

**Twin Vee Catamarans, Inc.
Twin Vee Catamarans, Ft. Pierce**

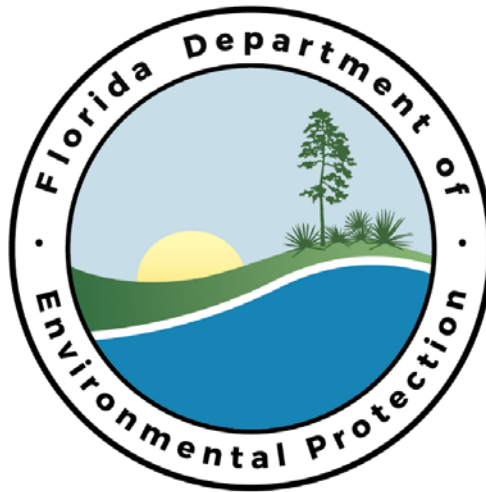
Facility ID No. 1110111

St. Lucie County

Title V Air Operation Permit Renewal

Permit No. 1110111-006-AV

(Renewal of Title V Air Operation Permit No. 1110111-005-AV)



Permitting Authority:

State of Florida

Department of Environmental Protection

Division of Air Resource Management

Office of Permitting and Compliance

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State of Florida

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Title V Air Operation Permit Renewal

Permit No. 1110111-006-AV

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Florida Department of Environmental Protection

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PERMITTEE:

Twin Vee Catamarans, Inc.
3101 South Federal Highway
Ft. Pierce, Florida 34982

Permit No. 1110111-006-AV
Twin Vee Catamarans, Ft. Pierce
Facility ID No. 1110111
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Twin Vee Catamarans, Inc. is located in St. Lucie County at 3101 South Federal Highway, Ft. Pierce, Florida. UTM Coordinates are: Zone 17, 565.87 kilometers (km) East and 3,031.86 km North. Latitude is: 27° 24' 36" North; and Longitude is: 80° 19' 37" West.

The Title V air operation permit 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 in accordance with the terms and conditions of this permit.

Executed in Tallahassee, Florida.

1110111-006-AV Effective Date: April 16, 2018
Renewal Application Due Date: September 3, 2022
Expiration Date: April 16, 2023

For:

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

SA/dlr/ead

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The existing Twin Vee Catamarans, Ft. Pierce facility performs applications of resin and gel coats using molds and spray application to produce fiberglass boats, primarily 26-foot catamarans. Other activities at the facility include upholstery fabrication, woodworking, and boat assembly/rigging. The facility does not consist of any boat maintenance, repair activities, or painting processes. The only cosmetics applied to the boats are adhesive decals. There are no emergency generators or other engines at the facility.

The facility consists of one large warehouse building that is divided into three sections: lamination, assembly, and rigging. There is also a smaller building located behind the main warehouse that is used for storage of molds and miscellaneous coating and solvent operations. All air emissions from the facility are considered fugitive because there are no pollution stacks associated with facility operations. Primary emissions from the facility include volatile organic compounds (VOC) and hazardous air pollutants (HAP), primarily styrene.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Fiberglass Boat Building Activities

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received November 20, 2017, this facility is a major source of HAP. The existing facility is not a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 63, Subpart A - General Provisions.	001
40 CFR 63, Subpart VVVV - NESHAP for Boat Manufacturing.	
State Rule Citations	
Chapter 62-4, F.A.C.: Permits.	001
Rule 62-204.800, F.A.C.: Federal Regulations Adopted by Reference.	
Rule 62-210.200, F.A.C.: Definitions.	
Rule 62-210.300, F.A.C.: Permits Required.	
Chapter 62-213, F.A.C.: Operation Permits for Major Sources of Air Pollution.	
Rule 62-296.320, F.A.C.: General Pollutant Emission Limiting Standards.	
Rule 62-297.310, F.A.C.: General Emissions Test Requirements	

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SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV., Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. 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” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General 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, VOC or OS without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Paving or maintenance of roads, parking areas, and yards.
- b. Application of water or dust suppressants to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
- d. Removal of particulate matter from roads and other paved areas under the control of the permittee to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Substitution of powdery materials with granular or pelletized materials, where possible.

[Rule 62-296.320(4)(c), F.A.C.; and proposed by applicant in Title V air operation permit renewal application received November 20, 2017.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements, for additional details and requirements.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection’s Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP’s Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software.

SECTION II. FACILITY-WIDE CONDITIONS.

Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070**. Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site:

<https://floridadep.gov/air/permitting-compliance/content/title-v-fees>. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.}

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit and to the US. EPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective. (See also Appendix RR, Conditions RR1 and RR7.) [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303
Attn: Air Enforcement Branch

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: <https://cdx.epa.gov>. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: <http://www2.epa.gov/rmp>. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
 - b. 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]

FW9. Semi-Annual Monitoring Reports.

- a. The permittee shall monitor compliance with the terms and conditions of this permit and shall submit reports of any deviations from the requirements of these conditions at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports, including reference to the specific requirement and the duration of such deviation. All reports shall be accompanied by a certification by a responsible official, pursuant to subsection 62-213.420(4), F.A.C. Each report

SECTION II. FACILITY-WIDE CONDITIONS.

must be postmarked or delivered no later than 45 days after the end of the applicable semi-annual reporting period. (See also Conditions RR2. – RR4. of Appendix RR, Facility-wide Reporting Requirements, for additional reporting requirements related to deviations.)

- b. To comply with the requirements of Subpart VVVV of Title 40, Chapter I, Subchapter C, Part 63 of the Code of Federal Regulations (40 CFR 63), the semi-annual report shall contain the following information, and to the extent possible, shall be organized according to the operations covered by this permit and the compliance procedure followed for that operation. Each report must contain six 12-month rolling-average periods (i.e., one 12-month period for each month in the semi-annual reporting period).
- (1) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or Maximum Achievable Control Technology (MACT) model point value averaging provision with which the facility is complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
 - (2) If the facility was in compliance with the emissions limitations and work practice standards during the reporting period, then the permittee must include a statement to that effect.
 - (3) If the facility deviated from an emissions limitation or work practice standard during the reporting period, then the permittee must also include the information listed below.
 - (a) A description of the operation involved in the deviation.
 - (b) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
 - (c) A description of any corrective actions taken to minimize the deviation and actions taken to prevent it from happening again.
 - (d) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

[Rules 62-204.800(11)(b)78, & 62-213.440(1)(b)3.a., F.A.C.; and 40 CFR 63.5764]

{Permitting Notes: EPA has clarified that, pursuant to 40 CFR 70.6(a)(3), the word “monitoring” is used in a broad sense and means monitoring (i.e., paying attention to) the compliance of the source with all emissions limitations, standards, and work practices specified in the permit. The permittee can submit one report that satisfies the requirements of both Rule 62-213.440, F.A.C., and 40 CFR 63, Subpart VVVV.}

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SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Emissions Unit 001. Fiberglass Boat Building Activities

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	Fiberglass Boat Building Activities

This emissions unit began operation in 2003. This emissions unit consists of open molding resin and gel coat operations to produce fiberglass boats. Types of application include spray gun and brush (hand lay-up). Emissions of VOC and HAP are released through the curing of the gel coat and resin and spray application overspray. Other activities include upholstery fabrication, woodworking, and boat assembly/rigging.

The main warehouse for boat production is divided in to three areas: lamination; assembly; and rigging. Air emissions are a byproduct of the lamination activities. A smaller building located behind the warehouse is used for storage and miscellaneous coating and solvent operations, usually smaller piece work (i.e., not the main boat hull). All air emissions from this unit are considered fugitive because there are no pollution stacks associated with facility operations

{Permitting Notes: This emissions unit is regulated as an existing source under 40 CFR 63, Subpart A - General Provisions, and 40 CFR 63, Subpart VVVV - NESHAP for Boat Manufacturing, adopted and incorporated by reference in Rules 62-204.800(11)(d)1, and 62-204.800(11)(b)78, F.A.C., respectively.}

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.2. HAP Emissions. Emissions of styrene shall not exceed 28.4 tons and emissions of total HAP (including styrene) shall not exceed 32.2 tons, in any consecutive 12-month period. [Rule 62-4.070(3), F.A.C., and Permit No. 1110111-001-AC]

A.3. NESHAP VVVV HAP Emissions. The permittee shall comply with the following requirements for open molding operations.

- a. *Open Molding Operations.* The permittee must limit organic HAP emissions from the five open molding operations listed below to the emission limit specified in paragraph b of this condition. Operations listed in paragraph c are exempt from the limit.
 - (1) Production resin.
 - (2) Pigmented gel coat.
 - (3) Clear gel coat.
 - (4) Tooling resin.
 - (5) Tooling gel coat.
- b. *Organic HAP Emissions Limit.* The permittee must limit organic HAP emissions from open molding operations to the limit specified by **Equation A-1**, based on a 12-month rolling average.

$$\text{HAP Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad (\text{Eq. A-1})$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms (kg).

