Florida Department of
Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested

DRAFT PERMIT

PERMITTEE

FRS Hose Extrusion
1921 North Broad Street
Lexington, TN 38351

Authorized Representative:
Mr. Tim Parys, President

Air Permit No. 0830007-010-AF
Permit Expires: 07/30/2017
Site Name: Fluid Routing Solutions
Federally Enforceable State Operating Permit (FESOP)
Project Name: Initial FESOP

This is the final air operation permit, which authorizes an initial FESOP as a result of the reduction of the facility's pollutant emissions to a level lower than the major thresholds of Title V permitting. The facility is Fluid Routing Solutions (Standard Industrial Classification No. 3052). The facility is located in Marion County at 3100 Maricamp Road in Ocala, Florida. The UTM coordinates are Zone 17, 393.3 km East, and 3230 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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.

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 Orange County, Florida

DRAFT

_____ _____

Caroline D. Shine
District Air Program Administrator
Central District

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 June 1, 2012 to the persons listed below.

Mr. Tim Parys, President-FRS Hose Extrusion Group: tim.parys@fluidrouting.com
Mr. Pat Shallow, Plant Manager, Fluid Routing Solutions: pat.shallow@fluidrouting.com
Mr. T. Brad Ray, Environmental Representative: brad.ray@fluidrouting.com
Mr. John Perella, P.E., ARCADIS, John.Perella@ARCADIS-us.com
Mr. Jonathan Holtom, DARM Office: Jonathan.Holtom@dep.state.fl.us
Ms. Ana Oquendo, U.S. EPA Region IV: oquendo.ana@epamail.epa.gov
Ms. Barbara Friday, DEP BAR: Barbara.Friday@dep.state.fl.us

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

DRAFT

_____ June 1, 2012
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

The Fluid Routing Solutions facility consists of a rubber hose manufacturing plant. The existing facility consists of the following operations: a rubber mixing process; two steam boilers; rubber curing and internal hose making operations; and mandrel treating consisting of spray coating operations. Plant-wide fugitive emissions are also included.

The existing facility consists of the following emissions units:

Facility ID No. 0830007	
ID No.	Emission Unit Description
EU001	Rubber mixing process
EU002	Two steam boilers (previously four steam boilers)
EU003	Curing and internal hose making
EU005	Mandrel treating

[Permitting Note: Note: Two steam boilers (EU 002 (previously four steam boilers)) have been removed from the facility. Former Emission Unit EU 004 (lead cover extrusion process) has been removed from the facility.]

Project Description

The purpose of this FESOP is to establish federally enforceable limitations on the facility and affected emissions units that will effectively change the status of the facility to non- Title V. As a result of the removal of equipment, substitution of non-volatile organic compound (VOC) materials, and establishing production limits, the facility's overall pollutant emissions have been reduced to a level significantly lower than the major thresholds of Title V permitting.

Exempt Emission Units/Activities

The following units are exempt from permitting per 62-210.300(3)(a)(2)&(3), F.A.C.:

1 Hose Braid Operation
2 Spray Lubricants and Spray Paints
3 Brake Cleaner
4 Brazing, Soldering or Welding Equipment
5 QA/QC and R&D Laboratory Chemicals & Testing Fluids
6 Lift Trucks
7 Vacuum Pumps in Labs
8 Aboveground Oil Storage Tank Farm
9 Flammable Liquid & Non Halogenated Solvent Storage
10 Impulse Room
11 Facility Maintenance Chemicals
12 Emergency Power Generators
13 55-gallon drum Storage containing #2 fuel oil & Boiler Chemicals in Boiler Room
14 Boiler condensate knock-out drums & atomizer
15 Chiller Equipment
16 Hazardous waste Drum Storage Area

17 Cafeteria Vents
18 Cooling Tower
19 Substitute compound pilot testing on Production Floor
20 Petroleum Lubrication Systems
21 Application of fungicide, Insecticide or herbicide
22 Diesel firewater pumps
23 Natural gas warming oven (350,000 BTU/hr)
24 Natural gas burn off oven (230,000 BTU/hr)

FACILITY REGULATORY CLASSIFICATION

- The facility is no longer a major source of hazardous air pollutants (HAP). As a result of the removal of equipment, substitution of non-volatile organic compound (VOC) materials, and establishing production limits, this facility is a synthetic non-Title V source HAPs, and any individual HAP
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C., but was previously classified as a Title V major source..
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

This project is the Federally Enforceable State Operating Permit No. 0830007-010-AF for the facility. It replaces Permit No. 0830007-009-AV.

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Air Resource Management Section. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767 Telephone: 407-897-4100

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

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Air Resource Management Section (see above mailing address and phone number).

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; and
   d. Appendix D. Common Testing Requirements.

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. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
   [Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

   c. copies of the most recent compliance test reports required by Specific Condition No. B.4., if not previously submitted.

