# Mocama Marine LLC
# Panama City Production Facility

Facility ID No. 0050102
Bay County

Initial Title V Air Operation Permit

**Permit No. 0050102-003-AV**



**Permitting and Compliance Authority:**

State of Florida
Department of Environmental Protection
Northwest District

160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

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# Title V Air Operation Permit

Permit No. 0050102-003-AV

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# FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Alexis A. Lambert
Secretary

Northwest District
160 W. Government St., Suite 308
Pensacola, FL 32502

**PERMITTEE:**
Mocama Marine LLC
245 Riverside Ave., Suite 310
Jacksonville, Florida 32202

Permit No. 0050102-003-AV
Panama City Production Facility

Facility ID No. 0050102
Initial Title V Air Operation Permit

The purpose of this permit is to issue the initial Title V air operation permit for the above referenced facility. This initial Title V permit incorporates air construction permit No. 0050102-002-AC. The existing Panama City Production Facility is located in Bay County at 6725 Bay Line Drive, Building 2 in Panama City, Florida 32404. UTM Coordinates are: Zone 16, 642.07 km East, and 3349.51 km North. Latitude is: 30° 16' 8.1660" North; and, Longitude is: 85° 31' 23.1636 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.

0050102-003-AV Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20zz
Expiration Date: Eff. DATE + 5 years, 20zz

***(Draft)***

_____ _____
Kimberly R. Allen Date
Permitting Program Administrator

KRA/db

## Subsection A. Facility Description.

The Panama City Production Facility is for reinforced fiberglass composite products, primarily recreational boats. Boats built at this facility are in the 16-to-26-foot range. The facility consists of a gel coat application room, a storage area for HAP-containing materials, lamination room with three resin stations, trim room, sanding and polishing area, and an area for mold storage / prep.

The facility's operation utilizes opening molding with non-corrosion resistant high strength resins, gel coats, and tooling gel coats. Fiberglass resin coating and gel coats are added to molds mechanically by atomized equipment, non-atomized equipment, or manually by rollers. After curing, the components are removed from the molds and the molds are cleaned using solvent based materials. Product production includes laminating, trimming, sanding, polishing, and grinding operations. Minor activities include routine cleaning and maintenance of non-production areas, painting of on-site structures, forklift operations, HVAC system maintenance, grounds-keeping operations, and portable generators.

This facility is limited to HAP emissions limitations in 40 CFR 63 Subpart VVVV. The facility is subject to 40 CFR 63, Subpart A - General Provisions and 40 CFR 63, Subpart VVVV, Boat Manufacturing. Subpart VVVV limits the facility's organic HAP emissions and work practice standards.

The facility shall demonstrate compliance by using the Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option pursuant to 40 CFR 63.5701(a) of 40 CFR 63 Subpart VVVV - NESHAP for Boat Manufacturing. This option allows the facility to demonstrate that emissions from the open molding resin and gel coat operations that they average meet the emission limit in §63.5698 using the procedures described in §63.5710 of 40 CFR 63 Subpart VVVV. Compliance with this option is based on a 12-month rolling average. Subpart VVVV limitations are dependent on operation and application type.

## Subsection B. Summary of Emissions Units.

| EU No. | Brief Description |
|---|---|
| *Regulated Emissions Units* | |
| 001 | Fiberglass Boat Manufacturing |

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 initial Title V air operation permit application received April 1, 2025, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

| Regulation | EU No(s). |
|---|---|
| *Federal Rule Citations* | |
| 40 CFR 63, Subpart A – General Provisions | 001 |
| 40 CFR 63, Subpart VVVV – National Emission Standard for Hazardous Air Pollutants Boat Manufacturing. | 001 |
| *State Rule Citations* | |
| Rule 62-4, F.A.C., Permits | 001 |
| Rule 62-204, F.A.C., General Provisions | 001 |
| Rule 62-296, F.A.C., Stationary Sources – Emission Standards | 001 |
| Rule 62-297, F.A.C., Stationary Sources – Emission Monitoring | 001 |

| Regulation | EU No(s). |
|---|---|
| Rule 62-210, F.A.C., Stationary Sources – General Requirements | Facility-Wide |
| Rule 62-213, F.A.C., Operation Permits for Major Sources of Air Pollution | Facility-Wide |

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

a. All containers, etc. that are used for temporary and permanent storage of VOC/organic solvents shall be covered to reduce VOC and HAP emissions.

b. All hoses and piping used in the transport of resin are maintained leak free.

