



MODIFIED AIR CONSTRUCTION PERMIT DETERMINATION

PERMITTEE:

Tom Shapiro, President
Sterling Manufacturing
8293 Consumer Court
Sarasota, FL 34240

Permitting Authority:

Sarasota County Parks, Recreation and Natural Resources [SCNR]
Air & Water Quality
1001 Sarasota Center Blvd.
Sarasota, Florida 34240

Project:

Air Permit No. 1150151-003-AC
Air Construction Permit Modification and Air Operation Permit Project: Corian^R kitchen countertop manufacturing facility
Sterling Manufacturing

On February 13, 2012 the applicant submitted a request to modify their state air construction permit to increase the hours of operation from 40 hrs/ wk to 80 hrs/ wk; with concurrent issue of an air operation permit. *NOTE: The air construction permit is federally enforceable.* The permits will be issued as one document pursuant to Section 403.087, Florida Statutes, (F.S.). The facility manufactures kitchen countertops using DuPont Corian^R solid surface material (Standard Industrial Classification No. 3299). Sterling Manufacturing fabricates the Corian^R by cutting/ routing/ sanding/ buffing and seamlessly joining pieces using Corian^R joint adhesive COR004 (Parts A and B). Denatured alcohol is used for cleaning purposes. The facility is located in Sarasota County at 8293 Consumer Court, Sarasota, FL 34240.

NOTICE AND COMMENTS

Applicant: The Applicant's consultant Lynn Robinson P. E., Southern Environmental Sciences, Inc., 1204 North Wheeler Street, Plant City, Florida 33563; requested we change the definition of "Synthetic Minor" to "Minor Facility" to accurately reflect that the facility is a minor source without additional control equipment.

FDEP and USEPA Region IV: No comments were received from either the FDEP or USEPA Region IV.

Public: No comments were received.

CONCLUSION

The final action is to issue the Modified Air Construction Permit and Air Operation Permit [one document] with changes requested by the Applicant.

S12PC.15



AIR CONSTRUCTION PERMIT and AIR OPERATION PERMIT

April 12, 2012

CERTIFIED MAIL #7011 3500 0001 1168 4633
RETURN RECEIPT REQUESTED:

PERMITTEE:

Sterling Manufacturing
8293 Consumer Court
Sarasota, FL 34240

Air Permit No.s: 1150151-003-AC and
1150151-004-AO
County: Sarasota County
Expiration Date: April 12, 2017

Authorized Representative:
Tom Shapiro, President

Sterling Manufacturing
Air Construction Permit Modification and Air
Operation Permit Project: Corian^R kitchen
countertop manufacturing facility

This state air construction permit modification (permit 1150151-003-AC) with concurrent issue of the state air operation permit (permit 1150151-004-AO), authorizes the facility to increase the hours of operation from 40 hrs/ wk to 80 hrs/ wk. *NOTE: The air construction permit is federally enforceable.* The permits are issued as one document. The facility manufactures kitchen countertops using DuPont Corian^R solid surface material. Sterling Manufacturing fabricates the Corian^R by cutting/ routing/ sanding/ buffing and seamlessly joining pieces using Corian^R joint adhesive COR004 (Parts A and B). Denatured alcohol is used for cleaning purposes. The facility is located at 8293 Consumer Court, Sarasota, FL 34240.

This permit is organized by the following sections.

- Section 1. General Information*
- Section 2. Administrative Requirements*
- Section 3. Facility Wide Specific Conditions*
- Section 4. Emissions Unit Specific Conditions*
- Section 5. Appendices*

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Section 5. Appendix A of this permit.

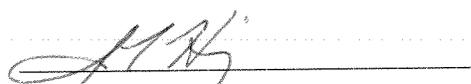
This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with Sarasota County Parks, Recreation and Natural Resources (SCNR). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Any party to this Order (air permit) has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Office of the County Attorney, 1660 Ringling Boulevard, Sarasota, Florida 34236; 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 of Appeal must be filed within thirty (30) days from the date this Order is filed with the Clerk of the Office of the County Attorney.

Executed in Sarasota, Florida.

