Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary - Designee

E-CORRESPONDENCE
sdough@bellsouth.net

Steve Dougherty, President
R. J. Dougherty & Associates, Inc.
544 Air Park Road
Edgewater, FL 32132

Re: DRAFT Title V Air Operation Permit No.: 1270163-005-AV
Air Park Road Facility

Dear Mr. Dougherty:

One copy of the notice and the DRAFT Title V Air Operation Permit for the Boat Manufacturing Facility, located at 544 Air Park Road, Edgewater, Volusia County, Florida, is enclosed. The permitting authority's "INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" are also included.

An electronic version of the DRAFT Permit will be posted on the Division of Air Resources 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/ards/default.asp

The "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" 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 pursuant to Rule 62-110.106(5), F.A.C. 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(11), F.A.C.

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 contact Mr. Zahm at 407/893-3335.

Sincerely,

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

LTK/jt
Enclosures

In the Matter of an
Application for Permits by:

R. J. Dougherty & Associates, Inc.
544 Air Park Road
Edgewater, FL 32132
Attn: Steve Dougherty, President

DRAFT Title V Operation Permit No.: 1270163-005-AV
Air Park Road Facility
Volusia County

INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT

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

The applicant, R. J. Dougherty & Associates, Inc., applied on December 23, 2005, to the permitting authority for a Title V Air Operation Permit for the Air Park Road Facility, located at 544 Air Park Road, Edgewater, Volusia County, Florida.

The permit will allow operation of the existing boat manufacturing facility that includes gelcoating, fiberglass laminating, grinding, trimming, and foam injection. This facility is a source of air emissions.

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 are required to continue operations at the described facility.

The permitting authority intends to issue the 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 A TITLE V AIR OPERATION PERMIT." 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(5), F.A.C.

The permitting authority will issue the PROPOSED Title V Air Operation Permit, and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the enclosed DRAFT Title V Air Operation 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 Title V Air Operation Permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT." 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 Title V Air Operation Permit, the permitting authority shall issue a Revised DRAFT Title V Air Operation 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: 850/245-2242, Fax: 850/245-2303. 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 persons other than those entitled to written notice under Section 120.60(3), F.S., 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. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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(s) have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

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 revision. Any petition shall be based only on objections to the permit revision 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, S.W., Washington, D.C. 20460.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT Title V Air Operation Permit package) and all copies were sent by certified mail or electronically (with Read Receipt) before the close of business on 1/8/07 to the person(s) listed:

E-CORRESPONDENCE
sdough@bellsouth.net

Steve Dougherty, President
R. J. Dougherty & Associates, Inc.
544 Air Park Road
Edgewater, FL 32132

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT Title V Air Operation Permit) were sent by U.S. mail or electronically (with Read Receipt) on the same date to the person(s) listed or as otherwise noted:

Michael C. Williams, P.E. **(mwilliams789@yahoo.com)**

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT (including the DRAFT Title V Air Operation Permit package) were sent by U.S. mail or electronically (with Read Receipt) on the same date to the person(s) listed or as otherwise noted:

Caroline Shine, FDEP
Barbara Friday, BAR **[Barbara.Friday@dep.state.fl.us]** (for posting with Region 4, USEPA)

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Dina Jones — Jan. 8, 2007
Clerk — Date

PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT

Florida Department of Environmental Protection
Central District

DRAFT Title V Air Operation Permit No.: 1270163-005-AV

Air Park Road Facility
Volusia County

The Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit to R. J. Dougherty & Associates, Inc., for the Air Park Road Facility, located at 544 Air Park Road, Edgewater, Volusia County, Florida. The applicant's name and address are: R. J. Dougherty & Associates, Inc., 544 Air Park Road, Edgewater, FL 32132, Attention: Mr. Steve Dougherty, President.

Title V Air Operation Permit No. 1270163-005-AV will allow operation of the existing boat manufacturing facility that includes gelcoating, fiberglass laminating, grinding, trimming, and foam injection. This facility is a source of air emissions.

