



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

**ELECTRONIC MAIL**

*tkuck@regalboats.com*

Tim Kuck, Vice President-Manufacturing  
Regal Marine Industries, Inc.  
2300 Jetport Drive  
Orlando, Florida 32809-7895

Re: Title V Air Operation Permit Renewal  
DRAFT Title V Permit No.: 0950212-007-AV  
Fiberglass Boat Manufacturing Facility

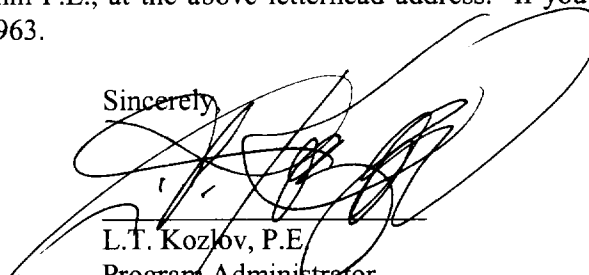
Dear Mr. Kuck:

One copy of the DRAFT Title V Air Operation Permit Renewal for the Fiberglass Boat Manufacturing Facility located at 2300 Jetport Drive, Orlando, Orange County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Alan Zahm P.E., at the above letterhead address. If you have any other questions, please fax them to 407.897.5963.

Sincerely,



L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management



LTK/jar  
Enclosures

In the Matter of an  
Application for Permit Renewal by:

Regal Marine Manufacturing, Inc.  
2300 Jetport Drive  
Orlando, Florida 32809-7895  
Attention: Tim Kuck,  
Vice President-Manufacturing

DRAFT Permit Project No.: 0950212-007-AV  
Fiberglass Boat Manufacturing Facility  
Orange County

### **INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL**

The Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal (copy of DRAFT Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Regal Marine Manufacturing, Inc., applied on October 27, 2004, to the permitting authority for a Title V Air Operation Permit Renewal for the Fiberglass Boat Manufacturing Facility, located at 2300 Jetport Drive, Orlando, Orange County.

The permitting authority has permitting jurisdiction 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. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803, [Telephone: 407/894-7555, Fax: 407/897-5963] within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the PROPOSED Permit, and subsequent FINAL Permit, in accordance with the conditions of the enclosed DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, FL 32399-3000, Telephone: 850/488-9730, Fax: 850/487-4938. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

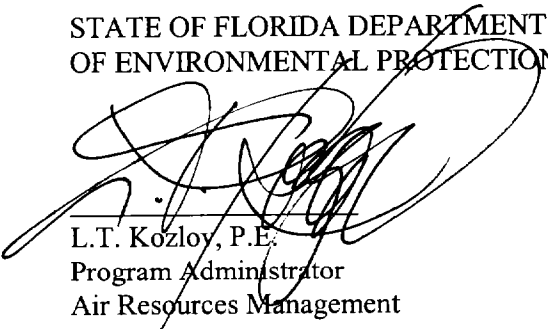
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at U.S. EPA, 401 M. Street SW, Washington, D.C. 20460.


Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



L.T. Kozloy, P.E.  
Program Administrator  
Air Resources Management

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by electronic mail before the close of business on 7/5/05  to the person(s) listed:

**E-CORRESPONDENCE**

*tkuck@regalboats.com*

Tim Kuck  
Vice President-Manufacturing  
Regal Marine Industries, Inc.  
2300 Jetport Drive  
Orlando, Florida 32809-7895


In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL (including the PUBLIC NOTICE and the DRAFT Title V Operation Permit) and all copies were e-mailed on the same date to the person(s) listed:

Tom T. John, P.E., Tom John Engineering, Inc., (*tjengr@msn.com*)  
Hamp Pridgen, Air Section Manager, OCEPD, (*Hamp.Pridgen@ocfl.net*)  
David Smalling, Environmental/Q.A. engineer, Regal Marine Industries, (*dsmalling@regalboats.com*)