[Rule 62-296.320(1), F.A.C., and proposed by applicant in the Initial Title V air operation permit application, Request for Additional Information response, received April 10, 2025]

**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. Paving and maintenance of roads, parking areas, and yards, as needed.

b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.

c. Application of water, chemicals, or other dust suppressants to unpaved roads and yards.

d. Removal of particulate matter from roads and other paved areas to prevents re-entrainment, and from buildings or work areas to prevent particulate matter from becoming airborne.

e. Landscaping or planting of vegetation, if needed.

f. Use of hoods, fans, filters, and similar equipment contain, capture, or vent particulate matter generated from gelcoat/fiberglass operation and parts cutting.

[Rule 62-296.320(4)(c), F.A.C.; and Permit No. 0050102-002-AC]

**Reports and Fees**

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

**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 (DEP) 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 1st 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: http://www.dep.state.fl.us/air/emission/tvfee.htm. [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.}*

*{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 1st 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 US. 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.) [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). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange 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.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

**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 60th day following the end of each calendar half (i.e., March 1st and August 29th 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. (See also Conditions RR2. – RR4. of Appendix RR, Facility-wide Reporting Requirements, for additional reporting requirements related to deviations.) [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)]

*{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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## Subsection A. Emissions Unit 001 – Fiberglass Boat Manufacturing

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

| EU No. | Emission Unit Description |
|---|---|
| 001 | Fiberglas Boat Manufacturing |

Emission Unit (EU) 001, Fiberglass Boat Manufacturing, is a facility for reinforced fiberglass composite products, primarily recreational boats in the 16-to-26-foot range. This facility consists of a gel coat application room, a storage area for HAP-containing materials, lamination room with three resin stations, trim room, sanding and polishing area, and an area for mold storage / prep. This emission unit officially began operating on January 1, 2024.

The facility's operation utilizes opening-molding-with non-corrosion resistant high strength resins, gel coats, and tooling gel coats. Prepared molds will be sprayed with styrene-based gel coat. Once the gel coat has sufficiently solidified, fiberglass and catalyzed styrene-based polyester and/or vinyl ester resin will be applied to the gel coated surface of the mold. The application methods may include hand layup, pressure fed roller, atomized, or non-atomized spray techniques. Cured fiberglass parts will then be removed from the molds and assembled into boats. If necessary, the molds may be repaired with tooling gel coats. Fabrication of new production molds is expected to remain outsourced and if MOC decides to create new production molds in-house or use resins to repair molds in-house they will notify the Department and obtain appropriate review.

Product production includes laminating, trimming, sanding, polishing, and grinding operations done in a closed-in area that has no dust collection system. Excess material is trimmed from the hardened part, typically with a hand-held air driven cutoff tool. Imperfections in the surfaces are removed by grinding the surface and re-applying gel coat and/or resin. Grinding of surface imperfections is performed by hand tools.

Miscellaneous putties and filler containing styrene may be used prior to or after removal of the part from the mold in the laminating area or for final assembly. Additional styrene-based materials may be used to bond parts as the final product is assembled and prepared for shipping. After passing a final quality control inspection, the product is prepared for shipping.

