

Maverick Boat Group, Inc.  
Maverick Boats

Facility ID No. 1110086  
St. Lucie County

Title V Air Operation Permit Renewal

**Permit No. 1110086-018-AV**

(Renewal of Title V Air Operation Permit No. 1110086-014-AV)



**Permitting Authority:**

State of Florida  
Department of Environmental Protection  
Division of Air Resource Management  
Permit Review Section  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, Florida 32399-2400  
Telephone: (850) 717-9000  
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**Compliance Authority:**

State of Florida  
Southeast District Office  
Florida Department of Environmental Protection  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, Florida 33406  
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## Title V Air Operation Permit Renewal

Permit No. 1110086-018-AV

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# FLORIDA DEPARTMENT OF Environmental Protection

**Ron DeSantis**  
Governor

**Alexis A. Lambert**  
Secretary

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**PERMITTEE:**

Maverick Boat Group, Inc.  
3207 Industrial 29<sup>th</sup> Street  
Fort Pierce, Florida 34946-8630

Permit No. 1110086-018-AV  
Maverick Boats  
Facility ID No. 1110086  
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Maverick Boat Group, Inc. is in St. Lucie County at 3207 Industrial 29<sup>th</sup> Street in Fort Pierce, Florida, and at 4551 St. Lucie Boulevard in Fort Pierce, Florida. UTM Coordinates are: Zone 17, 563.06 kilometers (km) East, and 3,040.61 km North. Latitude is: 27° 29' 21" North; and, Longitude is: 80° 21' 19" West.

The 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 operate the facility in accordance with the terms and conditions of this permit.

Executed in Tallahassee, Florida.

1110086-018-AV Effective Date: March 19, 2025

Renewal Application Due Date: August 6, 2029

Expiration Date: March 19, 2030

David Lyle Read, P.E., Environmental Administrator  
Permit Review Section  
Division of Air Resource Management

DLR/ead

## SECTION I. FACILITY INFORMATION.

### **Subsection A. Facility Description.**

Maverick Boat Group, Inc., is an existing boat manufacturing facility that is comprised of two separate locations. The main facility (Production Line No. 1) is located at 3207 Industrial 29<sup>th</sup> Street in Fort Pierce, Florida, and the second facility (Production Line Nos. 2 and 3) is located at 4551 St. Lucie Boulevard in Fort Pierce, Florida, approximately one mile from the main facility. The existing boat manufacturing facility produces fiberglass boats and consists of the following activities: lamination; assembly; tooling; warehouse; miscellaneous small parts and tooling activities.

### **Subsection B. Summary of Emissions Units.**

EU No.	Brief Description
001	Production Line No. 1 (3207 Industrial 29 <sup>th</sup> Street)
002	Production Line No. 2 (4551 St. Lucie Boulevard)
003	Production Line No. 3 (4551 St. Lucie Boulevard)

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

### **Subsection C. Applicable Regulations.**

Based on the Title V air operation permit renewal application received December 11, 2024, this facility is a major source of hazardous air pollutants (HAP). The existing facility is a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 63, Subpart A, NESHAP General Provisions	001 – 003
40 CFR 63, Subpart VVVV, NESHAP for Boat Manufacturing	
State Rule Citations	
Chapter 62-4, F.A.C., Permits	001 – 003
Rule 62-210.300, F.A.C., Permits Required	
Rule 62-212.400(12), F.A.C., PSD – Source Obligation	
Chapter 62-213, Operation Permits for Major Sources of Air Pollution	
Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards	
Chapter 62-297, F.A.C., Stationary Sources – Emissions Monitoring	

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## SECTION II. FACILITY-WIDE CONDITIONS.

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**The following conditions apply facility-wide to all emission units and activities:**

**FW1. Appendices.** The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

### **Emissions and Controls**

**FW2. Not federally Enforceable. Objectionable Odor Prohibited.** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

**FW3. General 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 or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

- a. Tightly cover or close all VOC containers when they are not in use.
- b. Tightly cover all VOC containing tanks when they are not in use.
- c. Maintain in good operating condition all pipes, valves, and fittings that handle VOC.
- d. Confine rags used with VOC to tightly close, fireproof containers when not in use.
- e. Immediately confine and clean up VOC spills and ensure waste is placed in closed containers for reuse, recycling, or proper disposal.

[Rule 62-296.320(1), F.A.C.; and Permit No. 1110086-006-AC]

**FW4. General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

**FW5. Unconfined Particulate Matter.** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Where applicable, tools that can be retrofitted or purchased with point source dust collection devices, including high-efficiency particulate air (HEPA) filtration vacuum systems are used for cutting and grinding operations.
- b. Paving and maintenance of roads, parking areas, and yards.
- c. Application of water or other dust suppressants to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- d. Application of asphalt, water, or other dust suppressants to unpaved roads, yards, open stockpiles, and similar activities.
- e. Removal of PM from roads and other paved areas under the control of the permittee to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- f. Landscaping or planting of vegetation.
- g. Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent PM.
- h. Confining abrasive blasting, where possible.
- i. Enclosure or covering of conveyor systems.
- j. Substitution of powder-based materials with granular or pelletized materials, where possible.

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## SECTION II. FACILITY-WIDE CONDITIONS.

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[Rule 62-296.320(4)(c), F.A.C.; and, proposed by applicant in Title V air operation permit renewal application received December 11, 2024]

### **Reports and Fees**

See Appendix RR, Facility-wide Reporting Requirements, for additional details and requirements.

**FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees.** The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1<sup>st</sup> of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, Post Office Box 3070, Tallahassee, Florida 32315-3070**. Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <https://floridadep.gov/air/permitting-compliance/content/title-v-fees>. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

*{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at [eaor@dep.state.fl.us](mailto:eaor@dep.state.fl.us).}*

*{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1<sup>st</sup> each year.}*

**FW7. Annual Statement of Compliance.** The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit and to the U.S. EPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective (See also Appendix RR, Conditions RR1 and RR7). The annual statement of compliance can be submitted to the U.S. EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) on EPA's Central Data Exchange (CDX) at <https://cdx.epa.gov/>. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

U.S. Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
Attn: Air Enforcement Branch

**FW8. Prevention of Accidental Releases (Section 112(r) of CAA).**

- a. As required by Section 112(r)(7)(B)(iii) of the CAA and 40 CFR 68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. (See paragraph e., below.)

## SECTION II. FACILITY-WIDE CONDITIONS.

- b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Division of Emergency Management, as established by department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6) of the CAA.
- c. The owner or operator shall submit the required annual registration fee to the Division of Emergency Management on or before April 1, in accordance with Part IV, Chapter 252, F.S., and Rule 27P-21, F.A.C.
- d. Any required written reports, notifications, certifications, and data required to be sent to the Division of Emergency Management, should be sent to: Division of Emergency Management, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2100, Telephone: (850) 413-9970, Fax: (850) 488-1739.
- e. Any Risk Management Plans, original submittals, revisions, or updates to submittals, should be sent electronically through EPA's CDX system at the following address: <https://cdx.epa.gov>. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: <https://www.epa.gov/rmp>. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
- f. Any required reports to be sent to the National Response Center, should be sent to: U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, 1200 Pennsylvania Ave. NW, Mail Code: US EPA (5101T), Washington, DC 20460, Telephone: (800) 424-8802.
- g. Send the required annual registration fee using approved forms made payable to: Cashier, Division of Emergency Management, State Emergency Response Commission, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2149

[Part IV, Chapter 252, F.S.; and, Rule 27P-21, F.A.C.]