   [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. FACILITY-WIDE CONDITIONS

EMISSIONS LIMITATIONS

A.1. Facility-Wide Emissions Limitations: The **facility-wide** emissions are limited to the following:

Pollutants	Tons per any consecutive 12-month period
Total VOCs	less than 20.0
Total HAPs	less than 10.0
Individual HAPs	less than 4.0

[Rule 62-21 0.200, (PTE), F.A.C.]

RECORDS

A.2. Monthly Log: In order to demonstrate compliance with operating condition number A.1., the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Monthly

a) designation of the month and year of operation for which the records are being tabulated;
b) consecutive 12-month total of VOC emissions;
c) consecutive 12-month total HAP emissions; and
d) consecutive 12-month total of each individual HAP emissions

[Rule 62-4.070(3), F.A.C.]

The monthly logs shall be completed by the end of the following month.
Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12-months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month.

A.3. Additional Recordkeeping Requirements: Records specified in Specific Condition No. A.2. (previous condition) must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations and available for review on site by the Department.
[Rule 62-4.070(3), F.A.C.]

A.4. Supporting Documentation: Supporting documentation (chemical usage tracking logs, "As Supplied" sheets, "As Applied" sheets, MSDS sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions for a minimum of five (5) years and made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). [Rule 62-4.070(3), F.A.C.]

B. EU No. 001 – Rubber Mixing Process

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	This Emission Unit consists of raw material mixing and hose and rubber forming operations. Bags of raw materials are first mixed in bins according to product recipes. The raw materials are primarily in dry powder form and consist of: synthetic rubber, magnesium oxide, chlorinated polyethylene resin, calcium carbonate, copolymers, and curing agents. The raw materials are then mixed with trioctyl trimellitate and carbon black, and then sent to a Banbury mill process to compress and form the hose. In addition, some mixed raw material is periodically sent to a separate Calendar mill to produce rubber used in hose inter layers. Emissions from the raw material mixing and Banbury mill processes are vented to a DCE Datamatic baghouse, which has an air to cloth ratio of 7 to 1 and a particulate matter reduction efficiency of 99.9% Emissions from the Calendar mill are vented to a Sly Dynaclone Type B baghouse, which has an air to cloth ratio of 2 to 1 and a particulate matter reduction efficiency of 99.9%

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity: The maximum permitted process rate per any consecutive 12-month period is 7,161 tons.
[Permit Application dated 01/27/2012 and Rule 62-210.200(PTE), F.A.C.]

B.2. Restricted Operation: The maximum hours of operation of for this emission unit are limited to 7,488 hours per any consecutive 12-month period.
[Permit Application dated 01/27/2012 and Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

B.3. Visible Emissions (VE) Standard: The visible emissions for this emission unit are limited to less than 5 percent opacity. An exceedance of this limit may subject the emission unit 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.

In the case of an emission unit which has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse, the Secretary or the appropriate Director of District Management may waive any particulate matter compliance test requirements for such emission unit specified in any otherwise applicable rule, and specify an alternate standard of 5 percent opacity. The waiver of compliance test requirements for a particulate emissions unit equipped with a baghouse, and the substitution of the visible emissions standard, shall be specified in the permit issued to the emissions unit. If the Department has reason to believe that the particulate weight emission standard applicable to such an emissions unit is not being met, it shall require that the compliance be demonstrated by the test method specified in the applicable rule. [Rule 62-296.620(4) F.A.C.]

TESTING REQUIREMENTS

B.4. Compliance Tests EU001 shall be tested for visible emissions prior to renewal. [Rule 62-297.310, F.A.C.]

B.5. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

B.6. Test Notification: The permittee shall notify the Compliance Authority 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. [Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

B.7. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(8), F.A.C.]

B.8. Monthly Log: In order to demonstrate compliance with operating condition numbers A.1., B.1. and B.2., the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Monthly
a) designation of the month and year of operation for which the records are being tabulated;
b) consecutive 12-month total of hours of operation;
c) consecutive 12-month process rates

[Rule 62-4.070(3), F.A.C.]

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-

to-date total. Facilities that have not been operating for 12-months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month.

C. EU No. 002 Two Steam Boilers

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
002	(2) Cleaver Brooks natural gas fired boilers, Model CBLE700-600, each with a heat input rating of 25 MMBTU/hr, each equipped with low NOx burners. The boilers are used to provide steam for the hose curing and production process. The boilers also burn low-sulfur #2 fuel oil as an emergency back-up fuel.

PERFORMANCE RESTRICTIONS

C.1. Authorized Fuel: Each of the two boilers is allowed to fire natural gas as a primary fuel. Each boiler is permitted to fire No. 2 fuel oil with a maximum sulfur content of 0.05 percent, by weight as an emergency back-up fuel.
[Permit Application dated 01/27/2012 and Rule 62-210.200, (PTE), F.A.C.]

