FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

DRAFT PERMITS

PERMITTEE

AquaWorx Incorporated
10450 66th Street North, Suite 3
Pinellas Park, Florida 33782

Authorized Representative:
Mr. Steve Hamilton, President

Air Permit Nos. 1030449-005-AC
1030449-006-AO
Permits Expire: 12/31/2014 (AC)
xx/xx/20xx (AO)
Minor Air Construction and Operation Permits
Fiberglass Products Manufacturing Facility

These are the final air construction and operation permits, in one document. Construction Permit 1030449-005-AC is for an increase in emissions limits due to expansion of fiberglass products manufacturing operations beyond limits allowed in the previously issued air general permit 1030449-004-AG. Operation Permit 1030449-006-AO is for operation of a synthetic minor area source fiberglass products manufacturing facility. The proposed work is conducted at the AquaWorx Incorporated fiberglass products manufacturing plant (Standard Industrial Classification No. 3089). The facility is located in Pinellas County at 10450 66th Street North in Pinellas Park, Florida. The UTM coordinates are Zone 17, 329.52 km East, and 3083.73 km North. As noted in the Final Determination provided with these final permits, no changes or only minor changes and clarifications were made to the draft permits.

This final document is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

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

These air pollution permits are 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 these permits. 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 these final permits, 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

DRAFT

_____ _____

Kelley M. Boatwright Effective Date
Permitting & Waste Cleanup Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permits 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 to the persons listed below.

Steve Hamilton, President, AquaWorx Incorporated, (Kathy@AquaWorxUSA.com)

Tom T. John, P.E., Tom John Professional Engineer, Incorporated, (tjengr@msn.com)

Sherrill Culliver, Pinellas County Air Quality Division, (sculliver@co.pinellas.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.

DRAFT

_____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

Aquaworx Incorporated manufactures fiberglass reinforced products, including architectural products and covers for equipment. The site is contained in a single 100.5 ft by 150.25 ft unit with-in a larger long rectangular building. Processes performed include resin lamination and gelcoating operations, fiberglass part trimming/grinding, putty/filler application, mold preparation and repair, general assembly and fiberglass mat and material cutting. The existing facility consists of the following emissions unit.

Facility ID No. 1030449

EU ID No.	Emission Unit Description
N/A	There are no current emission units listed for this facility as it has been operating under a general permit.

Project Description and Proposed Emission Unit

To increase emissions limits due to expansion of fiberglass products manufacturing operations beyond limits allowed in the previously issued air general permit 1030449-004-AG. The new limits will be 24 tons per year of Volatile Organic Compounds (VOC) and 24 tons per year total Hazardous Air Pollutants (HAP), of which no more than 9 tons per year will be contributed by a single HAP. This project will create the following emissions unit.

EU ID No.	Emission Unit Description
001	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

- Sanding, grinding, trimming and cutting fiberglass parts. [Rule 62-4.040(1)(b), F.A.C. (insignificant emissions)]

Exemptions under Rule 62-4.040(1)(b), F.A.C. (insignificant emissions), 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 not 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 not 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.
- This facility is a synthetic non-Title V source for the pollutants Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). The emission limitations and restriction on the type and amount of material, stored or processed in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces General Permit No. 1030449-004-AG and is the initial air operation permit for this facility.

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

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste 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 - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756
Telephone: 727-464-4422

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. 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 with a copy to Pinellas County Air Quality Division (Compliance 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 month of records/logs specified in Specific Condition No. **A.7.**

[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. EU No. 001 – Fiberglass Products Manufacturing

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

EU ID No.	Emission Unit Description
001	Fiberglass Products Manufacturing – Styrene based gelcoat, when used, is applied to a mold via atomized spray methods. Resin and fiberglass lamination are applied by hand or by atomized spray. When the gelcoat has sufficiently hardened, fiberglass material is placed in the mold and polyester resin is applied to the glass by hand or by atomized spray methods, saturating the fiberglass. The part is built up in layers until the required thickness is achieved. After curing the part is removed from the mold. Excess material is trimmed from the part and imperfections are removed by grinding and re-applying gelcoat and/or resin. Empty molds are cleaned and prepared for return to lamination using waxes, release agents and other solvent based materials. The building is exhausted by numerous relocatable box type fans in the work area, discharging horizontally into the building.