M_R = mass of production resin used in the past 12 months, megagrams (Mg).

M_{PG} = mass of pigmented gel coat used in the past 12 months, Mg.

M_{CG} = mass of clear gel coat used in the past 12 months, Mg.

M_{TR} = mass of tooling resin used in the past 12 months, Mg.

M_{TG} = mass of tooling gel coat used in the past 12 months, Mg.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Emissions Unit 001. Fiberglass Boat Building Activities

- c. *Exempt Materials.* The following materials are exempt from the open molding emission limit in paragraph b of this condition.
- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR Chapter I, Subchapter Q or the construction of small passenger vessels regulated by 46 CFR Chapter I, Subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment.
 - (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1% by weight of all gel coat used at your facility on a 12-month rolling-average basis.
 - (3) Pure, 100% vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5% by weight of all resin used at the permitted facility on a 12-month rolling-average basis.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5698]

Monitoring of Operations

A.4. Implementation Plan – Open Molding Operations. The permittee must prepare an implementation plan for all open molding operations for which emissions averaging is used to comply as described in Condition **A.11**.

- a. *Plan Content.* The implementation plan must describe the steps the permittee will take to bring the open molding operations covered by 40 CFR 63, Subpart VVVV, into compliance. For each operation included in the emissions average, the implementation plan must include the following elements.
- (1) A description of each operation included in the average.
 - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
 - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in Condition **A.3**.
- b. *Other Requirements.* The permittee must keep the implementation plan on site and provide it to the Department when asked. If the plan is revised, the permittee must submit the revised plan with the next semi-annual compliance report specified in Condition **FW9**.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5707]

Test Methods and Procedures

A.5. Test Methods. When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
24	Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings.
311	Analysis of HAP Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph.
ASTM D1259-85	Standard Test Method for Nonvolatile Content of Resins.

The above methods are described in 40 CFR 60, Appendix A, and 40 CFR 63, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-204.800, F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Emissions Unit 001. Fiberglass Boat Building Activities

- A.6. Additional Requirements for Test Methods and Procedures.** If the permittee is using a method described in Condition **A.5** to determine the organic HAP content for materials used, then the permittee must comply with the appropriate additional requirements in this condition.
- a. *Method 311.* The permittee may use Method 311 for determining the mass fraction of organic HAP. When determining organic HAP content by Method 311, the following procedures shall be used:
 - (1) Include in the organic HAP total each organic HAP that is measured to be present at 0.1% by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point.
 - (2) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point.
 - b. *Method 24.* The permittee may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.
 - c. *ASTM D1259-85.* The permittee may use ASTM D1259-85 to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5758]

- A.7. Alternative Methods for Determining Organic HAP Content.** If the permittee is determining the organic HAP content of materials used by a method not described in Conditions **A.5** and **A.6**, then the permittee must determine organic HAP content of materials used by a method described in this condition.
- a. *Alternative Methods.* The permittee may use an alternative test method for determining mass fraction of organic HAP if prior approval is obtained from the Department. The permittee must follow the procedures in 40 CFR 63.7(f) to submit an alternative test method for approval.
 - b. *Information from the Supplier or Manufacturer of the Material.* The permittee may rely on information such as manufacturer's formulation data, according to subparagraphs (1) through (3).
 - (1) Include in the organic HAP total each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds.
 - (2) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee must use the upper limit of the range for determining compliance.
 - (3) If the organic HAP content is provided as a single value, then permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value.
 - c. *Solvent Blends.* Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the permittee may use the values for organic HAP content that are listed in Tables 5 and 6 to Subpart VVVV of 40 CFR 63. The permittee may use Table 6 only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 and the permittee knows only whether the blend is aliphatic or aromatic. However, if test results indicate higher values than those listed in Tables 5 or 6, then the test results must be used for determining compliance.

