Permit Renewal Application Submittal - see Appendix TV-4, item 5

Section III. Emissions Unit(s) and Conditions.

Subsection A.

E.U. ID No.	**Brief Description**
004	Fiberglass Boat Manufacturing Operations

This emissions unit covers the activities related to the production of fiberglass boats and marine products (e.g., covers, hatches). It includes resin application (spray layup technique*), gelcoat application (airless assisted spray guns*), application of styrene-based putties, fillers, etc., mold care/preparation, solvent clean up, and product assembly. These activities occur at Site 1 (Buildings 1A through 1F) and Site 6 (Buildings 6A through 6K, 6M through 6O, and 6Z). Production resin application (lamination) may occur in Buildings 1A, 1B, 1C, and 6D. Production gelcoat application takes place at the gelcoat booth area of Building 6D and the Site 1 gelcoat booth area which may be located in either Building 1A or 1B. Each gelcoat booth exhaust fan is equipped with fiber filters to control particulate matter overspray emissions. Volatile organic compounds (VOC), organic solvents (OS), and hazardous air pollutants (HAP) contained in the resins, coatings, cleanup solvents, adhesives, and other materials are emitted through the exhaust ventilation system and the gelcoat booth stacks.

Mold preparation and construction occurs in Building 1C (tooling building). Assembly, gluing, painting, and other activities occur in Building 1A (assembly building), but may also occur in Building 1B. Depending upon production requirements these activities may be moved between buildings at Sites 1 or Site 6.

Particulate matter generated in the cutting, shaping, and sanding of fiberglass, wood, and foam are controlled by portable "shop-vac" vacuum collectors as needed and normal "good housekeeping" procedures.

(Permitting Note: Resin and gelcoat application methods/equipment are not limited to these techniques.)*

(Facility Description Note: Site 4 no longer exists as a Wellcraft facility and all references to it have been deleted from this permit.)

{Permitting Note: **IMPORTANT REGULATORY CLASSIFICATIONS** - This emission unit is subject to 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.}, which had a final compliance date of August 23, 2004,

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

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emission unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.2. VOC/HAP Emission Limitations The emissions of the following pollutants shall not exceed the limitations listed below:

Pollutant	Maximum Allowable Emission Rates: Pounds per hour* (monthly average)	Tons per consecutive 12-month period
Styrene (Site 6 only)	79.3	200.0
Total Facility VOC (Site 1 and Site 6) (includes styrene)	*NA*	350.0

*Note: The monthly pounds per hour shall be used as an indicator only; exceedance of a pounds per hour value shall not be considered noncompliance, in and of itself.

[Rule 62-210.200(PTE), F.A.C.; construction permit 0810073-006-AC]

A.3. Applicable Federal Standards - National Emission Standard For Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart VVVV – This emission unit is subject to and shall comply with 40 CFR 63 Subpart VVVV National Emission Standard For Hazardous Air Pollutants (NESHAP) for Boat Manufacturing, as adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C. These standards are attached and included as part of this permit in **Appendix 40 CFR 63 Subpart VVVV**. When demonstrating compliance with 40 CFR 63 Subpart VVVV, either the Emissions Averaging Option or the Compliant Materials Option may be used, but each time a compliance option is used it must be used for a minimum of 12 consecutive months before switching to the other option. It is the responsibility of the permittee to record the appropriate data required to demonstrate compliance.

See the following attached appendix:

- **Appendix 40 CFR 63 Subpart VVVV** – 40 CFR 63 Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [for Open Molding Resin and Gel Coat Operations using Emissions Averaging Option and/or Compliant Materials Option) *(Note: This Appendix also includes the applicable portions of the 40 CFR 63 Subpart A - General Provisions.)*

> ***(Important Compliance Note**; In accordance with the provisions of Table 1 of 40 CFR 63 Subpart VVVV, the compliance date for this existing facility was August 23, 2004.)*

[Rule 62-204.800(11)(b), F.A.C.; 40 CFR 63 Subpart VVVV and Subpart A]

Operation Limitations

A.4. Lamination and Gelcoat Operations - All lamination operations, other than minor touch-up, repair, mold making, and research and development, shall occur in Buildings 1A, 1B, 1C, and/or 6D. All gelcoat operations, other than minor touch-up, repair, mold making, and research and development, shall occur in the gelcoat booth areas located in Building 6D, or in the gelcoat booth areas located in either Building 1A, 1B or 1C.
[Rule 62-4.070(3), F.A.C.; construction permits 0810073-006-AC and 008-AC]