**FW9. Semi-Annual Reports.** The permittee shall monitor compliance with the terms and conditions of this permit and shall submit reports at least every six months to the compliance office. Each semi-annual report shall cover the 6-month periods of January 1 – June 30 and July 1 – December 31. The reports shall be submitted by the 60<sup>th</sup> day following the end of each calendar half (i.e., March 1<sup>st</sup> and August 29<sup>th</sup> of every year). All instances of deviations from permit requirements (including conditions in the referenced Appendices) must be clearly identified in such reports, including reference to the specific requirement and the duration of such deviation. If there are no deviations during the reporting period, the report shall so indicate. Any semi-annual reporting requirements contained in applicable federal NSPS or NESHAP requirements may be submitted as part of this report. The submittal dates specified above shall replace the submittal dates specified in the federal rules. All additional reports submitted as part of this report should be clearly identified according to the specific federal requirement. All reports shall include a certification by a responsible official, pursuant to subsection 62-213.420(4), F.A.C. [Rule 62-213.440(1)(b)3.a., F.A.C.; and, 40 CFR 60.19(d), 40 CFR 61.10(h) & 40 CFR 63.10(a)(5)]

A summary of the required semi-annual reports for informational purposes is given in the table below.

Overall Facility		
Report	Reporting Deadline	Related Condition(s) and Regulation(s)
Title V Semi-Annual Report	Within 60 days after the end of each calendar half	FW9 [Rule 62-213.440(1)(b)3.a, F.A.C. & 40 CFR 70.6(a)(3)(iii)(A)]
Emissions Unit Nos. 001, Production Line No. 1		
Report	Reporting Deadline	Related Condition
40 CFR 63 Subpart VVVV Semi-Annual Compliance Report	Within 60 days after the end of each calendar half	A.26
Emissions Unit Nos. 002 and 003, Production Line Nos. 2 and 3		
Report	Reporting Deadline	Related Condition
40 CFR 63 Subpart VVVV Semi-Annual Compliance Report	Within 60 days after the end of each calendar half	B.26

## SECTION II. FACILITY-WIDE CONDITIONS.

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*(See also Conditions RR2. - RR4. of Appendix RR, Facility-wide Reporting Requirements, for additional reporting requirements related to deviations.)*

*{Permitting Note: EPA has clarified that, pursuant to 40 CFR 70.6(a)(3), the word “monitoring” is used in a broad sense and means monitoring (i.e., paying attention to) the compliance of the source with all emissions limitations, standards, and work practices specified in the permit.}*

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Unit 001, Production Line No. 1

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	Production Line No. 1

Boat building Production Line No. 1 is located at 3207 Industrial 29<sup>th</sup> Street in Fort Pierce, Florida. The fiberglass boat building activities include the following: open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin); closed molding resin operations; resin and gel coat mixing operations; resin and gel coat application equipment cleaning operations; and miscellaneous materials usage that contains VOC. The production line consists of the following stages in the boat production process: lamination, tooling, and assembly. The lamination stage is the main source of VOC and HAP emissions from the source. Styrene resins and gel coats are the primary materials used. Styrene is the primary contributor to VOC and HAP emissions. The process also includes a range of adhesives, paints, solvents, and other VOC or HAP containing materials are used in the manufacturing process. The working areas use HEPA filters to recirculate air within the working spaces. The facility does not use add-on control devices.

*{Permitting Note: This emissions unit is regulated under 40 CFR 63 NESHAP Subpart A, General Provisions, and Subpart VVVV, NESHAP for Boat Building, both of which are adopted and incorporated by reference in Rule 62-204.800, F.A.C.}*

#### **Essential Potential to Emit (PTE) Parameters**

- A.1. Method of Operations – Boat Manufacturing.** The boat building activities subject to the applicable requirements in the NESHAP Subpart VVVV of 40 CFR 63 consist of:
- Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
  - Closed molding resin operations.
  - Resin and gel coat mixing operations.
  - Resin and gel coat application equipment cleaning operations.
  - Carpet and fabric adhesive operations.
- [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5689(a) – (e)]

- A.2. Hours of Operation.** This emissions unit may operate continuously without restriction.  
[Rule 62-210.200(PTE), F.A.C.; and Permit No. 1110086-010-AC]

#### **Emission Limitations and Standards**

Unless otherwise specified, the averaging time for Specific Conditions **A.3** – **A.8** are based on the specified averaging time of the applicable test method.

- A.3. VOC Emissions.** As determined by material balance, VOC emissions shall not exceed the following:
- Production Line No. 1.* 99 tons/year.
  - Facility-Wide Emissions Cap.* 339 tons/year for Production Line Nos. 1 – 3, combined.
- [Rules 62-4.070(3) and 62-212.400(Avoid PSD), F.A.C.; and Permit No. 1110086-016-AC]

*{Permitting Note: Organic HAP (e.g., styrene, methyl methacrylate, and other organic HAP identified by the applicant) contribute to this VOC limitation as well as the HAP limit.}*

- A.4. HAP Emissions.** The permittee shall not exceed the following HAP emissions from the open molding resin and gel coat operations:
- Open Molding Operations.* The permittee shall limit organic HAP emissions from the following open molding operations to the HAP emission limit specified in paragraph **A.4.b** below. Operations listed in paragraph **A.4.d** are exempt from this limit.

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection A. Emissions Unit 001, Production Line No. 1

- (1) Production resin.
- (2) Pigmented gel coat.
- (3) Clear gel coat.
- (4) Tooling resin.
- (5) Tooling gel coat.

- b. *HAP Limit.* The permittee shall limit organic HAP emissions from open molding operations to the limit specified in the following equation (Eq. 1), based on a 12-month rolling average:

$$\text{HAP Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad (\text{Eq. 1})$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

$M_R$  = mass of production resin, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{PG}$  = mass of pigmented gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{CG}$  = mass of clear gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{TR}$  = mass of tooling resin, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{TG}$  = mass of tooling gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

- c. *Open Molding Emission Limit.* The open molding emission limit is the same for both new and existing sources.
- d. *Exempt Materials.* The following materials are exempt from the open molding emissions limit specified in paragraph A.4.b, above.
- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR Subchapter Q or the construction of small passenger vessels regulated by 46 CFR Subchapter T. Production resins for which this exemption is used shall be applied with non-atomizing (non-spray) resin application equipment. The permittee shall keep a record of the resins for which this exemption is used as required in Specific Condition A.20.a.
  - (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption shall not exceed 1% by weight of all gel coat used at the facility on a 12-month rolling-average basis. The permittee shall keep a record of the amount of gel coats used per month when claiming this exemption as required in Specific Condition A.20.b.
  - (3) Pure, 100% vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in this exemption cannot exceed 5% by weight of all resin used at the facility on a 12-month rolling- average basis. The permittee shall keep a record of the amount of 100% vinylester skin coat resin used per month when claiming this exemption as required in Specific Condition A.20.c.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5698]

- A.5. Organic HAP Content Limit. The alternative organic HAP content requirements for open molding and resin and gel coat operations for the following operations shall not exceed the following:

- a. *Production Resin Operations.*

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection A. Emissions Unit 001, Production Line No. 1

- (1) Atomized (spray) shall not exceed a 28% weighted average organic HAP content.
- (2) Non-atomized (non-spray) shall not exceed a 35% weighted average organic HAP content.
- b. *Pigmented Gel Coat Operations*. Any application method shall not exceed a 33% weighted average organic HAP content.
- c. *Clear Gel Coat Operations*. Any application method shall not exceed a 48% weighted average organic HAP content.
- d. *Tooling Resin Operations*.
  - (1) Atomized (spray) shall not exceed a 30% weighted average organic HAP content.
  - (2) Non-atomized (non-spray) shall not exceed a 39% weighted average organic HAP content.
- e. *Tooling Gel Coat Operations*. Any application method shall not exceed a 40% weighted average organic HAP content.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 5701(b) & Table 2 to 40 CFR 63 Subpart VVVV]

#### A.6. Closed Molding Resin Operations Standards.

- a. If a resin application operation meets the definition of closed molding specified in 40 CFR 63.5779, there is no requirement to reduce emissions from that operation.
- b. If the resin application operation does not meet the definition of closed molding, then the permittee shall comply with the limit for open molding resin operations specified in Specific Condition A.4.
- c. Open molding resin operations that precede a closed molding operation shall comply with the limit for open molding resin and gel coat operations specified in Specific Condition A.4. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5728]

#### A.7. Equipment Cleaning Standards. The permittee shall meet the following standards for resin and gel coat application equipment cleaning operations.

