



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**  
CENTRAL DISTRICT  
3319 MAGUIRE BOULEVARD, SUITE 232  
ORLANDO, FLORIDA 32803-3767

RICK SCOTT  
GOVERNOR

CARLOS LOPEZ-CANTERA  
LT. GOVERNOR

JONATHAN P. STEVERSON  
SECRETARY

*Electronically sent – Received Receipt requested*  
[scott.church@sapagroup.com](mailto:scott.church@sapagroup.com)

**AIR PERMITTING PROGRAM REQUEST FOR ADDITIONAL INFORMATION**

**APPLICANT:** SAPA Precision Tubing, Rockledge, LLC  
**OWNER/AUTHORIZED REPRESENTATIVE:**  
Scott Church, Plant Director  
**ADDRESS:** 100 Gus Hipp Boulevard  
Rockledge, Florida, 32955

**DATE RECEIVED:** 01/02/15  
**PROJECT No.:** 0090078-008-AC  
**SITE:** SAPA Precision Tubing, Rockledge  
**PROJECT:** Application for Air Construction  
Permit – Coating Line Modification

Dear Mr. Church,

Your application for this project has been received and reviewed by this office. It was dated December 31, 2014 and was received January 2, 2015. We have assigned Project No. 009078-008-AC to the application. Thank you for meeting with us on 1/9/2015 to discuss the application. During the meeting we told you we would consider the application to be incomplete, in order to clarify two items. Evaluation of your application will be delayed until all the requested information has been received.

Please respond to the following items in order to complete the application:

1. Your current permit, 0090078-006-AF, has an emission limit of less than 25 tons per year (tpy) for total hazardous air pollutants (HAPs) and less than 10 tpy for any individual HAP. These limits are thresholds that keep you from being a major source. While reviewing past applications, we could not find the basis for this limit. Your current application indicates that HAPs are not present in the materials being used. As we discussed during our meeting on 1/9/2015, you need the flexibility to respond to a customer's requirements. Therefore, the permit needs to allow for use of materials with HAPs. Please provide a basis for a reasonable total and individual HAPs emission limit.
2. Your current permit, 0090078-006-AF is a Federally Enforceable State Operating Permit (FESOP). This implies that without restrictions or controls imposed by the permit, your operations have the potential to emit pollutants at such high rates that your facility should be considered a major source. Past Air Operating Reports that you have submitted and the information in the application indicate your facility should be classified as a "natural minor" source of air emissions rather than a "major source" controlled by a FESOP permit. During our 1/9/2015 meeting, we discussed the merits of no longer being a FESOP. I also mentioned I have to discuss the situation with staff in the Division of Air Resource Management (DARM in Tallahassee) to ensure changing from a FESOP to an air operating permit (that is, a "natural

minor” source of emissions) is allowable under current policy. Assuming it is allowable, would you prefer to be a natural minor source of air emissions?

Pursuant to Section 120.60(1), F.S., and Rule 62-4.055, F.A.C., the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Please provide the additional information within 30 days of the date you receive this letter. Submit an electronic original of the requested information to the Department and reference the above project application number in your correspondence. The Department would be glad to discuss a draft response before it is formally submitted.

If you have any questions or you would like to discuss your draft response to this Request for Additional Information, please contact Stephen Amirault, at 407-897-2942 or by email at [stephen.amirault@dep.state.fl.us](mailto:stephen.amirault@dep.state.fl.us).

Sincerely,



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F. Thomas Lubozynski, P.E.  
Waste and Air Resource Programs Administrator

January 13, 2015

Date

cc:

Ms. Roberta Molignaro, HSE Manager, SAPA Precision Tubing ([Roberta.molignaro@sapagroup.com](mailto:Roberta.molignaro@sapagroup.com))

Mr. Don Kramer, Technical Manager, SAPA Precision Tubing ([don.kramer@sapagroup.com](mailto:don.kramer@sapagroup.com))

Mr. Thomas Cozzie, T. Cozzie Consulting, Inc. ([tcozzie@tcozzie.com](mailto:tcozzie@tcozzie.com))