A.5. Exhaust Ventilation – The Building 6D exhaust ventilation system shall conform with the layout and operating specifications as shown and detailed in Attachment A-2005 (Building 6D New Ventilation System and Layout)*. As shown on this attachment, the exhaust fans shall have the following minimum exhaust airflow rates:

Exhaust Fan ID No.	Location	Minimum Exhaust Airflow Rate
001 - 005, 013 - 017	Lamination Area *(10 fans)*	26,000 acfm*
018, 019, 022, 023	Gelcoating Area *(4 fans)*	26,000 acfm
020, 021	Gelcoating Area *(2 fans)*	38,000 acfm

** acfm = actual cubic feet per minute*

(Permitting Note: Fan ID. Nos. 006 through 009 are not included in the above requirement because they exhaust the grinding area at the far southeast end of Building 6D. This area is physically isolated from the gelcoat and lamination areas in order to prevent particulate matter contamination of the parts built in Building 6D.)*

[Rule 62-4.070(3), F.A.C.; construction permit 0810073-008-AC]

A.6. General Pollutant Emission Limiting Standards - Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall comply with the following operating procedures and work practices relating to volatile organic compound/organic solvent (VOC/OS) use and emissions *(Note: These measures are in addition to those shown in Facility-wide Condition No. 7.)*:

a. The permittee shall not transfer or allow the transfer of bulk resin from any delivery vehicle into the stationary storage tank unless the vapors displaced are controlled by the following methods:

(1) During filling operations, employ a vapor-tight line from the storage tank to the delivery vehicle and a system that will ensure that the vapor line is connected before bulk resin can be transferred into the tank.

(continued)

A.6.a. *(continued)*

(2) The delivery vehicle shall be designed and maintained to be vapor-tight at all times, except for normal pressure vacuum venting, or for maintenance, inspection, or gauging.

b. Install and maintain new signs in all buildings where production lamination occurs (at least 2 ft by 3 ft, in contrasting colors), or refurbish the existing signs, adjacent to each door clearly warning employees that doors shall be shut at all times except as noted in subcondition F. below. The specific wording may be determined by Wellcraft Marine.

c. If the Department or the Manatee County Environmental Management Department (MCEMD) determine that an objectionable odor caused by Wellcraft Marine is occurring, the Department and the MCEMD may contact Wellcraft's environmental manager, plant manager, night-shift lamination manager, or the manufacturing support operations manager who shall immediately prepare an action plan for the Department's or MCEMD's review to address the objectionable odor. The elements of the plan will include an identification of the possible odor source, status or condition of the equipment or process from which the odor is occurring, requirements necessary to mitigate the odor, and a timeline for completing the requirements. Wellcraft Marine shall retain current home telephone numbers, pager numbers, and cell phone numbers of the environmental manager, plant manager, night-shift lamination manager, and the manufacturing support operations manager at the security guard post at Site 6, which is operated on a 24-hour a day basis.

d. The permittee shall install and maintain tamper-resistant switches on the exhaust fans that service Building 6D.

e. The Building 6D, exhaust fans listed in the table in Specific Condition No. A.5. shall be operating whenever resin application or gelcoating is being done in Building 6D and shall remain operating for at least 2 hours after these operations have ceased *(see Specific Condition No. A.16. for recordkeeping requirements associated with this condition).*

f. For each Building 6D exhaust stack, there shall be no device which reduces the vertical momentum of the stack gas, or reduces the vertical dispersion of the stack gas (this does not include butterfly valves).

g. Doors and windows at Building 6D shall be closed, except upon entering, exiting, and movement of boats or other items/materials into and out of the building, to ensure VOC/OS emissions are captured and exhausted through the gelcoat booth area stacks and/or roof exhaust stacks. *(continued)*

A.6.a. *(continued)*

One of the following options shall be employed to ensure exits are closed in a timely manner:

(1) The permittee shall install, operate and maintain a negative pressure alarm system to sound during working hours when the lamination areas in Building 6D do not achieve negative pressure. When the alarm sounds, the permittee shall take steps to reestablish negative pressure as soon as possible. The pressure sensor shall be centrally located in a manner to accurately represent the pressure in Building 6D.

