



# Florida Department of Environmental Protection

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Permittee:  
Emergency One, Inc.  
1701 SW 37<sup>th</sup> Avenue  
Ocala, Florida 34474

I.D. Number: 0830066  
Permit Number: 0830066-006-AF  
Expiration Date: **August 30, 2013**  
County: Marion  
Latitude/Longitude:

Attn: J. Richard Blue,  
Vice President of Human Resources

29° 10' 14"N/82° 11' 02"W  
Project: Fire Fighting and Rescue Vehicle  
Production Facility

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210. 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 department and made a part hereof and specifically described as follows:

This permit is a FESOP (Federally Enforceable State Operating Permit) to repermit the facility. This facility consists of a fire fighting and rescue vehicle production facility, which includes emission units 002, 003, and 013.

Emission Unit 002- Four paint booths at the facility. Three of the booths are located in the Body Plant Paint shop. These spray booths are equipped with prefilters and dry filters which provide a combined particulate control efficiency of approximately 94 percent. The fourth paint booth is a Crow Manufacturing Model T3524, equipped with dry filters which provide a particulate reduction efficiency of approximately 95 percent. This spray booth is located between the Body Plant and the Chassis Plant.

Emission Unit 003- Three curing ovens are fired by natural gas. Curing Oven #2 has a heat input of 2.8 MMBTU/hour and Curing Ovens #3 and #4 each have a heat input of 1.3 MMBTU/hour.

Emission Unit 013- Pressurized coating system is used to distribute paint to all paint booths.

This facility, classified as a synthetic minor source, is located at 1701 SW 37<sup>th</sup> Avenue, Ocala, Marion County, Florida.

## GENERAL CONDITIONS:

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, Florida Statutes (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 403.087(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 does 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 and 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 this 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:
  - (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.

## GENERAL CONDITIONS:

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 Section 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.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, Florida Administrative Code (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:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
  - ( ) Compliance with New Source Performance Standards
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 information) 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:
    1. The date, exact place, and time of sampling or measurements;
    2. The person responsible for performing the sampling or measurements;
    3. The date's analyses were performed;
    4. The person responsible for performing the analyses;
    5. The analytical techniques or methods used;
    6. 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.

**OPERATING CONDITIONS**

1. The facility is permitted to operate continuously.  
[Rule 62-210.200(203), (PTE), F.A.C., and application received on September 6, 2007.]
2. The natural gas usage is limited to 70.0 million cubic feet per consecutive 12 months. [Permit 0830066-003-AC]
3. The units shall only be fired with natural gas.  
[Permit 0830066-003-AC]
4. 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.]
5. No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOCs) or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department [Rule 62-296.320(1)(a), F.A.C.] To comply, procedures to minimize pollutant emissions should include but not be limited to the following:
  - a) tightly cover or close all VOC containers when they are not in use,
  - b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
  - c) maintain all piping, valves, fittings, etc. in good operating condition,
  - d) prevent excessive air turbulence across exposed VOCs,
  - e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal
6. 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. [Rule 62-296.320(2), F.A.C.]

**EMISSION LIMITS**

7. Regarding combined facility-wide emissions from **E-One's Main Plant (emission unit ID no. 0830066) and E-One's SVO Plant (emission unit ID no. 0830082)**, the maximum permitted emissions for **VOC and NOx** shall not exceed 99.0 tons per any consecutive 12-month period; the maximum permitted emissions for total HAPs shall not exceed 24.0 tons per any consecutive 12-month period, and the maximum permitted emissions for any individual HAP shall not exceed 9.5 tons per any consecutive 12-month period, all VOC and HAP emissions updated monthly. These limits are requested and accepted by the applicant to make the combined facilities a synthetic minor source.  
[Rules 62-210.200, (244), F.A.C. and 62-4.070(3), F.A.C.]

8. The visible emissions for each oven are limited to less than 20% opacity.  
[Rule 62-296.320(4)(b)1., F.A.C.]

**COMPLIANCE TESTING**

9. Each emission unit must be tested for visible emissions at each emission point in accordance with DEP Method 9 within 180 days after completion of construction/modification. The DEP Method 9 test shall last 30 minutes or the length of the batch/cycle if less than 30 minutes.  
[Rules 62-297.401(9)(c) and 62-297.310(4)(a)2., F.A.C.]
10. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the air compliance section of this office. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test. [Rule 62-297.310(7)(a)9., F.A.C.]
11. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.  
[Rule 62-297.310(2), F.A.C.]

**RECORDKEEPING AND DOCUMENT SUBMITTAL**

12. In order to demonstrate compliance with specific condition number 2 and 7, pursuant to Rule 62-4.070(3), F.A.C., the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log shall contain the following:

Monthly

- a) Designation of the month and year of operation for which the records are being tabulated; and
- b) Consecutive 12-month total of natural gas, VOC, combined HAPs and individual HAPs **usage rates**.
- c) Consecutive 12-month total of nitrogen oxide from natural gas combustion, VOC, combined HAPs and individual HAPs **emissions rates**.  
[Rules 62-4.070(3), F.A.C.]

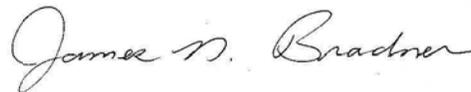
Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities 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.

13. Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years and made available to the Department. Daily logs shall be completed within seven business days and the monthly logs shall be completed by the end of the following month. [Rules 62-4.070(3), F.A.C.]
14. The owner or operator shall complete DEP Form No. 62-210.900(5), F.A.C., "Annual Operating Report for Air Pollutant Emitting Facility," for each calendar year and submit it either electronically using the latest Department Annual Operating Report software or by hard copy to the air compliance section of this office on or before March 1 of the following year in accordance with Rule 62-210.370(3), F.A.C. The emissions shall be computed in accordance with the provisions of Rule 62-210.370(2), F.A.C., for the purposes of the annual operating report. [Rule 62-210.370(3)(a)2., F.A.C.]

**PERMIT APPLICATION**

15. At least sixty days prior to the expiration date of this permit, the permittee shall submit to this office four air permit applications, DEP Form No. 62-210.900(4), along with the processing fee established in Rule 62-4.050(4), F.A.C. [Rule 62-4.090, F.A.C.]

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



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James N. Bradner, P.E.  
Program Administrator  
Air Resources Management

Issued: September 12, 2008