Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Jim Leffew
Maverick Boat Company, Inc.
3207 Industrial 29th Street
Ft. Pierce, Florida 34946

Re: Title V Air Operation Permit Revision
Proposed Permit No. 1110086-011-AV
Maverick Boat Company

Dear Mr. Leffew:

One copy of the proposed permit determination for the revision of the Title V air operation permit for the Maverick Boat Company located at 3207 Industrial 29th Street, Ft. Pierce, St. Lucie County, 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 has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is: http://www.dep.state.fl.us/air/eproducts/apds/default.asp

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation 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permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.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 should have any questions, please contact Eric Dunkelberger, at (561) 681-6623 or by email Eric.Dunkelberger@dep.state.fl.us.

Executed in Tallahassee, Florida

David Lyle Read, P.E.

David Lyle Read, P.E.
2017.08.15 14:38:59 -04'00'

For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr/ead

Jim Leffew, Maverick Boat Company, Inc.: jleffew@maverickboatgroup.com
Veronica Sgro, P.E., Koogler & Associates: vsgro@kooglerassociates.com
Pradeep Raval, P.E., Koogler & Associates: praval@kooglerassociates.com
Diane Pupa, FDEP SED: Diane.Pupa@dep.state.fl.us
Kent Edwards, FDEP SED: Kent.Edwards@dep.state.fl.us
Eric Dunkelberger, FDEP OPC: Eric.Dunkelberger@dep.state.fl.us
USEPA Region 4: R4TitleVFL@epa.gov
Ms. Lynn Scearce, FDEP OPC: Lynn.Scearce@dep.state.fl.us

Clerk Stamp

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

Lynn Scearce 2017.08.15 14:40:34 -04'00'

I. PUBLIC NOTICE

An Intent To Issue Air Permit issued to Maverick Boat Company, Inc. for the Maverick Boat Company located at 3207 Industrial 29th Street, Ft. Pierce, St. Lucie County, was clerked on June 30, 2017.

The Public Notice Of Intent To Issue Air Permit was published in St. Lucie News Tribune on July 15, 2017. The draft Title V air operation permit was available for public inspection at the permitting authority's office in person at 3301 Gun Club Road, MSC 7210-1, West Palm Beach, Florida 33406, and online at https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=75.144215.1]&[profile=Permitting_Authorization]. Proof of publication of the Public Notice of Intent To Issue Air Permit was received on July 20, 2017.

II. PUBLIC COMMENTS

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below.

Comments from Koogler & Associates (KA) dated July 5, 2017.

The key comments contained in the letter are condensed, repeated or paraphrased (in italics) below and followed by the Department's response.

1. *KA Comment*. Koogler requests that the facility description in Section I, Subsection A be revised to more accurately reflect the activities at the facility, including a more general description of the boats produced at the facility.

   Department Response. The Department agrees with the comment, and the facility description will be changed to reflect the production of fiberglass boats in general, not necessarily only fishing boats.

2. *KA Comment*. Koogler requests that the emissions unit description in Section III be revised so as not to imply a limit on facility production.

   Department Response. The Department agrees with the comment and will remove the sentence detailing typical facility production.

3. *KA Comment*. Koogler requests the deletion of Specific Condition **A.5** because testing is not required by permit or 40 CFR 63, Subpart VVVV.

   Department Response. The Department will not delete Specific Condition **A.5** because a test could still be required by Department request even though there are no specific test requirements according to 40 CFR 63, Subpart VVVV. The condition will be revised to remove inapplicable test methods 5B, 9, and 18.

4. *KA Comment*. Koogler requests the revision of Specific Conditions **A.7** and **A.21** to reflect that the initial notification of compliance status requirement has been met previously for the existing facility.

   Department Response. The Department agrees with the comment and will revise the condition to reflect that the requirement has been met. The initial notification of compliance status was submitted to the Department on June 26, 2006, along with the implementation plan required by 40 CFR 63, Subpart VVVV.

5. *KA Comment*. Koogler requests the revision of Specific Condition **A.9** to clarify the boat building activities regulated by 40 CFR 63, Subpart VVVV.

   Department Response. The Department agrees with the comment and will revise Specific Condition **A.9** so that boat building activities at the facility are not restricted more than is required by 40 CFR 63, Subpart VVVV.

6. *KA Comment*. Koogler requests that the add-on control option originally described in Specific Condition **A.11** be retained in the permit so that the facility has the flexibility to install add-on control devices in the future.

Department Response. The Department agrees with the comment and will restore Specific Condition **A.11** as previously permitted to include the add-on control option for HAP compliance.

7. *KA Comment*. Koogler commented that the requirements of Specific Condition **A.13**, paragraphs d. and e. should be included in the permit as they are applicable requirements of 40 CFR 63.5707.

   Department Response. The Department disagrees with the comment because the requirements of paragraphs d. and e. have been incorporated into paragraph c. of the same condition in a restructuring of Specific Condition **A.13** for the purpose of improved clarity. Because the applicable requirements are in the condition, no changes will be made.

8. *KA Comment*. Koogler requests that Specific Condition **A.14**, paragraph b. be deleted because it is not an applicable requirement of 40 CFR 63.5710. Koogler suggests making a permitting note instead, to reflect the content of paragraph b.

   Department Response. The Department disagrees with the comment because the requirement of paragraph b. is indeed an applicable requirement according to 40 CFR 63.5710(a). No changes will be made to this condition.

9. *KA Comment*. Koogler requests that the reference to the new boat production facility at 4551 St. Lucie Blvd. be removed from Specific Condition **A.22** because the new production facility is not addressed in this Title V air operation permit revision.

   Department Response. The Department agrees with the comment and acknowledges that the inclusion of the facility at 4551 St. Lucie Blvd. in Specific Condition **A.22** was an error, and it shall be removed from the permit.

III. CONCLUSION

The permitting authority will issue the proposed Title V Air Operation Permit No. 1110086-011-AV, with the changes noted above to be reviewed by the US EPA.