U.S. EPA Region IV (INTERNET E-mail Memorandum)  
Al Linero, DARM, BAR, Title V Section (INTERNET E-mail Memorandum)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 7/05/2005  
Clerk Date

**PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL**

Florida Department of Environmental Protection  
Central District

DRAFT Permit Project No.: 0950212-007-AV  
Regal Marine Industries, Inc.  
Fiberglass Boat Manufacturing Facility  
Orange County

The Florida Department of Environmental Protection, Central District (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal to Regal Marine Industries, Inc. for the Fiberglass Boat Manufacturing Facility located at 2300 Jetport Drive, Orlando, Orange County. The applicant's name and address are: Regal Marine Industries, Inc., 2300 Jetport Drive, Orlando, Florida 32809-7895, to the attention of Tim Kuck, Vice President-Manufacturing.

The permitting authority will issue the PROPOSED Permit, and subsequent FINAL Permit, in accordance with the conditions of the enclosed DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the permitting authority's office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, Telephone: 850/488-9730, Fax: 850/487-4938. Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at U.S. EPA, 401 M. Street SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Florida Department of Environmental Protection  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803  
Telephone: 407/894-7555  
Fax: 407/897-5963

The complete project file includes the Draft Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Alan Zahm P.E., at the above address, or fax to 407.897.5963 for additional information.

## **STATEMENT OF BASIS**

Regal Marine Industries, Inc.  
Fiberglass Boat Manufacturing Facility  
**Facility ID No.:** 0950212  
Orange County

Title V Air Operation Permit Renewal  
**DRAFT Permit Project No.:** 0950212-007-AV

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 perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This permit is being issued for the renewal of Title V Air Operation Permit. This facility consists of a fiberglass boat manufacturing operation which includes gelcoat, resin and adhesive application operations, and five resin storage tanks.

This facility includes the following emission unit:

001 - Gelcoat, Resin, and Adhesive Application Operations and Five Resin Storage Tanks

The applicable emission limitation references are as follows:

- a) Gelcoat, Resin, and Adhesive Application Operations, and Five Resin Storage Tanks - VOC limit of 249 tons/yr per construction permit 0950212-003-AC
- b) Facility-Wide - VOC limit of 249 tons/yr. per construction permit 0950212-003-AC, general VOC standard per Rule 62-296.320(1)(a), F.A.C., and general VE limit per Rule 62-296.320(4)(b)1., F.A.C.

Additionally, 40 CFR 60 Subpart VVVV, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, applies to the facility. The facility has chosen the "point value" method of compliance with the MACT of 40 CFR 60 Subpart VVVV for fiberglass boat builders.

Based on the initial Title V Permit Renewal Application received October 27, 2004, this facility is a major source of hazardous air pollutants (HAPs).



Regal Marine Industries, Inc.  
Fiberglass Boat Manufacturing Facility  
**Facility ID No.:** 0950212  
Orange County

**Title V Air Operation Permit Renewal**

**DRAFT Permit Project No.:** 0950212-007-AV

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

Compliance Authority:  
Orange County Environmental Protection Division  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808  
Telephone: 407/836-1400  
Fax: 407/836-1499

**Title V Air Operation Permit Renewal**

**DRAFT Permit No.: 0950212-007-AV**

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Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

**Permittee:**  
Regal Marine Industries, Inc.  
2300 Jetport Drive  
Orlando, FL 32809-7895

**DRAFT Permit No.:** 0950212-007-AV  
**Facility ID No.:** 0950212  
**SIC Nos.:** 37  
**Project:** Title V Air Operation Permit Renewal

Attention: Tim Kuck, Vice President-Manufacturing

The purpose of this permit is to renew the Title V Air Operation Permit. The existing facility is located at 2300 Jetport Drive, Orlando, Orange County; UTM Coordinates: Zone 17, 465.5 km East and 3146.5 km North; Latitude: 28° 28' 31" North and Longitude: 81° 21' 07" 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 perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix I-1, List of Insignificant Emissions Units and/or Activities  
Appendix TV-5, TITLE V CONDITIONS (version dated 3/28/05)  
Appendix Subpart 63-A  
Appendix Subpart VVVV

<b>Effective Date:</b>	<b>TBD</b>
<b>Renewal Application Due Date:</b>	<b>October 30, 2009</b>
<b>Expiration Date:</b>	<b>April 30, 2010</b>

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
LTK/jar

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L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management

## **Section I. Facility Information.**

### **Subsection A. Facility Description.**

This facility consists of a fiberglass boat manufacturing operation which includes gelcoat, resin and adhesive application operations, five resin storage tanks.