SARASOTA COUNTY PARKS, RECREATION AND NATURAL RESOURCES
AIR & WATER QUALITY


Susan Cameron
Environmental Specialist III
Sarasota County Air & Water Quality


John T. Hickey, P.E.
Manager
Sarasota County Air & Water Quality

Enclosure

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this Final Air Permit package was mailed by certified mail before the close of business on April 10, 2012 to:

Tom Shapiro, Sterling Manufacturing, 8293 Consumer Court, Sarasota, FL 34240;
TShapiro@sterling-mfg.com

The undersigned duly designated deputy clerk hereby certifies that this Notice of Final Air Permit package was sent by electronic mail (or a link to these documents made available electronically on a

publicly accessible server) with received receipt requested before the close of business on *April __, 2012* to the persons listed below:

Cc: Lynn Robinson, Southern Environmental Sciences, Inc., 1204 North Wheeler Street Plant City, Florida 33563; lrobinson@sesfla.com

Cindy Zhang-Torres, P.E. III, *Air Permitting Supervisor*, FDEP SW District, 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926; Cindy.Zhang-Torres@dep.state.fl.us

David M. Pearce, *Attorney*, Sarasota County Office of the County Attorney; dpearce@scgov.net

Melissa L. Wagar, Sarasota County Office of the County Attorney; mwagar@scgov.net

Clerk Stamp



FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated SCNR Clerk, receipt of which is hereby acknowledged.

Me. [Signature] April 10, 2012
Clerk Date

S12PC.014

SECTION 1. GENERAL INFORMATION

PERMITTEE:

Sterling Manufacturing
8293 Consumer Court
Sarasota, FL 34240

Air Permit No.s: 1150151-003-AC and
1150151-004-AO
Effective Date: April 12, 2012
Expiration Date: April 12, 2017
Air Construction Permit Modification and Air
Operation Permit Project: Corian^R kitchen
Countertop manufacturing facility

FACILITY AND PROJECT DESCRIPTION

This state air construction permit modification (permit 1150151-003-AC) with concurrent issue of the state air operation permit (permit 1150151-004-AO), authorizes the facility to increase the hours of operation from 40 hrs/ wk to 80 hrs/ wk. *NOTE: The air construction permit is federally enforceable.* The permits are issued as one document. The facility manufactures kitchen countertops using DuPont Corian^R solid surface material. Sterling Manufacturing fabricates the Corian^R by cutting/ routing/ sanding/ buffing and seamlessly joining pieces using Corian^R joint adhesive COR004 (Parts A and B). Denatured alcohol is used for cleaning purposes. The facility is located at 8293 Consumer Court, Sarasota, FL 34240.

The maximum allowable emissions of total PM, total VOC, total HAP, and individual HAP from the facility will be limited to 24.0, 10.0, 10.0, and 5.0 tons per any 12 consecutive month period, respectively. All emissions of HAPs at this facility are expected to be VOCs. Visible Emissions from four (4) cartridge filter systems are limited to a maximum of 5 % opacity.

Operational design of the facility will ensure that emissions of particulate matter (PM and PM-10), carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO₂), VOC (Volatile Organic Compounds), and HAP(s) (Hazardous Air Pollutant(s)) are below the Title V permitting thresholds of Chapter 62-213, F.A.C. The facility will be classified as a Naturally Minor facility as defined by Rule 62-210.200(195), F.A.C.:

Minor Facility: A facility that is not a major facility.

The conditions of this permit will ensure emissions remain below the Title V permitting thresholds of Chapter 62-213, F.A.C.

SECTION 1. GENERAL INFORMATION

FACILITY REGULATORY CLASSIFICATION

Subject to:	Y/N
Rule 62-212.300, Stationary Sources – Preconstruction Review, General Preconstruction Review Requirements, F.A.C. ¹	Y
Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. ²	N
Rule 62-296.320, Stationary Sources – Emission Standards - General Pollutant Emission Limiting Standards, F.A.C. ^{3,4}	Y
Rule 62-296.500, Reasonably Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities ⁵	N
Rule 62-296.700, Reasonably Available Control Technology (RACT) Particulate Matter ⁶	N
Rule 62-204.800(8), Stds. of Performance for New Stationary Sources, F.A.C. ⁷ (NSPS)	N
Rule 62-204.800(10), Natl. Emission Stds. for Hazardous Air Pollutants, F.A.C. ⁸ (NESHAPS)	N
Chapter 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C. ⁹	N
Rule 62-297.310, Stationary Sources – Emissions Monitoring - General Compliance Test Requirements, F.A.C. ¹⁰	Y

