

Dibble, Dickson

From: Jim Davis [JDavis@anuvaservices.com]
Sent: Tuesday, November 08, 2011 11:47 AM
To: Dibble, Dickson; 'Michael Kimble'; tpatel@anuvaservices.com
Cc: Arif, Syed
Subject: Requet for exemption: Surface Coating Operations Air General Permit Registration

Mr. Dickson,

Upon further review, Anuva Manufacturing Services is consuming less than 2 gallons per month of coating material and thinner.

As such, we would like to withdraw our application and, instead, claim an exemption regarding the Air General Permit per rule Rule 62-210.300(3)(a)27., F.A.C., Categorical and Conditional Exemptions, Surface coating within a single facility, which states:

27. Surface coating operations within a single facility, provided all the following conditions are met.
- a. The surface coating operation shall use only coatings containing 5.0 percent or less VOC, by volume, or the total quantity of coatings containing greater than 5.0 percent VOC, by volume, used at the facility shall not exceed 6.0 gallons per day, averaged monthly, where the quantity of coatings used includes all solvents and thinners used in the process or for cleanup.
 - b. Such operations are not subject to any unit-specific limitation or requirement.

We will maintain records of our usage for review should any of your inspectors request it.

Please advise as to whether you are in agreement regarding this.

Best regards,

Jim Davis

VP, Operations
Anuva Manufacturing Services, Inc.
"A minority, woman-owned, small business"

7703 Technology Drive
Suite 102
West Melbourne, FL 32904

Main: (321) 821-4900
Fax: (321) 821-4902
Cell: (321) 501-3205 <---- NEW CELL #

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From: Dibble, Dickson [mailto:Dickson.Dibble@dep.state.fl.us]
Sent: Tuesday, November 08, 2011 11:23 AM
To: 'Michael Kimble'; tpatel@anuvaservices.com; jdavis@anuvaservices.com
Cc: Arif, Syed
Subject: RE: Surface Coating Operations Air General Permit Registration Worksheet

Dear Mike,

You are correct regarding your October 24th response to my request and I apologize for that oversight.

However, as the case may be your response did not meet the requirements of the information requested in the rule and registration. The information required and for which I am looking should be expressed in **lbs of VOC's**.

I'm going to call you.

Dick

Dickson E. Dibble, ES III

Air General Permit Program
FDEP Division of Air Resource Management
Office of Permitting & Compliance
Minerals & Metals Section
Tel. (850) 717-9071
FAX (850) 717-9001
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Dickson.Dibble@dep.state.fl.us



Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure

From: Michael Kimble [mailto:mkimble@anuvaservices.com]
Sent: Tuesday, November 08, 2011 10:59 AM
To: Dibble, Dickson; mkimble@anuvaservices.com; tpatel@anuvaservices.com; jdavis@anuvaservices.com
Cc: Arif, Syed
Subject: Re: Surface Coating Operations Air General Permit Registration Worksheet

Hello Debbie,

I responded to your email on October 24th at 4:40pm. Here was my response:

I have calculated that we use approximately .5 cups of the 1B31 coating per day and approximately .4 cups of the 521 thinner. These numbers could go up or down based on the workload and orders placed for boards that require this coating. Please remember not all boards that we build require coating. The information that I am providing is based on what we have consumed over the past 6 months.

Let me know if you need any more information. Also please respond to this email so that I know that you received it.
Thank you,
Mike

-----Original Message-----

From: Dibble, Dickson [mailto:Dickson.Dibble@dep.state.fl.us]
Sent: Tuesday, November 8, 2011 10:43 AM
To: mkimble@anuvaservices.com, tpatel@anuvaservices.com, jdavis@anuvaservices.com

Cc: 'Arif, Syed'

Subject: FW: Surface Coating Operations Air General Permit Registration Worksheet

Dear Mr. Kimble, et al,

We are in the eleventh hour of the mandatory thirty (30) day review and processing period for this Surface Coating Air General Permit (AGP) Registration. There are three (3) days remaining in the review and processing period.

I have not yet received a response to my request for additional information from Anuva Manufacturing Services Inc regarding my October 24th e-mail request below and at this point I am unable to complete my review without the information requested. As the result I may have to deny the Air General Permit Registration which you have submitted. I really don't like to have to do that, so please help me bring this to a successful conclusion.