(2) Hang flexible plastic barrier strips so that each exterior lamination area doorway is covered.

h. All current Building 6D employees shall be trained by the permittee in the operating procedures and work practices contained in this permit (i.e., Specific Condition Nos. 7 and A.6.). New Building 6D employees shall be trained within 30 days of their hiring date. Records of such training shall be maintained by the permittee and include, at a minimum, the employee's name, date of training, trainer's name, and a certification signed by the employee that he/she understands the operating procedures and work practices contained in this permit.

i. The Building 6D Hull Lamination Areas shall be operated under negative pressure conditions whenever resin application or gelcoating is being done in Building 6D and for at least two hours after such application ceases. However, positive pressure due to meteorological conditions is allowed during the short time the entrance and exit doors are open (see item g. above), provided due care is taken. Due care includes, but is not limited to, ensuring all other doors, windows, vents, or other openings which may be a source of fugitive emissions are closed, sealed, or otherwise prevented from such discharge.

j. The Building 6D louvered wall vents (passive vents) shall be kept permanently sealed.

[Rule 62-296.320(1)(a), F.A.C.; as initially established in construction permit 0810073-004-AC, and revised by construction permit 0810073-008-AC]

A.7. Gelcoat Visible Emissions Indicator Standard - Visible emissions from the gelcoat operations are limited to 20% opacity (see Facility-Wide Specific Condition No. 3.), however, in order to provide reasonable assurance that the precautions listed in Specific Condition Nos. 7, 8, and A.6. are adequate, visible emissions shall not exceed 5 percent opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary. [Rules 62-4.070(3) & 62-296.320(4)(b)1., F.A.C.]

Compliance Testing Requirements

A.8. Building 6D Exhaust Fan Flow Rate Testing - In order to document compliance with Specific Condition No. A.5., the permittee shall conduct exhaust gas flow rate tests on each of the Building 6D exhaust fans shown in the table in Specific Condition A.5. The tests shall be conducted at the following frequency:

a. Within 60 days of initial operation of the new Building 6D ventilation system (as shown in Attachment A-2005), and every five years thereafter: Test two (2) of the Lamination Area fans (Fan ID Nos. 001-005, 013-017) and two (2) of the Gelcoating Area fans, (Fan ID Nos. 018-023) including one (but not both) of the two 38,000 acfm fans (Fan ID's 020, 021).

b. Annually, on or during the sixty (60) day period prior to the anniversary date of the original set of tests: Test two (2) of the Lamination Area fans and one (1) of the Gelcoating Area fans.

The fans tested from each area (Lamination and Gelcoating) shall be rotated such that no fan is tested again before all fans have been tested, therefore testing each fan once every five years. If filters are in the airflow, the condition of the filters shall be recorded as part of the stack test (e.g., number of days of filter operation prior to test). Failure to test under normal operating conditions may invalidate the test results.
[Rule 62-4.070(3), F.A.C.; as established in permit No. 0810073-004-AC and revised in construction permit 0810073-008-AC]

A.9. Test Methods. Exhaust gas flow rate testing shall be conducted using EPA Methods 1 and 2 contained in 40 CFR 60, Appendix A. The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A.
[Rule 62-297.310, F.A.C.]

A.10. Test Notification. The permittee shall notify the Air Compliance Sections of the Southwest District Office of the Department (SWD) and the MCEMD at least 15 days prior to the date on which each formal compliance test is 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.
[Rule 62-297.310(7)(a)9, F.A.C.]

A.11. Test Reports. The permittee of an air pollution emissions unit, for which compliance tests are required, shall file a report with the Air Compliance Sections of the SWD and the MCEMD on the results of each such test. The required test report shall be filed with the SWD and the MCEMD as soon as practical but no later than 45 days after each test is completed. The test report submittal shall meet all applicable requirements of Rule 62-297.310(8)(c), F.A.C.
[Rule 62-297.310(8), F.A.C.]

A.12. Special Compliance Tests - When the Department or MCEMD, after investigation, has good reason (such as objectionable odor complaints or questionable maintenance of ventilation system) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. The Department may also require that exhaust flow rate be conducted to verify that the operation of the Building 6D ventilation system is in accordance with the current ventilation plan.
[Rule 62-297.310(7)(b), F.A.C.; permit 0810073-008-AC]

Recordkeeping Requirements

A.13. VOC and HAP Emission Records - Compliance with the VOC and Styrene emission limitations of Condition A.2. shall be documented on a monthly basis, based upon usage of all VOC/Styrene containing materials (Resin, Gelcoat, Putties, Fillers, etc.) for all sites covered by this permit. Monthly usage of materials shall be based upon a monthly inventory and receipt of material during the month. The emission summary shall show the following:

a. The total combined VOC emissions for Site 1 and Site 6 (facility VOC emissions) for the month in tons.

b. Total Styrene emissions for Site 6 for the month in tons.

c. The total facility VOC emissions, in tons, for the most recent consecutive 12-month period.

d. Total Styrene emissions for Site 6, in tons, for the most recent consecutive 12-month period.

