A.S.A. Manufacturing, Inc.
Facility ID No. 0830104
Marion County

Title V Air Operation Permit

Permit No. 0830104-008-AV
(Title V Air Operation Permit Renewal)

Permitting Authority:

State of Florida
Department of Environmental Protection
Waste & Air Resource Programs, Central District

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

Telephone: (407) 897-4100
E-mail: DEP_CD@dep.state.fl.us

Compliance Authority:

State of Florida
Department of Environmental Protection
Compliance Assurance Program, Central District

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

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

FINAL PERMIT

PERMITTEE:
A.S.A. Manufacturing, Inc.
14879 SW 111th Street
Dunnellon, Florida 34432

Permit No. 0830104-008-AV
Facility ID No.: 0830104
Title V Air Operation Permit

This is a Title V air operation permit renewal for the above referenced facility. This existing facility is located at 14879 SW 111th Street, Dunnellon, Marion County. UTM Coordinates are: Zone 17, 366.9 km East and 3215.7 km North. Latitude is: 29˚03'44" North and Longitude is: 82˚21'59" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: January 28, 2015
Renewal Application Due Date: September 18, 2019
Expiration Date: April 30, 2020

F. Thomas Lubozynski, P.E.
Waste & Air Resource Programs Administrator

FTL/kr

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The facility is a fiberglass products manufacturing facility that produces fiberglass drains/sumps for swimming pools, fiberglass wall panels for water parks, and other miscellaneous fiberglass products.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fiberglass Products Manufacturing
Insignificant Emissions Units and Activities (See Appendix H)	
	1. Manually operated electric powered cutting, drilling, grinding and polishing equipment. 2. Wood shop for building pallets used for shipping and molds. 3. One propane-fueled forklift. 4. Application of mold release agent and polyvinyl alcohol (PVA) application using spray gun.

Subsection C. Applicable Regulations.

- Based on the initial Title V air construction permit, 0830104-003-AC, this facility is a major source of hazardous air pollutants (HAP) for Styrene.
- The facility is classified as a Title V facility.
- The facility is subject to NESHAP regulations, 40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.
- The facility has no units subject to the acid rain provisions of the Clean Air act (CAA).

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
State Rule Citations: 62-4.070, 62-210.200, 62-210.300, 62-210.370, 62-210.700, 62-210.900, 62-213.205, 62-213.420, 62.213.440, 62-296.320, F.A.C.	001
40 CFR 63, Subpart A, General Provisions	001
40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production	001

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. **Not federally Enforceable.** 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. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. The permittee shall comply with the following:

a. Resin/gel coating activities shall be conducted inside the manufacturing/shop building, with the exception of manual touch-up activities.

b. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of solvent materials.

c. All solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation in the atmosphere.

d. All materials containing VOC/OS's shall be stored in closed containers and/or in small automatic closing safety cans.

e. Tightly cover or close all VOC containers when they are not in use.

f. Prevent excessive air turbulence across exposed VOC/OS's.

g. Immediately confine and clean up VOC/OS spills. Make sure wastes are placed in closed containers for reuse, recycling, or proper disposal.

[Rule 62-296.320(1), F.A.C.; Construction Permit 0830104-003-AC]

FW4. 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% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1. and 4., F.A.C.]

FW5. Unconfined Particulate Matter. 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. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Application of water, when necessary, to control emissions.
b. Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent re-entrainment, and from buildings or work areas to prevent particulate.

c. Enclosure or covering of activities or equipment where necessary.
d. Filters shall be used on each exhaust fan at the three sided booth that vent air to the atmosphere. The filters shall be changed (replaced) as necessary to ensure proper capture of unconfined particulate matter.

[Rule 62-296.320(4)(c)1. and 2., F.A.C.; Construction Permit 0830104-003-AC]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees.

a. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C.

b. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due.

c. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.**

d. Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. The submittal may be made electronically to **DEP_CD@dep.state.fl.us**.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.

a. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650, or by e-mail RMPRC@epacdx.net.

b. According to the following hyperlink, the RMP can be submitted electronically: http://www.epa.gov/emergencies/content/rmp/index.htm#submitting
[40 CFR 68]

FW9. Title V Air Operation Permit Renewal. At least 225 days prior to the expiration date of this operation permit, the permittee shall submit to the Central District office, an appropriate air permit application, DEP Form No. 62-210.900(1). The Department recommends scheduling a pre-application meeting prior to the drafting and submittal of the renewal application. To properly apply for a Title V Air Operation Permit renewal, the applicant shall submit the following:

a. Application for Air Permit – Long Form (DEP Form No. 62-210.900(1)), which can be found at: http://www.dep.state.fl.us/air/rules/forms/application.htm . The applicant may apply electronically using the EPSAP (Electronic Permit Submittal and Processing) system and use EPSAP – Long Form, which can be found at: http://www.floridadep.org/air/emission/epsap/default.htm ;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent two months of records/logs specified in Specific Condition No. A.6 and A.7.

[Rule 62-213.420(a)2., F.A.C.]

Subsection A. Emissions Unit 001

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
-001	Fiberglass Products Manufacturing

Three sided Booth: In this emission unit, fiberglass drains/sumps and other miscellaneous fiberglass products are manufactured in a three-sided booth which is located within the manufacturing building. Molds are prepared using wax-like paste or polyvinyl alcohol (PVA) as a releasing agent. Gel coat and resin are applied to the molds using hand layup, as well as, a non-atomized chop gun (spray) application. Acetone is used for chop gun flushing and cleaning of tools. These materials are applied within the booth. Emissions are exhausted by means of two axial flow exhaust fans, which discharge horizontally from the manufacturing building through gravity louvers. Particulate filters are used before the exhaust fans to reduce particulate matter emissions.

