Premium Leisure, LLC

Facility ID No. 1030508
Pinellas County

Title V Air Operation Permit Renewal

Permit No. 1030508-004-AV
(Renewal of Title V Air Operation Permit No. 1030508-002-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
Fax: (813) 632-7668

Compliance Authority:

Pinellas County Air Quality Division

300 South Garden Avenue
Clearwater, Florida 33576

Telephone: (727) 464-4422

Title V Air Operation Permit Renewal

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Premium Leisure, LLC
6101 North 45th Street
St. Petersburg, Florida 33714

Permit No. 1030508-004-AV
Facility ID No. 1030508
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The facility is located in Pinellas County at 6101 North 45th Street, St. Petersburg, Florida. UTM Coordinates are: Zone 17, 334.8 East and 3078.99 North. Latitude is: 27° 49' 37" North; and, Longitude is: 82° 41' 39" 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: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Draft/Proposed)

_____

Cindy Zhang-Torres, P.E.
Air Permitting Manager
Southwest District

CZT/ds/pp

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The facility consists of a reinforced plastic composites production operation and associated activities. The primary source of emissions is the resin/gel coat application process which uses both mechanical (non-atomized) and manual application techniques. This operation includes preparation of mold, the application of resin and gel coat to the molds, product assembly, and touch up. Miscellaneous activities include spray foam application, the use of VOC-containing (non-HAP) solvents for cleanup activities, the use of piping primers/glues, wood working activities, and the use of water-based stains. VOC and HAP emissions from the resin/gel coat- application, touch up and cleaning solvents are emitted fugitively. The building ventilation system is used to disperse styrene emissions into the atmosphere to avoid and/or minimize odor impacts off-site. The facility took synthetic limit on the VOC emissions below 250 tons/year to avoid being a Prevention of Significant Deterioration (PSD) major facility. The facility also took synthetic limit on HAPs emissions below 100 tons/year to avoid the need for add-on controls to achieve 95% reduction of HAP emissions.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Reinforced Plastic Composites Production Facility and Associated Activities

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received July 15, 2011, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A	001
40 CFR 63, Subpart WWWW	001
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

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. 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. The doors and windows shall be closed whenever feasible to ensure that materials which emit VOC emissions from the materials containing VOC's are captured and exhausted through the stacks with adequate dispersion to prevent objectionable odors. If the Department receive a valid odor complaint, the Department reserves the right to require additional odor control measures/work practices be implemented.
[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C., Pinellas County Code 58-178; Construction Permit No. 1030508-001-AC]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvent (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following operating procedure and work practice relating to VOC/OS use and emissions:

a. The reinforced plastic composites production shall be conducted in the semi-enclosed areas within the production building, which shall be ventilated by fans and exhaust stacks as described below. Fans and exhaust stacks, as described below, located in the production building shall be operating whenever usage of material containing VOC/OS occurs and shall remain operating for at least 1 hour after the usage has been completed. The minimum total combined airflow through these stacks will be approximately 54,000 acfm, and the minimum height of each stack shall be 35 feet above ground level.

   The Department reserves the right to require greater airflow (acfm) or velocity should the existing parameters be found inadequate in capturing, exhausting and dispersing the VOC/OS emissions.

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

c. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.

d. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of materials containing VOC/OS's.

e. Immediately attend to all spills of materials containing VOC/OS's as appropriate.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1030508-001-AC]

{Permitting Note: Additional work practices are included in Table 4 of the attached 40 CFR 63, subpart WWWW.}

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, F.A.C.]

FW5. Unconfined Particulate Matter. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter resulting from the facility, including but not limited to, buffing, polishing, carving, cutting, drilling, routing, sanding, sawing, trimming, machining, surface grinding, or turning. Reasonable precaution to be taken includes the following:

a. Paved parking and trafficked areas shall be maintained and kept free of particulate matter build-up.

b. Proper disposal of wastes (e.g., saw dust, pipe cutting etc.) in an industrial dumpster.

c. Sprinkling with water shall be used as necessary on paved and unpaved areas and in the dumpster.

d. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particular matter.

[Rules 62-296.320(4)(c) and 62-4.070(3), F.A.C.; Construction Permit No. 1030508-001-AC]

FW6. Special Compliance Tests - When the Department, after investigation, has good reason (such as complaints, increased visible emissions, etc.) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7)(b), F.A.C.]

Annual Reports and Fees

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

FW7. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW8. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download 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. [Rule 62-213.205, F.A.C.]