- a. *Routine Flushing*. For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee shall use a cleaning solvent that contains no more than 5% organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
- b. *Storage Containers*. The permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers shall have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface shall be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5734]

#### A.8. Carpet and Fabric Adhesive Standard. The permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight. The permittee shall determine the organic HAP content of the carpet and fabric adhesives using the methods in Specific Conditions A.10 and A.15. [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5740]

#### Monitoring of Operations

##### A.9. Open Molding Operations Implementation Plan.

- a. The permittee shall prepare an implementation plan for all open molding operations for which emissions averaging is used to comply as described in Specific Condition A.13.

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Unit 001, Production Line No. 1

- b. The implementation plan shall describe the steps to take to bring the open molding operations covered by 40 CFR 63, Subpart VVVV into compliance. For each operation included in the emissions average, the implementation plan shall include the following elements:
  - (1) A description of each operation included in the average.
  - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
  - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit in Specific Condition A.4.
- c. The permittee shall submit the implementation plan to the Department with the notification of compliance status in Specific Condition A.25.
- d. The permittee shall keep the implementation plan on site and provide it to the Department when asked.
- e. If the implementation plan is revised, the permittee shall submit the revised plan with the next semi-annual compliance report specified in Specific Condition A.26.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5707]

#### **Test Methods and Procedures**

**A.10. Test Methods.** When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
24	Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings
25A	Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer
311	Analysis of HAP Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph
ASTM D1259-85	Standard Test Methods for Nonvolatile Content of Resins

The above methods are described in 40 CFR 60, Appendix A, and 40 CFR 63, Appendix A, adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-204.800, F.A.C.; and 40 CFR 63.5758(a)]

**A.11. Common Testing Requirements.** Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

*{Permitting Note: Air compliance test notifications can now be completed online in the Department's Business Portal. To access this online process, go to <http://www.fldepportal.com/go/home> and sign in (or register if you're a new user) from the link in the upper right corner of the page. On the Welcome page select the Submit option, then select Registration/Notification, and then click on Air Compliance Test Notifications. Once in the process, read the instructions on each screen (and under the Help tabs) to complete the notification.}*

**A.12. HAP Compliance Options.** The permittee shall use one or more of the following options to meet the emission limits in Specific Condition A.4 for the open molding resin and gel coat operations, based on a 12-month rolling-average basis, unless otherwise noted:

- a. *Emissions Averaging.* Maximum achievable control technology (MACT) model point value averaging option.

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- (1) Demonstrate that emissions from the open molding resin and gel coat operations averages meet the emission limit specified in Specific Condition **A.4** using the procedures described in Specific Condition **A.14**.
- (2) Those operations and materials not included in the emissions average shall comply with paragraph **A.12.b** or **A.12c** below.
- b. *Compliant Materials Option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Specific Condition **A.5**.
- c. *Add-On Control Option.* Use an enclosure and add-on control device and demonstrate that the resulting emissions meet the emission limit in Specific Condition **A.4**. Compliance with this option is based on control device performance testing and control device monitoring.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5701]

#### **A.13. Compliance Requirements for Open Molding HAP Emission Limits.**

- a. *Emissions Averaging Option.* For those open molding operations and materials complying using the emissions averaging option (MACT model point values), the permittee shall meet the following requirements.
  - (1) Use the methods in Specific Condition **A.15** to determine the organic HAP content of resins and gel coats.
  - (2) Complete the calculations described in Specific Condition **A.14.a** to show that the organic HAP emissions do not exceed the limitation specified pursuant to Specific Condition **A.4**.
  - (3) Keep records as specified in Specific Condition **A.21.a** for each resin and gel coat.
  - (4) Prepare and submit the implementation plan described in Specific Condition **A.9** to the Department and keep it up to date.
  - (5) Submit semi-annual compliance reports to the Department as specified in Specific Condition **A.26**.
- b. *Compliant Materials Option.* For each open molding operation complying using the compliant materials option, the permittee shall meet the following requirements.
  - (1) Use the methods specified in Specific Condition **A.15** to determine the organic HAP content of resins and gel coats.
  - (2) Complete the calculations described in Specific Condition **A.14.b** to show that the weighted-average organic HAP content does not exceed the limit specified in Specific Condition **A.5**.
  - (3) Keep records as specified in Specific Condition **A.21.b** for each resin and gel coat.
  - (4) Submit semi-annual compliance reports to the Department as specified in Specific Condition **A.26**.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5704(a) & (b)]

#### **A.14. Compliance Demonstrations.**

- a. *Emissions Averaging.* When complying with the appropriate HAP limit by MACT model point value averaging, then the permittee shall comply with the following requirements.
  - (1) If the organic HAP emissions, calculated in paragraph **A.14.a(3)**, below, are less than the organic HAP limitation calculated in Specific Condition **A.4** for the same 12-month period, then the facility is in compliance for those operations and materials included in the emissions average.
  - (2) Compliance using the emissions averaging option is based on a 12-month rolling-average period and is determined at the end of every month (*i.e.*, 12 times/year).
  - (3) At the end of the 12<sup>th</sup> month after startup, and at the end of every subsequent month, use the following equation (**Eq. 2**) to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Specific Condition **A.4** calculated for the same 12-month period. (Include terms in **Eq. 1** and **Eq. 2** for those operations and materials included in the emissions average.)

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$$\text{HAP Emissions} = \text{PV}[(\text{PV}_R)(\text{M}_R) + (\text{PV}_{PG})(\text{M}_{PG}) + (\text{PV}_{CG})(\text{M}_{CG}) + (\text{PV}_{TR})(\text{M}_{TR}) + (\text{PV}_{TG})(\text{M}_{TG})] \text{ (Eq. 2)}$$

Where:

HAP emissions = organic HAP emissions, kilograms, calculated using MACT model point values for each operation included in the average.

$\text{PV}_R$  = weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

$\text{M}_R$  = mass of production resin used in the past 12 months, megagrams.

$\text{PV}_{PG}$  = weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

$\text{M}_{PG}$  = mass of pigmented gel coat used in the past 12 months, megagrams.

$\text{PV}_{CG}$  = weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

$\text{M}_{CG}$  = mass of clear gel coat used in the past 12 months, megagrams.

$\text{PV}_{TR}$  = weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

$\text{M}_{TR}$  = mass of tooling resin used in the past 12 months, megagrams.

$\text{PV}_{TG}$  = weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

$\text{M}_{TG}$  = mass of tooling gel coat used in the past 12 months, megagrams.

- (4) At the end of every month, use **Eq. 3** to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$\text{PV}_{OP} = \frac{\sum_{i=1}^n (\text{M}_i \text{PV}_i)}{\sum_{i=1}^n (\text{M}_i)} \quad \text{(Eq. 3)}$$

Where:

$\text{PV}_{OP}$  = weighted-average MACT model point value for each open molding operation ( $\text{PV}_R$ ,  $\text{PV}_{PG}$ ,  $\text{PV}_{CG}$ ,  $\text{PV}_{TR}$ , and  $\text{PV}_{TG}$ ) included in the average, kilograms of HAP per megagram of material applied.

$\text{M}_i$  = mass of resin or gel coat  $i$  used within an operation in the past 12 months, megagrams.

$n$  = number of different open molding resins and gel coats used within an operation in the past 12 months.

$\text{PV}_i$  = the MACT model point value for resin or gel coat  $i$  used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

- (5) MACT Model Point Value ( $\text{PV}_i$ ). The permittee shall use the following equations to calculate the MACT model point value ( $\text{PV}_i$ ) for each resin and gel coat used in each operation in the past 12 months.

