



ENVIRONMENTAL PROTECTION DIVISION

Lori Cunniff, Manager  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808-7896  
407-836-1400 • Fax 407-836-1499  
[www.ocepd.org](http://www.ocepd.org)

December 17, 2007

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

**Subject: Title V Air Operation Permit Revision**  
**PROPOSED Title V Air Operation Permit Number 0950212-009-AV**  
**Fiberglass Boat Manufacturing Facility**

Dear Mr. Kuck:

One copy of the PROPOSED PERMIT DETERMINATION for the operation of Regal Marine Industries, Inc., located at 2300 Jetport Drive, Orlando, Orange County, Florida, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination will be posted on the Florida Department of Environmental Protection, Division of Air Resources Management's web site for review by the United States Environmental Protection Agency (USEPA) Region 4 office. The web site address is <http://www.dep.state.fl.us/air/eproducts/ards/default.asp>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn. If you have any other questions, please contact the project engineer, John M. Kasper, P.E., at 407-836-1400.

Sincerely,

A handwritten signature in blue ink that reads "Jodi D. Dittell".

Jodi D. Dittell  
Environmental Program Supervisor  
Air Quality Management Section  
Orange County  
Environmental Protection Division

A handwritten signature in blue ink that appears to be "JK/HP:bh".  
JK/HP:bh

Enclosures

Cc: Jim Bradner, Air Program Administrator, FDEP Central District  
Barbara Friday, FDEP BAR (for posting with Region 4, USEPA)  
Tom John, P.E., Tom John P.E., Inc.  
David Smalling, Regal Marine Industries, Inc.

## **PROPOSED PERMIT DETERMINATION**

PROPOSED Permit 0950212-009-AV

Page 1 of 1

### **I. Public Notice**

An “INTENT TO ISSUE TITLE V AIR OPERATION PERMIT” to Regal Marine Industries, Inc., located at 2300 Jetport Drive, Orlando, Orange County, was clerked on September 27, 2007. The “PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT” was published in the Orlando Business Journal on November 2, 2007. The DRAFT Title V Air Operation Permit was available for public inspection at the office of the Orange County Environmental Protection Division in Orlando. Proof of publication of the “PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT” was received on November 7, 2007.

### **II. Public Comment**

No comments were received during the 30-day public comment period. The DRAFT Title V Air Operation Permit becomes the PROPOSED Title V Air Operation Permit.

### **III. Conclusion**

Because no public comments were received, no significant changes were made to the DRAFT Permit. Minor changes were made to conform to FDEP guidelines. The Orange County Environmental Protection Division hereby issues the PROPOSED Permit Number 0950212-009-AV.

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

**Title V Air Operation Permit Revision**

**PROPOSED Title V Operation Permit Revision Number: 0950212-009-AV  
Revision of Title V Air Operation Permit Number: 0950212-007-AV**

**Permitting and 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 Revision

**PROPOSED Permit No.:** 0950212-009-AV

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## ENVIRONMENTAL PROTECTION DIVISION

Lori Cuniff, Manager

800 Mercy Drive, Suite 4

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407-836-1400 • Fax 407-836-1499

www.ocepd.org

**Permittee:**

Regal Marine Industries, Inc.

2300 Jetport Drive

Orlando, FL 32809-7895

**PROPOSED Permit No.:** 0950212-009-AV

**Facility ID No.:** 0950212

**SIC Number:** 37

**Project:** Title V Air Operation Permit Revision

Attention: Tim Kuck, Vice President-Manufacturing

The purpose of this permit is to revise the Title V Air Operation Permit to incorporate the new boat manufacturing building constructed under Construction Permit 0950212-005-AC. The facility is located at 2300 Jetport Drive, Orlando, Orange County, Florida; 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 Revision 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-6, TITLE V CONDITIONS (version dated 6/23/06)

Appendix Subpart 63-A

Appendix Subpart VVVV

**Effective Date:**

**Renewal Application Due Date:**

**Expiration Date:**

**To be determined**

**October 30, 2009**

**April 30, 2010**

ORANGE COUNTY ENVIRONMENTAL PROTECTION  
DIVISION

\_\_\_\_\_  
John M. Kasper, P.E.

Engineer III

Air Quality Management

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of a fiberglass boat manufacturing operation that includes:

1. Gelcoat and resin application operations using polyester resin;
2. Mold manufacture and repair operations using polyester resin;
3. Upholstery manufacturing operations using adhesives;
4. Five resin storage tanks.

These operations produce volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions. There are no HAP or VOC emission controls. Emissions vent through a large number of doors, ventilation fans and stacks on the production buildings at the facility.

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

Based on the renewal Title V permit application received October 27, 2004, and the permit revision application dated May 1, 2007, this facility is a major source of HAP emissions. This facility is subject to 40 CFR Part 63 Subpart VVVV, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

This facility and the manufacturing operations include the new boat manufacturing building south and west of the existing production buildings. The new building was completed in 2007, and allows the facility to manufacture boats using the same processes and materials as before. Incorporating the new building into the facility's manufacturing capability is the subject of this permit revision. Facility-wide emissions limits remain unchanged from permit 0950212-007-AV.

**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.  
Manufacturing operations are potentially conducted in any area of the production buildings. Gelcoat is applied to molds and allowed to cure. Fiberglass and styrene-based resin are then applied, using non-atomizing spray guns for the resin. After hardening, parts are removed from the molds and trimmed, and the molds are prepared to manufacture the next part. Upholstery and other parts are assembled using adhesives. Bulk resin and gelcoat are stored in five tanks. The new boat manufacturing building constructed under permit 0950212-005-AC is now part of emission unit 001.