Open Shop Area: Fiberglass wall panels and waterstops are manufactured on vacuum tables which are located in the open shop area of the manufacturing building. Vinyl ester resin, general purpose resin, and fiberglass are applied manually as needed (i.e., rollers or brush). A small amount of styrene is also applied to the wall panels by hand for cleaning and softening. All emissions are fugitive emissions and exhaust the building through two roll-up doors on either end of the building. There are two exhaust fans located directly over each roll-up door, two roof mounted exhaust fans and roof vents located along the peak of the roof.

Outside Covered Trim Area: The products are then transferred to a covered area outside the manufacturing building where trimming and grinding of parts is performed using hand held electric tools. Touch-up of the gel coat using a small brush is also performed as needed.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emission unit may operate 7,488 hours/year.
[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 0830104-003-AC]

A.2. Operation Requirements. The permittee shall comply with the following:

a. The two axial flow exhaust fans in the three sided booth shall have no device that restricts the exhaust exiting the stacks, i.e., rain cap.
b. The wall mounted exhaust fans located on both ends of the manufacturing/shop building shall have no device that restricts the exhaust exiting the stack, i.e., rain cap.
c. The intake of each exhaust fan shall not be obstructed, except for fiber filters that are used to control particulate emissions.
d. An exhaust fan shall be operating during any time materials containing VOCs and/or Styrene is being used in the section (area of the building) being exhausted by that fan. The fan shall remain operating for at least 1 hour after usage of such materials.

[Rule 62-296.320(1), F.A.C.; Construction Permit 0830104-003-AC]

A.3. Process Changes. Any process changes, including, but not limited to (a) any significant change of VOC/OS species, (b) any proposed increase in production rate, or (c) any proposed addition of processing equipment may require an air construction permit. Contact the Permitting Authority listed on the cover page of this permit prior to making a modification. Any physical change in, change in the method of operation or, or addition to a stationary source or facility, which increases the actual emissions of any air pollutant may be considered a “Modification”.
[Rule 62-210.300, F.A.C.; Construction Permit 0830104-003-AC]

Emission Limitations and Standards

A.4. VOC/HAPs Emissions Limit. The facility-wide VOC and HAPs emissions shall not exceed the following during any consecutive 12-month period:

Pollutant	**Emissions Limitation (tons per consecutive 12-month period)**
Total VOC (including styrene)	48.7
Total HAPs	35.8
Individual HAPs	34.1

[Rules 62-4.050, 62-296.320(1), and 62-210.200 (PTE), F.A.C.; Construction Permit 0830104-003-AC]

A.5. Excess Emissions. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may be reasonably prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Recordkeeping and Reporting Requirements

A.6. VOC Recordkeeping. In order to document compliance with Specific Condition A.4, the permittee shall maintain a monthly log at the facility. The logs shall be based on deliveries. The log at a minimum shall contain the following:

a. Facility Name, Facility ID No. (i.e. 0830104), Emission Unit No. and description;
b. Month and year of record;
c. Identification and quantity of each resin, solvent, chemical, etc. delivered to the facility that month which contains Styrene and/or VOCs;
d. The appropriate emission factor(s) with the application method(s) used.
    1. Styrene and Methyl Methacrylate (MMA) emissions shall be determined by using the emission factor (EF) in the attached Unified Emission Factor for Open Molding of Composites (UEF) Table (Appendix G) and the following formula:

    Styrene or MMA Emissions (tons) = [(% tons of resin or gel coat) x (EF / 2000 lbs/ton)]

    2. VOC and HAP emissions, other than Styrene and MMA, shall be determined by a mass balance method, or appropriate emission factors. When applicable, the emission factor used shall be documented appropriately. If the permittee seeks emission credits for removed chemicals, the documentation for all chemicals removed from the facility for recycling or disposal shall be attached to the log.
e. The tons of each individual HAP emissions for the month of record and for the most recent consecutive 12-month period;
f. The tons of total HAP emissions for the month of record and for the most recent consecutive 12-month period;
g. The tons of VOC (including Styrene) emissions for the month of record and for the most recent consecutive 12-month period;

The monthly logs shall be completed by the end of the following month.

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

A.7. Filter Change Record Keeping. In order to document compliance with Specific Condition FW5.d, the permittee shall maintain a log at the facility documenting the date each fan's filter was changed. Each fan's log shall include the facility name, facility ID No. (i.e. 0830104), Emission Unit number, and signature of the person changing the filter.
[Rule 62-4.070(3), F.A.C.]

A.8. Record Retention. All records required in this permit shall be retained for a minimum of five years. They shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A.	Citation Formats and Glossary of Common Terms
Appendix B.	General Conditions
Appendix C.	Common Conditions
Appendix D.	40 CFR Part 63 Subpart A - General Provisions
Appendix E.	40 CFR Part 63 Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
Appendix F.	Unified Emission Factor for Open Molding of Composites (UEF) Table
Appendix G.	List of Insignificant Emissions Units and/or Activities
Appendix RR.	Facility-wide Reporting Requirements
Appendix TV.	Title V General Conditions

The following Attachment is for Information only:

Table 1.	Permit History