The permitting authority will issue the PROPOSED Title V Air Operation Permit and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the DRAFT Title V Air Operation 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 Title V Air Operation Permit issuance action for a period of 30 (thirty) days from the date of publication of this Public Notice. Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Permitting Authority at the Florida Department of Environmental Protection, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803 (telephone: 407/894-7555; fax: 407/897-5963). As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices at http://faw.dos.state.fl.us/ and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting 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. All comments filed will be made available for public inspection.

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 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, FL 32399-3000, Telephone: 850/245-2242, Fax: 850/245-2303. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., 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. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 28-106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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(s) have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

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 Title V permit. Any petition shall be based only on objections to the Title V 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 Title V Air Operation Permit, the application(s), 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 call 407/893-3335 for additional information.

R. J. Dougherty & Associates, Inc.
Air Park Road Facility
Facility ID No.: 1270163
Volusia County

Title V Air Operation Permit

DRAFT Title V Operation Permit No.: 1270163-005-AV

Permitting and Compliance Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

Telephone: 407/893-3334
Fax: 407/897-5963

Title V Operation Permit

DRAFT Title V Operation Permit No.: 1270163-005-AV

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Statement of Basis

Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary - Designee

Permittee:
R. J. Dougherty & Associates, Inc.
544 Air Park Road
Edgewater, Florida 32123
Attention: Steve Dougherty, President

FINAL Permit No.: 1270163-005-AV
Facility ID No.: 1270163
SIC Nos.: 3732
Project: Title V Air Operation Permit

The purpose of this permit is the operation of the Fishing Boat Manufacturing Facility located at 544 Air Park Road, Edgewater, Volusia County; Latitude: 28° 58' 48" North and Longitude: 80° 55' 42" West.

STATEMENT OF BASIS: This 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, 62-213 and 62-214. 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
Appendix Subpart VVVV

Effective Date: **to be determined**
Renewal Application Due Date: **December 30, 2010**
Expiration Date: **June 30, 2011**

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

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

LTK/jt

Section I. Facility Information.

Subsection A. Facility Description.

The fiberglass boat manufacturing facility (EU 001) includes applying gel coat to hull deck and supporting structure, then lamination, grinding, and trimming. Afterwards foam is injected into the support structure, the hull and deck are assembled and polished, then the boat parts, motor, console and rub-rails are assembled. Small parts are made with a similar gel-coat/fiberglass lamination process. The operations described are located in six buildings at the facility that are designated as Buildings A, B, C, D, E, and F, per the application.

Based on the Title V permit application received December 23, 2005, 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	Fiberglass Boat Manufacturing Facility

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 the permitting authority:
Initial Title V Operation Permit Application received April 4, 2001.
Construction Permit Application received December 20, 2004.
Title V Operation Permit Revision Application received December 20, 2004.
Title V Operation Permit Renewal Application Received December 23, 2005.

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

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS are 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).
[Rule 62-296.320(4)(b)1., 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, Maryland 20703-1515
Telephone: 301/429-5018

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, VOC or 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.;
c. Maintain all piping, valves, fittings, etc. in good operating condition;
d. Prevent excessive air turbulence across exposed VOC; and
e. Immediately confine and clean up spills of VOC containing materials.

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

7. Emissions of Unconfined Particulate Matter. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Chemical or water application to unpaved roads and unpaved yard areas;
b. Paving and maintenance of roads, parking areas and yards;
c. Landscaping or planting of vegetation; and
d. Other techniques, as necessary.

[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 air compliance section of this office:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/893-3336
Fax: 407/897-5963

10. 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 & EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155
Fax: 404/562-9163

11. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the air compliance section of this office and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]
{Permitting note: This condition implements the requirements of Rules 62-213.440(3)(a)2. &3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62.213.420(4), F.A.C.]

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 air compliance section of this office.
[Rule 62-210.370(3), F.A.C.]

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

Section III. Emissions Unit(s) and Conditions.

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

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

The fiberglass boat manufacturing facility (EU 001) includes applying gel coat to hull deck and supporting structure, then lamination, grinding, and trimming. Afterwards foam is injected into the support structure, the hull and deck are assembled and polished, then the boat parts, motor, console and rub-rails are assembled. Small parts are made with a similar gel-coat/fiberglass lamination process.

