

American Marine Holdings, Inc.
dba Donzi Marine, LLC
Facility ID No.: 0810076
Manatee County

Title V Air Operation Permit Renewal
FINAL Permit No.: 0810076-008-AV

Permitting & Compliance Authority:
Florida Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813/632-7600
Fax: 813/632-7668

Title V Air Operation Permit Renewal
FINAL Permit No.: 0810076-008-AV

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Statement of Basis



Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:

American Marine Holdings, Inc.
dba Donzi Marine, LLC
7110 21st Street East
Sarasota, Florida 34448

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Permit No.: 0810076-008-AV

Facility ID No.: 0810076

SIC No(s): 37, 3732

Project: Fiberglass Boat
Manufacturing Facility

The purpose of this permit is to renew the Title V Air Operation Permit, and incorporate a construction modification permit (0810076-007-AC). This existing facility is located at 7110 21st Street East, Sarasota, Manatee County, UTM Coordinates: Zone 17, 347.79 km East and 3033.24 km North; Latitude: 27°24'51" North and Longitude: 82°32'23" 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-6, Title V Conditions (version dated 06/23/06: updated 11/10/08)
Attachment A, 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous
Air Pollutants for Boat Manufacturing
Appendix 40 CFR 63, Subpart A - General Provisions

Effective Date: January 10, 2010
Renewal Application Due Date: May 30, 2014
Expiration Date: January 10, 2015

Mara Grace Nasca
Mara Grace Nasca
District Air Program Administrator

MGN/NEK

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Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of a synthetic non-PSD fiberglass boat manufacturing facility, since allowable volatile organic compound (VOC) emissions are limited to a maximum of 248.8 tons/yr. The manufacturing operations are as described below:

Fiberglass Lamination Building (Building No. 1)

Boat molds are coated with a friction reducing agent, usually wax, prior to beginning the gelcoating and lamination process. Gelcoat is applied to the waxed mold surface by mechanical non-atomized spray layup. A portion of the fiberglass is then applied by hand (hand layup) with the remainder being applied with spraying equipment (non-atomized spray layup). Upon completion of the gelcoating and lamination process and after adequate curing time, the laminated fiberglass is removed from the mold. The lamination area of the building is approximately 103 ft. x 300 ft. x 30 ft. and is equipped with 17 forced air vents.

This building also houses a gelcoat spray area that is isolated within the building for touchup work, a large-piece grinding/sanding area for mainly hulls & decks, and a small-piece grinding/sanding area. Note that gelcoat spraying for tooling and production is performed in the lamination area of the building. Nine additional forced air vents are located in these areas.

Air ventilation is also provided by large access production doorways.

Assembly Building (Building No. 2)

This building contains a large assembly area, foam cutting/adhesive operation (i.e., sewing room), fabrication shop and repair shop. In the assembly area, decks and hulls are connected and power trains are installed along with other miscellaneous associated activities that may include solvent usage. Minor amounts of painting and grinding occur in this area (i.e., touchup). This building is equipped with 12 forced air vents. Air ventilation is also provided by large access doorways.

The foam cutting/adhesive operation produces the various fabric designs for boat interiors and related adhesions. Activities in this area can generate PM and VOC emissions.

The fabrication (i.e., welding) shop produces metal fabrications such as boating hardware structural supports. Activities in this area can generate PM emissions.

A repair shop is located to the west of the fabrication shop that provides an isolated area where boat repairs can be performed in a clean area. Activities in this area can generate PM and VOC emissions.

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Paint Booths (Building No. 3)

Paint booths are used to paint boats. There are two production paint booths located outside to the southwest of the assembly building. One additional booth (the one furthest from 21st Street East) is used for prep work only and does not involve the use of any material containing VOCs and/or HAPs. These three booths are side-by-side east-to-west. The two production paint booths have air filters that are located at the bottom of the two side walls (west and east walls) to control unconfined PM. There are also air intake filters located on the ceiling of each booth. The new paint booth has a propane gas fired heater, which is considered an insignificant source due to its low emissions. Air filters used in the production paint booths are serviced weekly.

Wood Shop (Building No. 4)

This building includes all production wood working (located in the south portion of the building) and customer service and repair work (located in the north portion of the building). Wood working is done to produce templates for tooling molds and related material patterns, cabinetry and related woodwork for boats. Repair operations involve all work related to boat hardware/equipment repairs as a service to existing customers. Minor touchup painting and grinding is performed as needed to address the repairs. Activities in this area can generate PM and VOC emissions. Significant repainting would require the boat to be moved to the painting booths. This building has six garage door entrances for ventilation.