HAP and VOC emissions are the result of species evaporation during the application stage, the curing stage of the resins and gel coats, and from the mold care materials. HAP and VOC emissions are exhausted through horizontal flowing wall fans or by diffusion through building openings. The trimming operation results in large fragments and particles too large to become airborne and results in fugitive emissions. The smaller particulates generated inside the building are controlled by portable shop vacuum collectors and normal good housekeeping procedures. There are no emission points for particulate matter and the quantity is negligible.

The emissions from the open molding of fiberglass boats are tied to raw material usage with a maximum process throughput rate of 600 tons per year. Segments within this emission units consist of gel coat spray application during open molding (240 tons per year or 480,000 lbs per year), resin spray application during open molding (360 tons per year or 720,000 lbs per year), and a maximum of 100 gallons of tooling gel coat expected to be used per year to repair the molds. Tooling gel coat is included within the 240 tons per year of total gel coats. The facility has elected to demonstrate compliance with the emission limits by averaging emissions with the applicable MACT model point value equations and appropriate record keeping.

*{Permitting Note: This emission unit is regulated under 40 CFR 63, Subpart VVVV, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C.).}*

### Essential Potential to Emit (PTE) Parameters

**A.1.** Facility Operations Covered by 40 CFR 63 Subpart VVVV. The affected source (the portion of the permittee's boat manufacturing facility covered by 40 CFR 63 Subpart VVVV) is the combination of all of the boat manufacturing operations listed in paragraphs (a) through (f) of 40 CFR 63.5689.

a. Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

b. Closed molding resin operations

c. Resin and gel coat mixing operations

d. Resin and gel coat application equipment cleaning operations.

e. Carpet and fabric adhesive operations.

f. Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

[Rule 62-204.800(11)(b)78, F.A.C., 40 CFR 63.5689, and Permit No. 0050102-002-AC]

*{Permitting Note: Current operations at this facility include Specific Condition 4(a) and (d).}*

**A.2.** Hours of Operation. This emissions unit may operate continuously without restriction. [Rule 62-210.200(PTE), F.A.C.; and, Permit No. 0050102-002-AC]

**Emission Limitations and Standards**

**A.3.** Compliance With the Open Molding Emissions Limit. The permittee has elected and must use the Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option listed in 40 CFR 63.5701(a) to meet the emissions limit in 40 CFR 63.5698 for the resins and gel coats used in open molding operations at the facility.

The permittee shall demonstrate that emissions from the open molding resin and gel coat operations that the permittee averages meet the emission limit in 40 CFR 63.5698 using the procedures described in 40 CFR 63.5710. Compliance with this option is based on a 12-month rolling average.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5701(a); and Permit No. 0050102-002-AC]

**A.4.** Emissions Limit for Open Molding Resin and Gel Coat Operations:

a. *Open Molding Operations*. The permittee must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of section 40 CFR 63.5698, listed below as (1) through (5), to the emission limit specified in paragraph (b) of section 40 CFR 63.5698, listed below as b. Operations listed in paragraph (d) of 40 CFR 63.5698 are exempt from this limit.

(1) Production resin.

(2) Pigmented gel coat.

(3) Clear gel coat.

(4) Tooling resin.

(5) Tooling gel coat.

b. *HAP Limit*. The permittee must limit organic HAP emissions from open molding operations to the limit specified by equation 1 of section 40 CFR 63.5698(b), based on a 12-month rolling average.

$$HAP\ Limit = \left[46\left(M_{R}\right) + 159\left(M_{PG}\right) + 291\left(M_{CG}\right) + 54\left(M_{TR}\right) + 214\left(M_{TG}\right)\right] \qquad (Eq.\ 1)$$

Where:

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

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

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

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

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

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

c. The open molding emission limit is the same for both new and existing sources.

d. The materials specified in paragraphs (d)(1) through (3) of section 40 CFR 63.5698 are exempt from the open molding emission limit specified in paragraph (b) of section 40 CFR 63.5698.

(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 must be applied with nonatomizing (non-spray) resin application equipment. The Permittee must keep a record of the resins for which the Permittee is using this exemption.

