# Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary


## DRAFT PERMIT

**PERMITTEE**

Goodrich Interiors
3414 S. 5th Street
Phoenix, AZ 85040-1169

Authorized Representative:
Mr. James Erickson, Vice President Evacuation Systems

Air Permit No. 0270022-001-AC
Permit Expires: 01/07/2013
Site Name : Winslow Marine Products Corporation
Minor Air Construction Permit
Initial Construction Permit

This is the final after-the-fact air construction permit for an existing marine and aviation life raft and float manufacturing and repair facility. The work will be conducted at the Winslow Marine Products Corporation (Standard Industrial Classification No. 3069). The facility is located in DeSoto County at 11700 SW Winslow Drive in Lake Suzy, Florida. The UTM coordinates are Zone 17, 397.24 km East, and 2991.56 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

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. 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.

Upon issuance of this final permit, 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 (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

*DRAFT*

_____ _____

Robert C. Wong Effective Date
District Air 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 Determination, 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.

James Erickson, Vice President Evacuation Systems
Goodrich Interiors
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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.

*DRAFT*

_____ _____

(Clerk) (Date)

## FACILITY AND PROJECT DESCRIPTION

### Project Description and Proposed Emission Unit

This is the final after-the-fact air construction permit for an existing marine and aviation life raft and float manufacturing and repair facility. This project will create the following emissions unit.

| Facility ID No. 0270011 | |
|---|---|
| ID No. | Emission Unit Description |
| 001 | Life Raft and Float Manufacturing and Repair |

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

### Exempt Emission Units/Activities

Surface coating operations are exempt since paint and solvent/thinner usage will be less than 2 gallons per day.
[Rule 62-210.300(3)(a)(27), F.A.C.]

## 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 volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

## PERMIT HISTORY/AFFECTED PERMITS

No previous permits.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

**1.** Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

**2.** Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

**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.** Non-Title V Air Operation Permit - This permit authorizes construction of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit. To apply for a Non-Title V air 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.3. and A.4.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050 and 62-4.220, F.A.C.]

## FACILITY-WIDE SPECIFIC CONDITIONS

**9**. Volatile Organic Compounds (VOC) and Organic Solvents (OS) Emissions - In addition to Condition 6. of Appendix C., the permittee shall comply with the following:

a. maintain covers, lids, etc., on all containers of VOC/OS when they are not being handled, tapped, etc.;

b. prevent excessive air turbulence across exposed VOC/OS;

c. keep applicators (brushes, rags, etc) in closed containers when not being used;

d. all fittings, valve lines, etc., shall be properly maintained;

e. all VOC/OS spills shall be attended to in a timely manner and the waste properly disposed of, recycled, etc.;

f. all solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation to the atmosphere.

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

## A. EU No. 001 – Life Raft and Float Manufacturing and Repair

This section of the permit addresses the following emissions unit.

| ID No. | Emission Unit Description |
|---|---|
| 001 | Fabric used to manufacture the life rafts or floats arrives at the facility in rolls. Pieces of fabric are cut using a computer controlled cutting machine. Assembly is performed by hand using catalytic adhesive to join the cut pieces of fabric. The catalysts, adhesives and clean-up solvents contain volatile organic compounds (VOC) and hazardous air pollutants (HAPs). Fugitive VOC and HAP emissions are controlled by keeping raw materials and applicators (brushes, rags) in covered containers. After the basic life raft or float is assembled, various straps, pockets, signage and other accessories are added. Some of the assemblies may be cured in an electric oven to strengthen the seams. Each life raft or float is then inflated and pressure tested. Final fittings and survival equipment are then attached, as applicable. The air in the life raft or float is evacuated and it is folded for packing. The life rafts and floats are shipped to customers worldwide.<br><br>A small amount of VOC is also emitted in the bottle shop from the IPA used in a small parts washer.<br><br>Life rafts, floats and evacuation slides are serviced in a separate section of the building. Smaller amounts of adhesive and solvent are used as well as touch up paint. |

### PERFORMANCE RESTRICTIONS

**A.1.** Hours of Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

### EMISSIONS STANDARDS

**A.2.** Emission Limitations - The emissions from life raft and float manufacturing and repair operations shall not exceed the following:

| Pollutant | Tons per any consecutive 12-month period |
|---|---|
| Volatile Organic Compounds (VOC) | 35.0 |
| Any Individual Hazardous Air Pollutant (HAP) | 8.0 |
| Total HAPs | 21.0 |

[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

**RECORDS AND REPORTS**

**A.3.** VOC Recordkeeping Requirements - In order to document compliance with Specific Condition A.2., the following monthly records shall be kept:

a. facility Name, Facility ID No. (0270022), Emission Unit No. (001);

b. month/year;

c. total quantity (gallons) and VOC content (lbs/gallon) of each VOC containing material used for the month;

d. calculated monthly total VOC emissions, in pounds per month (based upon material VOC content); and

e. cumulative total of the VOC emissions for the most recent consecutive 12-month period (tons per consecutive 12-month period).

The records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained at the facility for a minimum of the most recent three (3) year period. Monthly records shall be completed by the 15th of the following month.

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

**A.4.** HAP Recordkeeping Requirements - In order to document compliance with Specific Condition A.2., the following monthly records shall be kept:

a. facility Name, Facility ID No. (0270022), Emission Unit No. (001);

b. month/year;

c. total quantity (gallons) and HAP content (lbs./gallon) of each HAP containing material used for the month;

d. calculated monthly emissions for each individual HAP in pounds or tons per month (based upon material HAP content);

e. calculated monthly emissions for total HAPs in pounds or tons per month (based on d. above);

f. cumulative total emissions for each individual HAP for the most recent consecutive 12-month period (tons per consecutive 12-month period); and

g. cumulative total of all HAP emissions for the most recent consecutive 12-month period (tons per consecutive 12-month period).

The records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained at the facility for a minimum of the most recent three (3) year period. Monthly records shall be completed by the 15th of the following month.

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

**A.5.** Documentation - Supporting documentation (e.g., MSD sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records

required by Specific Condition Nos. A.3 and A.4, which includes sufficient information to determine VOC and HAP emissions, shall also be kept. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased. Documentation of solvents consumed may use a mass-balance method to determine usage (amount used minus amount collected for disposal or recycle).
[Rule 62-4.070(3), F.A.C.]