1. Not exempt from general permitting requirements
2. Facility is PSD minor source
3. Facility is a source of unconfined particulate matter emissions
4. Potential source of odors
5. Facility is not located in an ozone nonattainment or air quality maintenance area
6. Facility is not located in a PM air quality maintenance area or in the area of influence of such an area
7. Facility is not subject to Title 40 Part 60
8. Facility is minor for HAPs
9. Facility is naturally minor
10. Compliance testing is required

PERTINENT DOCUMENTS:

- 1150151-001-AC Original state air construction permit; and,
- 1150151-002-AO Original state air operation permit.

Facility Information Summary:

Site/Location: 8293 Consumer Court, Sarasota, FL 34240.

SECTION 1. GENERAL INFORMATION

UTM: 17-361.05 E 3026.26 N

Latitude: 27°21'08.99" Longitude: 82°24'17.41"

Facility ID No: 1150151

Emission Unit (EU) ID No.: 001 - Corian^R kitchen
countertop manufacturing facility

EU 001 Emissions Points:

001 - Model 336 DF Ultra-Conic cartridge filter

002 - Model 336 DF Ultra-Conic cartridge filter

003 - Model 211 CC Cartridge dust collector

004 - Model 211 CC Cartridge dust collector

Note: Please reference Permit No. and Emission Unit (EU) ID No. in all correspondence, test report submittals, applications, etc.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is Sarasota County Parks, Recreation and Natural Resources [SCNR], Air & Water Quality. SCNR's mailing address is: SCNR Air & Water Quality; 1001 Sarasota Center Blvd. Sarasota; Sarasota, Florida 34240. All documents related to applications for permits shall be submitted in triplicate to SCNR.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to SCNR. The mailing address and phone number are: SCNR Air & Water Quality; 1001 Sarasota Center Blvd.; Sarasota, Florida 34240; (941)861-0675.
3. Appendices: The following Appendices are attached as part of this permit:
 - Appendix A. Citation Formats and Glossary of Common Terms;
 - Appendix B. General Conditions;
 - Appendix C. Common Conditions; and,
 - Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms, and Application Procedures: All applicable rules and design discharge limitations specified in the application shall be adhered to. The facility is subject to all applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297. Issuance of this permit does not relieve the permittee from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Florida Department of Environmental Protection (DEP), SCNR or any other such requirements under Federal, State, or Local law. [Rules 62-210.300 and 62-4.070(7), F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, SCNR may require the permittee to conform to new or additional conditions. SCNR shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, SCNR may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modification: Any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere. No emissions unit or facility shall be constructed or modified without obtaining an air construction permit from SCNR prior to the beginning of construction or

SECTION 2. ADMINISTRATIVE REQUIREMENTS

modification. [40 CFR 60.14; Rules 62-4.030, 62-4.070(3), 62-4.080(2), 62-210.300(1) and 62-212.300(1), F.A.C.]

7. Rule Compliance: A facility or emissions unit subject to any standard or requirement of 40 CFR. Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. [Rule 62-296.100(3), F.A.C.]
8. Air Operation Permit Renewal: A completed application for an air operation permit shall be submitted to SCNR Air & Water Quality no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the applicant shall submit the following:
 - a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
 - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
 - c. a copy of the most recent 12 consecutive months of records as required by Specific Condition No.s 20 and 21;
 - d. a copy of the operating records (e.g., hours of operation) for the most recent 12 consecutive months for each process at this facility; and,
 - e. copies of the most recent visible emissions compliance tests as required by Specific Condition No. 15.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2) and 62-210.900, F.A.C.]

