TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

FRS Hose Extrusion Group
1921 North Broad Street
Lexington, Florida 38351

Fluid Routing Solutions

Facility ID No. 0830007

PROJECT

Project No. 0830007-010-AF
Application for Synthetic Minor Air Operation Permit
Project Name: Initial FESOP Permit

COUNTY

Marion County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

May 30 and 31, 2012 and June 1, 2012

Prepared by Jeff Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. <u>Project Description:</u>

A. Applicant:

Mr. Tim Parys, President
FRS Hose Extrusion Group
1921 North Broad Street
Lexington, TN 38351

B. Professional Engineer:

Mr. John F. Perella, P.E.
ARCADIS
14025 Riveredge Drive, Suite 600
Tampa, FL 33637

C. Project Location:

Fluid Routing Solutions
3100 SE Maricamp Road
Ocala, FL 34471

D. Project Summary:

This is the initial FESOP for this facility. It was previously permitted under Title V permit 0830007-009-AV; however, due to decreased production and substitution of non-VOC materials, the estimated emissions are below major source thresholds.

E. Application Information:

Application Received on: 01/30/2012
Additional Information Requested on: 02/27/2012
Additional Information Received and application Complete on: 02/28/2012

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Unconfined particulate matter emissions from vehicular traffic on paved and unpaved roads; and construction activities. The visible emissions for EU 001 are limited to less than 5 percent opacity. An exceedance of this limit may subject the EU 001 to a Method 5 stack test and Rule 62-296.320(4)(a)2., F.A.C., Process Weight Table 62-296.310-1, F.A.C.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards	Y	Facility is a source of VOC.
Rule 62-296.500, F.A.C. - Reasonably	N	Marion County is an attainment

Subject to:	Y/N	Comments
Available Control Technology (VOC)		area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is a synthetic minor Title V source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	Visible emission testing for EU 001.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
Total HAPS	Facility	7.99***	Less than 10.0
Single HAP	Facility	2.6***	Less than 5.0
VOC	Facility	15.02***	Less than 20.0
NOX	Facility	21.04*	
CO	Facility	17.67*	
PM	Facility	8.22**	
SO_2	Facility	0.13*	

* Emissions from 2 boilers
** Emissions from 2 boilers and Rubber Mixing Process
*** based on production limits in the permit

IV. Federal NSPS and/or NESHAP Provisions

No applicable regulations

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).