- (a) *Production Resin, Tooling Resin*. The permittee shall use the following formulas to calculate the MACT model point value for each resin and gel coat:

- i. Atomized application method:

$$0.014 \times (\text{Resin HAP}\%)^{2.425}$$

- ii. Atomized, plus vacuum bagging with roll-out:

$$0.01185 \times (\text{Resin HAP}\%)^{2.425}$$

- iii. Atomized, plus vacuum bagging without roll-out:

$$0.00945 \times (\text{Resin HAP}\%)^{2.425}$$

- iv. Non-atomized:

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$$0.014 \times (\text{Resin HAP}\%)^{2.275}$$

- v. Non-atomized, plus vacuum bagging with roll-out:

$$0.0110 \times (\text{Resin HAP}\%)^{2.275}$$

- vi. Non-atomized, plus vacuum bagging without roll-out:

$$0.0076 \times (\text{Resin HAP}\%)^{2.275}$$

- (b) *Pigmented Gel Coat, Clear Gel Coat, Tooling Gel Coat.* All application methods shall use the following formula to calculate the MACT model point value for each resin and gel coat:

$$0.445 \times (\text{Gel Coat HAP}\%)^{1.675}$$

- (c) *Equation Calculations.* These equations calculate MACT model point value in kilograms of organic HAP/megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric. HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100%.

b. *Compliant Materials.*

- (1) Compliance using the organic HAP content requirements listed in Specific Condition A.5 is based on a 12-month rolling average that is calculated at the end of every month. If using filled material (production resin or tooling resin), the permittee shall comply according to the procedure described in paragraph A.14.c below.
- (2) At the end of the 12<sup>th</sup> month after the compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Specific Condition A.5, then you are in compliance with the emission limit specified in Specific Condition A.4 for that 12-month period for that operation. In addition, the permittee does not need to complete the weighted-average organic HAP content calculation contained in paragraph A.14.b(3) below for that operation.
- (3) At the end of every month, the permittee shall use the following equation (Eq. 4) to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\text{Weighted - Average HAP Content (\%)} = \frac{\sum_{i=1}^n (M_i \text{HAP}_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eq. 4})$$

Where:

$M_i$  = mass of open molding resin or gel coat  $i$  used in the past 12 months in an operation, megagrams.

$\text{HAP}_i$  = Organic HAP content, by weight percent, of open molding resin or gel coat  $i$  used in the past 12 months in an operation. Use the methods in Specific Condition A.10 as described in Specific Condition A.15 to determine organic HAP content.

$n$  = number of different open molding resins or gel coats used in the past 12 months in an operation.

- (4) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Specific Condition A.5, then you are in compliance with the emission limit specified in Specific Condition A.5.

c. *Filled Resins.*

- (1) For filled production resin or filled tooling resin, demonstrate compliance for the filled material on an as-applied basis using the following equation (Eq. 5).

$$PV_F = PV_u \times \frac{(100 - \% \text{ Filler})}{(100)} \quad (\text{Eq. 5})$$

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Where:

PV<sub>F</sub> = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms (kg) organic HAP per megagram of filled material.

PV<sub>u</sub> = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in paragraph A.14.a(5) above.

%Filler = The weight-percent of filler in the as-applied filled resin system.

- (2) If the filled resin is used as a production resin and the value of PV<sub>F</sub> calculated by Eq. 5 does not exceed 46 kg of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
- (3) If the filled resin is used as a tooling resin and the value of PV<sub>F</sub> calculated by Eq. 5 does not exceed 54 kg of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
- (4) If including a filled resin in the emissions averaging procedure described in paragraph A.14.a above, then use the value of PV<sub>F</sub> calculated using Eq. 5 for the value of PV<sub>i</sub> in Eq. 3 in paragraph A.14.a above.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5710, 63.5713, 63.5714 & Table 3 to 40 CFR 63 Subpart VVVV]

**A.15. Methods for Organic HAP Content.** To determine the organic HAP content for each material used in open molding resin and gel coat operations, the permittee shall use one of the following options:

- a. *Method 311.* Method 311 for determining the mass fraction of organic HAP. Use the following procedures when determining organic HAP content by Method 311:
  - (1) Include in the organic HAP total each organic HAP that is measured to be present at 0.1% by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5% of the material by mass, the permittee does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point (for example, 0.1234).
  - (2) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
- b. *Method 24.* The permittee may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.
- c. *ASTM D1259-85.* The permittee may use ASTM D1259-85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
- d. *Alternative Method.* The permittee may use an alternative test method for determining mass fraction of organic HAP if obtain prior approval by the EPA. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
- e. *Information from the Supplier/Manufacturer of the Material.* The permittee may rely on information other than that generated by the test methods specified in paragraphs A.15.a – d, above, such as manufacturer's formulation data, according to the following:
  - (1) Include in the organic HAP total each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5% of the material by mass, the permittee does not have to include it in the organic HAP total.
  - (2) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs A.15.a – d,



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above, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee shall use the measured organic HAP content to determine compliance.

- (3) If the organic HAP content is provided as a single value, the permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs **A.15.a – d**, above, is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee shall use the measured organic HAP content to determine compliance.
- f. *Solvent Blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the permittee may use the values for organic HAP content that are listed in Table 5, Default Organic HAP Contents of Solvents and Solvent Blends, or Table 6, Default Organic HAP Contents of Petroleum Solvent Groups, of 40 CR 63, Subpart VVVV. The permittee may use Table 6 only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 and the permittee knows only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6, then the test results shall be used for determining compliance.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5758(a) & Tables 5 and 6 to 40 CFR 63 Subpart VVVV]

#### **A.16. Resin and Gel Coat Mixing Work Practice Standards.**

- a. All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, shall have a cover with no visible gaps in place at all times.
- b. The work practice standard in paragraph **A.16.a** above does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- c. To demonstrate compliance with the work practice standard in paragraph **A.16.a** above, the permittee shall visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
- d. The permittee shall keep records as required in Specific Condition **A.22**.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5731]

#### **Recordkeeping and Reporting Requirements**

**A.17. VOC Emissions Records.** The permittee shall maintain the following monthly records on materials usage and VOC emissions to demonstrate compliance with Specific Condition **A.3**:

- a. Material name.
- b. Monthly usage (pounds) of each material.
- c. Maximum possible VOC content (weight percent) of each material.
- d. Emissions factors used in calculations.
- e. Total, rolled monthly, VOC emissions from all materials (tons).
- f. Annual, 12-month rolling total VOC emissions from all materials (tons).

[Rules 62-4.070 & 62-212.400(Avoid PSD), F.A.C.; and Permit No. 1110086-016-AC]

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**A.18. Equipment Cleaning Records.** The permittee shall comply with the following requirements for resin and gel coat application equipment cleaning operations at the facility.

- a. *Cleaning Solvents.* Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Specific Condition **A.7** using the methods specified in Specific Condition **A.15**.
- b. *Recycled Cleaning Solvents.* If the permittee recycles cleaning solvents on site, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in Specific Condition **A.15** for demonstrating compliance with organic HAP content limits.
- c. *Inspections.* At least once per month, the permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5737]

**A.19. General Recordkeeping Requirements.** The permittee shall keep the following records:

- a. *Notification.* A copy of each notification and report submitted.
- b. *Documentation.* All documentation supporting any notification or report submitted.
- c. *No Control Device.* If the facility is not controlled by an add-on control device (*i.e.*, complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the permittee shall keep the following records:
  - (1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the permittee shall record the amounts of each applied by atomized and non-atomized methods.
  - (2) If applicable, the total amount of each aluminum coating used per month (including primers, topcoats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in 40 CFR 63.5752.
  - (3) If applicable, the total amount of each aluminum wipe-down solvent used per month and the weighted-average organic HAP content as determined in 40 CFR 63.5749.
- d. *Record Retention.*
  - (1) Records shall be readily available and, in a form, so they can be easily inspected and reviewed.
  - (2) Each record shall be kept for 5 years following the date that each record is generated.
  - (3) Each record shall be kept on site for at least 2 years after the date that each record is generated. The permittee can keep the records offsite for the remaining 3 years.
  - (4) Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
  - (5) Any records required to be maintained by this part that are submitted electronically via the EPA's Compliance and Emissions Data Reporting Interface (CEDRI) may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the Department or the EPA as part of an on-site compliance evaluation.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5767(a) – (c) & 63.5770]

**A.20. Exempt Material Records.** The permittee shall keep the following records for materials specified in Specific Condition **A.4.d** that are exempt from the open molding emissions limit in Specific Condition **A.4.b**:

- a. *Military Vessels.* The permittee shall keep a record of the resins for which the exemption is used in Specific Condition **A.4.d(1)**.

