



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**  
CENTRAL DISTRICT  
3319 MAGUIRE BOULEVARD, SUITE 232  
ORLANDO, FLORIDA 32803

RICK SCOTT  
GOVERNOR

CARLOS LOPEZ-CANTERA  
LT. GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

*Electronically Sent- Received Receipt Requested*  
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**FINAL PERMIT**

**PERMITTEE**

Really Innovations LLC  
605 Townsend Road  
Cocoa, FL 32926

Authorized Representative:  
Really Nolen, President

Air Permit No. 0090213-003-AF  
Permit Expires: March 30, 2019  
Site Name: Really Innovations LLC  
FESOP Renewal  
Project Name: FESOP Renewal

This is a FESOP (Federally Enforceable State Operation Permit) renewal. Really Innovations LLC (Standard Industrial Classification No. 2821) is located in Brevard County at 605 Townsend Road in Cocoa, Florida. The UTM coordinates are Zone 17, 519.89 km East, and 3137.74 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Facility-wide and Emissions Unit Specific Conditions
- Section 4. Appendices

Because of 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 written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within

14 days of receipt of that notice, regardless of the date of publication. 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](mailto: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 written notice of Intent to Issue Air 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,



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## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

The existing facility consists of the following emissions unit.

Facility ID No. 0090213	
ID No.	Emission Unit Description
001	Polyester Resin Plastics Products Fabrication Facility

#### Project Description

This project is a FESOP (Federally Enforceable State Operation Permit) renewal. The permittee may operate a Polyester Resin Plastics Products Fabrication Facility. The facility manufactures fiberglass tanks and includes molding, gel coating, open and closed lamination, trimming and sanding operations.

### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 213, F.A.C.
- The facility is classified as a synthetic minor source for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs).
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

### PERMIT HISTORY/AFFECTED PERMITS

This is a FESOP renewal. The previous permit was Permit No. 0090213-002-AF. Initially, the facility was permitted under Air General Permit (registration) No. 0090213-001-AG.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District, Waste & Air Resource Programs. The Central District's mailing address and phone number is:

Florida Department of Environmental Protection  
Central District Office  
3319 Maguire Blvd., Ste. 232  
Orlando, FL 32803-3767  
Telephone: 407-897-4100

All documents related to applications for permits shall be submitted to the above address or electronically to the following address: [DEP\\_CD@dep.state.fl.us](mailto:DEP_CD@dep.state.fl.us). In each document, clearly identify the Air Permit Project No. 0090213-003-AF.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program. (Use the above mailing or e-mail address.) In each document, clearly identify the Air Permit Project No. 0694866-001-AC and specific emission unit.
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. Facility Flow Diagram.
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.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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7. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports (AORs) shall be submitted electronically to the Compliance Authority by April 1<sup>st</sup> of each year. Go to the following website for the latest information about electronic submittal of AORs:

<http://www.dep.state.fl.us/air/emission/eaor/default.htm>

[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for an initial operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this air operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- 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/>);
  - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
  - copies of the most recent two months 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.]

**SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. EU No. 001 – Polyester Resin Plastics Products Fabrication Facility**

This section of the permit addresses the following emission unit.

ID No.	Emission Unit Description
001	Polyester Resin Plastics Products Fabrication Facility

**PERFORMANCE RESTRICTIONS**

- A.1. Restricted Operation: The hours of operation are not limited (8,760 hours per year). [Rule 62-210.200(247), Potential to Emit, F.A.C.]
  
- A.2. Circumvention: No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
  
- A.3. VOC Emissions: Pursuant to Rule 62-296.320(1)(a), F.A.C., the following procedures shall be used to minimize emissions:
  - a. Maintain tightly fitting cover, lids, etc. on all containers of VOCs when they are not being handled, used, etc.;
  
  - b. All equipment, fittings, valve lines, pipes, drums, tanks, etc. shall be properly operated and maintained;
  
  - c. Prevent excessive air turbulence across exposed VOCs; and
  
  - d. All VOC spills shall be attended to immediately and waste properly disposed, recycled, etc.  
[Rule 62-296.320(1), F.A.C.]
  
- A.4. Objectionable Odor Prohibited: 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 defined as 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(214) and 62-296.320(2), F.A.C.]

## SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

### A. EU No. 001 – Polyester Resin Plastics Products Fabrication Facility

#### EMISSIONS STANDARDS

A.5. VOC Emission Limitations: The maximum facility-wide VOC emissions are limited as follows:

Pollutant	Emission Limits (tons per any consecutive 12 month period)
Total Volatile Organic Compounds (VOCs)	Less than 9
Total Hazardous Air Pollutants (HAPs)	Less than 9
Individual Hazardous Air Pollutant (HAP)	Less than 9

[Rules 62-4.070(3) and 62-210.200(247), Potential to Emit, F.A.C.]

A.6. Visible Emissions Limitation: Visible emissions from each particulate emissions source are limited to less than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C.]

#### RECORDS AND REPORTS

A.7. Monthly Log: In order to demonstrate compliance with Specific Condition No. **A.5.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall be made available to the Department upon request. The log shall contain the following:

- a. Facility Name, Facility ID No. (i.e., 0090213);
- b. Month and year of record;
- c. Most recent monthly total of VOC emissions (tons);
- d. Most recent monthly total of total HAP emissions and individual HAP emissions (tons);
- e. Most recent consecutive 12-month total of VOC emissions (tons); and
- f. Most recent consecutive 12-month total of total HAP emissions and individual HAP emissions (tons).

*{Permitting Note: Various emission factors that are listed in Table 1 of 40 CFR 63, Subpart WWWW are used to calculate the HAP and VOC emissions from Gelcoat and Resin usage/applications. VOC emissions from catalyst usage may assume 60 percent Dimethyl Phthalate; a ratio of catalyst to gel coat of 2 percent; and a 0.04 percent of dimethyl phthalate emitted to the air (Haberlein, Robert, Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composite, March 24, 1999).}*

Monthly logs shall be completed by the end of the following month.

### SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

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#### A. EU No. 001 – Polyester Resin Plastics Products Fabrication Facility

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]

- A.8. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.7.** (previous condition) must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations and available for review on site by the Department. [Rule 62-4.070(3), F.A.C.]
- A.9. Supporting Documentation: Supporting documentation (chemical usage tracking logs, “As Supplied” sheets, Safety Data Sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions for a minimum of five (5) years and made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]
- A.10. Record Retention: The records required in Specific Condition No. **A.7.** shall be recorded in a permanent form suitable for inspection and made available to the Department upon request. The records shall be maintained onsite for a minimum of five (5) years. [Rule 62-4.070(3), F.A.C.]

## **SECTION 4. APPENDICES**

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### **Contents**

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D Facility Flow Diagram

**SECTION 4. APPENDIX A**

**Citation Formats and Glossary of Common Terms**

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**CITATION FORMATS**

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

**New Permit Numbers**

Example: Permit Nos. 0992222-001-AC, 0992222-001-AF, 0992222-001-AO, or 0992222-001-AV

Where: “099” (first three numbers) represents the specific county ID number in which the project is located

“2222” represents the specific facility ID number for that county

“001” identifies the specific permit project number

“AC” identifies the permit as an air construction permit

“AF” identifies the permit as a minor source federally enforceable state operation permit