General Recordkeeping Requirements

e. Record the method of application (where applicable) for each material used (see Table below).

f. Emissions of Styrene, Methyl methacrylate (MMA), and other volatile organic compounds (VOC's) shall be determined as follows until notified by the Department. (Note: Styrene and MMA are each considered a VOC and a HAP.)

1. Styrene emissions shall be determined using the following equation:

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

(continued)

A.13.f.1. *(continued)*

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:

(Permitting Note: This table, used in other Department permits, is intended to reduce recordkeeping and calculations, is derived from the Table of Unified Emission Factors for Open Molding of Composites and the National Marine Manufacturer Association's (NMMA) factors by expanding the tables, converting to lb/ton (NMMA,) and applying an industry average ratio for the breakdown between hatches/doors and hulls/decks –see additional notes below table.))

Styrene Emission Factor Table

% Monomer	**Resin** Hand (Non-Spray) Layup**	**Resin** Mechanical Atomized Spray Layup**	**Resin Mechanical Non-atomized* Spray Layup**	**Gel Coat** Mechanical Atomized Spray Layup**	**Gelcoat Mechanical Non-atomized* 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

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

Table Notes

* *Non-atomized* 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. Non-atomized 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.

2. MMA emissions shall be determined by the following equations:

$$\text{Emissions (tons)} = \text{Mmma} \times \text{Cmma} \times 0.75$$

where:

Mmma = amount of MMA containing material used (in tons)
Cmma = MMA content (wt. percent/100)

(continued)

A.13.f. (continued)

3. Other VOC emissions shall be determined by the following equation for each material. These values shall be used in conjunction with the above Styrene and MMA emissions to determine total VOC:

$$\text{Emissions (tons)} = \text{Mvoc} \times 1.00 \times \text{Cvoc}$$

where:
Mvoc = amount of VOC containing material used (in tons)
Cvoc = VOC content (wt. percent/100)
1.00 = assumed 100% emitted *(unless Department approves a different emission factor based on information submitted by the permittee)*

g. Each log, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle.

h. When determining the VOC emissions and Styrene emission rates, the percent of solids in the recovered materials shall be documented and accounted for in the emission calculations, if applicable.

The VOC and styrene emission summary, calculations, and records used to determine emissions shall be recorded in a permanent form suitable for inspection by the Department upon request. The monthly records shall be completed by the end of the following month. *(See also Facility-wide Specific Condition No. 16.)*
[Rule 62-213.440(1)(b), F.A.C.; construction permit 0810073-006-AC]

A.14. Styrene Pounds/hour Emission Records – The permittee shall maintain a log to document the monthly average Site 6 pounds/hour styrene emission rate as required in Specific Condition No. A.2. At a minimum the log shall include the following:

a. Daily, record the hours of operation (i.e. periods of production using styrene containing materials) of Site 6 for the calculation of the hourly styrene emission rate. For this purpose, it may be assumed that hours of operation include a two-hour period after styrene-containing material usage ceases.

b. From the records required in Specific Condition No. A.14.a. above, record the monthly styrene mission rates for Site 6.

c. Calculate and record the monthly average Site 6 styrene emission rate (lbs/hr), based on a. and b. above (i.e. average lbs/hour = monthly styrene emissions /monthly operating hours). This calculation assumes a uniform rate of application of material over the hours recorded. Appropriate recordkeeping shall be conducted if routine and significant deviations from non-uniform application are experienced.

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

Note to Permittee: See also Appendix 40 CFR 63 Subpart VVVV, including Sections, 63.5710, 63.5713, 63.5767 and 63.5770, for recordkeeping required to document compliance with 40 CFR 63 Subpart VVVV.

A.15. Gelcoat Areas Filter Change Records – In order to document compliance with the requirements of Specific Condition No. 8.b., the permittee shall record the date of all gelcoat area filter changes.
[Rule 62-4.070(3), F.A.C.]