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

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. The emissions unit is permitted to operate continuously.
[Rule 62-210.200, (PTE), F.A.C. and construction permit 1270163-004-AC]

A2. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly.
[Rules 62-210.200, (PTE), F.A.C. and 62-210.650, F.A.C.]

Emission Limitations and Standards

A3. The maximum permitted emissions for total VOCs shall not exceed 249.0 tons per any consecutive 12-month period; the maximum permitted emissions for total HAPs shall not exceed 249.0 tons per any consecutive 12-month period, and the maximum permitted emissions for any single HAP shall not exceed 249.0 tons per any consecutive 12-month period; all VOC and HAP emissions updated monthly
[Rule 62-210.200, (PTE), F.A.C. and construction permit 1270163-004-AC]

Recordkeeping and Reporting Requirements

A4. In order to demonstrate compliance with condition A3, the permittee shall maintain a monthly log at the facility. The log shall be completed by the end of the following month and retained on file at the facility for at least five years from the date the data is recorded. At a minimum, the monthly log shall contain the following:

a) Designation of the month and year of operation for which the records are being tabulated.
b) Consecutive 12-month totals of gel-coat, resins and other VOC/HAP containing materials.
c) Consecutive 12-month totals of VOC, combined HAPs, and individual HAP emission rates. The VOC/HAP emission rates are calculated using emission factors from the following table.

	NVS Monomer-35%	NVS Monomer-38%	NVS Monomer-42%
Resin Non-Spray Lay-up	11	11	12
Resin Spray Lay-up	16	18	20
Gel Coat	48	51	54

NVS = non-vapor suppressed
emission factors as a percent of available monomer

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month.
[Rule 62-4.070(3), F.A.C.]

A5. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSD sheets, emission factors, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) and including references to the VOC/HAP emission factors used, shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request.

Volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coatings, and inks, using EPA Reference Method 24 and 24A, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings". The documents shall be kept at the facility for at least five years and made available to the Department.
[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

A6. Within 60 days following the end of each 6-month period after startup, submit a semi-annual compliance report.
[Rule 62-4.070(3), F.A.C.]

A7. Each particulate emission source must be compliance tested for visible emissions in accordance with DEP Method 9 at least 180 days prior to the permit expiration date. The test shall be conducted for thirty minutes or the length of the batch/cycle.
[Rules 62-297.401(9)(c), and 62-297.310(4)(a)2., F.A.C.]

A8. The provisions of EPA Method 9 (40CFR), 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(9)(c), F.A.C.]

A9. 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 air compliance section of this office. 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.
[Rule 62-297.310(7)(a)9, F.A.C.]

A10. 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.].

40 CFR 63, Subparts A and VVVV

A11. The emissions unit(s) in this subsection is subject to the applicable requirements contained in 40CFR 63, Subpart A and 40CFR63, Subpart VVVV which are incorporated by reference and attached to this permit as "Appendix Subpart VVVV". The company will 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.

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

R. J. Dougherty & Associates, Inc.
Air Park Road Facility

DRAFT Permit No.: 1270163-005-AV
Facility ID No.: 1270163

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Project Type
-001	Boat and Parts Mfg.	1270163-001-AC	02/21/00	09/06/00	Construction, New
-001	Boat and Parts Mfg.	1270163-002-AV	09/24/01	06/30/06	Operation
-001	Boat and Parts Mfg.	1270163-003-AV	05/02/05	06/30/06	Operation Revision
-001	Boat and Parts Mfg.	1270163-004-AC	05/21/05	01/30/06	Construction
-001	Boat and Parts Mfg.	1270163-005-AV	tbd	06/30/11	Operation

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

R.J. Dougherty & Associates, Inc.
Air Park Road Facility

DRAFT Permit No.: 1270163-005-AV
Facility I.D. No.: 1270163

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

1. Grinding activities
2. Sanding activities
3. Trimming activities
4. Buffing activities
5. Deck and hull putty application
6. Two 6000 gallon styrene storage tanks
7. Emergency diesel generator
8. One 500 gal. diesel storage tank
9. Brazing, soldering, and welding equipment.
10. Abrasive blasting of foam parts
11. Gelcoat use for patching or touchup
12. Airless spray painting (less than 20 gals/month)

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APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

Chapter 62-4, F.A.C.

