FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Allied Molded Products, LLC
1145 13th Avenue East
Palmetto, FL 34221

Authorized Representative:
Mr. William Harvey

Air Permit No. 0810203-006-AC
Permit Expires: 07/01/2014
Minor Air Construction Permit
Increase Emission Limits

This is the final air construction permit to authorize increased emission limits at the existing facility. The increased emission limits will be incorporated into Title V Renewal Permit No. 0810203-007-AV. The proposed work will be conducted at the Allied Molded Products, LLC fiberglass parts manufacturing plant (Standard Industrial Classification No. 3089). The facility is located in Manatee County at 1145 13th Avenue East in Palmetto, Florida. The UTM coordinates are Zone 17, 346.8 km East, and 3045.4 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Kelley M. Boatwright

Kelley M. Boatwright
District Air Program Administrator
Southwest District

03/17/2014
Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination), the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

William Harvey, Allied Molded Products, LLC, (bharvey@alliedmolded.com)

Kenneth E. Given, P.E., Air Testing & Consulting, Inc., (ken@airtest.fdn.com)

Erin DiBacco, SWD Compliance Assurance Program Team Leader Manager (erin.dibacco@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Rhonda Hughes 3/17/2014

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility manufactures fiberglass products such as aeration tanks, planters, trash receptacles, electrical box pads, and pump house covers in four buildings designated as Building No.1, Building No. 2, Building No. 3, and a Shed.

The activities conducted in the 4 buildings are generally described and located as follows (not to scale):

SHED – The shed is divided into Sections 1 through 3 from east to west.

- Section 1 conducts assembly operations and has an opening on the north and south sides.
- Section 2 conducts hand layup repair, assembly, and has a holding area along with having an opening on the north and south sides.
- Section 3 conducts trim and cutting operations along with having an open north side and an exhaust fan with a fiber filter on the south wall. On the outside of the western side of the shed is an acetone recovery still.

BUILDING NO. 1 – This building is divided into Sections 1 - 6 from east to west.

- Section 1 is divided with an office on the north half and an employee break room on the south half.
- Section 2 conducts assembly operations (add bottoms to units). This section has a door opening on north and south sides along with an exhaust fan with a fiber filter on the north side.
- Section 3 conducts trimming operations (cutting & grinding). This section has a door opening on the south side and an exhaust fan with a fiber filter on the north side.
- Section 4 conducts lamination operations (Resin, Gelcoat, add chop, hand layup) in an area approximately 75 feet by 39 feet. This section has 1 door opening on the north side and 3 door openings on the south side. Emissions from this section are vented to 2 exhaust fans located on the north side. Each fan has a design airflow rate of 16,680 acfm and has a fiber filter. The fans exhaust through their own 25 foot high stack.
- Section 5 conducts gelcoat operations in an area approximately 25 feet by 39 feet. This section has a door opening on the south side. Emissions from this section are vented to an exhaust fan located on the north side. The fan has a design airflow rate of 16,680 acfm and has a fiber filter. The fan exhausts through its own 25 foot high stack.
- Section 6 conducts lamination operations (Resin, Gelcoat, add chop, hand layup) in an area approximately 25 feet by 39 feet. This section has a door opening on the south side. Emissions from this section are vented to an exhaust fan located on the north side. The fan has a design airflow rate of 16,680 acfm and has a fiber filter. The fan exhausts through its own 25 foot high stack. On the outside of the western wall of Building No. 1 is a resin storage tank.

BUILDING NO. 2 – This building is divided into Sections 1 – 6 from east to west.

- Section 1 is the main office.
- Section 2 contains the Shipping Department, which conducts buffing, cleaning, packaging, etc. This section has a door opening on the south side.
- Section 3 conducts resin and gelcoat parts repair operations, such as touch-ups.
- Section 4 conducts assembly operations (put units together, some hand layup). This section has a door opening on the south side. This section also shares with Section 5 an exhaust fan with fiber filter on north side.
- Section 5 conducts mold repair operation (touchup with putty, some sanding, etc.). This section has a door opening on the south side. This section also shares with Section 4 an exhaust fan with fiber filter on the north side.
- Section 6 contains a wood shop for cutting such items as plywood and wood 2x4's. This section has a door opening on the south side.

BUILDING NO. 3 – This building is divided into Sections 1 - 4 from east to west.

- Section 1 conducts lamination operations (Resin, Gelcoat, add chop, hand layup) in an area approximately 50 feet by 60 feet. This section has 2 door openings on the south side. Emissions from this section are vented to 2 exhaust fans located on the north side. Each fan has a design airflow rate of 16,680 acfm and has a fiber filter. The fans exhaust through their own 25 foot high stack.
- Section 2 also conducts lamination operations in an area approximately 17 feet by 60 feet. This section has 1 door opening on the south side. Emissions from this section are vented to an exhaust fan located on the north side. The fan has a design airflow rate of 16,680 acfm and has a fiber filter. The fan exhausts through its own 25 foot high stack.
- Section 3 conducts assembly and trim operations. This section has a door opening on the south side.
- Section 4 is divided with an assembly operation on the southern 2/3 of the section and a painting room (see Appendix I-1) on the northern 1/3 of the section. The southern side of this section has a door opening. Emissions from the painting room are vented to an exhaust fan with a fiber filter located on the north side. The fan, although designed with an airflow rate of 16,680 acfm, is physically modified to operate at 8,340 acfm and exhausts through its own 25 foot high stack. The painting room is exempt from 40 CFR 63, Subpart PPPP – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, since less than 100 gallons per year of paint containing hazardous air pollutants (HAPs) is used per 40 CFR 63.4481(b).