FW9. 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.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW10. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. 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.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

Subsection A. Emissions Unit No. 001

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

EU No.	Brief Description
-001	Reinforced Plastic Composites Production Facility and Associated Activities

The operation involves reinforced plastic composites production operation and associated activities. The primary source of emissions is the resin/gel coat application process using both mechanical (non-atomized) and manual application techniques. This operation includes preparation of mold, the application of resin and gelcoat to the molds, product assembly, and touch up. Miscellaneous activities include spray foam application, cleanup activities using non-HAP, VOC-containing solvents, use of piping primers/glues, wood working activities, and the use of water-based stains. VOC and HAP emissions from the resin/gel coat application, touch up and cleaning solvents are emitted fugitively. The building ventilation system is used to disperse styrene emissions into the atmosphere to avoid and/or minimize odor impacts off-site.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year).
[Construction Permit No. 1030508-001-AC; Rules 62-210.200 (PTE) and 62-4.070(3), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.2. Hazardous Air Pollutant (HAP) Emissions. Total HAP emissions from this emissions unit shall not exceed 98.0 tons in any consecutive 12-month period.
[Construction Permit No. 1030508-001-AC and Rule 62-210.200, F.A.C. – Definitions (PTE)]

A.3. Volatile Organic Compound (VOC) Emissions. Total VOC emissions from this emissions unit including styrene and other HAPs that are VOCs, shall not exceed 245.0 tons in any consecutive 12-month period.
[Construction Permit No. 1030508-001-AC and Rule 62-210.200, F.A.C. – Definitions (PTE)]

Recordkeeping and Reporting Requirements

A.4. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

A.5. Monthly Records - The permittee shall keep monthly logs for the facility to document compliance with the HAP and VOC emissions limitations of Specific Condition Nos. A.2. and A.3. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. "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. Once implemented, the chosen option shall not change without prior written approval of the Department. The monthly logs shall include at least the following information:

a. Facility Name, Facility ID No., Emission Unit ID No. (E.U. 1030508 001) and Description

b. Month, year, and method used for records (usage or purchases)

c. For each material/product used containing HAP/VOC (resin, gel, catalyst, foam, cleaning solvents, and miscellaneous materials, etc.) and per each application method record the following :

(1) the quantity of each material used for the month (in tons).

(2) the percentage (%) by weight of VOC,

(3) the percentage (%) by weight of HAP,

(4) each individual HAP emission factor in units of pounds per ton of resin/gel coat applied for each application method ,

(5) the emissions of each individual HAP in tons.

d. Calculate total VOC and total HAP emissions for the month in tons.

e. Calculate total VOC and total HAP emissions for the most recent consecutive 12-month period.

f. VOC and HAP Emissions Calculation Methods:

(1) VOC emissions shall be determined by a mass balance method, or appropriate emission factors.

(2) HAP emission calculation shall be determined by using the emission factors in Table 1 of 40 CFR Part 63, Subpart WWWW and/or from the Unified Emission Factors for Open Molding of Composites table dated July 23, 2001 (see Appendix NESHAP 40 CFR 63, Subpart WWWW and Appendix UEF). The current calculation shall use the formula:

$Emissions_{HAP}$ tons = ((χ tons of resin or gel coat) x (EF* lb/ton)) / 2000 lbs/ton

*EF = the appropriate emission factor from 40 CFR 63, Subpart WWWW, Table 1 and/or from the Unified Emission Factors for Open Molding of Composites table dated July 23, 2001.

HAP emission limits for open molding sources must meet the emission limits in Table 3 to the Subpart WWWW.

(3) Emission factors used to calculate HAP and VOC emissions for the logs shall be updated upon receiving more accurate emission data, such as updates to Subpart WWWW, UEF Table, AP-42, or other references or methods approved by the Department prior to using.

g. Additionally, each log shall have:

(1) the appropriate footnotes listing emission factors or other methods used in calculation, and

(2) if applicable, the documentation for all chemicals removed from the facility if the permittee seeks emission credits for the wastes.

Note, if any month results in total HAPs, and/or total VOCs emissions being within 10% of its associated allowable emission limit for the prior consecutive 12-month period, the monthly log required below shall be then kept daily. The daily logs shall include a cumulative total to demonstrate compliance with HAP and VOC emissions limitations of Specific Condition Nos. A.2. and A.3.

[Rule 62-4.070(3), F.A.C., 40 CFR 63, Subpart WWWW, Section 63.5805(d)(2)(ii) and Construction Permit No. 1030508-001-AC]

A.6. Recordkeeping Requirements. The monthly logs shall be completed by the 15th of the following month. Daily logs (if required) shall be completed within 5 business days. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each material, which includes sufficient information to determine HAP emissions and VOC emissions. The logs shall be retained on file at the facility for a minimum of the most recent five (5) years period and made available to the Department and PCAQD upon request.
[Rule 62-4.070(3), F.A.C.]

Other Requirements

A.7. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subparts A - General Provisions and 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

[Rules 62-204.800 and 62-213.440, F.A.C.]

{Permitting Note: Table 3, Applicability Table for 40 CFR 63, Subpart WWWW is included in the Referenced Attachments section of this permit. Items in the table identified as applicable are based upon operations at the time the Title V renewal application was received. Any change in operations may change the applicable of items in Table 3.}

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary
Appendix ICE, Requirements for Internal Combustion Engines
Appendix NESHAP 40 63, Subpart A – General Provisions.
Appendix NESHAP 40 CFR 63, Subpart WWWW.
Appendix RR, Facility-wide Reporting Requirements
Appendix TV, Title V General Conditions
Appendix UEF (Unified Emissions Factors for Open Molding of Composites)

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History.
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.
Table 3, Applicability Table for NESHAP 40 CFR 63, Subpart WWWW.
Statement of Basis