1. **Not federally enforceable.** General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, constructed, expanded, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.
[Rule 62-4.030, Florida Administrative Code (F.A.C.); and, Section 403.087, Florida Statute (F.S.)]

2. **Not federally enforceable.** Procedures to Obtain Permits and Other Authorizations; Applications.
(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.
(2) All applications and supporting documents shall be filed in quadruplicate with the Department.
(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except, when the application is for renewal of an air pollution operation permit at a non-Title V source as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.
(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.
(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.
(b) When an application is received without the required fee, the Department shall acknowledge receipt of the application and shall immediately notify the applicant by certified mail that the required fee was not received and advise the applicant of the correct fee. The Department shall take no further action until the correct fee is received. If a fee was received by the Department which is less than the amount required, the Department shall return the fee along with the written notification.
(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.
(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.
(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.
(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.
(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application for the same time duration except for modification under Chapter 62-45, F.A.C.
[Rule 62-4.050, F.A.C.]

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APPENDIX Subpart VVVV

(Last updated 6/18/03; includes Subpart A, General Provisions)

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

Sec.

What the Subpart Covers

63.5680 What is the purpose of this subpart?
63.5683 Does this subpart apply to me?
63.5686 How do I demonstrate that my facility is not a major source?
63.5689 What parts of my facility are covered by this subpart?
63.5692 How do I know if my boat manufacturing facility is a new source or an existing source?
63.5695 When must I comply with this subpart?

Standards for Open Molding Resin and Gel Coat Operations

63.5698 What emission limit must I meet for open molding resin and gel coat operations?
63.5701 What are my options for complying with the open molding emission limit?
63.5704 What are the general requirements for complying with the open molding emission limit?
63.5707 What is an implementation plan for open molding operations and when do I need to prepare one?
63.5710 How do I demonstrate compliance using emissions averaging?
63.5713 How do I demonstrate compliance using compliant materials?
63.5714 How do I demonstrate compliance if I use filled resins?

Demonstrating Compliance for Open Molding Operations Controlled by Add-on Control Devices

63.5715 What operating limits must I meet?
63.5716 When must I conduct a performance test?
63.5719 How do I conduct a performance test?
63.5722 How do I use the performance test data to demonstrate initial compliance?
63.5725 What are the requirements for monitoring and demonstrating continuous compliance?

Standards for Closed Molding Resin Operations

63.5728 What standards must I meet for closed molding resin operations?

Standards for Resin and Gel Coat Mixing Operations

63.5731 What standards must I meet for resin and gel coat mixing operations?

Standards for Resin and Gel Coat Application Equipment Cleaning Operations

63.5734 What standards must I meet for resin and gel coat application equipment cleaning operations?
63.5737 How do I demonstrate compliance with the resin and gel coat application equipment cleaning standards?

Standards for Carpet and Fabric Adhesive Operations

63.5740 What emission limit must I meet for carpet and fabric adhesive operations?

Standards for Aluminum Recreational Boat Surface Coating Operations

63.5743 What standards must I meet for aluminum recreational boat surface coating operations?
63.5746 How do I demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings?

STATEMENT OF BASIS

R. J. Dougherty & Associates, Inc.
Edgewater Facility
Facility ID No.: 1270163
Volusia County

Title V Air Operation Permit **Renwal**
DRAFT Permit No.: 1270163-005-AV

This 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 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 facility consists of a fiberglass boat and parts manufacturing process that includes fiberglass lamination, gelcoating, grinding, trimming, and foam injection.

Based on the Title V permit application received December 23, 2005, this facility is a major source of hazardous air pollutants (HAPs).

The applicable emission limitations are as follows:

-general VOC standard per Rule 62-296.320(1)(a), F.A.C.
-general VE limit per Rule 62-296.320(4)(b), F.A.C.
-annual VOC limit of 249 tons/yr
-annual single HAP and combined HAP limit of 249 tons/yr
-40CFR63, Subpart VVVV – NESHAP for Boat Manufacturing