SECTION 3. FACILITY WIDE SPECIFIC CONDITIONS

A. Facility Wide

Facility wide Performance Restrictions:

9. This section of the permit addresses the entire facility. Facility wide General Conditions, Common Conditions and Common Testing Conditions are located in Appendices B, C and D, respectively.
10. Operating Hours and Emissions Limits: The facility is permitted to operate 4,160 hours/year. Emissions from the facility are limited 5 tpy HAP (e.g., methyl methacrylate); 10 tpy total combined HAPs; 10 tpy total VOC; and 24.0 tpy total PM. [Rules 62-4.070(3) and 62-210.200(240) PTE, F.A.C.]
11. Circumvention: The permittee shall not circumvent any air pollution control devices or allow the emissions of air pollutants without the air pollution control device operating properly. The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [Rules 62-4.070(3), 62-210.650 and 62-210.700(4), F.A.C.]
12. Volatile Organic Compounds (VOC)/Organic Solvents Emissions: No person shall 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 emissions control devices or systems deemed necessary and ordered by SCNR. Such controls include the following:
- a. Tightly cover or close all adhesive/ solvent/ coating containers when they are not in use;
 - b. Tightly cover all adhesive/ solvent/ coating day tanks when not in use;
 - c. Maintain all pipes/ valves/ fittings/ hoses in good operating condition;
 - d. Confine rags used with adhesives/ solvents/ coatings to tightly closed, fireproof containers when not in use; and,
 - e. Immediately confine and clean up any spills; make sure wastes are placed in closed containers for reuse/ recycling/ proper disposal.
- [Rules 62-4.070(3) and 62-296.320(1), F.A.C.]

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Emissions Unit 001

Emissions Units -001 Performance Restrictions:

<i>Emissions Unit ID No.</i>	<i>Description</i>
001	<p>Corian^R kitchen countertop manufacturing facility</p> <p><i>with Emissions Points:</i></p> <p>001 - Model 336 DF Ultra-Conic cartridge filter 002 - Model 336 DF Ultra-Conic cartridge filter 003 - Model 211 CC Cartridge dust collector 004 - Model 211 CC Cartridge dust collector</p>

13. Unconfined Particulate Matter Emissions Opacity Standard: Visible emissions from Emission Points 001, 002, 003, & 004 of EU 001 shall not exceed 5% opacity. [1150151-001-AC; Rule 62-4.070(3), F.A.C.]

14. Operation & Maintenance: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. [Rule 62-4.070(3), F.A.C.]

15. Performance Testing: Emissions from Emission Points 001, 002, 003, & 004 of EU 001 shall be tested for visible emissions during each federal fiscal year (October 1 – September 30). [Rules 62-297.310(7)(a) 4.a., F.A.C.]

16. Visible Emissions Test Methods: Visible emissions tests shall be conducted using EPA Method 9. The visible emissions test shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Rule 62-297, F.A.C. [Rules 62-297.310(4)(a) and 62-297.401, F.A.C.]

17. Test Notification: The permittee shall provide SCNR 15 days prior notice of any performance test, the test date, time, place, and contact person. [Rule 62-297.310(7)(a) 9, F.A.C.]

18. Special Compliance Tests: When SCNR, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Emissions Unit 001

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 SCNR. [Rule 62-297.310(7)(b), F.A.C.]

19. Test Reports - Compliance test results shall be submitted to SCNR as soon as practical but no later than 45 days after the test is completed. [Rule 62-297.310(8)(b), F.A.C.]

Recordkeeping Requirements

20. VOC Recordkeeping: The permittee shall determine the VOC content of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
- The VOC content for each material containing or emitting VOCs;
 - The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s);
 - The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month; and,
 - A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

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

21. HAP Recordkeeping: The permittee shall determine the total and individual HAP contents of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
- The individual and total HAP contents for each material containing or emitting HAPs;
 - The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s);
 - The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month; and,
 - A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.

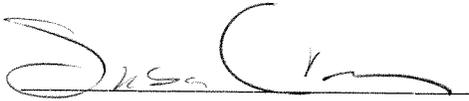
[Rule 62-4.070(3), F.A.C.]

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Emissions Unit 001

22. Records Retention: Records of the measurements/ tests/ reports required by this permit must be retained for at least three years following the date of the measurement or reporting [Rule 62-4.070(3), F.A.C.].