[\[Link to Tables\]](#)

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5758]

- A.8. Common Testing Requirements.** Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

- A.9. HAP Compliance Options – Open Molding Resin and Gel Coat Operations.** The permittee shall use one or more of the options listed in paragraphs a through c of this condition to meet the emission limit described in Condition **A.3** for the resins and gel coats used in open molding operations. Compliance with each option is based on a 12-month rolling-average basis, unless otherwise noted.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Emissions Unit 001. Fiberglass Boat Building Activities

- a. *MACT Model Point Value Averaging (Emissions Averaging) Option.* Demonstrate that emissions from the open molding resin and gel coat operations that the permittee averages meet the emission limit in Condition **A.3** using the procedures described in Condition **A.11**. Those operations and materials not included in the emissions average must comply with either paragraph b or c of this condition.
- b. *Compliant Materials Option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to Subpart VVVV of 40 CFR 63. [\[Link to Table\]](#)
- c. *Add-on Control Option.* Use an enclosure and add-on control device, and demonstrate that the resulting emissions meet the emission limit in Condition **A.3**. Compliance with this option is based on control device performance testing and control device monitoring.

[Rule 62-204.800(11)(b)78, F.A.C., 40 CFR 63.5701, and Table 2 to Subpart VVVV of Part 63]

A.10. General Requirements for Compliance with the Open Molding HAP Emission Limitation.

- a. *Emissions Averaging Option.* For those open molding operations and materials complying using the emissions averaging option, the permittee must demonstrate compliance according to the following requirements.
 - (1) Use the methods specified in Conditions **A.5** through **A.7** to determine the organic HAP content of resins and gel coats.
 - (2) Complete the calculations described in Condition **A.11** to show that the organic HAP emissions do not exceed the limit specified in Condition **A.3**.
 - (3) Keep records according to Condition **A.23**.
 - (4) Prepare and submit the implementation plan as described in Condition **A.4** and keep it up to date.
- b. *Compliant Materials Option.* For each open molding operation complying using the compliant materials option, the permittee must demonstrate compliance according to the following requirements.
 - (1) Use the methods specified in Conditions **A.5** through **A.7** to determine the organic HAP content of resins and gel coats.
 - (2) Complete the calculations described in Condition **A.12** to show that the weighted-average organic HAP content does not exceed the applicable limit specified in Table 2 to Subpart VVVV of 40 CFR 63. [\[Link to Table\]](#)
 - (3) Keep records according to Condition **A.23**.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5704]

A.11. Compliance Demonstration – Emissions Averaging. If the permittee is complying with the appropriate HAP limit by MACT model point value averaging, then the permittee shall comply with the following requirements.

- a. If the organic HAP emissions, calculated in paragraph c of this condition, are less than the organic HAP limitation calculated in Condition **A.3** for the same 12-month period, then the facility is in compliance for those operations and materials included in the emissions average.
- b. Compliance using the emissions averaging option is based on a 12-month rolling average period and is determined at the end of every month (i.e., 12 times per year).
- c. At the end of every month, use **Equation A-2** to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit pursuant to Condition **A.3** calculated for the same 12-month period. Include only the terms in **Equation A-2** for those operations and materials included in the emissions average.

$$\text{HAP Emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$$

(Eq. A-2)

Where:

HAP emissions = organic HAP emissions calculated using MACT model point values for each operation included in the average, kg.

PV_R = weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram (kg/Mg).

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Emissions Unit 001. Fiberglass Boat Building Activities

M_R = mass of production resin used in the past 12 months, Mg.

PV_{PG} = weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kg/Mg.

M_{PG} = mass of pigmented gel coat used in the past 12 months, Mg.

PV_{CG} = weighted-average MACT model point value for clear gel coat used in the past 12 months, kg/Mg.

M_{CG} = mass of clear gel coat used in the past 12 months, Mg.

PV_{TR} = weighted-average MACT model point value for tooling resin used in the past 12 months, kg/Mg.

M_{TR} = mass of tooling resin used in the past 12 months, Mg.

PV_{TG} = weighted-average MACT model point value for tooling gel coat used in the past 12 months, kg/Mg.

M_{TG} = mass of tooling gel coat used in the past 12 months, Mg.

- d. At the end of every month, use **Equation A-3** to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eq. A-3})$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation included in the average, kg of HAP/Mg of material applied.

M_i = mass of resin or gel coat i used within an operation in the past 12 months, Mg.

n = number of different open molding resins and gel coats used within an operation in the past 12 months.

PV_i = the MACT model point value for resin or gel coat i used within an operation in the past 12 months, kg of HAP/Mg of material applied.