Hand-held powered tools are equipped with collectors, as appropriate. The particulate emissions generated inside the buildings are controlled by the vacuum bag collectors connected to the hand-held tools, by portable "shop-vac" vacuum collectors as needed, and normal "good housekeeping" procedures. These careful "good housekeeping practices" which provide control of unconfined particulate emissions are implemented to prevent contamination of the molds and the fiberglass and gelcoat surfaces.

This facility is subject to the requirements of 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

Compliance Assurance Monitoring (CAM) is not applicable for this emission unit, since there is no control device.

The existing facility consists of the following emissions unit (EU).

Facility ID No. 0810203	
EU ID No.	**Emissions Unit Description**
001	Miscellaneous Fiberglass Products Manufacturing

Project Description and Affected/Proposed Emission Units

The applicant requests increases in permitted emissions of VOC (from 45.6 to 60.0 tons per year) and styrene (from 37.5 to 50.0 tons per year). This project also makes minor language changes to the general unconfined particulate matter emissions controls and adds outdoor sandblasting to the list of insignificant operations. This project will modify the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Miscellaneous Fiberglass Products Manufacturing

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Sources/Activities

- The following activities are considered insignificant and are therefore exempt under Rule 62-213.430(6), F.A.C. (Insignificant Emissions Units or Pollutant –Emitting Activities)

1. Acetone handling in 55 gallon drums
2. Storage and handling of MEK: store 6-8 gallons in jugs
3. Acetone recovery unit
4. Paint Spray Booth (Paint Room)
5. A small quantity of natural gas or propane fuel for space heating may be used at the facility.
6. Chemicals/materials used for research/development, quality control evaluation, cleanup materials, propellants, mold care/cleaners, and adhesives that emit air pollutants at the facility that are used on a non-routine basis. A "non-routine basis" means for these activities/operations, when a chemical/material is used less than 100 pounds/year as determined from purchase logs/records.
7. Activities involving the cutting, sanding, or trimming of fiberglass, wooden, or foam parts, where not performed by hand tools (trivial list activity) or in the area utilizing a vacuum collector (e.g., "shop vac") venting internally to the building. These activities are to be conducted under Good Work Practice Standards.
8. Resin Storage Tank
9. Outdoor Sandblasting Activity

Exemptions under Rule 62-213.430(6), F.A.C. (Insignificant Emissions Units or Pollutant –Emitting Activities), may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

This permit modifies emissions limits in Title V Operation Permit No. 0810203-005-AV. Also reference concurrently processed Title V Operation Permit No. 0810203-007-AV that incorporates the modifications in the renewal of Title V Operation Permit No. 0810203-005-AV.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions;

d. Appendix D. Common Testing Requirements; and

e. Appendix E. Unified Emission Factors for Open Molding of Composites

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical

change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Application for Title V Air Operation Permit - This permit authorizes modification of the permitted emissions unit. Title V Air Operation Permit Renewal No. 0810203-007-AV, being processed concurrently with this permit, will permit continued operation of the emissions unit.
[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

8. Unconfined Particulate Matter - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320(4)(c), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, or industrial related activities such as loading, unloading, storing, and handling of material including ash from the incinerator. Applicable reasonable precautions to be taken included the following:

a. Paving and maintenance of roads, parking areas and yards, when necessary.

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

c. Application of water or non-hazardous chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.

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

e. Landscaping or planting of vegetation.

f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.

g. Confine abrasive blasting where possible.

[Rule 62-296.320(4)(c), F.A.C., Permit Application received 1/13/2014]

A. EU No. 001 Miscellaneous Fiberglass Products Manufacturing

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Miscellaneous Fiberglass Products Manufacturing – The manufacture of fiberglass products such as aeration tanks, planters, trash receptacles, electrical box pads, and pump house covers.

PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements - This emission unit is subject to 40 CFR 63, Subpart A – General Provisions and 40 CFR 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production; which are adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-204.800, F.A.C.]

A.2. Operation Limitations - The permittee shall comply with the following:

a. Except for the painting room's exhaust fan with a 25 foot high stack, the other seven fans with 25 foot high stacks shall each have a minimum exhaust airflow rate of 15,012 acfm (16,680 x 0.9). There shall be no device that restricts the exhaust exiting the stacks, i.e., rain cap.

b. The painting room's fan with a 25 foot high stack shall have a minimum exhaust airflow rate of 7,956 acfm (8,840 x 0.9). There shall be no device that restricts the exhaust exiting the stack, i.e., rain cap.

c. All exhaust fan intakes shall not be obstructed, except for fiber filters that are used.

