

## STATEMENT OF BASIS

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Initial Title V Air Operation Permit  
Permit No. 0050102-003-AV

### APPLICANT

The applicant for this project is Mocama Marine LLC. The applicant's responsible official and mailing address are: William Long, Vice President, Mocama Marine LLC, 245 Riverside Ave., Suite 310, Jacksonville, Florida 32202.

### FACILITY DESCRIPTION

The applicant operates the existing Panama City Production Facility, which is located in Bay County at 6725 Bay Line Drive, Building 2, Panama City, Florida 32404.

This existing facility produces fiberglass motorboats 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.

Emissions Unit 001, Fiberglass Boat Manufacturing, is for the manufacturing of reinforced fiberglass composite products, primarily recreational boats. 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 unit 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 coats are included within the 240 tons per year of total gel coats.

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. If necessary, the molds may be repaired with tooling gel coats. 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.

Product assembly includes trimming and grinding operations. The trimming results in large fragments and particles that are too large to become airborne and results in fugitive emissions. 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 surface imperfections are performed by hand tools. The smaller particulates generated inside the building are controlled by portable shop vacuum collectors and good housekeeping procedures.

Miscellaneous putties and fillers 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.

Insignificant 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.

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.

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### REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Fiberglass Boat Manufacturing

### APPLICABLE REGULATIONS

Based on the Title V air operation permit application received on 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).
<i>Federal Rule Citations</i>	
40 CFR 63, Subpart A – General Provisions	001
40 CFR 63, Subpart VVVV – National Emission Standard for Hazardous Air Pollutants Boat Manufacturing.	001
<i>State Rule Citations</i>	
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
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

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

### PROJECT DESCRIPTION

The purpose of this permitting project is to issue the initial Title V permit for the above referenced facility and incorporate air construction permit No. 0050102-002-AC.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for the initial Title V Air Operation Permit received [April 1, 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 V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.). Facility-wide potential emissions of Total HAPs exceed 25 tons/year and potential emissions of Styrene exceed 10 tons/year.

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

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility .

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

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### CONCLUSION

This project is the initial Title V air operation permit for the facility and incorporates air construction permit No. 0050102-002-AC. This initial Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.