“AO” identifies the permit as a minor source air operation permit

“AV” identifies the permit as a major Title V air operation permit

**Florida Administrative Code (F.A.C.)**

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

**Code of Federal Regulations (CFR)**

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

**GLOSSARY OF COMMON TERMS**

° **F:** degrees Fahrenheit

**AAQS:** Ambient Air Quality Standard

**acf:** actual cubic feet

**acfm:** actual cubic feet per minute

**ARMS:** Air Resource Management System (DEP database)

**BACT:** best available control technology

**bhp:** brake horsepower

**Btu:** British thermal units

**CAM:** compliance assurance monitoring

**CEMS:** continuous emissions monitoring system

**cfm:** cubic feet per minute

**CFR:** Code of Federal Regulations

**CAA:** Clean Air Act

**CMS:** continuous monitoring system

**CO:** carbon monoxide

**CO<sub>2</sub>:** carbon dioxide

**COMS:** continuous opacity monitoring system

**DARM:** Division of Air Resource Management

**DEP:** Department of Environmental Protection

**Department:** Department of Environmental Protection

## SECTION 4. APPENDIX A

### Citation Formats and Glossary of Common Terms

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<b>dscf:</b> dry standard cubic feet	<b>Pb:</b> lead
<b>dscfm:</b> dry standard cubic feet per minute	<b>PM:</b> particulate matter
<b>EPA:</b> Environmental Protection Agency	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>ppm:</b> parts per million
<b>EU:</b> emissions unit	<b>ppmv:</b> parts per million by volume
<b>F.A.C.:</b> Florida Administrative Code	<b>ppmvd:</b> parts per million by volume, dry basis
<b>F.A.W.:</b> Florida Administrative Weekly	<b>QA:</b> quality assurance
<b>F.D.:</b> forced draft	<b>QC:</b> quality control
<b>F.S.:</b> Florida Statutes	<b>PSD:</b> prevention of significant deterioration
<b>FGD:</b> flue gas desulfurization	<b>psi:</b> pounds per square inch
<b>FGR:</b> flue gas recirculation	<b>PTE:</b> potential to emit
<b>Fl:</b> fluoride	<b>RACT:</b> reasonably available control technology
<b>ft<sup>2</sup>:</b> square feet	<b>RATA:</b> relative accuracy test audit
<b>ft<sup>3</sup>:</b> cubic feet	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>gpm:</b> gallons per minute	<b>SAM:</b> sulfuric acid mist
<b>gr:</b> grains	<b>scf:</b> standard cubic feet
<b>HAP:</b> hazardous air pollutant	<b>scfm:</b> standard cubic feet per minute
<b>Hg:</b> mercury	<b>SIC:</b> standard industrial classification code
<b>I.D.:</b> induced draft	<b>SIP:</b> State Implementation Plan
<b>ID:</b> identification	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>kPa:</b> kilopascals	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>lb:</b> pound	<b>TPD:</b> tons/day
<b>MACT:</b> maximum achievable technology	<b>TPH:</b> tons per hour
<b>MMBtu:</b> million British thermal units	<b>TPY:</b> tons per year
<b>MSDS:</b> material safety data sheets	<b>TRS:</b> total reduced sulfur
<b>MW:</b> megawatt	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants	<b>VE:</b> visible emissions
<b>NO<sub>x</sub>:</b> nitrogen oxides	<b>VOC:</b> volatile organic compounds
<b>NSPS:</b> New Source Performance Standards	
<b>O&amp;M:</b> operation and maintenance	
<b>O<sub>2</sub>:</b> oxygen	

## SECTION 4. APPENDIX B

### General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

## SECTION 4. APPENDIX B

### General Conditions

- a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
- a. Determination of Best Available Control Technology (not applicable);
  - b. Determination of Prevention of Significant Deterioration (not applicable); and
  - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - (a) The date, exact place, and time of sampling or measurements;

**SECTION 4. APPENDIX B**

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**General Conditions**

- (b) The person responsible for performing the sampling or measurements;
  - (c) The dates analyses were performed;
  - (d) The person responsible for performing the analyses;
  - (e) The analytical techniques or methods used;
  - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

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## SECTION 4. APPENDIX C

### Common Conditions

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Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

#### EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: 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. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means 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 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20%

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## SECTION 4. APPENDIX C

### Common Conditions

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opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

#### 9. Unconfined Particulate Emissions:

- a. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
- b. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
- c. Reasonable precautions include the following:
  - (1) Paving and maintenance of roads, parking areas and yards.
  - (2) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
  - (3) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
  - (4) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
  - (5) Landscaping or planting of vegetation.
  - (6) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
  - (7) Confining abrasive blasting where possible.
  - (8) Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c), F.A.C.]

#### **RECORDS AND REPORTS**

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded, unless otherwise specified by Department rule. Records shall be made available to the Department upon request. [Rule 62-4.160, F.A.C.]
  - a. *Annual Operating Report for Air Pollutant Emitting Facility*
    - (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
      - a. All Title V sources.
      - b. All synthetic non-Title V sources.

