

Brunswick Corporation
Brunswick Commercial and Government Products
Facility ID No.: 1270173
Volusia County

Title V Air Operation Permit Renewal

Draft Permit Project No.: 1270173-003-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 Renewal

Draft Permit No.: 1270173-003-AV

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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

Permittee:

Brunswick Commercial and Government Products
420 Megan Z Avenue
Edgewater, Florida 32132

DRAFT Permit: 1270173-003-AV

Facility ID No.: 1270173

SIC Nos.: 37

Project: Title V Air Operation Permit Renewal

Attention: Jennifer Butera, General Manager

The purpose of this permit is to renew the Title V Air Operation Permit. The existing facility is located at 420 Megan Z Avenue, Edgewater, Volusia County; UTM Coordinates: Zone 17-508.4 km East and 3207 km North; Latitude: 28° 59' 34" North and Longitude: 80° 54' 46" West.

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

Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emission units and/or Activities

Appendix TV-6, Title V Conditions version dated 6/23/06

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

Effective Date:

TBD

Renewal Application Due Date:

November 15, 2013

Expiration Date:

June 30, 2014

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

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

JNB/jar

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www.dep.state.fl.us

Section I. Facility Information.

Subsection A. Facility Description.

The facility includes resin and gel coat operations. Processes include fiberglass lamination, grinding and trimming operations, support structure installation, foam injection and final assembly.

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

Based on the Title V Air Operation Permit Renewal application received January 5, 2009, 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 and Boat Parts Manufacturing

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

Statement of Basis

These documents are on file with the permitting authority:

Air Construction Permit 1270173-001-AC, issued June 17, 2002.

Application for initial Title V Operation Permit received October 9, 2003.

Initial Title V Air Operation Permit issued June 9, 2004.

Application for a Title V Air Operation Permit Renewal received January 5, 2009.

Responsible Official Notification Form received February 2, 2009.

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, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person 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). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018
 - and,
 - b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]
5. Insignificant Emissions Units and /or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), 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, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions shall include the following:

- a) Tightly cover or close all VOC containers when they are not in use;
- b) Tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use;
- c) Maintain all piping, valves, fittings, etc. in good operating condition;
- d) Prevent excessive air turbulence across exposed VOCs; and
- e) Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

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

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent unconfined emissions of unconfined particulate matter at this facility include the following requirements:

- a) 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;
- d) Frequent sweeping of outside areas; and
- e) 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. 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 Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. The required elements of the compliance certification are listed in 40 C.F.R. Part 70.6(c)(5)(iii) as indicated in Condition Number 51 of Appendix TV-6, Title V Conditions.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS.)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the following office:

Florida Department of Environmental Protection
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334; Fax: 407/897-5963

11. 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

12. Certification of 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 for Air Pollutant Emitting Facility.

The owner or operator shall complete DEP Form No. 62-210.900(5), F.A.C., "Annual Operating Report for Air Pollutant Emitting Facility," for each calendar year and submit it either electronically using the latest Department Annual Operating Report software or by hard copy to the air compliance section of this office by **April 1** of the following year, **except that the annual operating report for year 2008 shall be submitted by May 1, 2009** in accordance with Rule 62-210.370(3), F.A.C. The emissions shall be computed in accordance with the provisions of Rule 62-210.370(2), F.A.C., for the purposes of the annual operating report. The address for the Central District is the following:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334

[Rule 62-210.370(3), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No./Brief Description

001 Boat and Boat Parts Manufacturing

The facility includes resin and gel coat operations. Processes include fiberglass lamination, grinding and trimming operations, support structure installation, foam injection and final assembly.

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. The emission unit is permitted to operate continuously.
[Rule 62-4.160(2) and Rule 62-210.200 - (PTE), F.A.C.]

Emission Limitations and Standards

A2. Visible emissions from the facility shall not exceed 20% opacity.
[Rule 62-296.320(4)(b)1, F.A.C.]

A3. Volatile Organic Compound: The total VOC emission rate is not to exceed 49 tons per consecutive twelve months and the styrene emission rate is not to exceed 49 tons per twelve consecutive months, updated monthly.
[Permit 1270063-001-AC, date July 22, 1996]

Recordkeeping and Reporting Requirements

A4. In order to demonstrate compliance with specific condition number **A3.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

- a) month and year for which records are being tabulated
- b) consecutive 12 months total of:
 - pounds of resin used;
 - gel coat material used;
 - VOC emissions; and
 - styrene emissions.

[Rule 62-213.440(1)(b)2.b.,F.A.C.]

Note: A consecutive 12-months 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-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months 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.]

40 CFR 63, Subpart VVVV

A6. The emissions unit(s) in this subsection are subject to the applicable requirements contained in 40 C.F.R. 63, Subpart A, which is incorporated by reference and attached to this permit.

A7. The facility is subject to the applicable requirements contained in 40 C.F.R. 63, Subpart VVVV, which is incorporated by reference and attached to this permit. The company 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.