FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

FINAL PERMIT

PERMITTEE

Spaulding Craft, Inc.
1053 Harbor Lake Drive
Safety Harbor, FL 34695

Authorized Representative:
Mr. Wayne Spaulding, President

Air Permit No. 1030465-004-AF
Permit Expires: xx/xx/xxxx
Federally Enforceable State Operation Permit (FESOP)
Project: FESOP Renewal

This is the final permit to renew Federally Enforceable State Operation Permit No. 1030465-003-AF for a polyester resin fabrication operation at Spaulding Craft (Standard Industrial Classification No. 3089). The facility is located in Pinellas County at 1053 Harbor Lake Drive in Safety Harbor, Florida. The UTM coordinates are Zone 17, 332.7 km East, and 3098.2 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this final permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise

statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this final permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

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 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 the date indicated below to the persons listed below.

Wayne Spaulding, Spaulding Craft, Inc. (columns@gte.net)

Marvin Scott, Environmental Engineering Consultants, Inc. (mscott@eec-tampabay.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.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility fabricates polyester resin products such as architectural columns and domes using various open (spray lay-up and flow coating) and closed (rotational) application methods as part of the fabrication process. The resin and gel coat materials used in the process contain the HAP styrene, while VOC and small amounts of the HAP toluene may be present in the clean-up solvents and other products used in the process. The facility also utilizes a paint spray booth and includes activities such as mechanical sanding, grinding, trimming, cutting and sand blasting as part of the fabrication process. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1030465	
EU ID No.	**Emissions Unit Description**
001	Polyester Resin Prods Fabrication Facility

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Sources/Activities

- Paint Spray Booth is exempt per rule 62-210.300(3)(b), Generic and Temporary Exemptions.
- Sanding, grinding, cutting and trimming activities are exempt per rule 62-210.300(3)(b) Generic and Temporary Exemptions.

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 VOC and HAP.

PERMIT HISTORY/AFFECTED PERMITS

This permit renews FESOP No. 1030465-003-AF.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air and Solid Waste Permitting Program. The mailing address, phone number and e-mail address 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
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above e-mail address and/or 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; 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 with a copy to Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of this 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 Nos. A.8. and A.9.

[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, Polyester Resin Prods Fabrication Facility

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

EU ID No.	Emissions Unit Description
001	Polyester Resin Prods Fabrication Facility – Polyester resin products such as architectural columns and domes are fabricated using various open (spray layup and flow coating) and close (rotational) application methods as part of the fabrication process. The resin and gel coat materials used in the process contain the HAP styrene, while VOC and small amounts of the HAP toluene may be present in the cleanup solvents and other products used in the process.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

A.2. VOC and/or OS Emissions Work Practice Requirements - No person shall 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 facility shall comply with the following:

a. In order to reduce and minimize emissions from coating operations, the permittee shall have written work practices in place that describe controlled spraying techniques, spray gun calibration procedures and waste minimization procedures.

b. Authorization to use the non-spray lay-up emission factors (Specific Condition No. A.9.) is contingent upon operation of the facility's fluid impingement technology (FIT) equipment at low pressure, resulting in a non-atomized spray. Low pressure is determined by multiplying the pump air pressure by the pump ratio. The resultant pressure should never be greater than 150 psi. The current equipment uses a 30 psi air setting with a pump ratio of 3:1, with a resultant tip pressure of 90 psi. To use the non-spray factor for any other non-spray equipment (flow coater or pressure-fed roller), verify that the resultant tip pressure is at or below 150 psi and utilize the following calibration procedure to verify the resultant spray is not atomized:

1. Verify that the resin is the correct temperature, and has been properly mixed within the manufacturer's specified period.
2. Verify that the spray tip is in good condition and suitable for producing flow rate range and fan pattern width for the given job.
3. Aim the spray gun at a disposable surface on the floor, maintaining a distance of 12" to 18" and perpendicular to the floor.
4. Turn the pump pressure down to zero and pull the trigger.
5. Slowly begin to increase the pressure in 10 psi increments until the fan pattern is adequate and not atomized.
6. Record this pressure in the spray gun set-up log for each piece of equipment.
7. Do not increase the pressure past this point. The result will be over-atomization, increased over-spray, and poor transfer efficiency.

c. 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.

d. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

e. Tightly cover or close all VOC and/or solvent containers when they are not in use.

f. Prevent excessive air turbulence across exposed VOC.

g. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a) F.A.C., Pinellas Co. Code, Sec 58-178; Permit 1030465-001-AF]

A.3. Unconfined Particulates Work Practice Requirements - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, but not be limited to the following:

a. Activities such as sanding, trimming, shaping, and grinding shall be controlled by good work practices which may include tarps, continued use of filters on exhaust fans, regular sweeping, and/or the use of "shop-vac" type vacuum collectors or a central vacuum dust collection system.

b. All sand blasting activities are to be conducted within the construction shelter located between Building Nos. 1 and 2.