Based on the renewal Title V permit application received October 27, 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 Gelcoat, Resin, and Adhesive Application Operations and Five Resin Storage Tanks

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, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Additional information received April 12, 2005.

Additional information request dated April 5, 2005.

Additional information received March 10, 2005.

Additional information request dated February 10, 2005.

Additional information received January 14, 2004.

Additional information request dated December 29, 1999.

Renewal Title V Application received October 27, 2004

Initial Title V Permit Application received June 17, 1996.

## **Section II. Facility-wide Conditions.**

### **The following conditions apply facility-wide:**

1. APPENDIX TV-5, TITLE V CONDITIONS (version dated 03/28/05), is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Rule 62-297, F.A.C.  
[Rule 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. To comply, procedures to minimize pollutant emissions shall include the following:
  - a) tightly cover or close all VOC containers when they are not in use,
  - b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
  - c) maintain all piping, valves, fittings, etc. in good operating condition,
  - d) prevent excessive air turbulence across exposed VOC's,

- e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.]

7. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility may include the following on an as-needed basis:

- a) Frequent sweeping of outside areas
- b) Maintain filters in good working order

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

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Orange County Environmental Protection Division's office:

Orange County Environmental Protection Division  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808-7850  
Telephone: 407/836-1400  
Fax: 407/836-1499

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

10. Hours of Operation. The facility is allowed to operate continuously.

[Rule 62-210.200, (PTE), F.A.C. and construction permit 0950212-003-AC]

11. Emission Limit. The maximum facility VOC emission rate is limited to less than 249 tons per consecutive twelve months, single HAP emissions are limited to less than 249 tons per consecutive twelve months, and combined HAP emissions are limited to less than 249 tons per consecutive twelve months.

[Rule 62-210.200, (PTE), F.A.C., and construction permit 0950212-003-AC]

12. Supporting documentation, such as Material Safety Data Sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc., shall be kept which includes sufficient information to determine compliance. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least 5 years and made available to the Department. Daily logs shall be completed within 7 business days and the monthly logs shall be completed by the end of the following month.

[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

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

[Rule 62-210.370(3), F.A.C.]

**14. 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 Orange County Environmental Protection Division and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. The required elements of the compliance certification are listed in 40 C.F.R. Part 70.6(c)(5)(iii) as indicated in Condition Number 51 of Appendix TV-5, Title V Conditions.

[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.)}

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

### **Test Methods and Procedures**

**16.** Each emission unit shall demonstrate compliance with its visible emission limit in accordance with DEP Method 9 prior to permit expiration date. The test period shall be a minimum of 30 minutes or the length of the batch/cycle.

[Rules 62-297.401(9)(c), 62-297.310(4)(a)2., and 62-297.310(7)(a)4.a., F.A.C.]

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

a) EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen-second intervals during the required period of observation.

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

1) For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

2) For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

18. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Orange County Environmental Protection Division. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test. The Department may waive the 15-day notice requirement on a case-by-case basis.

[Rule 62-297.310(7)(a)9., F.A.C.]

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

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

20. Reports of the required compliance tests shall be filed with the Orange County Environmental Protection Division as soon as practical but no later than 45 days after the last test is completed.

[Rule 62-297.310(8)(b), F.A.C.]