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- b. *Part/Mold Repair and Touch Up.* The permittee shall keep a record of the amount of gel coats used per month when claiming the exemption in Specific Condition **A.4.d(2)**, and the permittee shall keep copies of calculations showing that the exempt amount does not exceed 1% of all gel coat used.
- c. *Skin Coats.* The permittee shall keep a record of the amount of 100% vinylester skin coat resin used per month when claiming the exemption in Specific Condition **A.4.d(3)**, and the permittee shall keep copies of calculations showing that the exempt amount does not exceed 5% of all resin used.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5698(d)]

**A.21. Open Molding HAP Emission Limits Records.** The permittee shall keep the following records for each resin and gel coat:

- a. *Emissions Averaging Option.*
  - (1) HAP content.
  - (2) Amount of material used per month.
  - (3) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized (non-spray) technology.
  - (4) Calculations performed to demonstrate compliance based on MACT model point values, as described in Specific Condition **A.14.a**.
- b. *Compliant Materials Option.*
  - (1) HAP content.
  - (2) Amount of material used per month.
  - (3) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized (non-spray) technology.
  - (4) Calculations performed to demonstrate compliance based on weighted-average organic HAP content, as described in Specific Condition **A.14.b**.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5704(a)(3) & (b)(3)]

**A.22. Resin and Gel Coat Mixing Records.** The permittee shall keep records of which mixing containers are subject to the work practice standards in Specific Condition **A.16** and the results of the inspections, including a description of any repairs or corrective actions taken. [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5731(d)]

**A.23. Carpet and Fabric Adhesive Records.** The permittee shall keep records of the organic HAP content of the carpet and fabric adhesives determined using the methods in Specific Conditions **A.10** and **A.15**. [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5740(b)]

**A.24. Reporting Schedule.** The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
40 CFR 63 Subpart VVVV Semi-Annual Compliance Report	Within 60 days after the end of each calendar half	<b>A.26</b>

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

**A.25. Compliance Notifications.** The permittee shall submit the following notifications to the Department's Southeast District Office:

- a. *Compliance Extension.* A request for a compliance extension as specified in 40 CFR 63.9(c) no later than the dates specified in 40 CFR 63.6(i).
- b. *Compliance Status.* A notification of compliance status as specified in 40 CFR 63.9(h) if complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging

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provisions. The notification must be submitted no later than 30 calendar days after the end of the first 12-month averaging period after the facility's compliance date under 40 CFR 63 Subpart VVVV.

- c. *Notifications of Information Updates.* If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the Department within 15 calendar days after the change. [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5761& Table 7 to 40 CFR 63 Subpart VVVV]

**A.26. Semi-Annual Compliance Report.** The permittee shall submit and organize each of the following applicable reports according to the operations and the compliance procedure followed for that operation.

- a. *Submittal Dates.* Unless the EPA has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee shall submit each report by the following dates:
- (1) If the source is not controlled by an add-on control device (*i.e.*, the permittee is complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report shall cover the period beginning 12 months after the compliance date specified for the source in 40 CFR 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for the source in 40 CFR 63.5695.
  - (2) The first compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph **A.26.a(1)**.
  - (3) Each subsequent compliance report shall cover the applicable semi-annual reporting period from January 1 through June 30 or from July 1 through December 31.
  - (4) Each subsequent compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the semi-annual reporting period.
- b. *Report Content.* Each compliance report shall include the following:
- (1) Company name and address.
  - (2) A statement by a responsible official with the official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
  - (3) The date of the report and the beginning and ending dates of the reporting period.
  - (4) A description of any changes in the manufacturing process since the last compliance report.
  - (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which the facility is complying. The statement or table shall also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
  - (6) If the facility was in compliance with the emissions limitations and work practice standards during the reporting period, then the permittee shall include a statement to that effect.
  - (7) If the facility deviated from an emissions limitation or work practice standard during the reporting period, then the permittee shall also include the following information:
    - (a) A description of the operation involved in the deviation.
    - (b) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
    - (c) A description of any corrective actions taken to minimize the deviation and actions taken to prevent it from happening again.
    - (d) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5764(a), (b)(1) – (4) & (c)]

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#### Subsection A. Emissions Unit 001, Production Line No. 1

*{Permitting Note: The Subpart VVVV semi-annual compliance reports may be submitted on the same schedule as the semi-annual Title V monitoring reports required under Facility-Wide Condition **FW9**.}*

- A.27. Electronic Reporting Requirements.** The semi-annual compliance reports required under Specific Condition **A.26** must be submitted electronically to the EPA according to the requirements of 40 CFR 63.5765(c) and (d). [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5765(c) and (d)]
- A.28. Other Reporting Requirements.** See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

#### **Other Requirements**

- A.29. NESHAP Provisions.** The permittee shall meet the applicable requirements in 40 CFR 63 NESHAP Subpart A, General Provisions, and Subpart VVVV, NESHAP for Boat Manufacturing, both of which are adopted and incorporated by reference in Rule 62-204.800, F.A.C. [Rule 62-204.800, F.A.C.; and NESHAP Subparts A and VVVV of 40 CFR 63]

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
002	Production Line No. 2
003	Production Line No. 3

Boat building Production Line Nos. 2 and 3 are located at 4551 St. Lucie Boulevard in Fort Pierce, Florida. The fiberglass boat building activities include the following: open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin); closed molding resin operations; resin and gel coat mixing operations; resin and gel coat application equipment cleaning operations; and miscellaneous materials usage that contains VOC. Boat building activities at both production lines (EU 002 and EU 003) are identical. Each production line consists of the following stages in the boat production process: lamination, tooling, and assembly. The lamination stage is the main source of VOC and HAP emissions from the source. Styrene resins and gel coats are the primary materials used. Styrene is the primary contributor to VOC and HAP emissions. The process also includes a range of adhesives, paints, solvents, and other VOC or HAP containing materials are used in the manufacturing process. The working areas use filters to recirculate air within the working spaces. The facility does not use add-on control devices.

*{Permitting Note: These emissions units are regulated under 40 CFR 63 NESHAP Subpart A, General Provisions, and Subpart VVVV, NESHAP for Boat Building, both of which are adopted and incorporated by reference in Rule 62-204.800, F.A.C.}*

- B.1. Method of Operations – Boat Manufacturing.** The boat building activities subject to the applicable requirements in the NESHAP Subpart VVVV of 40 CFR 63 consist of:
- Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
  - Closed molding resin operations.
  - Resin and gel coat mixing operations.
  - Resin and gel coat application equipment cleaning operations.
  - Carpet and fabric adhesive operations.
- [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5689(a) – (e)]

- B.2. Hours of Operation.** These emissions units may operate continuously without restriction.  
[Rule 62-210.200(PTE), F.A.C.; and Permit No. 1110086-010-AC]

#### **Emission Limitations and Standards**

Unless otherwise specified, the averaging time for Specific Conditions **B.3– B.8** are based on the specified averaging time of the applicable test method.

- B.3. VOC Emissions.** As determined by material balance, VOC emissions shall not exceed the following:
- Production Line Nos. 2 and 3. 240 tons/year.
  - Facility-Wide Emissions Cap. 339 tons/year for Production Line Nos. 1 – 3, combined.
- [Rules 62-4.070(3) and 62-212.400(Avoid PSD), F.A.C.; and Permit No. 1110086-016-AC]

*{Permitting Note: Organic HAP (e.g., styrene, methyl methacrylate, and other organic HAP identified by the applicant) contribute to this VOC limitation as well as the HAP limit.}*

- B.4. HAP Emissions.** The permittee shall not exceed the following HAP emissions from the open molding resin and gel coat operations:
- Open Molding Operations. The permittee shall limit organic HAP emissions from the following open molding operations to the HAP emission limit specified in paragraph **B.4.b** below. Operations listed in paragraph **B.4.d** are exempt from this limit.