(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 must not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. The Permittee must keep a record of the amount of gel coats used per month for which the Permittee is using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent 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 the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis. The Permittee must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5698(a), (b), (c) and (d)]

{*Permitting Note: The facility's tooling gel coat is included within the total tons of gel coat expected to be used per 12-month rolling average. Therefore, the exemption for tooling gel coat listed in 40 CFR 63.5698(b) does apply to this facility at this time.*}

**A.5.** General Requirements for Complying with the Open Molding Emission Limit (*Emissions averaging option*): For those open molding operations and materials complying using the emissions averaging option, the Permittee must demonstrate compliance by performing the steps in paragraphs (1) through (5) of section 40 CFR 63.5704.

a. Use the methods specified in §63.5758 to determine the organic HAP content of resins and gel coats.

b. Complete the calculations described in §63.5710 to show that the organic HAP emissions do not exceed the limit specified in §63.5698.

c. Keep records as specified in paragraphs (a)(3)(i) through (iv) of section 40 CFR 63.5704, listed below as (1) through (4), for each resin and gel coat.

(1) Hazardous air pollutant 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 nonatomized technology.

(4) Calculations performed to demonstrate compliance based on MACT model point values, as described in §63.5710.

d. Prepare and submit the implementation plan described in §63.5707 to the Administrator and keep it up to date.

e. Submit semiannual compliance reports to the Administrator as specified in §63.5764.

[Rule 62-204.800(11)(b)78, F.A.C., 40 CFR 63.5704(a)]

**A.6.** Implementation Plan:

a. The Permittee must prepare an implementation plan for all open molding operations for which the Permittee must comply by using the emissions averaging option described in §63.5704(a).

b. The implementation plan must describe the steps the Permittee will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in paragraphs (b)(1) through (3) of section 40 CFR 63.5707, listed below.

(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 specified in §63.5698.

c. The Permittee must submit the implementation plan to the Administrator with the notification of compliance status specified in §63.5761.

d. The Permittee must keep the implementation plan on site and provide it to the Administrator when asked.

e. If the Permittee revises the implementation plan, the Permittee must submit the revised plan with the next semiannual compliance report specified in §63.5764.

[Rule 62-204.800(11)(b)78, F.A.C., 40 CFR 63.5707]

**A.7.** Demonstrating Compliance Using the Emissions Averaging Option:

a. Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in §63.5695.

b. At the end of the twelfth month after the compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in §63.5698 calculated for the same 12-month period.

(Include terms in equation 1 of §63.5698 and equation 1 of section 40 CFR 63.5710(b) for only those operations and materials included in the average.)

$$HAP\ \text{emissions} = \left[(\mathrm{PV_R})(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})\right] \qquad (Eq.\ 1)$$

Where:

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

$PV_R$ = 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.

c. At the end of every month, use equation 2 of section 40 CFR 63.5710(c) to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^{n}(M_i\ \mathrm{PV_i})}{\sum_{i=1}^{n}(\mathrm{M_i})} \qquad (Eq.\ 2)$$

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.

d. The Permittee must use the applicable equations from Table 3 to Subpart VVVV of Part 63 to calculate the MACT model point value ($PV_i$) for each resin and gel coat used in each operation in the past 12 months.

**Excerpt from Table 3 to Subpart VVVV of Part 63 [1]**

| For this operation— | And this application method— | Use this formula to calculate the MACT model plant value for each resin and gel coat— |
|---|---|---|
| 1. Production resin, tooling resin | a. Atomized | $0.014 \times (\text{Resin HAP\%})^{2.425}$ |
| | d. Nonatomized | $0.014 \times (\text{Resin HAP\%})^{2.275}$ |
| 2. Pigmented gel coat, clear gel coat, tooling gel coat | All methods | $0.445 \times (\text{Gel coat HAP\%})^{1.675}$ |

[1]Equations calculate MACT model point value in kilograms of organic HAP per megagrams of resin or gel coat applied. HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100 percent.

