FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Mobro Marine, Inc.
P.O. Box 47080
Jacksonville, Florida 32247

Air Permit Number: 0190068-004-AF
Date of Issue: March 06, 2013
Expiration Date: March 06, 2018

Authorized Representative:
Mr. Stephen Cumella, Vice President

Air Operating Permit Renewal

This is the final air operating permit renewal for the continued operation of the existing Boat Repair Facility Surface Coating Operation (Standard Industrial Classification No. 3731). The facility is located at 606 State Road 16 E., Green Cove Springs, Clay County, Florida. The UTM coordinates are Zone 17, 437.68 km East, and 3316.52 km North.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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 operation 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.). 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 Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Khalid Al-Nahdy

Khalid A. Al-Nahdy, P. E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package 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 March 06, 2013 to the persons listed below.

Mr. Stephen Cumella, Mobro marine Inc. (scumella@mobromarine.com)
Mr. George Whitmer, Whitmer Environmental Services, Inc. (george@whitmerenv.com)

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.

Shane Maghen

(Clerk) March 6, 2013 (Date)

FACILITY AND PROJECT DESCRIPTION

PROJECT

This project is for the renewal of operating permit No. 0190068-003-AO.

This Boat Repair Facility emits minor quanitities of VOC, HAPs and PM from cleaning, repairing and painting cranes, barges, and to a lesser extent, boats. The barge operation includes blasting with Black Beauty and painting boats.

Pollutants: Particulate Matter, Unconfined Particulate Matter, VOC and HAPs emissions.

Facility requested CAP of <10 TPY individual HAPs; <25 TPY total HAPs; <25 TPY VOC and <50 TPY of PM.

REGULATED EMISSION UNIT:

Facility ID No. 0190068	
EU. No. 001	**Boat Repair Facility**
Description of Emissions Point	
EP01	Sandblasting spraying operation

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

1. Permitting and Compliance Authority: The permitting authority for this project is the Northeast District, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, 904- 256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.

2. 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.

3. 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.

4. 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.]

5. Modifications. The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

6. Construction Permit Required. Unless exempt from permitting pursuant to Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., an air construction permit shall be obtained by the owner or operator of any proposed new, reconstructed, or modified facility or emissions unit, or any new pollution control equipment prior to the beginning of construction, reconstruction pursuant to CFR 60.15 or 63.2, or modification of the facility or emissions unit or addition of the air pollution control equipment; or to establish a PAL; in accordance with all applicable provisions of Chapter 62-210, F.A.C., Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C.

7. A completed **Application for Non-Title V Air Permit Renewal** (DEP Form No. 62-210.900(4), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit. [Rules 62-4.055, 62-4.090, and 62-4.220, F.A.C.]

The following specific conditions apply to the Emissions Unit listed below:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. **Hours of Operation:** The hours of operation are not restricted 24 H/D; 7 D/W; 52 W/Y (8760 H/Y).

   [Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 0190068-001-AC]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

2. **Emissions:** The permitted maximum allowable emission rate for each pollutant is as follows:

Pollutant	Maximum Allowable	Rule
Volatile Organic Compound	≤ 24.9 tons per year	----[1]
Hazardous Air Pollutant	≤ 9.9 tons in any consecutive 12 -month period	----[1]
Total Hazardous Air Pollutants	≤ 24.9 tons in any consecutive 12-month period	----[1]
Particulate Matter	≤ 49.9 tons per year	----[1]

[1]Construction Permit No. 0190068-001-AC

3. **Objectionable Odor:** The permittee shall not cause, suffer, allow or permit the discharge of air pollutants that cause or contribute to an objectionable odor from this emission unit.

   [Rule 62-296.320(2), F.A.C.]

4. **Unconfined Particulate Matter:** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility may include but are not limited to:

   a. Reduced speed for vehicular traffic.
   b. Use of dust suppressants or wetting agents.
   c. Use of paving or other asphaltic materials.
   d. Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or wetting prior to sweeping.

Specific Condition 4 continued:

e. Covering of trucks, trailers, frontend loader and other vehicles or containers to prevent spillage of particulate matter during transport.
f. Use of mulch, hydo seeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being windblown.
g. Use of hoods, fans, filters and similar equipment to contain, capture and prevent particulate matter.
h. Enclosure or covering of conveyor systems.
i. Confining abrasive blasting where possible. Blasting is restricted when the wind speed is greater than 15 mph unless the facility uses some type of confining structure or equipment to minimize or reduce the release of particulate matter.
j. Sprinkling or otherwise wetting or conveyor systems.

[Rule 62-296.320(4)(c)2., F.A.C.]

5. **VOC Emissions**: Procedures to minimize VOC emissions shall include, but not limited to:
a. Maintain tightly fitting cover, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.
b. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC so that it can be covered when not in use.
c. All fittings, valves, lines, etc. shall be properly maintained.
d. All VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.
e. Maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.

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

6. **Excess Emissions-Startup, Shutdown or Malfunction:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

7. **Excess Emissions-Notification**: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

8. **Compliance Demonstration**: The owner or operator shall demonstrate compliance with emissions limiting standards in Specific Condition No. 2 by recording the data for each material used at the facility that contains HAPs and VOCs. See Specific Condition No. 9 for more details.

   [Rule 62-4.070, F.A.C.]

REPORTING AND RECORDKEEPING REQUIREMENTS

9. **RecordkeepingVOC & HAPs:** Owner or operator shall record and maintain the following data.

   a. Material balance reports
   b. Manufacturer's certification of VOC and HAP density (pounds per gallon), and Constituent factor (% by weight)
   c. Total estimated emissions of VOC, Individual HAP and Total HAPs on a 12-month rolling total basis.
   d. VOC and HAP materials usage records
   e. Copy of all calculations and supporting documents for VOC and HAP emission rate estimation.

   Note: Emissions factors and emissions calculation methods shall be consistent with those used in the permit application and/or modification requests.

   [Rule 62-4.070, F.A.C.,Rule 62-210.370(2)(c)3., F.A.C.]

10. **Record keeping-Sand Blast Media**: Compliance with Specific Condition No. 2 shall be determined by recording the following data for all sandblast media used at the facility:

- Material usage records
- PM emissions [Ton/month and Ton/ any 12-month consecutive period]

[Rule 62-4.070(3), F.A.C. Permit No. 0190068-001-AC]

11. **Record Retention**: All the measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least three (3) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request.

[Rule 62-4.160(14)b, F.A.C.]

12. **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.

The report shall also include, at a minimum, the information required in Specific Conditions No. 9 and No.10.

[Rule 62-4.070(3), F.A.C.; 62-210.370(3)(a), F.A.C.]