SWD INTERNAL PERMITTING MEMORANDUM
AND TECHNICAL EVALUATION

TO: Steve Morgan
Air and Solid Waste Permitting Manager

THRU: Quaid Noor
Air Permitting Engineering Specialist IV

FROM: Richard Spaulding, PE
Professional Engineer II

DATE: 01/08/15

SUBJECT: FESOP Renewal No: 1030465-004-AF
Spaulding Craft, Inc.

Application Receipt Date: 12/11/2014 *(ARMS Day 90 is 03/11/15)*

Application Document Date: 12/08/2014

EU ID Nos. To Be Linked To This Project When Final is issued 001

This project renews FESOP 1030465-003-AF (current permit) for continued operation of a polyester resin fabrication operation. The project is located in Pinellas County, so Sherrill Culliver of PCDEM was contacted on 12/12/14 as the compliance authority. He indicated on 12/16/14 during a meeting that the facility was in compliance, no other response was received from the compliance authority.

The application referred to the current permit for the emission limits and factors. No changes were requested.

Upon review of the current permit, it was discovered that the emission factors being used for the emission calculations to be reported were not reconcilable with the Unified Emission Factors normally used. The permit stated as a reference that the factors in use had been approved by Pinellas County per "PCDEM letter to applicant dated 03/13/02, and included in the 12/06/2004 FESOP renewal application".

A file review determined that the earliest reference to these factors was in a permit application submitted in 2004 that included the referenced letter from Pinellas County as an attachment approving these emission factors. The emission factors were incorporated into 1030465-002-AF issued in 2005 and in 1030465-003-AF issued in 2010 without further documentation. As the emission factors were approved by the Permitting and Compliance Authorities, there were no objections by the applicant and the facility has not changed operations, the emission factors used in the previous permits were incorporated into this permit

A request for additional information was emailed to Marvin Scott at Environmental Engineering Consultants on 12/19/2014. This request was for the records and logs required in Administrative Requirement No. 8 of 1030465-003-AF and requesting support for the emission factors stated in the permit. These records and logs were received 01/08/2015.

As the only changes to the permit involve updating to the current permit template, no public notice was required.

The final permit for this project is attached for your approval and signature, which authorizes renewal of FESOP 1030465-003-AF. The facility operates in Pinellas County at 1053 Harbor Lake Drive in Safety Harbor, Florida.

I recommend your approval of the attached final permit for this project.