TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Fiberglass Products Manufacturing Plant

Facility ID No. 1030449

PROJECT

Project No. 1030449-005-AC
Application for Minor Air Construction Permit
Project Name: Replacement of Air General Permit 10300449-004-AG

COUNTY

Pinellas County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air and Solid Waste Permitting
Southwest District Office
Temple Terrace, Florida 33637-0926

August 26, 2014

Prepared by Richard Spaulding, PE

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. Facility Description:

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.

II. Project Description:

A. Applicant:

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

B. Professional Engineer:

Tom T. John
Tom John, Professional Engineer, Incorporated
6250 Cape Hatteras Way #2
St. Petersburg, Florida, 33702

C. Project Location:
10450 66th Street North, Suite 3
Pinellas Park, Florida 33782

D. Project Summary:

To increase emissions limits due to expansion of fiberglass products manufacturing operations beyond limits allowed in previously issued air general permit 1030449-004-AG. The new emission 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. The construction permit changes the status of the facility to "synthetic minor", as further described in the permit.

E. Application Information:

Application Received on: 08/18/2014
Application Complete on: 08/18/2014

III. Applicable State and Federal Regulations

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 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
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	Sanding/grinding/cutting operations could be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Gelcoat and resin operations are a source of VOC and odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	Y	Pinellas County is an air quality maintenance 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 (NESHAPS – 40 CFR 61)	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	EU No. 001 is not subject to 40 CFR 63, Subpart WWWW as it is not a major source

Subject to:	Y/N	Comments
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required. Compliance is demonstrated via recordkeeping.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
PM/PM10	001 - Fiberglass Products Manufacturing	Insignificant	N/A
	Total	**N/A**	**N/A**
VOC	001 - Fiberglass Products Manufacturing	24	24
	Total	**24**	**24**
Total HAP	001 - Fiberglass Products Manufacturing	24	24
	Total	**24**	**24**
Individual HAP (styrene)	001 - Fiberglass Products Manufacturing	9	9
	Total	**9**	**9**
Individual HAP (MMA)	001 - Fiberglass Products Manufacturing	9	9
	Total	**9**	**9**
Individual HAP (ethanol)	001 - Fiberglass Products Manufacturing	9	9
	Total	**9**	**9**
VE Limitation			
VE	001 - Fiberglass Product Manufacturing		VE20

V. 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.

VI. 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, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

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).