

RECEIVED

NOV 01 2010

**SURFACE COATING OPERATIONS
AIR GENERAL PERMIT REGISTRATION FORM**

Bureau of Air Monitoring
& Mobile Sources

Part II. Notification to Permitting Office

(Detach and submit to appropriate permitting office; keep copy onsite)

Instructions: To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (\$100 as of the effective date of this form)

0112711-003

Registration Type

Check one:

INITIAL REGISTRATION - Notification of intent to:

- Construct and operate a proposed new facility.
- Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit).

RE-REGISTRATION (for facilities currently using an air general permit) - Notification of intent to:

- Continue operating the facility after expiration of the current term of air general permit use.
- Continue operating the facility after a change of ownership.
- Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.

Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only

If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box.

- All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit, specifically permit number(s): _____
- No air operation permits currently exist for this facility.

General Facility Information

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

Survival Products, Inc.

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.)

Facility Location (Provide the physical location of the facility, not necessarily the mailing address.)

Street Address: 5614 S.W. 25th Street

City: Hollywood

County: Broward

Zip Code: 33023-4009

Facility Start-Up Date (Estimated start-up date of proposed new facility.) (N/A for existing facility)

N/A

Owner/Authorized Representative

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.) Print Name and Title: Charles G. Rogers, Jr. / President.		
Owner/Authorized Representative Mailing Address Organization/Firm: Survival Products, Inc. Street Address: 5614 S.W. 25 th Street City: Hollywood County: Broward Zip Code: 33023 - 4099		
Owner/Authorized Representative Telephone Numbers Telephone: 954/966-7329 Fax: 954/966-3584 Cell phone (optional):		

Facility Contact (If different from Owner/Authorized Representative)


Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.) Print Name and Title:		
Facility Contact Mailing Address Organization/Firm: Street Address: City: County: Zip Code:		
Facility Contact Telephone Numbers Telephone: Fax: Cell phone (optional):		

Owner/Authorized Representative Statement

This statement must be signed and dated by the person named above as owner or authorized representative

I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof.

I will promptly notify the Department of any changes to the information contained in this registration form.

Signature  Date 01 NOV 2010

Material Usage Rates

If this is an **initial registration** for a surface coating operation, provide an estimate of the average quantity of volatile organic compounds in all coatings (solvents and thinners) expected to be used on a daily basis.

SPECIFIC CRITERIA Survival Products, Inc.'s average daily usage (**NOT CONSIDERING WASTE AS DEDUCTIBLE**) for 2009 was 41.25 pounds per day. **GENERAL CRITERIA** Survival Products, Inc.'s yearly potential for 2009 was 6.8 TPY for toluene and 7.53 TPY for all VOC/HAP'S. Survival Products, Inc. expects this usage and potential to remain approximately the same or less in the future. A substantiating package including purchase orders, invoices, and calculations for 2009 is attached. These usages and potentials are below the 44 LB/DAY and 10/25 TPY limits respectively.

If this is a **re-registration** for an existing surface coating operation, provide the highest monthly average of the daily quantity of volatile organic compounds in all coatings (solvents and thinners) used in the last five years. Indicate the month and year during which this usage occurred.

Description of Facility

Below, or as an attachment to this form, provide a description of the surface coating operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

Survival Products, Inc. manufactures emergency safety equipment life rafts entailing surface coating operations of neoprene coated nylon fabric. These operations utilize adhesive containing toluene/hexane, adhesive, accelerator containing methanol, and toluene itself used as a solvent and thinner.

Survival Products, Inc.'s potential to emit hazardous air pollutants is less than the general criteria of 10 and 25 tons per year as specified in 62-210.310(2)(a). This was determined by Survival Products, Inc.'s actual potential for 2009.

Survival Products, Inc.'s usage of hazardous air pollutants is less than the specific criteria of 44 pounds per day averaged monthly as specified in 62-210.310(4)(e). This was determined by Survival Products, Inc.'s actual usage for 2009. A substantiating package including purchase orders, invoices, and calculations for 2009 is attached.