## SECTION 4. APPENDIX C

### Common Conditions

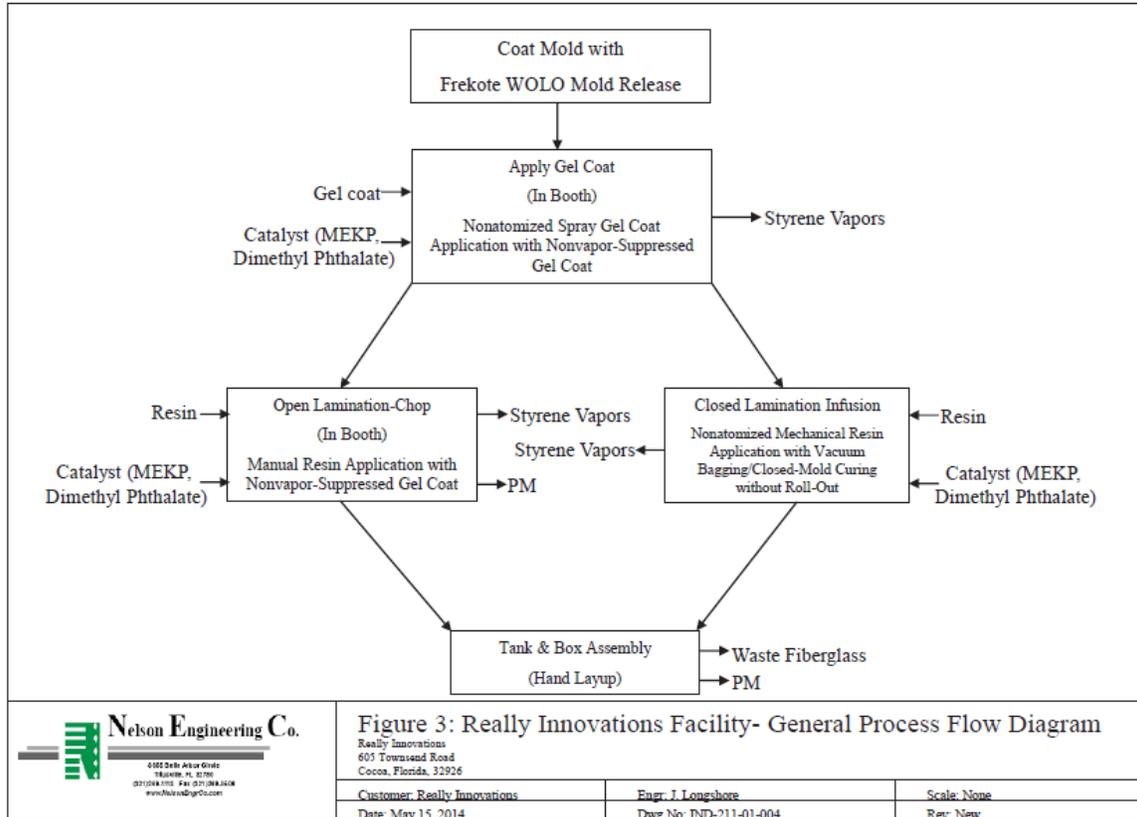
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- c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
- d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

SECTION 4. APPENDIX D

Facility Flow Diagram



**Figure 3: Really Innovations Facility- General Process Flow Diagram**

Customer: Really Innovations	Engr: J. Longshore	Scale: None
Date: May 15, 2014	Dwg No: RND-211-01-004	Rev: New

A3



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Really Innovations LLC  
605 Townsend Road  
Cocoa, FL 32926

Really Innovations

Facility ID No. 0090213

**PROJECT**

Project No. 0090213-003-AF  
Application for FESOP Renewal  
Project Name: FESOP Renewal

**COUNTY**

Brevard County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Waste and Air Resource Programs  
Central District Office  
Orlando, Florida 32803-3767  
DEP\_CD@dep.state.fl.us

June 18, 2014

Prepared by Jeff Rustin, P.E.

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## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### 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. Project Description:

A. Applicant:

Mr. Really Nolen, President  
Really Innovations LLC  
605 Townsend Road  
Cocoa, FL 32926  
[reallynolen@reallyinnovations.com](mailto:reallynolen@reallyinnovations.com)

B. Application Contact:

Mr. Really Nolen, President  
Really Innovations LLC  
605 Townsend Road  
Cocoa, FL 32926  
[reallynolen@reallyinnovations.com](mailto:reallynolen@reallyinnovations.com)

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

C. Project Location:

605 Townsend Road  
Cocoa, FL 32926

D. Project Summary:

This is a FESOP renewal for an existing facility.

