

Odom Fiberglass, Inc.
Fiberglass Tubs, Spas, Hunting Blind and Boat Manufacturing Facility
Facility ID No.: 1130040
Santa Rosa County

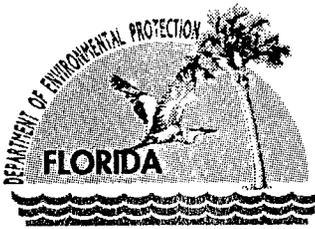
Air Operation Permit
Permit No.: 1130040-002-AF

Permitting Authority
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

Air Operation Permit
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Table of Contents

<u>Section Number</u>	<u>Page</u>
Placard Page	1
I. Facility Information	2
A. Facility Description.	
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
C. Relevant Documents.	
II. Facility-wide Conditions	3
III. Emissions Unit(s) and Conditions	
A. Fiberglass Resin Products	5
Appendices:	
Appendix G-1, General Conditions	



Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

Permittee:
Odom Fiberglass, Inc.

Permit No.: 1130040-002-AF
Facility ID No.: 1130040
SIC Nos.: 30, 3089
Project: Air Operation Permit

This permit is for the operation of the Fiberglass Tub, Spa, Hunting Blind and Boat Manufacturing Facility located at 2944 Avalon Blvd, North of I-10 and Avalon Blvd (SR 281), Santa Rosa County; UTM Coordinates: Zone 16, 472.74 km East and 3378.78 km North; Latitude: 30° 32' 34" North and Longitude: 87° 17' 03" West.

STATEMENT OF BASIS: This 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, and 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix G-1, General Conditions

Effective Date: April 13, 1999
Renewal Application Due Date: February 12, 2004
Expiration Date: April 13, 2004

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Ed K. Middleswart, P.E.
Air Program Administrator

EKM/as

Section I. Facility Information.**Subsection A. Facility Description.**

This is a fiberglass goods manufacturing facility. It manufactures hot tubs, spas, hunting blinds and boats by applying gelcoat, fiberglass and styrene resins to molds and vacuum forming plastic/acrylic sheets. The forms are allowed to set up in the molds and then are removed and taken to a finishing area where excess is trimmed off, holes are drilled and appropriate hardware and frames are attached. Some of the products are taken to a foam application area for the application of spray-on insulating foam.

Emissions of styrene are estimated at 7.8 T/yr, with other miscellaneous solvents adding 2.7 T VOC/yr. The majority of the VOC/styrene emissions exit the spray/lay-up building from a filtered ventilating system stack.

Based on the permit application received February 17, 1999, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**E.U.**

<u>ID No.</u>	<u>Brief Description</u>	<u>SCC Segment #</u>
001	Fiberglass Resin Products	3-08-007
	Mold release	3-08-007-02
	Gelcoat: Spray On	3-08-007-22
	Resin Spray Lay-Up	3-08-007-30
	Resin: General: Roll On	3-08-007-23
	Solvent Consumption	3-08-007-03
	Adhesive Consumption	3-08-007-04
	Other Not Classified (foam application)	3-08-007-99
	Plastics Machining: Drilling/Sanding/Sawing/etc.	3-08-007-01

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:

Operating Permit Application received October 1, 1993

Operating Permit AO57-238754, issued October 8, 1993

Operating Permit Renewal Application received February 17, 1999

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. 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(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:

- a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
- b. certification forms and/or RMPs according to the promulgated rule schedule.

[Rule 62-204.800(12), F.A.C., and 40 CFR 68]

5. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. All vats, containers, etc., that are used for temporary and permanent storage of VOC/organic solvents shall be covered when not being accessed for filling, emptying or working.

[Rule 62-296.320(1)(a), F.A.C.]

6. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- (a) Maintenance of roads, parking areas, and yards, including application of water or dust suppressants when necessary to control emissions, removal or particulate matter from roads and other paved areas under control of the owner or operator to mitigate reentrainment, and from building or work areas to reduce airborne particulate matter.
- (b) Keeping dust-containing receptacles closed and protected from the action of the wind.

[Rule 62-296.320(4)(c)2., F.A.C.]

Odom Fiberglass, Inc.

Permit No.: 1130040-002-AF

Fiberglass Tubs, Spas, Hunting Blind and Boat Manufacturing Facility

Page 4

7. An annual operating report for air pollutant emitting facility, DEP Form 62-210.990(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department's Northwest District office.

[Rule 62-210.370, F.A.C.]

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in FAC Rule 62-4.050(4) to the Northwest District office of the Department.

[Rule 62-4.090, F.A.C.]

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364 during normal working hours.

[Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.**Subsection A. This section addresses the following emissions unit(s).****E.U.**

<u>ID No.</u>	<u>Brief Description</u>	<u>SCC Segment #</u>
001	Fiberglass Resin Products	3-08-007
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The majority of the VOC/styrene emissions exit the spray/lay-up building from a filtered ventilating system stack. VOCs and HAPs are controlled by limiting annual materials usage. PM is controlled by filters on the building exhaust system

The following specific conditions apply to the emissions unit(s) listed above:**Essential Potential to Emit (PTE) Parameters**

A.1. Capacity. The annual usage of styrene resins, gelcoats, paints and solvents shall not exceed the amounts which, based on the HAP contents and in combination with other HAP emitting units, violates the emissions caps.

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C., and permittee request]

A.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year, as long as the materials usage limits are observed.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.3. Hazardous Air Pollutants The facility-wide maximum allowable annual emissions of HAPs shall not be equal to or greater than; 10 T of any one HAP, or 25 T of any combination of HAPs.
[Rules 62-4.160(2), 62-4.070, 62-210.200(PTE), F.A.C., and permittee request]

Recordkeeping and Reporting Requirements

A.4. HAP emissions shall be tracked by use logs and monthly materials usage and emissions calculations based on materials' HAP content (wt %), gallons of materials used, and pound of material/gallon of material. Monthly summaries of emissions shall be kept and maintained for Department inspection for at least five years from date of usage. Monthly summaries shall be certified by a responsible company representative to be accurate and truthful calculated representations of actual emissions.
[Rules 62-4.160(2), 62-4.070, 62-210.200(PTE), F.A.C., and permittee request]

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. 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), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute 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 the 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, are required by Department rules. This provision includes the operation of backup or 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
 - c. Sampling or monitoring 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 exact 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.

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 proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with 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 Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. 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 instrumentation) 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:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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.