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

- (1) Production resin.
- (2) Pigmented gel coat.
- (3) Clear gel coat.
- (4) Tooling resin.
- (5) Tooling gel coat.

- b. *HAP Limit.* The permittee shall limit organic HAP emissions from open molding operations to the limit specified in the following equation (**Eq. 1**), based on a 12-month rolling average:

$$\text{HAP Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad (\text{Eq. 2})$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

$M_R$  = mass of production resin, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{PG}$  = mass of pigmented gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{CG}$  = mass of clear gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{TR}$  = mass of tooling resin, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

$M_{TG}$  = mass of tooling gel coat, megagrams, used in the past 12 months, excluding any materials exempt under paragraph d. of this condition.

- c. *Open Molding Emission Limit.* The open molding emission limit is the same for both new and existing sources.
- d. *Exempt Materials.* The following materials are exempt from the open molding emissions limit specified in paragraph **B.4.b**, above.
- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR Subchapter Q or the construction of small passenger vessels regulated by 46 CFR Subchapter T. Production resins for which this exemption is used shall be applied with non-atomizing (non-spray) resin application equipment. The permittee shall keep a record of the resins for which this exemption is used as required in Specific Condition **B.20.a**.
  - (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption shall not exceed 1% by weight of all gel coat used at the facility on a 12-month rolling-average basis. The permittee shall keep a record of the amount of gel coats used per month when claiming this exemption as required in Specific Condition **B.20.b**.
  - (3) Pure, 100% vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in this exemption cannot exceed 5% by weight of all resin used at the facility on a 12-month rolling- average basis. The permittee shall keep a record of the amount of 100% vinylester skin coat resin used per month when claiming this exemption as required in Specific Condition **B.20.c**.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5698]

- B.5. Organic HAP Content Limit.** The alternative organic HAP content requirements for open molding and resin and gel coat operations for the following operations shall not exceed the following:

- a. *Production Resin Operations.*

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

- (1) Atomized (spray) shall not exceed a 28% weighted average organic HAP content.
- (2) Non-atomized (non-spray) shall not exceed a 35% weighted average organic HAP content.
- b. *Pigmented Gel Coat Operations*. Any application method shall not exceed a 33% weighted average organic HAP content.
- c. *Clear Gel Coat Operations*. Any application method shall not exceed a 48% weighted average organic HAP content.
- d. *Tooling Resin Operations*.
  - (1) Atomized (spray) shall not exceed a 30% weighted average organic HAP content.
  - (2) Non-atomized (non-spray) shall not exceed a 39% weighted average organic HAP content.
- e. *Tooling Gel Coat Operations*. Any application method shall not exceed a 40% weighted average organic HAP content.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 5701(b) & Table 2 to 40 CFR 63 Subpart VVVV]

#### **B.6. Closed Molding Resin Operations Standards.**

- a. If a resin application operation meets the definition of closed molding specified in 40 CFR 63.5779, there is no requirement to reduce emissions from that operation.
- b. If the resin application operation does not meet the definition of closed molding, then the permittee shall comply with the limit for open molding resin operations specified in Specific Condition **B.4**.
- c. Open molding resin operations that precede a closed molding operation shall comply with the limit for open molding resin and gel coat operations specified in Specific Condition **B.4**. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5728]

#### **B.7. Equipment Cleaning Standards.** The permittee shall meet the following standards for resin and gel coat application equipment cleaning operations.

- a. *Routine Flushing*. For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee shall use a cleaning solvent that contains no more than 5% organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
- b. *Storage Containers*. The permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers shall have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface shall be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5734]

#### **B.8. Carpet and Fabric Adhesive Standard.** The permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight. The permittee shall determine the organic HAP content of the carpet and fabric adhesives using the methods in Specific Conditions **B.10** and **B.15**. [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5740]

#### **Monitoring of Operations**

##### **B.9. Open Molding Operations Implementation Plan.**

- a. The permittee shall prepare an implementation plan for all open molding operations for which emissions averaging is used to comply as described in Specific Condition **B.13**.



### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

- b. The implementation plan shall describe the steps to take to bring the open molding operations covered by 40 CFR 63, Subpart VVVV into compliance. For each operation included in the emissions average, the implementation plan shall include the following elements:
  - (1) A description of each operation included in the average.
  - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
  - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit in Specific Condition **B.4**.
- c. The permittee shall submit the implementation plan to the Department with the notification of compliance status in Specific Condition **B.25**.
- d. The permittee shall keep the implementation plan on site and provide it to the Department when asked.
- e. If the implementation plan is revised, the permittee shall submit the revised plan with the next semi-annual compliance report specified in Specific Condition **B.26**.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5707]

#### **Test Methods and Procedures**

- B.10. Test Methods.** When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
24	Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings
25A	Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer
311	Analysis of HAP Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph
ASTM D1259-85	Standard Test Methods for Nonvolatile Content of Resins

The above methods are described in 40 CFR 60, Appendix A, and 40 CFR 63, Appendix A, adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-204.800, F.A.C.; and 40 CFR 63.5758(a)]

- B.11. Common Testing Requirements.** Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

*{Permitting Note: Air compliance test notifications can now be completed online in the Department's Business Portal. To access this online process, go to <http://www.fldepportal.com/go/home> and sign in (or register if you're a new user) from the link in the upper right corner of the page. On the Welcome page select the Submit option, then select Registration/Notification, and then click on Air Compliance Test Notifications. Once in the process, read the instructions on each screen (and under the Help tabs) to complete the notification.}*

- B.12. HAP Compliance Options.** The permittee shall use one or more of the following options to meet the emission limits in Specific Condition **B.4** for the open molding resin and gel coat operations, based on a 12-month rolling-average basis, unless otherwise noted:

- a. *Emissions Averaging.* Maximum achievable control technology (MACT) model point value averaging option.

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

- (1) Demonstrate that emissions from the open molding resin and gel coat operations averages meet the emission limit specified in Specific Condition **B.4** using the procedures described in Specific Condition **B.14**.
  - (2) Those operations and materials not included in the emissions average shall comply with paragraph **B.12.b** or **B.12.c** below.
- b. *Compliant Materials Option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Specific Condition **B.5**.
  - c. *Add-On Control Option.* Use an enclosure and add-on control device and demonstrate that the resulting emissions meet the emission limit in Specific Condition **B.4**. Compliance with this option is based on control device performance testing and control device monitoring.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5701]

#### **B.13. Compliance Requirements for Open Molding HAP Emission Limits.**

- a. *Emissions Averaging Option.* For those open molding operations and materials complying using the emissions averaging option (MACT model point values), the permittee shall meet the following requirements.
  - (1) Use the methods in Specific Condition **B.15** to determine the organic HAP content of resins and gel coats.
  - (2) Complete the calculations described in Specific Condition **B.14.a** to show that the organic HAP emissions do not exceed the limitation specified pursuant to Specific Condition **B.4**.
  - (3) Keep records as specified in Specific Condition **B.21.a** for each resin and gel coat.
  - (4) Prepare and submit the implementation plan described in Specific Condition **B.9** to the Department and keep it up to date.
  - (5) Submit semi-annual compliance reports to the Department as specified in Specific Condition **B.26**.
- b. *Compliant Materials Option.* For each open molding operation complying using the compliant materials option, the permittee shall meet the following requirements.
  - (1) Use the methods specified in Specific Condition **B.15** to determine the organic HAP content of resins and gel coats.
  - (2) Complete the calculations described in Specific Condition **B.14.b** to show that the weighted-average organic HAP content does not exceed the limit specified in Specific Condition **B.5**.
  - (3) Keep records as specified in Specific Condition **B.21.b** for each resin and gel coat.
  - (4) Submit semi-annual compliance reports to the Department as specified in Specific Condition **B.26**.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5704(a) & (b)]

#### **B.14. Compliance Demonstrations.**

- a. *Emissions Averaging.* When complying with the appropriate HAP limit by MACT model point value averaging, then the permittee shall comply with the following requirements.
  - (1) If the organic HAP emissions, calculated in paragraph **B.14.a(3)**, below, are less than the organic HAP limitation calculated in Specific Condition **B.4** for the same 12-month period, then the facility is in compliance for those operations and materials included in the emissions average.
  - (2) Compliance using the emissions averaging option is based on a 12-month rolling-average period and is determined at the end of every month (*i.e.*, 12 times/year).
  - (3) At the end of the 12<sup>th</sup> month after startup, and at the end of every subsequent month, use the following equation (**Eq. 2**) to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Specific Condition **B.4** calculated for the same 12-month period. (Include terms in **Eq. 1** and **Eq. 2** for those operations and materials included in the emissions average.)