- e. The permittee must use the equations in Table 3 to Subpart VVVV of 40 CFR 63 to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.
[\[Link to Table\]](#)

[Rule 62-204.800(11)(b)78, F.A.C., 40 CFR 63.5710 and Table 3]

A.12. Compliance Demonstration – Compliant Materials. If the permittee is complying with the appropriate HAP limit by using compliant materials, then the permittee shall comply with the following requirements.

- a. Compliance using the organic HAP content requirements listed in Table 2 to Subpart VVVV of 40 CFR 63 [\[Link to Table\]](#) is based on a 12-month rolling average that is calculated at the end of every month. For filled material (production resin or tooling resin), the permittee must comply according to the requirements of Condition **A.13**.
- b. At the end of every month, the permittee shall use **Equation A-4** to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\text{Weighted-Average HAP Content (\%)} = \frac{\sum_{i=1}^n (M_i \text{HAP}_i)}{\sum_{i=1}^n M_i} \quad (\text{Eq. A-4})$$

Where:

M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, Mg.

HAP_i = organic HAP content, by weight %, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in Condition **A.6** to determine organic HAP content.

n = number of different open molding resins or gel coats used in the past 12 months in an operation.

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- c. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 to Subpart VVVV of 40 CFR 63 [[Link to Table](#)] then the facility is in compliance with the emission limit specified in Condition **A.3**.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5713]

A.13. Compliance Demonstration – Filled Resins. When using filled resins, the permittee must comply with the following requirements.

- a. For filled production resins or filled tooling resins, the permittee must demonstrate compliance for the filled material on an as-applied basis using **Equation A-5**.

$$PV_F = (PV_U) \left(\frac{(100 - \% \text{ Filler})}{100} \right) \quad (\text{Eq. A-5})$$

Where:

PV_F = the as-applied MACT model point value for a filled production resin or tooling resin, kg organic HAP/Mg of filled material.

PV_U = the MACT model point value for the neat (unfilled) resin, before filler is added, calculated using the formulas in Table 3 to Subpart VVVV of 40 CFR 63. [[Link to Table](#)]

%Filler = the weight % of filler in the as-applied filled resin system.

- b. If the filled resin is used as a production resin and the value of PV_F calculated by **Equation A-5** does not exceed 46 kg of organic HAP/Mg of filled resin applied, then the filled resin is in compliance.
- c. If the filled resin is used as a tooling resin and the value of PV_F calculated by **Equation A-5** does not exceed 54 kg of organic HAP/Mg of filled resin applied, then the filled resin is in compliance.
- d. If the filled resin is included in the emissions averaging procedure in Condition **A.11**, then use the value of PV_F calculated in **Equation A-5** for the value of PV_i in **Equation A-3**.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5714]

A.14. Closed Molding Resin Operations. Closed molding resin operations at the facility are subject to the following requirements.

- a. If a resin application operation meets the definition of closed molding specified in 40 CFR 63, Subpart VVVV, then there is no requirement to reduce emissions from that operation.
- b. If a resin application operation does not meet the definition of closed molding, then the facility must comply with the limitation for open molding resin operations pursuant to Condition **A.3**.
- c. Open molding resin operations that precede a closed molding operation (e.g., gel coat or skin coat layers that are applied before lamination by closed molding) must comply with the limitation for open molding resin and gel coat operations pursuant to Condition **A.3**.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5728]

A.15. Work Practice Standards for Resin and Gel Coat Mixing Operations. Resin and gel coat mixing operations at the facility are subject to the following requirements.

- a. All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters (~55 gallons), including those used for onsite mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
- b. The work practice standard in paragraph a of this condition does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- c. To demonstrate compliance with the work practice standard in paragraph a of this condition, all mixing containers subject to this condition must be visually inspected at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and container, or between the cover and equipment passing through the cover.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5731]

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- A.16. Resin and Gel Coat Application Equipment Cleaning Operations.** The permittee shall comply with the following requirements for resin and gel coat application equipment cleaning operations at the facility.
- For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee must use a cleaning solvent that contains no more than 5% organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limitation applies.
 - The permittee must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters (~2 gallons), the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resins or gel coats are exempt from the requirements of 40 CFR 63, Subpart T (NESHAP for Halogenated Solvent Cleaning). Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5734]

- A.17. HAP Content.** The permittee shall determine the total and individual HAP contents of all materials, coatings, and solvents, and shall monitor the usage of such materials. [Rule 62-4.070(3), F.A.C., and Permit No. 1110111-001-AC]