SARASOTA COUNTY PARKS, RECREATION AND NATURAL RESOURCES
AIR & WATER QUALITY



Susan Cameron
Environmental Specialist III
Sarasota County Air & Water Quality



John T. Hickey, P.E.
Manager
Sarasota County Air & Water Quality

S12PC.015

SECTION 5. APPENDICES

Contents

- Appendix A. Citation Formats and Glossary of Common Terms;
- Appendix B. General Conditions;
- Appendix C. Common Conditions;
- Appendix D. Common Testing Requirements;

SECTION 5. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS:

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Permit Numbers

- Example: Permit Nos. 1150001-001-AC, 1150001-002-AF, 1150001-002-AO, or 1150001-002-AV
- Where:
- 115 represents Sarasota County, the county ID # in which the project is located;
 - 0001 represents the specific facility ID number for that county;
 - 001 identifies the specific permit project number;
 - AC identifies the permit as an air construction permit;
 - AF identifies the permit as a minor source federally enforceable state air operation permit;
 - AO identifies the permit as a minor source air operation permit; and
 - AV identifies the permit as a major Title V air operation permit.

Florida Administrative Code (F.A.C.)

- Example: [Rule 62-213.205, F.A.C.]
- Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

- Example: [40 CFR 60.7]
- Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

- | | |
|---|--|
| ° F: degrees Fahrenheit | AAQS: Ambient Air Quality Standard |
| acf: actual cubic feet | acfm: actual cubic feet per minute |
| AQ/STM: Sarasota County Natural Resources, Air Quality/ Storage Tank Management | CO: carbon monoxide |
| ARMS: Air Resources Management System (DEP database) | CO ₂ : carbon dioxide |
| bhp: brake horsepower | COMS: continuous opacity monitoring system |
| Btu: British thermal units | DARM: Division of Air Resource Management |
| CAM: compliance assurance monitoring | DEP: Department of Environmental Protection |
| CEMS: continuous emissions monitoring system | Department: Department of Environmental Protection |
| cfm: cubic feet per minute | dscf: dry standard cubic feet |
| CFR: Code of Federal Regulations | dscfm: dry standard cubic feet per minute |
| BACT: best available control technology | EPA: Environmental Protection Agency |
| CAA: Clean Air Act | esp: electrostatic precipitator (control system for reducing particulate matter) |
| CMS: continuous monitoring system | EU: emissions unit |
| | F.A.C.: Florida Administrative Code |
| | F.A.W.: Florida Administrative Weekly |

SECTION 5. APPENDIX A

Citation Formats and Glossary of Common Terms

f.d.: forced draft	ppm: parts per million
F.S.: Florida Statutes	ppmv: parts per million by volume
fgd: flue gas desulfurization	ppmvd: parts per million by volume, dry basis
fgr: flue gas recirculation	QA: quality assurance
Fl: fluoride	QC: quality control
ft ² : square feet	PSD: prevention of significant deterioration
ft ³ : cubic feet	psi: pounds per square inch
gpm: gallons per minute	PTE: potential to emit
gr: grains	RACT: reasonably available control technology
HAP: hazardous air pollutant	RATA: relative accuracy test audit
Hg: mercury	RBLC: EPA's RACT/BACT/LAER Clearinghouse
i.d.: induced draft	SAM: sulfuric acid mist
ID: identification	scf: standard cubic feet
kPa: kilopascals	scfm: standard cubic feet per minute
lb: pound	SCNR: Sarasota County Parks, Recreation and Natural Resources, Air & Water Quality
MACT: maximum achievable technology	SIC: standard industrial classification code
MMBtu: million British thermal units	SIP: State Implementation Plan
MSDS: material safety data sheets	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
MW: megawatt	SO ₂ : sulfur dioxide
NESHAP: National Emissions Standards for Hazardous Air Pollutants	tpd: tons/day
NO _x : nitrogen oxides	tph: tons per hour
NSPS: New Source Performance Standards	tpy: tons per year
O & M: operation and maintenance	TRS: total reduced sulfur
O ₂ : oxygen	UTM: Universal Transverse Mercator coordinate system
Pb: lead	VE: visible emissions
PM: particulate matter	VOC: volatile organic compounds
PM ₁₀ : particulate matter with a mean aerodynamic diameter of 10 microns or less	

SECTION 5. APPENDIX B

General Conditions

General Conditions: The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

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, 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 403.987(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 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 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 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 the 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.