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

$$\text{HAP Emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})] \text{ (Eq. 2)}$$

Where:

HAP emissions = organic HAP emissions, kilograms, calculated using MACT model point values for each operation included in the average.

$PV_R$  = weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

$M_R$  = mass of production resin used in the past 12 months, megagrams.

$PV_{PG}$  = weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

$M_{PG}$  = mass of pigmented gel coat used in the past 12 months, megagrams.

$PV_{CG}$  = weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

$M_{CG}$  = mass of clear gel coat used in the past 12 months, megagrams.

$PV_{TR}$  = weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

$M_{TR}$  = mass of tooling resin used in the past 12 months, megagrams.

$PV_{TG}$  = weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

$M_{TG}$  = mass of tooling gel coat used in the past 12 months, megagrams.

- (4) At the end of every month, use **Eq. 3** to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)} \quad \text{(Eq. 3)}$$

Where:

$PV_{OP}$  = weighted-average MACT model point value for each open molding operation ( $PV_R$ ,  $PV_{PG}$ ,  $PV_{CG}$ ,  $PV_{TR}$ , and  $PV_{TG}$ ) included in the average, kilograms of HAP per megagram of material applied.

$M_i$  = mass of resin or gel coat  $i$  used within an operation in the past 12 months, megagrams.

$n$  = number of different open molding resins and gel coats used within an operation in the past 12 months.

$PV_i$  = the MACT model point value for resin or gel coat  $i$  used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

- (5) MACT Model Point Value ( $PV_i$ ). The permittee shall use the following equations to calculate the MACT model point value ( $PV_i$ ) for each resin and gel coat used in each operation in the past 12 months.

- (a) *Production Resin, Tooling Resin*. The permittee shall use the following formulas to calculate the MACT model point value for each resin and gel coat:

- i. Atomized application method:

$$0.014 \times (\text{Resin HAP}\%)^{2.425}$$

- ii. Atomized, plus vacuum bagging with roll-out:

$$0.01185 \times (\text{Resin HAP}\%)^{2.425}$$

- iii. Atomized, plus vacuum bagging without roll-out:

$$0.00945 \times (\text{Resin HAP}\%)^{2.425}$$

- iv. Non-atomized:

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

$$0.014 \times (\text{Resin HAP}\%)^{2.275}$$

- v. Non-atomized, plus vacuum bagging with roll-out:

$$0.0110 \times (\text{Resin HAP}\%)^{2.275}$$

- vi. Non-atomized, plus vacuum bagging without roll-out:

$$0.0076 \times (\text{Resin HAP}\%)^{2.275}$$

- (b) *Pigmented Gel Coat, Clear Gel Coat, Tooling Gel Coat.* All application methods shall use the following formula to calculate the MACT model point value for each resin and gel coat:

$$0.445 \times (\text{Gel Coat HAP}\%)^{1.675}$$

- (c) *Equation Calculations.* These equations calculate MACT model point value in kilograms of organic HAP/megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric. HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100%.

b. *Compliant Materials.*

- (1) Compliance using the organic HAP content requirements listed in Specific Condition **B.5** is based on a 12-month rolling average that is calculated at the end of every month. If using filled material (production resin or tooling resin), the permittee shall comply according to the procedure described in paragraph **B.14.c** below.
- (2) At the end of the 12<sup>th</sup> month after the compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Specific Condition **B.5**, then you are in compliance with the emission limit specified in Specific Condition **B.4** for that 12-month period for that operation. In addition, the permittee does not need to complete the weighted-average organic HAP content calculation contained in paragraph **B.14.b(3)** below for that operation.
- (3) At the end of every month, the permittee shall use the following equation (**Eq. 4**) to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\text{Weighted – Average HAP Content (\%)} = \frac{\sum_{i=1}^n (M_i \text{HAP}_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eq. 4})$$

Where:

$M_i$  = mass of open molding resin or gel coat  $i$  used in the past 12 months in an operation, megagrams.

$\text{HAP}_i$  = Organic HAP content, by weight percent, of open molding resin or gel coat  $i$  used in the past 12 months in an operation. Use the methods in Specific Condition **B.10** as described in Specific Condition **B.15** to determine organic HAP content.

$n$  = number of different open molding resins or gel coats used in the past 12 months in an operation.

- (4) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Specific Condition **B.5**, then you are in compliance with the emission limit specified in Specific Condition **B.5**.

c. *Filled Resins.*

- (1) For filled production resin or filled tooling resin, demonstrate compliance for the filled material on an as-applied basis using the following equation (**Eq. 5**).

$$PV_F = PV_u \times \frac{(100 - \% \text{ Filler})}{(100)} \quad (\text{Eq. 5})$$

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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Where:

PV<sub>F</sub> = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms (kg) organic HAP per megagram of filled material.

PV<sub>u</sub> = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in paragraph **B.14a(5)** above.

%Filler = The weight-percent of filler in the as-applied filled resin system.

- (2) If the filled resin is used as a production resin and the value of PV<sub>F</sub> calculated by **Eq. 5** does not exceed 46 kg of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
- (3) If the filled resin is used as a tooling resin and the value of PV<sub>F</sub> calculated by **Eq. 5** does not exceed 54 kg of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.
- (4) If including a filled resin in the emissions averaging procedure described in paragraph **B.14.a** above, then use the value of PV<sub>F</sub> calculated using **Eq. 5** for the value of PV<sub>i</sub> in **Eq. 3** in paragraph **B.14.a** above.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5710, 63.5713, 63.5714 & Table 3 to 40 CFR 63 Subpart VVVV]

**B.15. Methods for Organic HAP Content.** To determine the organic HAP content for each material used in open molding resin and gel coat operations, the permittee shall use one of the following options:

- a. *Method 311.* Method 311 for determining the mass fraction of organic HAP. Use the following procedures when determining organic HAP content by Method 311:
  - (1) Include in the organic HAP total each organic HAP that is measured to be present at 0.1% by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5% of the material by mass, the permittee does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point (for example, 0.1234).
  - (2) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
- b. *Method 24.* The permittee may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.
- c. *ASTM D1259-85.* The permittee may use ASTM D1259-85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
- d. *Alternative Method.* The permittee may use an alternative test method for determining mass fraction of organic HAP if obtain prior approval by the EPA. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
- e. *Information from the Supplier/Manufacturer of the Material.* The permittee may rely on information other than that generated by the test methods specified in paragraphs **B.15.a – d**, above, such as manufacturer's formulation data, according to the following:
  - (1) Include in the organic HAP total each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5% of the material by mass, the permittee does not have to include it in the organic HAP total.
  - (2) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs **B.15.a – d**,

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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above, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee shall use the measured organic HAP content to determine compliance.

- (3) If the organic HAP content is provided as a single value, the permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs **B.15.a – d**, above, is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee shall use the measured organic HAP content to determine compliance.

- f. *Solvent Blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the permittee may use the values for organic HAP content that are listed in Table 5, Default Organic HAP Contents of Solvents and Solvent Blends, or Table 6, Default Organic HAP Contents of Petroleum Solvent Groups, of 40 CR 63, Subpart VVVV. The permittee may use Table 6 only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 and the permittee knows only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6, then the test results shall be used for determining compliance.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5758(a) & Tables 5 and 6 to 40 CFR 63 Subpart VVVV]

#### **B.16. Resin and Gel Coat Mixing Work Practice Standards.**

- a. All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, shall have a cover with no visible gaps in place at all times.
- b. The work practice standard in paragraph **B.16.a** above does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- c. To demonstrate compliance with the work practice standard in paragraph **B.16.a** above, the permittee shall visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
- d. The permittee shall keep records as required in Specific Condition **B.22**.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5731]

#### **Recordkeeping and Reporting Requirements**

#### **B.17. VOC Emissions Records.** The permittee shall maintain the following monthly records on materials usage and VOC emissions to demonstrate compliance with Specific Condition **B.3**:

- a. Material name.
- b. Monthly usage (pounds) of each material.
- c. Maximum possible VOC content (weight percent) of each material.
- d. Emissions factors used in calculations.
- e. Total, rolled monthly, VOC emissions from all materials (tons).
- f. Annual, 12-month rolling total VOC emissions from all materials (tons).