PERFORMANCE RESTRICTIONS

A.1. 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.2. VOC/HAP Emission Limitations - In order to establish the facility as a non-Title V minor source of VOC and HAP emissions, the following emission limits shall apply.

a. Hazardous Air Pollutants (HAPs) –

(1) Styrene emissions shall not exceed 9.0 tons in any 12 consecutive month period;

(2) Individual HAP emissions (other than Styrene) shall not exceed 9.0 tons in any 12 consecutive month period;

(3) Total combined emissions of all HAPs, including Styrene, shall not exceed 24.0 tons in any 12 consecutive month period.

c. Volatile Organic Compounds (VOC) - Total combined emissions of all VOC shall not exceed 24.0 tons in any 12 consecutive month period.

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit Application received 08-18-2014]

A.3. Unconfined Particulate Matter - In addition to the precautions to prevent unconfined particulate emissions listed in Common Condition No.9 of Appendix C, all fiberglass cutting, trimming, shaping and grinding operations producing significant PM emissions will be controlled by work practices (i.e., good housekeeping practices), including frequent cleaning of surfaces and tools and sweeping of floors. If necessary, portable "shop vac" type collectors will be used at the source and for clean-up. No device used for collection of particulates shall be allowed to directly discharge out of the building.
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit Application Received 08-18-2014]

A.4. Volatile Organic Compound Emissions and/or Organic Solvent Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

a. all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials;

b. perform mixing/blending operations with vessel lids in place when practical;

c. tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;

d. immediately confine and clean up VOC and/or solvent spills, and ensure wastes are placed in closed containers for reuse, recycling or proper disposal; and

e. used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.]

A.5. Objectionable Odor - No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-210.200 ("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code Section 58-178]

A.6. Emission Calculations - In order to document compliance with Specific Condition No. **A.2**., the permittee shall calculate emissions based on the following methodology:

Material Usage Rate (lbs) ***x*** Species Concentration (% by weight)* ***x*** Emission Factor (lbs emitted/lbs applied)* = Species Emission Rate (lbs)

* Styrene and methyl methacrylate (MMA) emission factors shall be determined in accordance with Appendix E - Unified Emission Factors (UEF) for Open Molding of Composites table dated July 23, 2001. Emission factors for any other VOC or HAP shall be 1.0 unless lower emission factors are approved by the Department in writing.
[Rules 62-4.070(3), F.A.C.; Construction Permit Application received 08-18-2014]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.7. Monthly VOC and HAP Recordkeeping - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition No. A.2. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased and the material is not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:

a. facility name, facility ID No., emission unit ID No., and description (i.e., AquaWorx, 1030449, E.U. No. 001, Fiberglass Products Manufacturing);

b. month, year, and method used for records (usage or purchase);

c. identity and monthly total quantity in gallons of each material (resin, gelcoat, solvent, etc.) that contains Styrene, HAPs, and/or VOC;

d. percentage by weight of each individual HAP (including Styrene) and VOC for each material identified in c., above;

e. appropriate emission factor(s), and method(s) of application (i.e., mechanical atomized, mechanical non-atomized) used to determine emissions;

f. monthly total of Styrene, other individual HAP, total HAP and VOC emissions (tons/month) based on c., d. and e. above; and

g. most recent 12 consecutive month period total of Styrene, other individual HAP, total HAP and VOC emissions (tons/12 consecutive month period) based on f. above.

The monthly logs shall be completed by the 15th of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each VOC and HAP containing material.

[Rule 62-4.070(3), F.A.C.; Construction Permit Application Received 08-18-2014]