[Rule 62-296.320(1), F.A.C.; Construction Permit No. 0810203-001-AC]

A.3. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

EMISSIONS STANDARDS

A.4. Emissions shall not exceed the following: -

Pollutant	Tons per any consecutive 12-month period
Styrene	50.0
Total VOCs, which includes styrene and methyl methacrylate (MMA).	60.0

[Rule 62-210.200, F.A.C. ("Potential to Emit"); Permit Application received 1/13/2014]

COMPLIANCE TESTING REQUIREMENTS

A.5. Compliance Tests - During each federal fiscal year (October 1st to September 30th), emissions unit EU No. 001 shall be tested to demonstrate compliance with the requirements of Specific Condition A.2. Velocity testing shall be performed to determine the fan exhaust airflow rate (acfm) from:

a. The 25 foot high stack associated with the painting room in Building No. 3.

b. Two of the other seven 25 foot high stacks. The 2 stacks selected each year shall be different from the stack(s) tested in previous years until a complete sequence of the 7 stacks has been completed. For example, test Stacks 1&2, then Stacks 3&4, then Stacks 5&6, then Stacks 7&1, then Stacks 2&3, etc.

Note: the Department reserves the right to designate a different or additional fan(s)/stack(s) to be tested during the test day(s).

[Rules 62-204.800, 62-297.310 and 62-4.070(3), F.A.C.; Construction Permit No. 0810203-001-AC]

A.6. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.7. Compliance Test Methods - Required compliance tests shall be performed in accordance with the following reference methods.

Methods	Description of Method and Comments
1-2	Traverse Points, Velocity and Flow Rate

The above methods are described in Appendix A of 40 CFR 60 and are 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. Testing should be conducted prior to normal replacement of the associated fiber filter being changed.

[Rules 62-204. 800 and 62-4.070(3), F.A.C.; Appendix A of 40 CFR 60; Construction Permit No. 0810203-001-AC]

NOTIFICATION REQUIREMENTS

A.8. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9, F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.9. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. The velocity test reports shall be submitted to the Air Compliance Section of this office within 45 days of testing. Be sure at least 1 recent month of logs/records as required by Specific Condition No. A.10. are attached to the test report(s). Additionally, provide the date the associated fiber filter for the fan/stack tested was last changed along with a statement of the condition (dust loading) of the filter.
[Rule 62-297.310(8), and 62-4.070(3), F.A.C.]

A.10. Daily and/or Monthly Log for HAP and VOC - In order to document compliance with Specific Condition No. A.4, the permittee shall record the following monthly:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Allied Molded Products, LLC, 0810203, EU 001, Miscellaneous Fiberglass Products Manufacturing);

b. date;

c. identity and quantity of each resin, coating, solvent, chemical, etc. used at the facility that contains styrene, MMA, and VOCs;

d. the appropriate emission factor(s) along with the application method(s) used to determine styrene, MMA, and VOC emissions;

e. total tons of styrene emissions for the month;

f. total tons of MMA emissions for the month;

g. total tons of VOC emissions for the month;

h. total tons of styrene emissions for the most recent consecutive 12-month period;

i. total tons of MMA emissions for the most recent consecutive 12-month period; and

j. total tons of VOC emissions for the most recent consecutive 12-month period.

Usage of materials may be based upon an inventory at the beginning of the month, receipt of material during the month and inventory of the materials at the end of the month provided the material is not used in multiple application methods with different emission factors.

Supporting documentation such as styrene/HAP/VOC content, styrene/HAP/VOC emission factors used, MSDS sheets, purchase orders, "As Supplied" data sheets, etc. shall be kept for each chemical and associated products, which includes sufficient information to determine emissions.

Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle).

If any month results in total VOC and/or styrene emissions being within 10% of its allowable emission limit for the prior consecutive 12-month period, the monthly log required above shall then be kept daily. The daily logs shall include a cumulative 12-month emission total to demonstrate compliance with the emission limitation.

The monthly logs shall be completed within 30 days after the end of each month. Daily logs (if required) shall be completed within 3 business days. All records shall be maintained at the facility in a form suitable for inspection by the Department upon request and shall be retained for at least a five (5) year period.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0810203-001-AC]

A.11. Emission Calculation Requirements - Emissions of styrene, Methyl methacrylate (MMA), and other volatile organic compounds (VOCs) shall be determined as follows:

Material Usage Rate x Species Concentration* x Emission Factor* = Species Emission Rate

* Styrene and MMA emission factors shall be determined in accordance with the attached Unified Emission Factors for Open Molding of Composites table dated July 23, 2001.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0810203-001-AC]

A.12. Filter Logs - In order to document reasonable precautions to prevent emissions of unconfined particulate matter, the permittee shall keep a log documenting the date each fan's filter was changed along with the operator's signature.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0810203-001-AC]