SECTION 5. APPENDIX B

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 Sections 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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, 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:
 - a. Determination of Best Available Control Technology ___;
 - b. Determination of Prevention of Significant Deterioration ___;
 - c. 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 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:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) 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.

[62-4.160, F.A.C., Permit Conditions]

SECTION 5. APPENDIX C

Common Conditions

COMMON CONDITIONS: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

Facility-wide Emissions and Controls:

1. **Plant Operation - Problems:** If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.070(3) and 62-4.130, F.A.C.]
2. **General Pollutant Emissions Limiting Standards:** (a) No person shall 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 SCNR. {Permitting note: No vapor control device was deemed necessary at the time of issuance of this permit.}; (b). 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 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. [Rules 62-210.200, 62-296.320(1) and (2), F.A.C.]
3. **General Visible Emissions Standard:** Except for emission units that are subject to a particulate emission limit or opacity limit set forth in, or established by rule and reflected by conditions elsewhere in the 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 opacity of which is equal to or greater than 20%. [Rules 62-4.070(3) and 62-296.320(4)(b)1., F.A.C.]
4. **Unconfined Emissions of Particulate Matter (PM):** Normal "good housekeeping" procedures and reasonable work practices shall be utilized to minimize unconfined particulate matter from any source including, **but not limited to**, material handling operations, vehicular movement, construction, alteration, demolition or wrecking, loading, unloading, storing and handling. Reasonable precautions shall include:
 - a. Paving and maintenance of roads, parking areas, and yards;
 - b. Application of water, or chemical dust suppressants, to control emissions from activities such as demolition of buildings, grading of roads, construction, and land clearing;
 - c. Application of water, or chemical dust suppressants, to facility grounds (e.g., unpaved roads, yards, open stock piles and similar emission units) as needed;
 - d. Landscaping or planting of vegetation;
 - e. Using applicable control equipment (e.g., hoods, fans, filters, baghouses, cyclones, conveyor enclosures, etc.);
 - f. Posting vehicle/truck speed limits so that vehicles and material handling equipment operate at slow speed to minimize emissions from traveling/working on facility grounds; and
 - g. Collecting, bagging and disposing of debris as needed;[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

SECTION 5. APPENDIX C

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5. Fugitive VOC/Organic Solvent (OS): The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by SCNR. The following procedures shall be utilized to minimize pollutant emissions:
- a. All VOC generating processes (i.e., application/use of sealants, adhesives, cleaners, paints/coatings, solvents, etc.) shall be conducted inside designated work areas (i.e., paint spray booth, lamination, etc.);
 - b. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills;
 - c. All solvent from solvent washings (e.g., equipment clean-up) shall be directed into containers that prevent evaporation to the atmosphere;
 - d. All VOC/HAP/OS containing material containers shall be closed/covered when not in use to prevent odors and volatilization; and
 - e. All VOC/HAP/OS spills shall be attended to immediately and the waste properly disposed of, recycled, etc.
- [Rules 62-4.070(3) and 62-296.320(1), F.A.C.]
6. Objectionable Odor(s): 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 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. [Rules 62-210.200 and 62-296.320(2), F.A.C.]
7. Anytime the emissions unit is found to be performing inadequately because of overloading, neglect, or other reasons, the permittee shall discontinue its use until measures are provided to correct the cause of such performance. [Rule 62-4.070(3), F.A.C.]
8. Excess Emissions: The following excess emissions provisions cannot be used to vary any NSPS requirements from any subpart of 40 CFR 60:
- a. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by SCNR for longer duration;
 - b. Excess emissions which are caused entirely or in part by inadequate maintenance/ operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited.
- [Rules 62-210.700(1) and (4), F.A.C.]
9. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
10. Source Obligation:
- a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours

SECTION 5. APPENDIX C

Common Conditions

of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

- b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rules 62-212.400(12)(b) and (c), F.A.C.]

