SARASOTA COUNTY
"Dedicated to Quality Service"

AIR CONSTRUCTION PERMIT and AIR OPERATION PERMIT

February 24, 2012
CERTIFIED MAIL/ RETURN RECEIPT REQUESTED#:

PERMITTEE:

Sterling Manufacturing
8293 Consumer Court
Sarasota, FL 3424

Air Permit No.s: 1150151-003-AC and 1150151-004-AO
County: Sarasota County
Expiration Date:

Authorized Representative:
Tom Shapiro, President

Sterling Manufacturing
Air Construction Permit Modification and Air Operation Permit Project: Corian[R] kitchen countertop manufacturing facility

This state air construction permit modification (permit 1150151-003-AC) with concurrent issue of the state air operation permit (permit 1150151-004-AO), authorizes the facility to increase the hours of operation from 40 hrs/ wk to 80 hrs/ wk. *NOTE: The air construction permit is federally enforceable.* The permits are issued as one document. The facility manufactures kitchen countertops using DuPont Corian[R] solid surface material. Sterling Manufacturing fabricates the Corian[R] by cutting/ routing/ sanding/ buffing and seamlessly joining pieces using Corian[R] joint adhesive COR004 (Parts A and B). Denatured alcohol is used for cleaning purposes. The facility is located at 8293 Consumer Court, Sarasota, FL 34240.

This permit is organized by the following sections.

Section 1. General Information
Section 2. Administrative Requirements
Section 3. Facility Wide Specific Conditions
Section 4. Emissions Unit Specific Conditions
Section 5. Appendices

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Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Section 5. Appendix A of this permit.

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with Sarasota County Parks, Recreation and Natural Resources (SCNR). 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.

Any party to this Order (air permit) has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Office of the County Attorney, 1660 Ringling Boulevard, Sarasota, Florida 34236; 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 of Appeal must be filed within thirty (30) days from the date this Order is filed with the Clerk of the Office of the County Attorney.

Executed in Sarasota, Florida.

SARASOTA COUNTY PARKS, RECREATION AND NATURAL RESOURCES
AIR & WATER QUALITY

Susan Cameron	John T. Hickey, P.E.
Environmental Specialist III	*Manager*
Sarasota County Air & Water Quality	Sarasota County Air & Water Quality

Enclosure

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this Notice of Intent to Issue Air Permit package was mailed by certified mail before the close of business on ***February __, 2012*** to:

> Tom Shapiro, Sterling Manufacturing, 8293 Consumer Court, Sarasota, FL 34240; TShapiro@sterling-mfg.com

The undersigned duly designated deputy clerk hereby certifies that this Notice of Final Air Permit package 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 ***February __, 2012*** to the persons listed below:

Cc: Lynn Robinson, Southern Environmental Sciences, Inc., 1204 North Wheeler Street Plant City, Florida 33563; lrobinson@sesfla.com

Cindy Zhang-Torres, P.E. III, *Air Permitting Supervisor*, FDEP SW District, 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926; Cindy.Zhang-Torres@dep.state.fl.us

David M. Pearce, *Attorney*, Sarasota County Office of the County Attorney; dpearce@scgov.net

Melissa L. Wagar, Sarasota County Office of the County Attorney; mwagar@scgov.net

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated SCNR Clerk, receipt of which is hereby acknowledged.

_____ ***February __, 2012***
Clerk Date

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SECTION 1. GENERAL INFORMATION

PERMITTEE:
Sterling Manufacturing
8293 Consumer Court
Sarasota, FL 34240

Air Permit No.s: 1150151-003-AC and 1150151-004-AO

Effective Date:
Expiration Date:
Air Construction Permit Modification and Air Operation Permit Project: Corian[R] kitchen Countertop manufacturing facility

FACILITY AND PROJECT DESCRIPTION

This state air construction permit modification (permit 1150151-003-AC) with concurrent issue of the state air operation permit (permit 1150151-004-AO), authorizes the facility to increase the hours of operation from 40 hrs/ wk to 80 hrs/ wk. *NOTE: The air construction permit is federally enforceable.* The permits are issued as one document. The facility manufactures kitchen countertops using DuPont Corian[R] solid surface material. Sterling Manufacturing fabricates the Corian[R] by cutting/ routing/ sanding/ buffing and seamlessly joining pieces using Corian[R] joint adhesive COR004 (Parts A and B). Denatured alcohol is used for cleaning purposes. The facility is located at 8293 Consumer Court, Sarasota, FL 34240.

The maximum allowable emissions of total PM, total VOC, total HAP, and individual HAP from the facility will be limited to 24.0, 10.0, 10.0, and 5.0 tons per any 12 consecutive month period, respectively. All emissions of HAPs at this facility are expected to be VOCs. Visible Emissions from four (4) cartridge filter systems are limited to a maximum of 5 % opacity.