C.2. Restricted Operation: The hours of operation of are not limited when using natural gas (8,760 hours per year). The two boilers may each fire fuel oil for a maximum of 200 hours (each boiler) per consecutive 12 months.

[Permit Application dated 01/27/2012 and Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

C.3. BACT Determined by DEP:
The amount of particulate and sulfur dioxide emissions from each boiler will be limited by the firing of natural gas or fuel oil containing no more than 0.05 percent sulfur by weight.
[Rule 62-296.406(2)&(3), F.A.C. and permit 0830007-004-AC]

C.4. Visible Emissions Standard. Visible emissions shall not exceed 20% opacity except for one two minute period per hour during which opacity shall not exceed 40%.
[Rule 62-296.406(1), F.A.C.]

RECORDS AND REPORTS

C.5. Monthly Recordkeeping Requirements: In order to demonstrate compliance with Specific Condition Nos. A.1., C.1., and C.2., the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded and made available to the Department upon request. The log shall contain the following:

Monthly
a) designation of the month and year of operation for which the records are being tabulated
b) Total amount of natural gas used (fired), in million cubic feet,
c) Total amount of new no. 2 fuel oil used (fired), in gallons,
d) Total operational hours for each boiler when using new no. 2 fuel oil (fired).

e) Fuel oil analysis of the sulfur content, percent by weight, of the fuel oil used. (See specific Condition No. C.7.)

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12-months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month.
[Rule 62-4.070(3), F.A.C.]

C.7. Fuel Sulfur Content Records: In order to demonstrate ongoing compliance, the permittee shall maintain fuel supplier documentation of fuel oil sulfur content, by weight, for each shipment of fuel oil. The fuel sulfur content for liquid fuels shall be evaluated using ASTM methods ASTM D4057-88 and one of the following ASTM D2622-94, ASTM D4294-90(95), ASTM 1552-95, ASTM D1266-91, ASTM D129-95 or latest editions. Alternately, after written notification to and approval from the Permitting Authority, the permittee may use other DEP Air Program-approved methods, i.e. alternate sampling procedures, for sulfur in petroleum products.
[Rules 62-210.300(3)(c)1.c. and 62-297.440, F.A.C.]

D. EU No. 003 Rubber Curing and Hose Making

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
003	This Emission Unit consists of rubber curing and hose making processes. The emission unit contains hose extruding, braiding, and labeling operations, and four steam vulcanizers used for hose curing. Emissions from this emission unit are primarily fugitive emissions vented into the building, and through roof vents from the vulcanizer process area.

PERFORMANCE RESTRICTIONS

D.1. Permitted Capacity: The maximum permitted process rate per any consecutive 12-month period is 7,161 tons.
[Permit Application dated 01/27/2012 and Rule 62-210.200(PTE), F.A.C.]

D.2. Restricted Operation: The maximum hours of operation of for each emission unit are limited to 7,488 hours per any consecutive 12-month period.
[Permit Application dated 01/27/2012 and Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS AND LIMITATIONS

D.3. Visible Emissions (VE) Standard: The visible emissions for this emission unit are limited to less than 20 percent opacity.
[Rule 62-296.320(4)(b) F.A.C.]

RECORDS AND REPORTS

D.4. Daily and/or Monthly Log: In order to demonstrate compliance with operating condition numbers A.1., D.1., and D.2.., the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Monthly
a) designation of the month and year of operation for which the records are being tabulated;
b) consecutive 12-month total hours of operation; and
c) consecutive 12-month process rates
[Rule 62-4.070(3), F.A.C.]

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12-months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]

E. EU No. 005 Mandrel Treating

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
005	This Emission Unit consists of hose mandrel treating processes. The emission unit contains two spray booths which spray coatings on the hose mandrels. One of the spray booths uses VOC –containing coatings (containing tetrachloroethylene, and xylene), the second booth uses non-VOC coatings Emissions from this emission unit are vented from the building through individual stacks from each spray booth.

PERFORMANCE RESTRICTIONS

E.1. Permitted Capacity: The maximum permitted process rate per any consecutive 12-month period is 7,161 tons.
[Permit Application dated 01/27/2012 and Rule 62-210.200(PTE), F.A.C.]

E.2. Restricted Operation: The maximum hours of operation of for each emission unit are limited to 7,488 hours per any consecutive 12-month period.
[Permit Application dated 01/27/2012 and Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

E.3. Visible Emissions (VE) Standard: The visible emissions for this emission unit are limited to less than 20 percent opacity.
[Rule 62-296.320(4)(b) F.A.C.]

RECORDS AND REPORTS

E.4. Daily and/or Monthly Log: In order to demonstrate compliance with operating condition numbers A.1., E.1., and E.2., the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Monthly
a) designation of the month and year of operation for which the records are being tabulated;
b) consecutive 12-month total hours of operation; and
c) consecutive 12-month process rates
[Rule 62-4.070(3), F.A.C.]