TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Winslow Marine Products Corporation

Facility ID No. 0270022

PROJECT

Project No. 0270022-001-AC
Application for Minor Air Construction Permit
Project Name: Initial Construction Permit

COUNTY

DeSoto County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

July 20, 2012

Prepared by Nancy E. Knight

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. James Erickson, Vice President Evacuation Systems
Goodrich Interiors
3414 S. 5th Street
Phoenix, AZ 85040-1169

B. Professional Engineer:

Mr. Robert Fox, P.E.
Environmental Resources Management
5909 Hampton Oaks Parkway, Suite D
Tampa, FL 33610-9581

C. Project Location:

11700 SW Winslow Drive
Lake Suzy, FL 34269

Aerial View and Street Map of Winslow Marine

D. Project Summary:

This is an after-the-fact air construction permit for an existing marine and aviation life raft and float manufacturing and repair facility, as further described in the permit.

Clean-up of excess adhesive.

Covered container for brushes, sponges, etc.

Pressure testing.

E. Application Information:

Application Received on: July 16, 2012
Additional Information Requested on: July 20, 2012
Additional Information Received on: July 26, 2012
Application Complete: July 26, 2012

II. Rule Applicability:

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

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	manufacturing operations could be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. -	Y	manufacturing operations are a source of

Subject to:	Y/N	Comments
General Pollutant Emission Limiting Standards (VOC and Odor)		VOC and odors
Rule 62-296.401-470, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	DeSoto County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	there is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required. Compliance is demonstrated via recordkeeping.

III. Summary of Emissions:

Pollutant	EU No. and brief description	Potential Emissions (tons per year) *	Allowable Emissions (tons per year)*
VOC	001 - Life Raft and Float Manufacturing and Repair	29.45	35.0
	Total	29.45	35.0
Total HAP	001 - Life Raft and Float Manufacturing and Repair	10.66	21.0
	Total	10.66	21.0
Individual HAP (toluene)	001 - Life Raft and Float Manufacturing and Repair	7.99	8.0

Pollutant	EU No. and brief description	Potential Emissions (tons per year) *	Allowable Emissions (tons per year)*
	Total	7.99	8.0
Individual HAP (benzene)	001 - Life Raft and Float Manufacturing and Repair	0.00035	8.0
	Total	0.00035	8.0
Individual HAP (ethylbenzene)	001 - Life Raft and Float Manufacturing and Repair	0.00040	8.0
	Total	0.00040	8.0
Individual HAP (methanol)	001 - Life Raft and Float Manufacturing and Repair	0.72	8.0
	Total	0.72	8.0
Individual HAP (hexane)	001 - Life Raft and Float Manufacturing and Repair	1.95	8.0
	Total	1.95	8.0

* Potential emissions are based on roughly doubling the current material usage. This may be achieved by adding an additional shift. Emissions closer to the allowable emissions may be achieved by adding additional shifts and store fabric and finished product offsite.

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

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.

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and 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 Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).