Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

JRL Ventures, Inc.
1651 Whitfield Avenue
Sarasota, FL 34243

Authorized Representative:
Mr. Matt Chambers, President

Air Permit No. 0810236-001-AC
Permit Expires: 04/23/2014
Site Name: Manatee County Facility
Minor Air Construction Permit
Project Name: Initial construction permit

This is the final air construction permit for a fiberglass products, forms, molds, and plugs manufacturing facility. The proposed work will be conducted at the Manatee County Facility (Standard Industrial Classification No. 3732). The facility will be located in Manatee County at 1651 Whitfield Avenue in Sarasota, Florida.* The UTM coordinates are Zone 17, 349.5 km East, and 3034.1 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

**Note: This is the current post office mailing address for this site. A new post office mailing address is expected to be issued in the near future.*

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Robert C. Wong
District Air Program Administrator
Southwest District

October 2, 2012
Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Matt Chambers, President
JRL Ventures, Inc.
mchambers@marineconcepts.com

Mr. Tom John, P.E.
Tom John Engineering, Inc.
tjengr@msn.com

Ms. Danielle Henry
Southwest District Air Compliance Manager
Danielle.D.Henry@dep.state.fl.us

Clerk Stamp

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

Digitally signed by Carol L. Moore
Date: 2012.10.03 07:32:35 -04'00'

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Project Description and Proposed Emission Unit

For the initial construction of a fiberglass products, forms, molds, and plugs manufacturing facility. This project will create the following emissions unit.

ID No.	Emission Unit Description
001	Fiberglass Products, Forms, Molds, and Plugs Manufacturing

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units/Activities

- Site Remediation Activities per Rule 62-210.300(3)(b)1., F.A.C. *This activity is also exempt from 40 CFR 63, Subpart GGGGG – National Emission Standards for Hazardous Air Pollutants: Site Remediation per 40 CFR 63.7881(a)(3).*

- Three (3) milling machines with particulate matter emissions controlled by a dust collector. Uncontrolled emissions are exempt per Rule 62-210.300(3)(b)1., F.A.C.

- Solvent Recovery Unit per Rule 62-210.300(3)(b)1., F.A.C.

FACILITY REGULATORY CLASSIFICATION

– The facility is not a major source of hazardous air pollutants (HAPs).

– The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).

– The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

– The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

– This facility is a synthetic non-Title V source for the pollutants: Total HAPs, Individual HAP, and VOC. The emission limitations in this permit will ensure that the facility's Total HAPs, Individual HAP, and VOC emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

No previous permits

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.
   e. Appendix E. Unified Emission Factor for Open Molding Composites.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit: This permit authorizes construction of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

   c. copies of the most recent month of records/logs specified in Specific Condition No. A.8.

   The application shall be submitted to the Permitting Authority.
   [Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

A. EU No. 001 - Fiberglass Products, Forms, Molds, and Plugs Manufacturing

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Fiberglass Products, Forms, Molds, and Plugs Manufacturing: This emissions unit manufactures finished laminated products for the marine and other fiberglass manufacturing industries along with producing forms, plugs, and molds. The manufacturing processes typically occur in a western building and an eastern building as further described below: <u>Western Building</u> Plugs manufactured may be constructed on either wood and/or rigid foam. For more traditional wood plug method, a wooden structure of approximately correct dimensions is made from (typically) ¾ inch thick plywood. This part is brought to the correct shape by one of the three (3) milling machines, and is erected on a wooden support base. A dust collector that vents inside the building is used control particulate matter emissions from the milling machines. The structure is then planked with plywood sheets. For some small parts, epoxy glues may be used to bond the wood pieces prior to shaping on the milling machines. From either starting point, filler putty (e.g., bondo) is applied to the surface to fill any gaps in the wood surface; the surface is then sanded until "fair" (smooth), after which the entire plug is brushed with styrene based resin, followed by a spray applied primer. The surfaces are dry sanded, another layer of primer is applied, and the plug is wet sanded. After wet sanding, the finished plug is inspected and readied for shipment to customers who will make their own mold from the plug to manufacture their products. In the foam method of plug manufacture, instead of planking with plywood, the base wood structure is covered with a spray applied "2 ½ lb density" or smaller two (2) part urethane foam. Smaller parts may be initially constructed of sheets of urethane foam. The foam surface is then rough cut into an approximate shape using the milling machines. The surface is then brushed with resin, then putty is used to fill any voids, and the surface is covered with spray/chopped resin and fiberglass. After curing, a high density foam is applied to the surface, and the part is milled in a final cut. Final plug detailing is then completed in the same manner as the wooden plug, with a hand applied resin coat, primer, sanding, and re-coating, etc. Finished molds may also be made from the plugs. Molds, which are the parts used by boat and laminated parts manufacturers to make their parts, are made from plugs. The plug is the original surface, from which molds, which have a shorter working life, will be made. To make the mold, the plug is spray coated with gelcoat, followed by hand laid resin/fiberglass or hand laid resin/fiberglass and filled resin. This process of hand and spray application continues until the desired mold wall thickness is reached, at which point the back of the mold is braced with steel bracing cut and welded to shape (or wood bracing laminated into the mold for smaller parts). The edges of the mold are trimmed, the part is removed from the plug, and wet sanded and buffed as needed prior to inspection and shrink wrapping for shipment. Waxing the plug with a mold release agent prior to applying the mold materials allows the mold to be easily removed from