e. If the organic HAP emissions, as calculated in paragraph (b) of this specific condition, are less than the organic HAP limit calculated in §63.5698(b) for the same 12-month period, then the Permittee is in compliance with the emission limit in §63.5698 for those operations and materials included in the average.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5710]

**A.8.** Standards for Resin and Gel Coat Application Equipment Cleaning Operations:

a. For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the Permittee must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.

b. The Permittee must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must 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 must 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 part 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)78, F.A.C., and 40 CFR 63.5734]

**A.9.** Compliance Demonstration With the Resin and Gel Coat Application Equipment Cleaning Standards:

a. The Permittee must determine and record the organic HAP content of the cleaning solvents subject to the standards specified in §63.5734 using the methods specified in §63.5758.

b. 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 §63.5758 for demonstrating compliance with organic HAP content limits.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5737]

**Excess Emissions**

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS or NESHAP provision.

**A.10.** Excess Emissions. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided (1) best practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration. Excess emissions that are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(1), F.A.C.]

**Monitoring of Operations**

**A.11.** Monthly visual inspections of containers holding organic HAP-containing solvents. At least once per month, the Permittee must 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. [Rule 62-204.800(11)(b), F.A.C., and 40 CFR 63.5737(c)]

**Test Methods and Procedures**

**A.12.** Test Methods. When required, tests shall be performed in accordance with the following reference methods:

| Method | Description of Method and Comments |
|---|---|
| 311 | HAP Compounds in Paints and Coatings |
| ASTM D1259-85 | Standard Test Method for Nonvolatile Content of Resins |

The above methods are described in 40 CFR 60, Appendix A, and 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.13.** 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, just carefully read the instructions on each screen (and under the Help tabs) to complete the notification.}*

**A.14.** Determination of Organic HAP Content of Materials For Each Material Used: To determine the organic HAP content for each material used in open molding resin and gel coat operations, or carpet and fabric adhesive operations, the Permittee must use one of the options in paragraphs (1) through (6) of section 63.5758, listed below as a. through f.

a. *Method 311 (appendix A to 40 CFR part 63).* The Permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1) and (2) of this section 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 percent 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 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent 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. *ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins).* 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.

c. *Alternative method.* The Permittee may use an alternative test method for determining mass fraction of organic HAP if the Permittee obtains prior approval by the Administrator. The Permittee must follow the procedure in §63.7(f) to submit an alternative test method for approval. Per §63.5776(b)(2)(iv), under §63.6(g), the authority to approve alternatives to the method for determining hazardous air pollutant content of regulated materials is NOT delegated to the State of Florida.

d. *Information from the supplier or manufacturer of the material.* The Permittee may rely on information other than that generated by the test methods specified in paragraphs (a) through (d) of section 63.5758, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of section 63.5758(5), listed below as (1) through (3).

(1) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, it does not have to be included 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 upper limit of the range must be used for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of section 63.5758, listed above as a. through d., exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the measured organic HAP content must be used to determine compliance.

(3) If the organic HAP content is provided as a single value, it may be assumed that 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)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the provided value may be used to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the measured organic HAP content must be used to determine compliance.

e. *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 must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the values for organic HAP content that are listed in Table 5 or 6 to 40 CFR 63 Subpart VVVV may be used. The Permittee may use Table 6 to 40 CFR 63 Subpart VVVV only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 to 40 CFR 63 Subpart VVVV and it is known only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to 40 CFR 63 Subpart VVVV, then the test results must be used for determining compliance.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5758(a)]

**Recordkeeping and Reporting Requirements**

**A.15.** Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

| Report | Reporting Deadline | Related Condition(s) |
|---|---|---|
| Compliance Report | Semi-annual | **A.20** Report Submittal |
| Notification of Compliance Status | No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date | **A.6.c.** Implementation Plan |
| Implementation Plan | Submit with the Notification of Compliance Status | **A.6.c.** Implementation Plan |

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

**A.16.** Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

**A.17.** 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 outlined in Specific Condition 12 using the methods outlined in Specific Condition 13.

b. *Recycles 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 13 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.18.** 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 14.