- A.18. VOC Content.** The permittee shall determine the VOC contents of all materials, coatings, and solvents, and shall monitor the usage of such materials. [Rule 62-4.070(3), F.A.C., and Permit No. 1110111-001-AC]

- A.19. Material Usage.** The permittee shall monitor the usage of all materials (i.e., resin; gel coat; catalyst; putty; filler; etc.). [Rule 62-4.070(3), F.A.C., and Permit No. 1110111-001-AC]

{Permitting Note: The requirements of Conditions A.17 through A.19 are satisfied by complying with the recordkeeping and reporting requirements according to Subpart VVVV of 40 CFR 63.}

Recordkeeping and Reporting Requirements

- A.20. Reporting Schedule.** The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Semi-annual Report	Every 6 months	FW9.

[Rules 62-204.800(11)(b)78, & 62-213.440(1)(b), F.A.C., and 40 CFR 63.5764]

- A.21. Other Reporting Requirements.** See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

- A.22. Records of VOC/HAP Emissions.** The permittee shall continuously keep and maintain a 5-year ongoing compilation of the following records to demonstrate compliance with the styrene and total HAP emissions limitations of Condition A.2. Records shall be completed no later than the 30th of the following month.
- Amounts in pounds of each material used each month that contains VOC and/or HAP.
 - Weight percentage of HAP in materials using the highest value listed on Material Safety Data Sheets. For non-HAP VOC, the mid-point value may be used.
 - Amount in pounds of VOC/HAP emitted each month from each material used during the month, calculated by multiplying the amount of each material used by its VOC/HAP content and then by the appropriate emission factor.
 - Total amount in pounds of VOC/HAP emitted each month, calculated as the sum of VOC/HAP emitted from each material used during the month, as determined in paragraph c of this condition.
 - Rolling 12-month total amount in pounds and tons of styrene/total HAP emitted in the most recent consecutive 12-month period, calculated as the sum of HAP emitted during that month and the preceding eleven months.

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- f. VOC/total HAP/styrene in tons per calendar year shall be determined and reported in the Annual Operating Report (Facility-wide Condition **FW6**).

[Rules 62-4.070(3) and 62-213.440, F.A.C.; and Permit No. 1110111-001-AC]

{Permitting Note: The above condition is intended to provide a compliance method for the styrene and total HAP emission limitations in Condition A.2. Records kept according to Condition A.23 can satisfy certain requirements of the above condition.}

A.23. NESHAP VVVV Recordkeeping Requirements. The permittee shall keep records for compliance with the requirements of 40 CFR 63, Subpart VVVV.

- a. *Material Usage Records.* The permittee shall record the total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight %. For open molding production resin and tooling resin, the permittee must also record the amounts of each applied by atomized and nonatomized methods.
- b. *Material Exemption Records.* The permittee shall keep records of any materials claimed as exempt from the organic HAP emissions limit described in Condition **A.3**. These records must include the amount of the exempt material used and calculations to verify that the exempt amount used does not exceed the specified percentage of total material used, if applicable.
- c. *Calculations.* The permittee shall keep records of any calculations performed to ensure compliance according to any method described in Condition **A.10**.
- d. *Resin and Gel Coat Mixing Operations Records.* The permittee shall keep records of which mixing containers are subject to the requirements of Condition **A.15** and the results of the inspections required by that condition, including a description of any repairs or corrective actions taken.
- e. *Equipment Cleaning Records.* The permittee shall meet the following requirements for cleaning solvents used to clean gel coat and resin application equipment.
 - (1) The permittee must determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Condition **A.16** using the methods specified in Conditions **A.5** and **A.6**.
 - (2) If cleaning solvents are recycled on site, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the requirements of Condition **A.7** for demonstrating compliance with organic HAP content limitations.
 - (3) At least once per month, the permittee must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin or gel coat to ensure that the containers have covers with no visible gaps. The permittee must keep records of the monthly inspections and any repairs made to the covers.
- f. *Records Format.* The permittee shall keep each record for five years following the date that each record is generated. Records must be readily available and in a form so they can be easily inspected and reviewed. Records can be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

[Rule 62-204.800(11)(b)78, F.A.C.; and 40 CFR 63, Subpart VVVV]

A.24. NESHAP Applicability. The permittee shall comply with all applicable requirements of 40 CFR 63, Subparts A– General Provisions and Subpart VVVV – NESHAP for Boat Manufacturing. These subparts are located in the appendices and are part of this permit. [40 CFR 63 Subparts A and VVVV]

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