Please reference the Permit Number, Facility ID Number, and appropriate Emissions Unit(s) ID Number(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/ID Number Changes

Statement of Basis

These documents are on file with the permitting authority:

Title V Revision Application received June 27, 2007

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-6, TITLE V CONDITIONS (version dated 06/23/06), is a part of this permit.
  2. **Not federally enforceable.** 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., Orange County Ordinance Chapter 15 Article III]
  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. **Not federally enforceable.** 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-6, 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-6, TITLE V CONDITIONS.)}

**15.** 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

**16. Renewal.** At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to the Orange County Environmental Protection Division 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**

**17.** 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.]

**18. 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.]

**19.** 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 Orange County Environmental Protection Division may waive the 15-day notice requirement on a case-by-case basis.

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

**20.** 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.]

**21.** 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**

#### **22. 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**

**23.** In order to demonstrate compliance with conditions numbers A.1 and A.3, 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**

**24.** 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.

**25.** 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 the 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. If the results of calculations using the methods of 40 C.F.R. 63 Subpart VVVV conflict with the results of calculations using the method of condition A.2 below, the results obtained from 40 C.F.R. 63 Subpart VVVV shall be used to demonstrate compliance with the limits of this permit.

### 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. Manufacturing operations are potentially conducted in any area of the production buildings. Gelcoat is applied to molds and allowed to cure. Fiberglass and styrene-based resin are then applied, using non-atomizing spray guns for the resin. After hardening, parts are removed from the molds and trimmed, and the molds are prepared to manufacture the next part. Upholstery and other parts are assembled using adhesives. Bulk resin and gelcoat are stored in five tanks. The new boat manufacturing building constructed under permit 0950212-005-AC is now part of emission unit 001.

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. 20.  
[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	<b>Resin** Hand (Non- Spray) Layup</b>	<b>Resin** Mechanical Atomized Spray Layup</b>	<b>Resin Mechanical Nonatomized* Spray Layup</b>	<b>Gel Coat** Mechanical Atomized Spray Layup</b>	<b>Gelcoat Mechanical Nonatomized* Spray Layup</b>
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 TV-6, Version Dated June 23, 2007**

**Document e-mailed as a separate PDF File  
16 Pages**

**40 CFR 63 Subpart A,  
National Emission Standards for Hazardous Air Pollutants  
for Source Categories: General Provisions**

**Document e-mailed as a separate PDF File  
39 Pages**



**40 CFR 63 Subpart VVVV,  
National Emission Standards for Hazardous Air Pollutants  
for Boat Manufacturing**

**Document e-mailed as a separate PDF File  
31 Pages**

## 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
EPD:	Orange County Environmental Protection Division
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	refers to	Title 40
	CFR	refers to	Code of Federal Regulations
	60	refers to	Part 60
	60.334	refers to	Regulation 60.334

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

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

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

ISO: International Standards Organization refers to those conditions at 288 Kelvin, 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, 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

**PROPOSED Permit No.:** 0950212-009-AV  
**Facility ID No.:** 0950212

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#### Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Project</u>
-001	Gelcoat, Resin, and Adhesive	0950212-007-AV	11/7/2005	04/30/2010	Renewal
	Application Operations, and	0950212-006-AV	12/10/2003	04/30/2005	Revision
	Five Resin Storage Tanks	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

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## **STATEMENT OF BASIS**

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

Title V Air Operation Permit Revision  
**PROPOSED Permit Project No.:** 0950212-009-AV

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213, and Chapter 15 of the Orange County Code of Ordinances. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Title V Operation Permit 0950212-007-AV was issued November 7, 2005. The purpose of this 0950212-009-AV permit revision is to incorporate the new boat manufacturing building constructed under permit 0950212-005-AC and to make administrative changes to the 0950212-007-AV permit. Manufacturing processes, materials and emissions limits were not changed, but the following revisions were made to permit 0950212-007-AV.

1. The permit introduction was changed to make Orange County Environmental Protection Division the Permitting and Compliance Authority, a change that became effective July 2, 2007.
2. The facility and emission unit descriptions in Section I, Subsections A and B, and Section III, were modified to include more information and the new boat manufacturing building.
3. The term "Not federally enforceable" was added to Section II conditions 2 and 6.
4. Condition 15 was added to Section II to provide EPA contact information.
5. The last sentence of condition 25 was added to clarify that the calculation methods of 40 CFR Part 63 Subpart VVVV would be used to demonstrate compliance.

This facility consists of a fiberglass boat manufacturing operation that includes gelcoat, resin and adhesive application operations, and five resin storage tanks. Volatile organic compounds (VOC) and hazardous air pollutants (HAP) are emitted without control equipment, from the resins, gelcoats and adhesives used in the manufacture of fiberglass boats. This facility includes the following emission unit:

EU001 - Gelcoat, Resin, and Adhesive Application Operations and Five Resin Storage Tanks

The applicable emission limitation references are as follows:

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

Additionally, 40 CFR Part 63 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 40 CFR Part 63 Subpart VVVV.

Compliance Assurance Monitoring (CAM) requirements do not apply.

Also included in this permit are miscellaneous insignificant emission units and activities.

Based on the renewal Title V permit application received October 27, 2004, and the permit revision application dated May 1, 2007, this facility is a major source of HAP emissions.