In order to provide reasonable assurance that the above measures are being implemented and that they are effective in controlling unconfined emissions of particulate matter, visible emissions from this facility shall not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but an indication that additional controls may be required.
[Rules 62-4.070(3), 62-296.320(4)(c), F.A.C. and Pinellas County Code Sec 58-178]

EMISSIONS STANDARDS

A.4. VOC Emissions Standard - VOC emissions (including styrene) shall not exceed 52 tons per any consecutive 12-month period.
[Rule 62-210.200, F.A.C. – Definitions (PTE); Construction Permit 1030465-001-AF]

A.5. Styrene Emissions Standard - Styrene emissions shall not exceed 9.7 tons per any consecutive 12-month period.
Rule 62-210.200, F.A.C. – Definitions (PTE); Construction Permit 1030465-001-AF]

A.6. Total HAP Emissions Standard - Total HAP emissions (including styrene) shall not exceed 12 tons per any consecutive 12-month period.
Rule 62-210.200, F.A.C. – Definitions (PTE); Construction Permit 1030465-001-AF]

A.7. 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 (Definition "Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas Co. Code, Sec. 58-178]

*{**Permitting Note:** Based on the processes involved in manufacturing polyester resin products, styrene is considered the highest possible individual hazardous air pollutant that can be emitted. Therefore, limiting styrene, total HAPs, and VOC will ensure that facility emissions will not exceed Title V permitting thresholds.}*

RECORDKEEPING AND REPORTING REQUIREMENTS

A.8. VOC/HAP Records - In order to document compliance with the VOC/HAP limitations of Specific Condition Nos. A.4., A.5. and A.6., the permittee shall maintain a monthly log based on the tracking of all styrene, other HAPs and/or VOC containing material used in association with manufacturing activities. The logs shall contain, at a minimum, the following information.

a. For each material (resin, coating, solvent, chemical, etc.), used at the facility that contains Styrene, other HAPs and/or VOC:

1. the identity of each material used;
2. the application method (e.g., RTM resin application, Spray Lay-up);
3. the quantity each material used where usage of materials may be based upon an inventory at the beginning of the month, receipt of material during the month, and inventory of the materials at the end of the month;
4. the appropriate emission factor(s) used to determine Styrene, other HAPs, and/or VOC emissions (see Specific Condition No. A.10. for styrene emissions calculation requirements and emissions factors);
5. if using non-spray lay-up (non-atomized) emission factors when using flow-type coaters then;
   (a) record the Air Pressure and Pump Ratio, and
   (b) calculate resultant tip pressure (Air Pressure **x** Pump Ratio).

b. The total styrene emissions (in tons) for the month and for the most recent consecutive 12 month period.

c. The Total HAP emissions (in tons and including styrene) for the month and for the most recent consecutive 12 month period.

d. The total VOC emissions (in tons and including styrene) for the month and for the most recent consecutive 12 month period.

Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). Supporting documentation such as Styrene/VOC content, Styrene/VOC emission factors used, MSDS sheets, waste disposal records, purchase orders, "As Supplied" data sheets, etc., shall be kept for each chemical and associated products, which includes sufficient information to determine emissions. The monthly logs shall be completed by the end of the following month. Daily logs (when utilized) shall be completed within 3 business days. These records shall be available to the Department and PCDEM upon request and shall be retained on file at the facility for at least three years.
[Rule 62-4.070(3), F.A.C. and Pinellas Co. Code Sec 58-90]

A.9. (FIT) Equipment Calibration Records - In order to document compliance with the procedure referenced in Specific Condition No. A.2., record the performance of the calibration procedure whenever it is utilized (for example, when a new type of spray tip is used). Documentation shall be retained on file at the facility for at least three years.
[Rule 62-4.070(3), F.A.C. and Pinellas Co. Code Sec 58-90]

A.10. Emission Calculation Requirements - Styrene emissions shall be calculated using the following formula and emission factors, or other factors agreed to by the Department and/or the PCDEM.

A. Styrene emissions shall be determined using the following equation:

$$\textbf{Emissions (tons)} = \frac{\textbf{Ms x EF}}{\textbf{2000 lb/ton}}$$

where:

Ms = amount of styrene containing material used (in tons)
EF = emission factor (lb/ton) for styrene monomer content (from table below)

B. Styrene emissions for RTM resin application (rotational closed mold resin application) shall be estimated using an emissions factor of 0.03 lb/ton.

C. Styrene emissions from resin applied with an airless system, such as for tooling resin/mold-making, shall be estimated using emission factors for spray application, based on the percent styrene. If a lower percent styrene is used than is presented in the table, contact Pinellas County Air Quality.

D. Table of Styrene Emission Factors

% Styrene Monomer	Emission Factors		
	Non-Spray Lay-up	Spray Lay-up (airless system)	Gel Coat (airless system)
30	0.123	0.175	0.455
31	0.124	0.178	0.462
32	0.126	0.181	0.469
33	0.127	0.184	0.476
34	0.129	0.187	0.483
35	0.130	0.190	0.490
36	0.137	0.210	0.497
37	0.143	0.230	0.503
38	0.150	0.250	0.510
39	0.153	0.263	0.515
40	0.155	0.275	0.520
41	0.158	0.288	0.525
42	0.160	0.300	0.530
43	0.163	0.313	0.535

[Rule 62-4.070(3), F.A.C, and PCDEM letter to applicant dated 03/13/02, and included in the 12/06/2004 FESOP renewal application]