Survival Products, Inc. does not expect to exceed these general or specific criteria in the future but will notify the Department of Environmental Protection should they ever be exceeded.

01NOV10 SPI 2009 VOC/HAP PURCHASES

<u>TOLUENE (ASHLAND / TOLUENE)</u>				(7.25 LB/USG)	
<u>INV DATE</u>	<u>INV NO.</u>	<u>SPI P.O.</u>	<u>DRUMS</u>	<u>TOLUENE POUNDS</u>	<u>TOTAL POUNDS</u>
07JAN09	92167205	ROBERT	10	3990	3990
27MAY09	92508684	ROBERT	10	3990	7980
16SEP09	92795586	ROBERT	10	3990	11970
<u>ADHESIVE (CLIFTON / TOLUENE PORTION)</u>				(7.18 x .46)	
<u>INV DATE</u>	<u>INV NO.</u>	<u>SPI P.O.</u>	<u>USG</u>	<u>TOLUENE POUNDS</u>	<u>TOTAL POUNDS</u>
28JAN09	14013	4257	163.0	538	538
15APR09	14473	4286-B	162.5	537	1075
03JUN09	14758	ROBERT	166.3	549	1624
<u>ADHESIVE (CLIFTON / HEXANE PORTION)</u>				(7.18 x .34)	
<u>INV DATE</u>	<u>INV NO.</u>	<u>SPI P.O.</u>	<u>USG</u>	<u>HEXANE POUNDS</u>	<u>TOTAL POUNDS</u>
28JAN09	14013	4257	163.0	398	398
15APR09	14473	4286-B	162.5	397	795
03JUN09	14758	ROBERT	166.3	406	1201
<u>ACCELERATOR (CLIFTON / METHANOL PORTION)</u>				(7.31 x .79)	
<u>INV DATE</u>	<u>INV NO.</u>	<u>SPI P.O.</u>	<u>USG</u>	<u>METHANOL POUNDS</u>	<u>TOTAL POUNDS</u>
28JAN09	14013	4257	15.0	87	87
15APR09	14473	4286-B	15.0	87	174
03JUN09	14758	ROBERT	15.0	87	261

GENERAL CRITERIA TOLUENE 6.8 TPY, ALL 7.53 TPY <10/25 TPY LIMITS
 (11970 + 1624)/2000 = 6.8 TPY (11970 + 1624 + 1201 + 261)/2000 = 7.53 TPY

SPECIFIC CRITERIA 41.25 LB/DAY <44 LB/DAY LIMIT
 (11970 + 1624 + 1201 + 261)/365 = 41.25 LBDAY

NOTE: WASTE NOT DEDUCTED !!!

ASHLAND.

INVOICE

ORIGINAL
Page 1(1)



Invoice Number 92167205	Invoice Date 07 Jan 2009	Due Date 08 Feb 2009
P.O.Number <i>robert</i>	Payment Terms Net 30 Days	Payer Number 167230
Shipped From MIAMI NORTHEAST 181ST ST PKG	Carrier ASHLAND FLEET MIAMI	Bill-To Number 167230
Bill of Lading Number 1593923	Incoterms : DDP Dest, Frt Prepaid	Ship-To Number 130459

Billing address
SURVIVAL PRODUCTS INC
5614 SW 25TH ST
HOLLYWOOD FL 33023

Shipping address
SURVIVAL PRODUCTS INC
5614 SW 25TH ST
HOLLYWOOD FL 33023

Qty.	UoM	Material Number	Material Description	Batch Number	Billing Qty	UoM	Unit Price	Amount USD
10	DR	20054	TOLUENE DR453 Florida Pollut Solv Fuel/EnergySurcharge	0176K01698	3.990	LB	1.8050 0.0590 /GAL	7,201.95 32.46 25.00

PAID JAN 27 2009
38662

Should you have any questions regarding this invoice, please contact CUSTOMER CSR CHEM SE1 DUB at 800-531-6964	Invoice Total : USD 7,259.41
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Remit to P.O. Box 116735 ATLANTA GA 30388-6735	ACH Credit Ashland Inc. Account Number:0986468 Mellon Bk NA Bank-ID: 043000261	Wire transfer Ashland Inc. Account Number:40502427 Citibank NA Bank-ID: 021000069
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Please refer to the invoice number on the remittance.
Please return remittance advice with your payment.

