Title V Air Operation Permit Renewal
Permit No. 0830104-008-AV

APPLICANT

The applicant for this project is A.S.A. Manufacturing, Inc. The applicant's responsible official and mailing address are:

Todd DuPlessis, President
A.S.A. Manufacturing, Inc.
14879 SW 111th Street
Dunnellon, Florida 34432-4734

FACILITY DESCRIPTION

The applicant operates the A.S.A. Manufacturing facility, which is located in Marion County at 14879 SW 111th Street in Dunnellon, Florida.

The facility is a fiberglass products manufacturing facility that produces fiberglass drains/sumps swimming pools, fiberglass wall panels for water parks, and other miscellaneous fiberglass products.

PROJECT DESCRIPTION

The purpose of this project is to issue a renewal of the Title V Operation Permit, No. 0830104-008-AV for the above referenced facility. Details of the project are provided in the application.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal was received October 20, 2014
Additional Supporting Information received via email November 12, 2014

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is 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.). The emission levels are above threshold levels for Title V for individual HAPs and Total HAPS.

PSD: The facility is not a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility is subject to NESHAP regulations, 40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility since there are no control devices in place.

PROJECT REVIEW

To issue a renewal of the Title V operation permit for the fiberglass products manufacturing facility which was constructed in accordance with air Title V construction permit 0830104-003-AC.

This operation permit renewal made the following significant changes to the operation permit:

- The original PTE annual TPY calculations used 7,488 hours per year instead of 8,760 hours per year. Therefore, the hours of operation (Specific Condition A.1) was changed from 8,760 hours/year to 7,488 hours/year.
- As a result of the Department's inspection in March 2014, the facility changed methods of tracking from beginning/ending inventories to a delivery method. Therefore, the VOC recordkeeping requirements (Specific Condition A.6) was changed to reflect this basis for tracking.
- Added an insignificant item #4 to Appendix H:
    - Application of mold release agent and polyvinyl alcohol (PVA) application using spray gun (total of <0.12 tons of VOC per year based on annual usage amounts).

Summary of Emissions:

Pollutant	EU No.	Potential Emissions* (tons per year)	Allowable Emissions
VOC	-001	48.7	48.7
Total HAP	-001	35.8	35.8
Individual HAP (Styrene)	-001	34.1	34.1

*PTE calculations from Construction Permit 0830104-003-AC Application, Attachments B-1, B-3, and B-5, circa 2004 (re-submitted via email on November 12, 2014). PTE calculations are based on 7,488 hours of operation per year and on the UEF Table (see Appendix G).

CONCLUSION

This project is to issue a renewal of the Title V air operation permit, No. 0830104-008-AV. This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.