[Rules 62-4.070 & 62-212.400(Avoid PSD), F.A.C.; and Permit No. 1110086-016-AC]

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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

- B.18. Equipment Cleaning Records.** The permittee shall comply with the following requirements for resin and gel coat application equipment cleaning operations at the facility.
- Cleaning Solvents.* Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Specific Condition **B.7** using the methods specified in Specific Condition **B.15**.
  - Recycled Cleaning Solvents.* If the permittee recycles cleaning solvents on site, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in Specific Condition **B.15** for demonstrating compliance with organic HAP content limits.
  - Inspections.* At least once per month, the permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5737]

- B.19. General Recordkeeping Requirements.** The permittee shall keep the following records:
- Notification.* A copy of each notification and report submitted.
  - Documentation.* All documentation supporting any notification or report submitted.
  - No Control Device.* If the facility is not controlled by an add-on control device (*i.e.*, complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the permittee shall keep the following records:
    - (1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the permittee shall record the amounts of each applied by atomized and non-atomized methods.
    - (2) If applicable, the total amount of each aluminum coating used per month (including primers, topcoats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in 40 CFR 63.5752.
    - (3) If applicable, the total amount of each aluminum wipe-down solvent used per month and the weighted-average organic HAP content as determined in 40 CFR 63.5749.
  - Record Retention.*
    - (1) Records shall be readily available and, in a form, so they can be easily inspected and reviewed.
    - (2) Each record shall be kept for 5 years following the date that each record is generated.
    - (3) Each record shall be kept on site for at least 2 years after the date that each record is generated. The permittee can keep the records offsite for the remaining 3 years.
    - (4) Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
    - (5) Any records required to be maintained by this part that are submitted electronically via the EPA's Compliance and Emissions Data Reporting Interface (CEDRI) may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the Department or the EPA as part of an on-site compliance evaluation.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5767(a) – (c) & 63.5770]

- B.20. Exempt Material Records.** The permittee shall keep the following records for materials specified in Specific Condition **B.4.d** that are exempt from the open molding emissions limit in Specific Condition **B.4.b**:
- Military Vessels.* The permittee shall keep a record of the resins for which the exemption is used in Specific Condition **B.4.d(1)**.

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

- b. *Part/Mold Repair and Touch Up.* The permittee shall keep a record of the amount of gel coats used per month when claiming the exemption in Specific Condition **B.4.d(2)**, and the permittee shall keep copies of calculations showing that the exempt amount does not exceed 1% of all gel coat used.
- c. *Skin Coats.* The permittee shall keep a record of the amount of 100% vinylester skin coat resin used per month when claiming the exemption in Specific Condition **B.4.d(3)**, and the permittee shall keep copies of calculations showing that the exempt amount does not exceed 5% of all resin used.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5698(d)]

**B.21. Open Molding HAP Emission Limits Records.** The permittee shall keep the following records for each resin and gel coat:

- a. *Emissions Averaging Option.*
  - (1) HAP content.
  - (2) Amount of material used per month.
  - (3) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized (non-spray) technology.
  - (4) Calculations performed to demonstrate compliance based on MACT model point values, as described in Specific Condition **B.14.a**.
- b. *Compliant Materials Option.*
  - (1) HAP content.
  - (2) Amount of material used per month.
  - (3) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized (non-spray) technology.
  - (4) Calculations performed to demonstrate compliance based on weighted-average organic HAP content, as described in Specific Condition **B.14.b**.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5704(a)(3) & (b)(3)]

**B.22. Resin and Gel Coat Mixing Records.** The permittee shall keep records of which mixing containers are subject to the work practice standards in Specific Condition **B.16** and the results of the inspections, including a description of any repairs or corrective actions taken. [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5731(d)]

**B.23. Carpet and Fabric Adhesive Records.** The permittee shall keep records of the organic HAP content of the carpet and fabric adhesives determined using the methods in Specific Conditions **B.10** and **B.15**. [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5740(b)]

**B.24. Reporting Schedule.** The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
40 CFR 63 Subpart VVVV Semi-Annual Compliance Report	Within 60 days after the end of each calendar half	<b>B.26</b>

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

**B.25. Compliance Notifications.** The permittee shall submit the following notifications to the Department's Southeast District Office:

- a. *Compliance Extension.* A request for a compliance extension as specified in 40 CFR 63.9(c) no later than the dates specified in 40 CFR 63.6(i).
- b. *Compliance Status.* A notification of compliance status as specified in 40 CFR 63.9(h) if complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging



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### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

provisions. The notification must be submitted no later than 30 calendar days after the end of the first 12-month averaging period after the facility's compliance date under 40 CFR 63 Subpart VVVV.

- c. *Notifications of Information Updates.* If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the Department within 15 calendar days after the change. [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5761& Table 7 to 40 CFR 63 Subpart VVVV]

**B.26. Semi-Annual Compliance Report.** The permittee shall submit and organize each of the following applicable reports according to the operations and the compliance procedure followed for that operation.

- a. *Submittal Dates.* Unless the EPA has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee shall submit each report by the following dates:
- (1) If the source is not controlled by an add-on control device (*i.e.*, the permittee is complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report shall cover the period beginning 12 months after the compliance date specified for the source in 40 CFR 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for the source in 40 CFR 63.5695.
  - (2) The first compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph **B.26.a(1)**.
  - (3) Each subsequent compliance report shall cover the applicable semi-annual reporting period from January 1 through June 30 or from July 1 through December 31.
  - (4) Each subsequent compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the semi-annual reporting period.
- b. *Report Content.* Each compliance report shall include the following:
- (1) Company name and address.
  - (2) A statement by a responsible official with the official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
  - (3) The date of the report and the beginning and ending dates of the reporting period.
  - (4) A description of any changes in the manufacturing process since the last compliance report.
  - (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which the facility is complying. The statement or table shall also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
  - (6) If the facility was in compliance with the emissions limitations and work practice standards during the reporting period, then the permittee shall include a statement to that effect.
  - (7) If the facility deviated from an emissions limitation or work practice standard during the reporting period, then the permittee shall also include the following information:
    - (a) A description of the operation involved in the deviation.
    - (b) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
    - (c) A description of any corrective actions taken to minimize the deviation and actions taken to prevent it from happening again.
    - (d) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

[Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5764(a), (b)(1) – (4) & (c)]

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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#### Subsection B. Emissions Units 002 and 003, Production Line Nos. 2 and 3

*{Permitting Note: The Subpart VVVV semi-annual compliance reports may be submitted on the same schedule as the semi-annual Title V monitoring reports required under Facility-Wide Condition **FW9**.}*

- B.27. Electronic Reporting Requirements.** The semi-annual compliance reports required under Specific Condition **B.26** must be submitted electronically to the EPA according to the requirements of 40 CFR 63.5765(c) and (d). [Rule 62-204.800(11)(b), F.A.C.; and 40 CFR 63.5765(c) and (d)]
- B.28. Other Reporting Requirements.** See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

#### **Other Requirements**

- B.29. NESHAP Provisions.** The permittee shall meet the applicable requirements in 40 CFR 63 NESHAP Subpart A, General Provisions, and Subpart VVVV, NESHAP for Boat Manufacturing, both of which are adopted and incorporated by reference in Rule 62-204.800, F.A.C. [Rule 62-204.800, F.A.C.; and NESHAP Subparts A and VVVV of 40 CFR 63]

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