Tooling Redesign Building (Building No. 5)

This building includes all tooling redesign/development operations (located in the south portion of the building) and, similar to Building No. 4, customer service and repair work (located in the north portion of the building). Tooling redesign is a process to repair, modify, or create tooling molds needed for boats. The molds may be for existing or new boat hulls or related molded boat structures. Activities in this area can generate PM or VOC emissions. This building is equipped with one stationary forced air vent and six portable air fans for ventilation.

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

Based on the Title V Air Operation Permit Renewal application received December 15, 2008, this facility is a major source of hazardous air pollutants (HAPs).

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

Compliance Assurance Monitoring (CAM) is not applicable for this emission unit, since there is no control device.

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

<u>EU ID No.</u>	<u>Brief Description</u>
001	Fiberglass Boat Manufacturing Facility

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

Subsection C. Relevant Documents.

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

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

These documents are on file with the permitting authority:
Application for a Title V Air Operation Permit Renewal dated December 10, 2008, and received on December 15, 2008.
Request for additional information (RAI) letter dated February 13, 2009.
Responses to RAI received May 28, and June 04, 2009.
Second request for addition information dated June 5, 2009.
Response received June 8, 2009.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-6, Title V Conditions, is a part of this permit.
(*Permitting Note: Appendix TV-6, 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

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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 ("Objectionable Odor") and 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 10162
Fairfax, VA 22038-1515
Telephone: 703/227-7650
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 or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following:

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6. *(continued)*

- a. Maintain tightly fitting covers, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.
- b. Prevent excessive air turbulence across exposed VOC's.
- c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC so that it can be covered when not in use.
- d. All fittings, valve lines, etc. shall be properly maintained.
- e. All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.
- f. The associated forced air vents shall be operating during activities/operations which release VOC/OS emissions and shall remain operating for at least 2 hours after the activities/operations have stopped.
- g. Work practice controls shall include limiting the amount of clean-up solvents issued to employees and employees shall use gloves whenever handling resins.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; Construction Permit 0810076-007-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 No. 57 of Appendix TV-6, Title V Conditions):

- a. Paving and maintenance of roads, parking areas, and yards.
- b. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter including the following:
 - (1) Wood Shop (Building No. 4) - Routers are pre-wired with a commercial shop vacuum cleaner to ensure that control equipment is operational during routing.
 - (2) Two Production Paint Spray Booths (Building No. 3) - Forced air vent filters operate automatically when the painting system is activated in the booth. The filtering system is maintained per recommendations of the manufacturer of the paint booths.
 - (3) Lamination Building (Building No. 1) - Polyester Paint Arrestor Filters are used on all 17 exhaust fans and are serviced weekly.

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As an indicator that adequate control measures are being employed, visible emissions from exhaust fans, doors, and vents should not exceed 5% opacity. If this level is exceeded, it shall not be considered a violation in and of itself, but may allow the Department to require additional controls or work practices.

[Rule 62-296.320(4)(c)2., F.A.C.; Construction Permit 0810076-007-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 62-4.070(3), 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 Air Compliance Section of the Department's Southwest District Office and the 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. and 3., F.A.C. (see Condition No. 51 of Appendix TV-6, Title V Conditions))

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Air Compliance Section of the Department's Southwest District office.

Department of Environmental Protection
Southwest District Office
Air Compliance Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813/632-7600
Fax: 813/632-7668

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

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

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Telephone: 404/562-9155
Fax: 404/562-9163

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

12. Certification by Responsible Official: 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 (RO) 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.]

NOTES TO PERMITTEE:

Annual Operating Report (AOR) - see Appendix TV-6, item 24(3).

Annual Statement of Compliance - see Appendix TV-6, item 51.

Permit Renewal Application - see Appendix TV-6, item 5.

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Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
001	Fiberglass Boat Manufacturing Facility

This emissions unit is a fiberglass boat manufacturing facility including gelcoating, fiberglass lamination, repair and cleanup, and woodworking (cabinet shop).

(Permitting Note: Important Regulatory Classifications – This emission unit is regulated by 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(11)(b), F.A.C.)

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

Essential Potential to Emit Parameters

A.1. Permitted Capacity - The facility only utilizes a "resin non-spray layup" process and a "Flow Coater" application system, which is considered a "Mechanical Nonatomized" spray layup process. See Table in Condition A.6.

[Rules 62-4.160(2) and 62-210.200 ("Potential to Emit"), F.A.C.]