Operational design of the facility will ensure that emissions of particulate matter (PM and PM-10), carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO2), VOC (Volatile Organic Compounds), and HAP(s) (Hazardous Air Pollutant(s)) are below the Title V permitting thresholds of Chapter 62-213, F.A.C. The facility will be classified as a Naturally Minor facility as defined by Rule 62-210.200(298), F.A.C.:

> *<u>Synthetic Non-Title V Source</u>: A facility that would be classified as a Title V source, but for a physical or operational limitation assumed by the owner or operator on the capacity of the facility to emit a pollutant, including any air pollution control equipment and any restriction on*

hours of operation or on the type or amount of material combusted, stored, or processed, provided that such physical or operational limitation is federally enforceable.

The conditions of this permit will ensure emissions remain below the Title V permitting thresholds of Chapter 62-213, F.A.C.

FACILITY REGULATORY CLASSIFICATION

Subject to:	Y/N
Rule 62-212.300, Stationary Sources – Preconstruction Review, General Preconstruction Review Requirements, F.A.C.[1]	Y
Rule 62-212.400, Prevention of Significant Deterioration, F.A.C[2]	N
Rule 62-296.320, Stationary Sources – Emission Standards - General Pollutant Emission Limiting Standards, F.A.C[3,4]	Y
Rule 62-296.500, Reasonably Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities[5]	N
Rule 62-296.700, Reasonably Available Control Technology (RACT) Particulate Matter[6]	N
Rule 62-204.800(8), Stds. of Performance for New Stationary Sources, F.A.C.[7] (NSPS)	N
Rule 62-204.800(10), Natl. Emission Stds. for Hazardous Air Pollutants, F.A.C.[8] (NESHAPS)	N
Chapter 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C.[9]	N
Rule 62-297.310, Stationary Sources – Emissions Monitoring - General Compliance Test Requirements, F.A.C.[10]	Y

1. Not exempt from general permitting requirements
2. Facility is PSD minor source
3. Facility is a source of unconfined particulate matter emissions
4. Potential source of odors
5. Facility is not located in an ozone nonattainment or air quality maintenance area
6. Facility is not located in a PM air quality maintenance area or in the area of influence of such an area
7. Facility is not subject to Title 40 Part 60
8. Facility is minor for HAPs
9. Facility is naturally minor
10. Compliance testing is required

PERTINENT DOCUMENTS:

1150151-001-AC Original state air construction permit; and,

SECTION 1. GENERAL INFORMATION

1150151-002-AO Original state air operation permit.

Facility Information Summary:

Site/Location: 8293 Consumer Court, Sarasota, FL 34240.

UTM: 17-361.05 E 3026.26 N Latitude: 27°21'08.99" Longitude: 82°24'17.41"

Facility ID No: 1150151

Emission Unit (EU) ID No.: 001 - Corian[R] kitchen countertop manufacturing facility

EU 001 Emissions Points:
001 - Model 336 DF Ultra-Conic cartridge filter
002 - Model 336 DF Ultra-Conic cartridge filter
003 - Model 211 CC Cartridge dust collector
004 - Model 211 CC Cartridge dust collector

Note: Please reference Permit No. and Emission Unit (EU) ID No. in all correspondence, test report submittals, applications, etc.

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SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is Sarasota County Parks, Recreation and Natural Resources [SCNR], Air & Water Quality. SCNR's mailing address is: SCNR Air & Water Quality; 1001 Sarasota Center Blvd. Sarasota; Sarasota, Florida 34240. All documents related to applications for permits shall be submitted in triplicate to SCNR.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to SCNR. The mailing address and phone number are: SCNR Air & Water Quality; 1001 Sarasota Center Blvd.; Sarasota, Florida 34240; (941)861-0675.

3. Appendices: The following Appendices are attached as part of this permit:

   Appendix A. Citation Formats and Glossary of Common Terms;

   Appendix B. General Conditions;

   Appendix C. Common Conditions; and,

   Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms, and Application Procedures: All applicable rules and design discharge limitations specified in the application shall be adhered to. The facility is subject to all applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297. Issuance of this permit does not relieve the permittee from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Florida Department of Environmental Protection (DEP), SCNR or any other such requirements under Federal, State, or Local law. [Rules 62-210.300 and 62-4.070(7), F.A.C.]

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, SCNR may require the permittee to conform to new or additional conditions. SCNR shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, SCNR may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modification: Any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere. No emissions unit or facility shall be constructed or modified without obtaining an air construction permit from SCNR prior to the beginning of construction or

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modification. [40 CFR 60.14; Rules 62-4.030, 62-4.070(3), 62-4.080(2), 62-210.300(1) and 62-212.300(1), F.A.C.]

7. Rule Compliance: A facility or emissions unit subject to any standard or requirement of 40 CFR. Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. [Rule 62-296.100(3), F.A.C.]

