

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

CERTIFIED MAIL

George Michael Draper  
General Manager  
Palm Harbor Homes, Inc.  
605 South Frontage Road  
Plant City, FL 33563

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File No.: 0570369-007-AF  
County: Hillsborough

Enclosed is Permit Number 0570369-007-AF to operate a mobile home manufacturing facility, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, FL 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) 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. 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC'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, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (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 EPC's proposed action;
- (f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Palm Harbor Homes, Inc.  
Plant City, FL 33563

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Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

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 EPC's Legal Office at 3629 Queen Palm Drive, Tampa, FL 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

Sincerely,

Richard D. Garrity, Ph.D.  
Executive Director

RDG/KRZ/krz

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 20.52(11), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

**PERMITTEE:**

Palm Harbor Homes, Inc.  
605 South Frontage Road  
Plant City, FL 33563

**PERMIT/CERTIFICATION**

Permit No.: 0570369-007-AF  
County: Hillsborough  
Expiration Date: December 29, 2016  
Project: Mobile Home Manufacturing Facility  
(Plant 06 and Plant 09)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 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 the EPC and made a part hereof and specifically described as follows:

Palm Harbor Homes, Inc., is a mobile home manufacturing facility, which consists of two side by side plants, Plant No. 6 and Plant No. 9. The operations at Plant No. 6 and Plant No. 9 are substantially similar in nature.

The mobile home manufacturing operation involves a series of processes in which mobile homes are assembled and finished. The manufacturing starts with the metal frame painting operation. Assembled metal frames are received and are coated by spray gun in a partially enclosed area. The painted frames serve as the foundation and chassis for the mobile homes. The process continues with the construction and installation of exterior /interior/ walls, floors, ceilings, doors, roofs, electrical, plumbing fixtures, lighting, and appliances. Cabinets are also installed but they are constructed off-site. These operations use a variety of products such as adhesives, cements, fillers, sealants, solvents, surface coatings, specialty coatings, and miscellaneous products.

VOC emissions from this facility are limited by material usage and low solvent technology. The facility is subject to VOC-RACT Rule 62-296.513, F.A.C. for the metal frame painting operation, which limits the VOC content of the coating to 3.5 lb/gal. Their method of compliance is by implementing good work practices and recordkeeping.

Location: 605 S. Frontage Road, Plant City

UTM: 17-389.94 E 3101.35 N

NEDS NO: 0570369

Emission Unit (EU) ID: 003 - Metal Frame Painting – Plant 06  
004 - Manufacturing – Plant 06  
005 - Metal Frame Painting – Plant 09  
006 - Manufacturing – Plant 09

Replacement Permit No.: 0570369-006-AF

Reference Permit No.: 0570369-005-AF

PERMITTEE:  
Palm Harbor Homes, Inc.

Permit/Certification No.: 0570369-007-AF  
Project: Mobile Home Manufacturing Facility  
(Plant 06 and Plant 09)

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-209, 62-210, 62-212, 62-272, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. As requested by the permittee, in order to limit the potential to emit for the facility, the following emission limitations shall apply:  
[Rule 62-4.070(3), F.A.C. and FESOP No.0570369-005-AF]
  - A) The maximum volatile organic compound (VOC) emissions from the entire facility shall not exceed 95.0 tons for any 12 consecutive month period.
  - B) The HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and less than 25 tons in any 12 consecutive month period for any combination of HAPs.
5. VOC emissions shall not exceed 3.5 pounds per gallon of coating, excluding water, as applied to the metal frame. [Rule 62-296.513, F.A.C., and FESOP No.0570369-005-AF]
6. All VOC emissions from solvent washings shall be considered in the emission limitation of Specific Condition No. 4, unless the solvent is directed into containers that prevent evaporation into the atmosphere. [Rule 62-296.513(2)(c), F.A.C.]
7. The coatings for the metal frames shall be applied as supplied by the coating manufacturer. No cutting with other solvents is allowed. [Rule 62-4.070(3), F.A.C., and FESOP No.0570369-005-AF]
8. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]
9. The operating hours for the frame painting and manufacturing operations are not restricted. [Rule 62-4.070(3), F.A.C.]
10. [Reserved]
11. To comply with the emission limitations in Specific Condition Nos. 4 and 5, the permittee shall maintain daily and monthly recordkeeping of the operation for the most recent three year period. The

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Palm Harbor Homes, Inc.

Permit/Certification No.: 0570369-007-AF  
Project: Mobile Home Manufacturing Facility  
(Plant 06 and Plant 09)

**SPECIFIC CONDITIONS:**

records shall be made available to the local, state, or federal air pollution agency upon request. The records shall include, but not limited to the following: [Rule 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) Day, Month, Year
- B) Amount of each material/product usage (metal/non-metal), in gallons.
- C) VOC content of each material used (metal/non-metal), in pounds per gallon.
- D) VOC emissions for each material used, in pounds.
- E) HAP emissions for each material used, in pounds.
- F) MSD sheets for each material used indicating the VOC (in pounds per gallon), the HAP content (in percent by weight) and the CAS number for the HAPS, as submitted with the permit application.
- G) Monthly and twelve month rolling total of 11.B, 11.D and 11.E above in tons.

12. Compliance with the emission limitations of Specific Condition No. 4 shall be determined using EPA Method 24 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The Department may accept, instead of the coating analysis methods required under Rules 62-296.500(2)(b)2, F.A.C., a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings." These records shall be kept on site for each material and made available upon request to the Environmental Protection Commission of Hillsborough County. [Rule 62-296.500(2)(b), F.A.C.]

13. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, the following:

- A) Maintenance of parking areas and yards.
- B) Removal of particulate matter from paved areas, buildings and work areas under the control of the owner/operator.
- C) All metal frames shall be painted in the partially enclosed station on an impervious surface.
- D) Maintain dust control equipment, located and discharging inside the building, so that no visible emissions occur.

14. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320, F.A.C.]

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SPECIFIC CONDITIONS:

- A) Maintain tightly fitting covers and lids on all containers when they are not being handled/tapped.
- B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
- C) Immediately attend to all spills/waste as appropriate.

15. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

16. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(168), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rule 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.

17. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

18. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director