If you have any questions, comments or concerns please e-mail or call.

Thank you and have a great day!

Sincerely yours,

Dickson E. Dibble

Dickson E. Dibble, ES III

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From: Dibble, Dickson

Sent: Monday, October 24, 2011 3:47 PM

To: 'mkimble@anuvaservices.com'

Cc: Arif, Syed; 'tpatel@anuvaservices.com'; 'jdavis@anuvaservices.com'

Subject: Surface Coating Operations Air General Permit Registration Worksheet

Dear Mr. Kimble,

I have received the subject item registration worksheet (see attached .pdf file) which you have submitted as your notification of intent to use the Surface Coating Operations Air General Permit Registration at your facility.

I am in need of additional information. Page four (4) of the registration, under **Material Usage Rates**, for **initial registrations** and the applicable rule (**Rule 62-210.310(4)(c)3.a., F.A.C.**) requests the following information (see highlighted text):

(c) Air General Permit for Facilities Comprising Surface Coating Operations.

1. A facility comprising one (1) or more surface coating operations shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C., and the following specific criteria.
 - a. The facility shall use no other air general permit.
 - b. The facility shall not be subject to any unit-specific limitation or requirement other than any such limitation or requirement set forth in this air general permit.
2. A facility using this air general permit shall comply with the general conditions given at subsection 62-210.310(3), F.A.C., and the following specific conditions.
 - a. The total quantity of volatile organic compounds in all coatings used shall not exceed forty-four (44) pounds per day, averaged monthly, where coatings used shall include all solvents and thinners used in the process or for cleanup.
 - b. The owner or operator shall maintain records to document the VOC content and the quantity of coatings used. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years.
3. The registration for this air general permit shall include all the following information.
 - a. For initial registrations, an estimate of the average quantity of volatile organic compounds in all coatings (solvents and thinners) expected to be used on a daily basis.
 - b. For re-registrations, the highest monthly average of the daily quantity of volatile organic compounds in all coatings (solvents and thinners) used in the last five years, and the month and year during which this usage occurred.

The registration worksheet submitted, including your e-mail to Ms. Tina Patel, as an attachment to your registration, indicated that *?The coating we use is Humiseal 1B31 with Humiseal 521 thinner. We have consumed 6 gallons of the 1B31 conformal coating and 4 gallons of the 531 thinner in the past 6 months?*

In order for me to continue with the review and processing of your registration, I will need an estimate of the average quantity of volatile organic compounds (VOC?s) in all coatings (solvents & thinners) expected to be used on a daily basis. The applicable rule (Rule 62-210.310(4)(c)2.a., F.A.C.) refers to the VOC?s of all coatings, solvents, and thinners, in pounds (lbs.). As the result, the VOC information you provide should be expressed in lbs. rather than in gallons.

Let me also offer some additional information which may assist you in your own analysis and determination of your Air General Permit eligibility as provided for in the rules. Regarding exemptions from permitting, you may refer to Rule 62-210.300(3)(a)27., F.A.C., Categorical and Conditional Exemptions, Surface coating within a single facility, provided all of the following conditions are met. (See below.)

27. Surface coating operations within a single facility, provided all the following conditions are met.

- a. The surface coating operation shall use only coatings containing 5.0 percent or less VOC, by volume, or the total quantity of coatings containing greater than 5.0 percent VOC, by volume, used at the facility shall not exceed 6.0 gallons per day, averaged monthly, where the quantity of coatings used includes all solvents and thinners used in the process or for cleanup.
- b. Such operations are not subject to any unit-specific limitation or requirement.

I hope this helps, but if you have any questions, comments or concerns please e-mail or call.

Thank you and have a great day!

Sincerely yours,

Dickson E. Dibble

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To: 'Michael Kimble'; Dibble, Dickson; tpatel@anuvaservices.com
Cc: Arif, Syed
Subject: RE: Surface Coating Operations Air General Permit Registration Worksheet

We will have the data in LBS to you shortly.

Regards,

Jim Davis

VP, Operations
Anuva Manufacturing Services, Inc.
"A minority, woman-owned, small business"

7703 Technology Drive
Suite 102
West Melbourne, FL 32904

Main: (321) 821-4900
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