8. Air Operation Permit Renewal: A completed application for an air operation permit shall be submitted to SCNR Air & Water Quality 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.;
c. a copy of the most recent 12 consecutive months of records as required by Specific Condition No.s 20 and 21;
d. a copy of the operating records (e.g., hours of operation) for the most recent 12 consecutive months for each process at this facility; and,
e. copies of the most recent visible emissions compliance tests as required by Specific Condition No. 15.

[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.]

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SECTION 3. FACILITY WIDE SPECIFIC CONDITIONS
A. Facility Wide

Facility wide *Performance Restrictions*:

9. This section of the permit addresses the entire facility. Facility wide General Conditions, Common Conditions and Common Testing Conditions are located in Appendices B, C and D, respectively.

10. Operating Hours and Emissions Limits: The facility is permitted to operate 4,160 hours/year. Emissions from the facility are limited 5 tpy HAP (e.g., methyl methacrylate); 10 tpy total combined HAPs; 10 tpy total VOC; and 24.0 tpy total PM. [Rules 62-4.070(3) and 62-210.200(240) PTE, F.A.C.]

11. Circumvention: The permittee shall not circumvent any air pollution control devices or allow the emissions of air pollutants without the air pollution control device operating properly. The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [Rules 62-4.070(3), 62-210.650 and 62-210.700(4), F.A.C.]

12. Volatile Organic Compounds (VOC)/Organic Solvents Emissions: No person shall store, pump, handle process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emissions control devices or systems deemed necessary and ordered by SCNR. Such controls include the following:
    a. Tightly cover or close all adhesive/ solvent/ coating containers when they are not in use;
    b. Tightly cover all adhesive/ solvent/ coating day tanks when not in use;
    c. Maintain all pipes/ valves/ fittings/ hoses in good operating condition;
    d. Confine rags used with adhesives/ solvents/ coatings to tightly closed, fireproof containers when not in use; and,
    e. Immediately confine and clean up any spills; make sure wastes are placed in closed containers for reuse/ recycling/ proper disposal.

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

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SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS
A. Emissions Unit 001

Emissions Units -001 *Performance Restrictions*:

Emissions Unit ID No.	***Description***
001	Corian[R] kitchen countertop manufacturing facility *with* Emissions Points*:* 001 - Model 336 DF Ultra-Conic cartridge filter 002 - Model 336 DF Ultra-Conic cartridge filter 003 - Model 211 CC Cartridge dust collector 004 - Model 211 CC Cartridge dust collector

13. Unconfined Particulate Matter Emissions Opacity Standard: Visible emissions from Emission Points 001, 002, 003, & 004 of EU 001 shall not exceed 5% opacity. [1150151-001-AC; Rule 62-4.070(3), F.A.C.]

14. Operation & Maintenance: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. [Rule 62-4.070(3), F.A.C.]

15. Performance Testing: Emissions from Emission Points 001, 002, 003, & 004 of EU 001 shall be tested for visible emissions during each federal fiscal year (October 1 – September 30). [Rules 62-297.310(7)(a) 4.a., F.A.C.]

16. Visible Emissions Test Methods: Visible emissions tests shall be conducted using EPA Method 9. The visible emissions test shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Rule 62-297, F.A.C. [Rules 62-297.310(4)(a) and 62-297.401, F.A.C.]

17. Test Notification: The permittee shall provide SCNR 15 days prior notice of any performance test, the test date, time, place, and contact person. [Rule 62-297.310(7)(a) 9, F.A.C.]

18. Special Compliance Tests: When SCNR, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those

rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to SCNR. [Rule 62-297.310(7)(b), F.A.C.]

19. Test Reports - Compliance test results shall be submitted to SCNR as soon as practical but no later than 45 days after the test is completed. [Rule 62-297.310(8)(b), F.A.C.]

Recordkeeping Requirements

20. VOC Recordkeeping: The permittee shall determine the VOC content of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
    a. The VOC content for each material containing or emitting VOCs;
    b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s);
    c. The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month; and,
    d. A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

    [Rule 62-4.070(3), F.A.C.]

21. HAP Recordkeeping: The permittee shall determine the total and individual HAP contents of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
    a. The individual and total HAP contents for each material containing or emitting HAPs;
    b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s);
    c. The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month; and,
    d. A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.

    [Rule 62-4.070(3), F.A.C.]

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SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS
A. Emissions Unit 001

22. Records Retention: Records of the measurements/ tests/ reports required by this permit must be retained for at least three years following the date of the measurement or reporting [Rule 62-4.070(3), F.A.C.].

SARASOTA COUNTY PARKS, RECREATION AND NATURAL RESOURCES
AIR & WATER QUALITY

Susan Cameron	John T. Hickey, P.E.
Environmental Specialist III	*Manager*
Sarasota County Air & Water Quality	Sarasota County Air & Water Quality

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