

STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 0251388-008-AV

APPLICANT

The applicant for this project is Midnight Express Powerboats, Inc. The applicant's responsible official and mailing address are: Mr. Harris Glaser, President, Midnight Express Powerboats, Inc., 351 NE 185 Street, Miami, Florida 33179.

FACILITY DESCRIPTION

The applicant operates the existing Midnight Express Powerboats, Inc. facility, which is located in Miami-Dade County at 351 NE 185 Street, Miami, Florida.

Midnight Express Powerboats, Inc. manufactures fiberglass boats. Manufacturing operations includes mold maintenance, gelcoat application, lamination (polyester resin application), infusion, parts extraction, parts cutting & grinding, parts inspection, assembly, test, final finish, inspection, and delivery. Boat manufacturing is done using contact open molding and infusion processes. After the mold is prepared, the gelcoat is applied to the mold, which is then followed by either the contact open molding process of laying fiberglass and polyester resin, or the infusion process of laying fiberglass and polyester resin. In the contact open molding process, after the gelcoat is applied onto the mold, layers of fiberglass and polyester resin are applied together with a catalyst, allowed to cure, and then pulled once cured. This process is used on small parts, like hatches, seats, and consoles. In the infusion process, after the gelcoat is applied, a few layers of fiberglass and polyester resin are applied together with a catalyst, then foam core, and the entire part is placed in an airtight bag. The part is freed of air, resin is infused into the part, allowed to cure, and then pulled once cured. The infusion process is used on the hull and deck of the boat. The facility also conducts spray painting operations, and manufactures boats with the following sizes: 34, 37, 39, 43, and 60 feet.

This facility also includes miscellaneous insignificant emissions units and/or activities.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Fiberglass Boat Manufacturing
002	Spray Painting of Fiberglass Boats with Two (2) Paint Spray Booths

APPLICABLE REGULATIONS

Based on the Title V air operation permit revision application received on January 27, 2025, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not 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).
<i>Federal Rule Citations</i>	
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart VVVV, NESHAP for Boat Manufacturing	001
<i>State Rule Citations</i>	
Rule 62-4, Florida Administrative Code (F.A.C.) (Permits)	001 & 002
Rule 62-204, F.A.C. (Air Pollution Control – General Provisions)	001 & 002
Rule 62-210, F.A.C. (Stationary Sources – General Requirements)	001 & 002

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Rule 62-213, F.A.C. (Operation Permits for Major Sources of Air Pollution)	001 & 002
Rule 62-296, F.A.C. (Stationary Sources – Emissions Standards)	001 & 002
Rule 62-297, F.A.C. (Stationary Sources – Monitoring)	001 & 002
<i>Miami-Dade County Code</i>	
Local Rule – Chapter 24 – Code of Miami-Dade County	001 & 002

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility. The revision incorporates the terms and conditions of concurrently processed permit No. 0251388-007-AC which is issued for the installation of one (1) paint spray booth (Booth No. 2).

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received [**January 27, 2025**]

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3732 – Boat Building and Repairing.

North American Industry Classification System (NAICS): 336612 – Boat Building.

HAP: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility does not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply.

GHG: The facility is not identified as a major source of green house gas (GHG) pollutants.

PROJECT REVIEW

The purpose of this project is to revise Title V air operation permit No. 0251388-006-AV to incorporate the terms and conditions of concurrently processed permit No. 0251388-007-AC, which is issued for the installation of one (1) paint spray booth (Booth No. 2).

Changes to the permit made as part of this revision are shown in ~~strike-through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been **highlighted in yellow** within the permit document. The revisions shown below are the only portions of the permit that are open for public comment or challenge. Comments received related to the remainder of the permit will not be addressed during this permitting action.

1. The headers, footers, and permit numbers throughout the permit documents have been updated to reflect this Title V air operation permit revision.
2. Section I. Subsection A, the Facility Description is revised as per the applicant as follows:

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Midnight Express Powerboats, Inc. manufactures fiberglass boats. Boat mManufacturing operations includes mold maintenance, gelcoat application, lamination (polyester resin application), infusion, parts extraction, parts cutting & grinding, parts inspection, assembly, test, final finish, inspection, and delivery. Boat manufacturing is done using contact open molding and infusion processes. After the mold is prepared, the gelcoat is applied to the mold, which is then followed by either the contact open molding process of laying fiberglass and polyester resin, or the infusion process of laying fiberglass and polyester resin. Contact open molding process is used on small parts, like hatches, seats, and consoles. The infusion process is used on the hull and deck of the boat. The facility also conducts spray painting operations, and manufactures boats with the following sizes: 34, 37, 39, 43, and 60 feet. In the contact open molding process, after the gelcoat is applied onto the mold, layers of fiberglass and polyester resin are applied together with a catalyst, allowed to cure, and then pulled once cured. This process is used on small parts, like hatches, seats, and consoles. In the infusion process, after the gelcoat is applied, a few layers of fiberglass and polyester resin are applied together with a catalyst, then foam core, and the entire part is placed in an airtight bag. The part is freed of air, resin is infused into the part, allowed to cure, and then pulled once cured. The infusion process is used on the hull and deck of the boat. The facility also conducts spray painting operations, and manufactures boats with the following sizes: 34, 37, 39, 43, and 60 feet.

3. Section I. Subsection B, the Summary of Emissions Unit is revised as follows:

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Fiberglass Boat Manufacturing
002	Spray Painting of Fiberglass Boats with <u>One Two (42)</u> Paint Spray Booths

4. Section III. Subsection B, the Emissions Unit Table is revised as follows:

EU No.	Brief Description
002	Spray Painting of Fiberglass Boats with <u>One Two (42)</u> Paint Spray Booths

Paint Spray Booth No. 1: One (1) paint spray booth with unknown manufacturer and Model No. of dimensions 25'L x 10'W x 10'H, one (1) 3HP, tubeaxial fan with 10,310 CFM, and one (1) 48"x 48" exhaust filter.

Paint Spray Booth No. 2: One (1) custom manufactured paint spray booth of dimensions 49'-4''L x 28'-11.5''W x 10'H, one (1) 5HP, Dayton, Model No. 36VF05B exhaust fan with 15,000 CFM, and one (1) 35''H x 72''W exhaust filter panel.

5. Section III. Subsection B. The incorporation of permit No. 0251388-007-AC required that the affected Specific Conditions also cite this permit.
6. Updated Table H, Permit History, to reflect the current projects.

CONCLUSION

This project revises Title V air operation Permit No. 0251388-006-AV, which was effective on September 24, 2023. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.