A.2. Permitted Capacity - The percent (%) of available monomer (styrene) shall not exceed the following:

- a. Resin Non-Spray Layup and Flow Coater ----- 50%
- b. Tooling/Pigmented/Base Gel Coats ----- 45%

[Rules 62-4.160(2) and 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 0810076-007-AC]

A.3. Hours of Operation - This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 0810076-007-AC]

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Emission Limitations and Standards

A.4. Emissions shall not exceed the following:

Pollutant	Tons per any 12 consecutive month period
Total VOCs, which includes styrene and methyl methacrylate (MMA).	248.8*

- * 233.8 tons per any consecutive 12-month period of emissions from materials containing VOC's that are not associated with trivial and exempt (insignificant) emission units and/or activities. The remaining 15.0 tons per any consecutive 12 month period of emissions are allocated to the trivial and exempt (insignificant) emission units and/or activities at the facility and are not required to demonstrate compliance as specified below. This allocation is considered a reasonable and practicable requirement for this type of facility in order to assure the facility remains a synthetic non-PSD facility.

[Rules 62-4.160(2) and 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 0810076-007-AC]

Recordkeeping and Reporting Requirements

A.5. In order to document compliance with Specific Condition No. A.4., the permittee shall record the following monthly based upon usage of all VOC/styrene containing materials (resin, gelcoat, putties, fillers, etc.):

- facility name, facility ID No., emission unit ID No., and description (i.e., Donzi Marine, LLC, 0810076, EU 001, Fiberglass Boat Manufacturing Facility);
- total VOC emissions (tons/month);
- total styrene emissions (tons/month);
- total VOC emissions for the most recent 12 consecutive month period (tons/12 consecutive months);
- total styrene emissions for the most recent 12 consecutive month period (tons/12 consecutive months); and
- method of application for all gel coat and resin usage (see Table below).

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Usage of materials shall be based upon an inventory at the beginning of the month, receipt of material during the month and inventory of the materials at the end of the month provided the material is not used in multiple application methods with different emission factors.

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

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 monthly logs shall be completed by the end of the following month. Supporting documentation (MSDS sheets, purchase orders, etc.) shall be kept for each material, which includes sufficient information to determine VOC emissions and styrene emissions.

The logs/records shall be kept at the facility for a minimum of 5 years. The VOC, styrene, and MMA emission summary, calculations, and records used to determine emissions shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rules 62-4.070(3), F.A.C.; Construction Permit 0810076-007-AC]

A.6. Emission Calculation Requirements - Emissions of styrene, MMA, and other volatile organic compounds (VOCs) shall be determined as follows until notified by the Department. Note, styrene and MMA are each considered a VOC and a HAP.

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

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

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:

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Percent Monomer	Resin Hand (Non-Spray) Layup *	Resin Mechanical Atomized Spray Layup *	Resin Mechanical Nonatomized Spray Layup **	Gel Coat Mechanical Atomized Spray Layup *	Gelcoat Mechanical Nonatomized Spray Layup **
18	39	51	39	138	67
19	41	54	41	148	70
20	43	58	43	158	79
21	45	61	45	168	88
22	48	64	47	178	97
23	50	68	49	189	106
24	52	71	51	200	115
25	55	75	54	211	124
26	57	78	56	221	133
27	59	82	58	233	142
28	62	86	60	244	151
29	64	90	62	256	160
30	67	94	64	269	169
31	69	97	66	281	178
32	71	102	68	295	187
33	74	105	71	308	196
34	77	112	74	322	205
35	80	118	77	336	214
36	83	127	80	354	223
37	86	136	83	371	232
38	90	146	86	390	241
39	92	156	89	408	250
40	95	166	93	427	259
41	98	176	96	446	268
42	100	187	99	466	278
43	112	192	102	477	287
44	117	202	105	495	296
45	122	212	108	513	305
46	127	221	111	532	314
47	133	232	115	551	323
48	138	242	118	571	332
49	143	252	121	590	341
50	148	263	124	609	350

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

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- 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.

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

b. 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 (percent/100)

c. 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:

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

where:

Mvoc = amount of VOC containing material used (in tons)

Cvoc = VOC content (percent/100)

Rf = Release factor (percent/100), if applicable

The Department may request technical documentation to support how the factor was determined/derived.

Permitting Note: The release factor (Rf) described in c. above shall be equal to one (1) until otherwise established by the Department.

[Rule 62-4.070(3), F.A.C.; Construction Permit 0810076-007-AC]

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MACT - 40 CFR 63, Subparts A and VVVV, Requirements

A.7. This emission unit shall comply with 40 CFR 63, Subparts A and VVVV. These requirements are for only Open Molding Resin and Gel Coat Operations using Emissions Averaging Option and/or Compliant Materials Option. Requirements relating to add-on-control devices have been deleted, since this emission unit does not utilize add-on-control devices. 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.

[Rule 62-204.800(11)(b)59., F.A.C.; 40 CFR 63, Subparts A and VVVV]