### **Monitoring of Operations**

#### **21. Determination of Process Variables.**

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]



**Recordkeeping and Reporting Requirements**

22. In order to demonstrate compliance with conditions no. A1 and A3, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

- a) month
- b) consecutive 12 month  
total of:
  - VOC emission rate
  - total HAP emission rate
  - hours of operation

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

**40 CFR 63, Subpart VVVV**

23. The emissions unit(s) in this subsection are subject to the applicable requirements contained in 40 C.F.R. 63, Subpart A, which is incorporated by reference and attached to this permit.

24. The facility is subject to the applicable requirements contained in 40 C.F.R. 63, Subpart VVVV, which is incorporated by reference and attached to this permit. The company shall maintain records to show compliance with Subpart VVVV. Rule 63.5701 allows three methods to comply with open molding emission limit; a) maximum achievable control technology model point averaging (emission averaging) option, b) compliant material option, or c) add-on control device. The facility has chosen the "point value" method of compliance with the MACT of 40 CFR 60 Subpart VVVV for fiberglass boat builders.

**Section III. Emissions Unit(s) and Conditions.**

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

**E.U. ID No./ Brief Description**

001 Gelcoat, Resin, and Adhesive Application Operations, and Five Resin Storage Tanks

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

**Essential Potential to Emit (PTE) Parameters**

**A1. Emissions Unit Operating Rate Limitation After Testing.** See specific condition no. 21.  
[Rule 62-297.310(2), F.A.C.]

**Emission Limitations and Standards**

**A2.** The facility volatile organic compound (VOC) emission rate is limited to less than 249 tons per consecutive twelve months. The emissions are based on the quantity of material used during any consecutive twelve-month period and the following emission factors:

1. 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:

% 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

% 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
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

\* *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.

\*\* *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.*

A3. See facility-wide condition no. 3 for the visible emission limitation for each emission unit.

## Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

### Abbreviations and Acronyms:

°F:	Degrees Fahrenheit
BACT:	Best Available Control Technology
CFR:	Code of Federal Regulations
DEP:	State of Florida, Department of Environmental Protection
DARM:	Division of Air Resource Management
EPA:	United States Environmental Protection Agency
F.A.C.:	Florida Administrative Code
F.S.:	Florida Statute
ISO:	International Standards Organization
LAT:	Latitude
LONG:	Longitude
MMBtu:	million British thermal units
MW:	Megawatt
ORIS:	Office of Regulatory Information Systems
SOA:	Specific Operating Agreement
UTM:	Universal Transverse Mercator

### Citations:

*The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.*

#### Code of Federal Regulations:

*Example:* [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

#### Florida Administrative Code (F.A.C.) Rules:

*Example:* [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

## Identification Numbers:

### Facility Identification (ID) Number:

*Example:* Facility ID No.: 1050221

*Where:*

105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by state database.

### Permit Numbers:

*Example:* 1050221-002-AV, or  
1050221-001-AC

*Where:*

AC = Air Construction Permit  
AV = Air Operation Permit (Title V Source)  
105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by permit tracking database  
001 or 002 = 3-digit sequential project number assigned by permit tracking database

*Example:* PSD-FL-185  
PA95-01  
AC53-208321

*Where:*

PSD = Prevention of Significant Deterioration Permit  
PA = Power Plant Siting Act Permit  
AC = old Air Construction Permit numbering

## Appendix H-1, Permit History/ID Number Changes

Regal Marine Industries, Inc.  
Fiberglass Boat Manufacturing Facility

**DRAFT Permit No.:** 0950212-007-AV  
**Facility ID No.:** 0950212

### Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date		Project
-001	Gelcoat, Resin, and Adhesive Application Operations, and Five Resin Storage Tanks	0950212-006-AV	12/10/2003	04/30/2005		Revision
		0950212-005-AC	02/15/2001	02/28/2006		Construction (Mod.)
		0950212-004-AV	03/29/2000	04/30/2005		Revision
		0950212-003-AC	08/23/1999	07/30/2004		Construction (Mod.)
		0950212-002-AV	05/20/1998	04/30/2002		Initial