	the plug for final polishing and inspection prior to shipping. Eastern Building This building is typically used to perform lamination, gelcoating, grinding, and other related activities. In the lamination process, a layer of catalyzed gelcoat is spray applied to the part mold, which has been prepared with a release agent to facilitate the removal of the cured part from the mold. The mold and gelcoat surfaces must be kept extremely clean to avoid cosmetic flaws in the exterior surface of the product. After the application of the gelcoat layer, the various layers of catalyzed resin and fiberglass are applied using non-atomized spray techniques. After curing, the hardened fiberglass products are removed from the mold and the excess material ("flashing") is trimmed, typically with a hand held air driven cut off tool, as necessary. Imperfections in the surfaces are removed by grinding the surface and re-applying gelcoat and/or resin as necessary. This activity is performed in the "grind booth". Activities in Both Buildings The majority of the particulates generated from the fiberglass and wood/foam cutting, shaping, and sanding operations are expected to be too large to exit the area and are in general controlled by portable "shop-vac" vacuum collectors where appropriate and normal "good housekeeping" procedures.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation: The hours of operation of are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.2. Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. (See Appendix C, Condition No. 9). These provisions are applicable to any source, including but not limited to, industrial related activities such as loading, unloading, storing and handling of materials. These provisions shall include:

a. A dust collector is used to control particulate matter emissions from the three (3) milling machines.

b. Exercise good housekeeping procedures as necessary. (e.g., such as cleaning and sweeping of floors and work surfaces along with the use of "shop-vac" vacuum collectors.)

[Rule 62-296.320(4)(c), F.A.C.]

A.3. Reasonable Precautions to Prevent VOC and Organic Solvent (OS) Emissions: The permittee shall not store, pump, handle process, load, unload, or use in any process or installation, VOC or OS's without applying know and existing vapor emission control devices or systems deemed necessary by the Department. Reasonable precautions and/or controls shall include the following:

a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated and maintained in such a manner as to minimize leaks, fugitive emission, and spills of paints and solvent materials that contain VOC and/or OS's.

b. All solvents from solvent washings that contain VOC and/or OS's shall be directed into containers that prevent evaporation into the atmosphere.

c. All resin/gelcoat activities shall be conducted inside the eastern and western buildings.

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

EMISSIONS STANDARDS

A.4. Styrene Emission Limitation: Emissions of styrene, an individual HAP, shall not exceed 9.4 tons per any consecutive 12-month period.
(Note: Styrene is the highest emitting individual HAP at this facility)
[Rule 62-210.200(PTE), F.A.C.]

A.5. Total HAPs Emission Limitation: Total emissions of HAPs shall not exceed 24.0 tons per any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.]

A.6. Total VOC Emission Limitation: Total emissions of VOC (including styrene) shall not exceed 24.0 tons per any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.]

NOTIFICATION REQUIREMENTS

A.7. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of this emission unit no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070(3) and 62-210.200(Definition of Commence Operation), F.A.C.]

RECORDS AND REPORTS

A.8. HAP and VOC Recordkeeping: The permittee shall keep monthly logs to document compliance with the styrene, Total HAPs, and Total VOC limitations in Specific Condition Nos. A.4., A.5., and A.6. Usage of materials may be based on inventory at the beginning of the month, receipt of material during the month, and inventory of the materials at the end of the

month, provided that the materials are not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:

a. facility name, facility ID No., EU ID No. with desription (i.e., JRL Ventures, Inc., 0810236, E.U. 001 - Fiberglass Products, Forms, Mold, and Plugs Manufacturing);

b. month, year, and method used for records (usage or inventory);

c. identify and quantify each resin, coating, solvent, etc. used at the facility that contains Styrene, MMA, and/or other HAPs and VOC;

d. appropriate emission factor(s), and method(s) of application (e.g., mechanical atomized, gelcoat controlled spray application) used to determine styrene, MMA and/or other HAPs and VOC emissions;

e. monthly total of styrene emissions (tons/month);

f. monthly total of VOC (including styrene) emissions (tons/month);

g. monthly total of Total HAP emissions (tons/month);

h. most recent 12 consecutive month period total of styrene emissions (tons/12 consecutive month period) based on (e.) above;

i. most recent 12 consecutive month period total of VOC (including styrene) emissions (tons/12 consecutive month period) based on (f.) above; and

j. most recent 12 consecutive month period total of Total HAP emissions (tons/12 consecutive month period) based on (g.) above.

[Note: Emissions shall be determined and calculated based on material usage and species concentration. Additionally, styrene and MMA emissions shall be determined and calculated using the emission factors in the attached Appendix E (Composite Fabricators Association – Unified Emission Factors for Open Molding of Composites (July 23, 2001))].

The monthly logs shall be completed by the end of the following month. These records shall be maintained at the facility for at least three (3) years and made available to the Department upon request. Supporting documentation such as styrene/VOC /HAP content, styrene/VOC/HAP emission factors used, MSDS sheets, purchase orders, "As Supplied" data sheets, etc. shall be kept for each product which includes sufficient information to determine emissions.

Daily Recordkeeping
If any month results in emissions of styrene or total HAP being equal to or greater than 90% of the allowable emission limits in Specific Condition Nos. A.4. and A.5. for the prior consecutive

12-month period, the emission calculations for styrene and/or total HAP shall be kept daily. The option of using purchases as a proxy for usage is not allowed for this daily recordkeeping. The total daily emissions for the month shall then be added to the previous 11-month period total emissions. The daily recordkeeping shall remain in effect until the consecutive 12-month period emission total for styrene and/or total HAP are below 90% of their respective allowable emission limitations. The daily logs shall be completed within three (3) business days.
[Rule 62-4.070(3), F.A.C.]