11. Emissions Computation and Reporting:

- a. Applicability. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

- b. Computation of Emissions. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

(1) Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.

- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

(2) Continuous Emissions Monitoring System (CEMS).

- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate

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means of computing emissions for purposes of this rule.

- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - 1) A calibrated flow meter that records data on a continuous basis, if available; or
 - 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.

(3) Mass Balance Calculations.

- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
- (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
- (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

(4) Emission Factors.

- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the

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period over which emissions are computed.

- 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
 - (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
 - (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
 - (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rules 62-4.070(3) and 62-210.370(2), F.A.C.]

Facility-wide Recordkeeping and Reporting Requirements:

12. Operation and Maintenance (O & M) Plan Documentation: The permittee shall maintain an O & M plan, and records documenting the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; or any malfunction of the air pollution control equipment. The records shall be recorded in a permanent form suitable for inspection and shall be retained for at least 3 years. [Rule 62-4.070(3), F.A.C.]
13. Records Retention: The permittee shall retain at the facility records of all monitoring information (including all calibration/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. Records shall be recorded in a permanent form suitable for inspection by SCNR, DEP, and/or EPA, and shall be available upon request. These materials shall be retained on site for a minimum of the most recent three (3) consecutive year period from the date of the sample, measurement, report, or application. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

Facility-wide Compliance Testing Requirements:

14. Visible Emissions (VE) Test Methods: Compliance with visible emissions limitations shall be determined using EPA Method 9, incorporated and adopted by reference in Rule 62-297.401(9)(a), F.A.C. The visible emissions test shall be conducted by a certified observer concurrently with the particulate matter performance test and be a minimum of 30 minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. [Rules 62-4.070(3), 62-297.310(4)(a), and 62-297.401, F.A.C.]

15. Special Compliance Tests: When SCNR, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) 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 SCNR. [Rule 62-297.310(7)(b), F.A.C.]

S12PC.016



P.E. CERTIFICATION STATEMENT

Permittee:
 Tom Shapiro, President
 Sterling Manufacturing
 8293 Consumer Court
 Sarasota, FL 34240

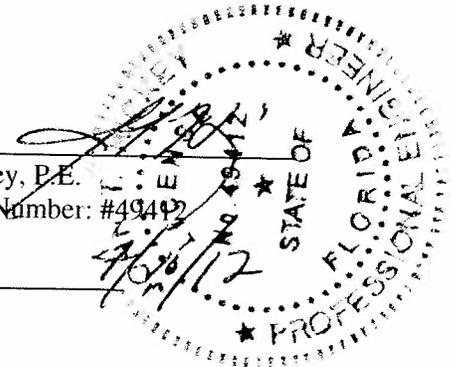
Permit No.: 1150151-003-AC
 Facility ID No.: 1150151

Project Type: Air construction permit modification to increase the hours of operation from 40 hrs/ wk to 80 hrs/ wk; with concurrent issue of an air operation permit. The permits will be issued as one document pursuant to Section 403.087, Florida Statutes, (F.S.). The facility manufactures kitchen countertops using DuPont Corian[®] solid surface material (Standard Industrial Classification No. 3299). Sterling Manufacturing fabricates the Corian[®] by cutting/ routing/ sanding/ buffing and seamlessly joining pieces using Corian[®] joint adhesive COR004 (Parts A and B). Denatured alcohol is used for cleaning purposes. The facility is located in Sarasota County at 8293 Consumer Court, Sarasota, FL 34240.

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes; and Chapters 62-4, and 62-204 through 62-297, Florida Administrative Code. However, I have not evaluated and I do not certify aspects of the proposal that are outside my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological and geological features).

 John T. Hickey, P.E.
 Registration Number: #49492

 Date



Permitting Authority:
 Sarasota County Community Services
 Parks, Recreation and Natural Resources, Air & Water Quality
 1001 Sarasota Center Blvd.
 Sarasota, Florida 34240
 Telephone: 941-861-0675
 Fax: 941-861-6267

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