A.16. Building 6D Lamination and Gelcoating Areas Ventilation System Operation Records* – In order to document compliance with the requirements of Specific Condition No. A.6.e., the permittee shall maintain daily records that show the following:

a. all periods when production resin lamination or gelcoating is taking place in Building 6D (date, start time, and end time);

b. operating status of the Building 6D Lamination Area and Gelcoating Area exhaust fans shown in the Table in Specific Condition No. A.5., showing periods of operation for all fans (date, fan ID (if record entry does not apply to all affected Building 6D exhaust fans) time turned on, time turned off.

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

(Alternative to Recordkeeping: At their option, Wellcraft may institute an automatic system whereby the exhaust fans controls are tied to the Building 6D lighting controls such that the Lamination Area and Gelcoating Area exhaust fans are automatically turned on when the Building 6D lights are turned on, and remain on at least 2 hours after the light are turned off (this will be achieved by a timer on the exhaust fan controls which is activated by the turning off of the lights). If this automatic exhaust fan operation control system is instituted and maintained, then the above ventilation system operating records are not required.)*

Reporting Requirements

A.17. Changes In Operation - Wellcraft Marine Corp. shall report any proposed process changes to this operation, including, but not limited to: (a) any proposed change in the use of VOC, or (b) any proposed increase in the utilization rates of VOC, to the Air Compliance Section of the SWD and the MCEMD for proper processing at least 15 days prior to the proposed change at the facility. Any physical change, or change in the method of operation, or addition to a stationary source or facility, which increases the actual emissions of any air pollutant may be considered a “modification” to this permit.
[Permit No. 0810073-006-AC]

Permitting Note: For changes to operations other than resin or gelcoat processes, the permittee need only report if the changes have the potential (based on projected usage) to increase net VOC emissions by 1000 lbs/yr or more, or introduce a new HAP with potential emissions (based on projected usage) of 1000 lbs/yr or more.

A.18. Ventilation System Changes - The permittee shall furnish written notification to the Air Compliance Sections of the SWD and the MCEMD of changes to the air management system of the Building 6D (Lamination and Gelcoating) that may render the assumed VOC capture efficiencies ineffective. The notification shall be made at least 7 days prior to making any changes and include any potential impact on VOC emissions.
[Rule 62-4.070(3), F.A.C.; Permit No. 0810073-006-AC]

Note to Permittee: See also Appendix 40 CFR 63 Subpart VVVV, including Sections, 63.5707, 63.5764, and Table 7, for implementation plan (if required) and reporting requirements specified by 40 CFR 63 Subpart VVVV.

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	**Brief Description**
002	Soil/Groundwater Treatment Operations -

The Soil/Groundwater Treatment Operations consist of the following unit operations that are used to remediate soil and groundwater contaminated with organic solvents. The major organic solvent in the contaminated media is acetone. Smaller amounts of (HAPs) IPA, styrene, MIBK, MEK, ethylbenzene, and toluene are present.

1) Soil Vapor Extraction System: Extracted soil vapors are treated in a catalytic oxidizer fired with natural gas.

2) Groundwater Treatment System – Groundwater is treated through air strippers and a biotreater (bioreactor). Emissions from the air strippers are vented to a thermal oxidizer fired with natural gas. The system also includes various tanks and transfer systems, including pumps and valves..

{**IMPORTANT REGULATORY CLASSIFICATIONS** - This emission unit is subject to NESHAP – 40 CFR 63, Subpart GGGGG National Emission Standards for Hazardous Air Pollutants: Site remediation (adopted and incorporated by reference in Rule 62-204.800, F.A.C.}.

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

B.1. Applicable Federal Standards - National Emission Standard For Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart GGGGG – This facility is subject to and shall comply with the applicable requirements of 40 CFR 63 Subpart GGGGG National Emission Standard For Hazardous Air Pollutants (NESHAP): Site Remediation*, as adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C. These standards are attached and included as part of this permit in **Appendix 40 CFR 63 Subpart GGGGG**.

See the following attached appendix:

- **Appendix 40 CFR 63 Subpart GGGGG** – 40 CFR 63 Subpart GGGGGNational Emission Standards for Hazardous Air Pollutants: Site Rremediation *(Note: This Appendix also includes the applicable portions of the 40 CFR 63 Subpart A - General Provisions.)*

> ***(* Important Compliance Note**; *In accordance with 40 CFR63.7883 (see the above Appendiix), the final compliance date for this existing facility is October 9, 2006.)*

[Rule 62-204.800(11)(b), F.A.C.; 40 CFR 63 Subpart GGGGG and Subpart A]