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

ELECTRONIC MAIL
peter@ewboats.com

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Peter Truslow, President
EdgeWater Power Boats LLC
211 Dale Street
Edgewater, FL 32132

Re: **FINAL** Title V Permit No.: 1270166-007-AV
Boat Manufacturing Facility

Dear Mr. Truslow:

Enclosed is **FINAL** Permit Number 1270166-007-AV for the operation of a Boat Manufacturing Facility located at 211 Dale Street, Edgewater, Volusia County, issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.
Program Administrator
Air Resources Management

LTK/azt

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL Permit) and all copies were sent by certified mail or electronically (with Received Receipt) before the close of business on 5/7/07 to the person(s) listed:

Tom T. John, P.E. **(tjengr@msn.com)**
Caroline Shine, FDEP

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this NOTICE OF FINAL PERMIT (including the FINAL Permit) were sent by certified mail or electronically (with Received Receipt) on the same date to the person(s) listed:

Barbara Friday, BAR **[Barbara.Friday@dep.state.fl.us]** (for posting with Region 4, U.S. EPA)

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 May 7, 2007
(Clerk) (Date)

FINAL Determination

Title V Air Operation Permit
FINAL Permit No.: 1270166-007-AV
Edgewater Power Boats LLC
Boat Manufacturing Facility

I. Comment(s).

No comments were received from the USEPA during their 45 day review period of the PROPOSED Permit.

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit.

EdgeWater Power Boats LLC
Boat Manufacturing Facility
Facility ID No.: 1270166
Volusia County

Title V Air Operation Permit Renewal

FINAL Title V Operation Permit No.: 1270166-007-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 Air Operation Permit

FINAL Title V Operation Permit No.: 1270166-007-AV

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Statement of Basis

Florida Department of Environmental Protection

Central District
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Lt. Governor

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Secretary

Permittee:
EdgeWater Power Boats LLC
211 Dale Street
Edgewater, Florida 32132
Attention: Peter Truslow, President

FINAL Permit No.: 1270166-007-AV
Facility ID No.: 1270166
SIC Nos.: 37, 3732
Project: Title V Air Operation Permit

The purpose of this permit is the operation of the Boat Manufacturing Facility located at 211 Dale Street, Orlando, Volusia County; UTM Coordinates: Zone 17, 507.39 km East and 3206.49 km North; Latitude: 28° 59' 17" North and Longitude: 80° 55' 24" 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:	**April 23, 2007**
Renewal Application Due Date:	**March 15, 2011**
Expiration Date:	**September 15, 2011**

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.
Program Administrator
Air Resources Management

LTK/az

Section I. Facility Information.

Subsection A. Facility Description.

The facility consists of a fiberglass boat manufacturing operation. The processes include applying gel coat to the hull, deck, and supporting structure, then laminating, grinding, and trimming. Next, foam is injected into the support structure. The hull and deck are then assembled and polished, and finally, the boat parts, motor, console and rubrails are assembled. Open and closed molding and touch-up is also included.

The facility is subject to NESHAP, 40CFR63, Subpart VVVV (except for closed molding) and compliance will be demonstrated by the "point value" averaging method.

Based on the Title V permit renewal application received October 6, 2006, 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 Boat Manufacturing Facility – The process of manufacturing fiberglass fishing boats includes several separate operations as described above.

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/I.D. Number Changes
Statement of Basis

These documents are on file with the permitting authority:
Air construction permit 1270166-001-AC, issued September 12, 2000
Application for initial Title V Operation Permit received March 28, 2001
Application for Air Construction Permit and Title V Operation Permit Revision received November 14, 2003
Application for Air Construction Permit received September 30, 2005
Application for Title V Permit Renewal received October 6, 2006

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 Boat Manufacturing Facility

The process of manufacturing fiberglass boats includes several separate operations. These include applying gel coat to the hull, deck, and supporting structure, then laminating, grinding, and trimming. Next, foam is injected into the support structure. The hull and deck are then assembled and polished, and finally, the boat parts, motor, console and rub rails are assembled. Open and closed molding and touch-up is also included.

The facility is subject to NESHAP, 40CFR63, Subpart VVVV (except for closed molding) and compliance will be demonstrated by the "point value" averaging method.

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 Permit 1270166-006-AC]

A2. All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions shall include, but not be limited to, the following:
a) Using high efficiency spray guns; and
b) Maintaining filter(s) in good working order.
[Rule 62-296.320(4)(c), F.A.C.]

Emission Limitations and Standards

A3. The maximum **facility-wide** VOC and total HAP emissions shall not exceed 75.0 tons per any consecutive 12-month period and each **facility-wide** HAP emission shall not exceed 75.0 tons per any consecutive 12-month period, updated monthly
[Permit 1270166-006-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. The monthly log shall include the following:

Monthly

a) month
b) Consecutive 12-month total of:
- VOC and HAP usage rates
- coatings usage rates
- VOC emissions rates
- total and each HAP emission rates

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

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 are 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, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) 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, Subpart VVVV

A11. The facility is subject to the applicable requirements contained in 40 C.F.R. 63, Subpart A, which is incorporated by reference and attached to this permit. The facility is also subject to the applicable requirements contained in 40 C.F.R. 63, Subpart VVVV, which is incorporated by reference and attached to this permit. The company 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. Subparts A and VVVV are described in the attached APPENDIX VVVV.