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

**A.19.** Notifications Submittal:

a. The Permittee must submit all of the applicable notifications in Table 7 to 40 CFR 63 Subpart VVVV by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to 40 CFR 63 Subpart VVVV.

**Excerpt from Table 7 to Subpart VVVV of Part 63**

| If your facility— | You must submit— | By this date— |
|---|---|---|
| 2. Is a new source subject to this subpart | The notifications specified in §63.9(b) (3) to (5) | No later than the dates specified §63.9(b)(4) and (5). |
| 4. Is complying with organic HAP content limits, application equipment requirements; or MACT model point value averaging provisions | A notification of compliance status as specified in §63.9(h) | No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date. |

b. If the Permittee changes any information submitted in any notification, the Permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5761]

**A.20.** Report Submittal:

a. The Permittee must submit the applicable reports specified in paragraphs (b) through (c) of section 63.5764, listed below as b. through c. To the extent possible, the Permittee must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.

b. Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the Permittee must submit each report by the dates in paragraphs (b)(1) through (5) of section 63.5764, listed below as (1) through (5).

(1) If the source is not controlled by an add-on control device (i.e., compliance is demonstrated with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for the source in §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 §63.5695.

(2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of section 63.5764, listed above as b.

(3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of section 63.5764, listed above as b. (1) through (4).

c. The compliance report must include the information specified in paragraphs (c)(1) through (7) of section 63.5764, listed below as c. (1) through (7).

(1) Company name and address.

(2) A statement by a responsible official with that 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 Permittee is complying. The statement or table must 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 Permittee was in compliance with the emission limits and work practice standards during the reporting period, the Permittee must include a statement to that effect.

(7) If the Permittee deviated from an emission limit or work practice standard during the reporting period, the Permittee must also include the information listed in paragraphs (c)(7)(i) through (iv) of section 63.5764, listed below as (a) through (d), in the semiannual compliance report.

(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 action the Permittee took to minimize the deviation and actions the Permittee has 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.

d. If your facility has an add-on control device, you must submit semiannual compliance reports and quarterly excess emission reports as specified in paragraph (b) of section 63.10(e). The contents of the reports are specified in paragraph (b) of 63.10(e).

*{Permitting Note: The facility does not use any control equipment at this time to comply with the 40 CFR 64 Subpart VVVV requirements. If the facility decides to install any control equipment, it shall apply for and obtain an air construction permit to install such equipment.}*

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5764]

**A.21.** Additional Recordkeeping: The permittee must keep the records specified in paragraphs (a) through (c) below in addition to records specified in individual sections of 40 CFR 63 Subpart VVVV.

a. The Permittee must keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart VVVV.

b. The Permittee must keep all documentation supporting any notification or report submitted.

c. If the facility is not controlled by an add-on control device (i.e., it is complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the Permittee must keep the records specified in paragraph (c)(1) of section 63.5767:

The Permittee must keep records of 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 must also record the amounts of each applied by atomized and nonatomized methods.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5767]

**A.22.** Format and Length of Recordkeeping:

a. The facility records must be readily available and in a form so they can be easily inspected and reviewed.

b. The Permittee must keep each record for 5 years following the date that each record is generated.

c. The Permittee must keep each record on site for at least 2 years after the date that each record is generated. You can keep the records offsite for the remaining 3 years.

d. The Permittee can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

[Rule 62-204.800(11)(b)78, F.A.C., and 40 CFR 63.5770]

**A.23.** Monitoring Data and Supporting Documentation: Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept, which includes sufficient information to determine compliance. The log and documents shall be kept for at least 5 years and made available to the Department. Monthly logs shall be completed within 10 calendar days of the following month. [Rule 62-4.070(3) F.A.C.]

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