E. Application Information:

Application Received on: 05/27/2014  
Request for Additional Information (RAI) No. 1 sent on: 06/11/2014  
Response to RAI received on: 06/16/2014  
Application determined to be complete on: 06/16/2014

II. PSD Applicability for Project

The emission limits have not changed from the previous permit and the potential to emit is approximately the same (see Section IV Summary of Emissions on page 3 of this Technical Evaluation and Determination). This project is not subject to further PSD preconstruction evaluation.

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, and Chapters 62-204 through 62-297, F.A.C., as indicated below.

<b>Subject to:</b>	<b>Y/N</b>	<b>Comments</b>
<b>Rule 62-212.400, F.A.C.</b> - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
<b>Rule 62-296.320(4), F.A.C.</b> - General Particulate Emission Limiting Standards	Y	Visible emissions for each source that emits particulates are limited to less than 20 percent opacity.
<b>Rules 62-296.320(1) and (2), F.A.C.</b> - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	The facility is a source of VOCs and a potential source of odors.
<b>Rule 62-296.400, F.A.C.</b> – Stationary Source Emission Standards	N	There is no applicable source category.
<b>Rule 62-296.500, F.A.C.</b> - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone
<b>Rule 62-204.800(8), F.A.C.</b> - Standards of Performance for New Stationary Sources (NSPS – 40 CFR 60)	N	There is no applicable source category.

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

<b>Subject to:</b>	<b>Y/N</b>	<b>Comments</b>
<b>Rule 62-204.800(11), F.A.C.</b> National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	This facility is not subject to 40 CFR Part 63, Subpart WWWW – NESHAP for Reinforced Plastics Composites, because the facility is not classified as a major source of HAPs. Various emission factors that are listed in Table 1 of 40 CFR 63, Subpart WWWW are used to calculate the HAP and VOC emissions.
<b>Chapter 62-213, F.A.C.</b> - Operation Permits for Major Sources of Air Pollution	N	The permit for the facility is a Federally Enforceable State Operation Permit.
<b>Rule 62-297.310, F.A.C.</b> – General Compliance Test Requirements	N	No compliance testing is required.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tons/year)	Major Source Thresholds (tons/year)
PM	Facility	1.03*	100
VOC	Facility	6.286**	100
Total HAPs	Facility	6.044**	25
Individual HAP (styrene)	Facility	6.044**	10

\* based on calculations provided in Attachment 3 (Page B3) of the Executive Summary, dated May 15, 2015, that was provided by the Nelson Engineering Company as part of the permit renewal application package.

\*\* potential emissions based on proposed material used by the facility as listed in Table 1 (shown below) of the Executive Summary.

Table 1: Maximum Amount of Materials Proposed

Material	Maximum Material Used Monthly (lbs)	Maximum Material Used Annually (lbs)
Open Molded Resin	10,875	130,500
Manually Applied Resin	3,625	43,500
Closed Molded Resin	1,422	17,064
Gel coat	2,525	30,300
Gel coat (Special Colors)	1,103	13,236
Catalyst (Dimethyl Phthalate)	480	5,760

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### V. Discussion

The facility was previously permitted under FESOP Permit No. 0090213-002-AF; however, the permit had expired on March 30, 2013. A site visit on April 23, 2014, by Tom Lubozynski, P.E., Waste and Air Programs Administrator, and Jeff Rustin, P.E., Air Permitting Engineer, confirmed that no significant changes in production or equipment at the facility had occurred. Some of the emission factors used to calculate HAP and VOC emissions were updated for this permit renewal after conferring with DEP and Nelson Engineering Company, their environmental consulting company.

### VI. Federal NSPS and/or NESHAP Provisions

No applicable categories. 40 CFR 63, Subpart WWWW does not apply because the facility is not a major source of HAPs (Hazardous Air Pollutants). Various emission factors that are listed in Table 1 of 40 CFR 63, Subpart WWWW are used to calculate the HAP and VOC emissions from Gelcoat and Resin usage/applications. VOC emissions from catalyst usage may assume 60 percent Dimethyl Phthalate; a ratio of catalyst to gel coat of 2 percent; and a 0.04 percent of dimethyl phthalate emitted to the air (Haberlein, Robert, *Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composite*, March 24, 1999).

### VII. Conclusions

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.

### VIII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and adopted 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, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, by e-mail at [jeff.rustin@dep.state.fl.us](mailto:jeff.rustin@dep.state.fl.us) or by phone at 407-897-4100.