Comments:
CONFIRMED PRICING WITH CUST:

Federal ID number 20-0865835 D-U-N-S number 00-500-3264
The terms and conditions of this sale are set forth at <http://www.ashland.com/salesterms>.

Print date 08 Jan 2009

ASHLAND.

INVOICE

ORIGINAL
Page 1(1)



Invoice Number 92508684	Invoice Date 27 May 2009	Due Date 26 Jun 2009
P.O.Number VERBAL ROBERT	Payment Terms Net 30 Days	Payer Number 167230
Shipped From MIAMI NORTHEAST 181ST ST PKG	Carrier ASHLAND FLEET MIAMI	Bill-To Number 167230
Bill of Lading Number 1800927	Incoterms : DDP Dest, Frt Prepaid	Ship-To Number 130459

Billing address
SURVIVAL PRODUCTS INC
5614 SW 25TH ST
HOLLYWOOD FL 33023

Shipping address
SURVIVAL PRODUCTS INC
5614 SW 25TH ST
HOLLYWOOD FL 33023

Qty.	UoM	Material Number	Material Description	Batch Number	Billing Qty	UoM	Unit Price	Amount USD
10	DR	20054	TOLUENE DR453 Florida Pollut Solv Fuel/EnergySurcharge	0176L00428	3,990	LB	1.8250 0.0590 /GAL	7,281.75 32.46 25.00

Should you have any questions regarding this Invoice, please contact CUSTOMER CSR CHEM SE1 DUB at 800-531-6964	Invoice Total : USD 7,339.21
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Remit to P.O. Box 116735 ATLANTA GA 30368-6735	ACH Credit Ashland Inc. Account Number:0968468 Mellon Bk NA Bank-ID: 043000261	Wire transfer Ashland Inc. Account Number:40502427 Citibank NA Bank-ID: 021000089
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Please refer to the invoice number on the remittance.
Please return remittance advice with your payment.

Comments:
CONFIRMED PRICING WITH CUST:

Federal ID number 20-0865835 D-U-N-S number 00-500-3264
The terms and conditions of this sale are set forth at <http://www.ashland.com/salesterms>.

Print date 28 May 2009

D JUN 1 2009
PA
#36517

ASHLAND.

INVOICE

ORIGINAL
Page 1(1)



Invoice Number 92795586	Invoice Date 16 Sep 2009	Due Date 16 Oct 2009
P.O.Number Verbal Robert	Payment Terms Net 30 Days	Payer Number 167230
Shipped From MIAMI NORTHEAST 181ST ST PKG	Carrier ASHLAND FLEET MIAMI	Bill-To Number 167230
Bill of Lading Number 2023513	Incoterms : DDP Dest, Frt Prepaid	Ship-To Number 130458

Billing address
SURVIVAL PRODUCTS INC
5614 SW 25TH ST
HOLLYWOOD FL 33023

Shipping address
SURVIVAL PRODUCTS INC
5614 SW 25TH ST
HOLLYWOOD FL 33023

Qty.	UoM	Material Number	Material Description	Batch Number	Billing Qty	UoM	Unit Price	Amount	USD
10	DR	20054	TOLUENE DR453 Florida Pollut Solv	0176L00797 0176L00942 0176L00942	3,990	LB	1.9750 0.0590 /GAL	7,880.25 32.46	
			Fuel/Energy Surcharge						25.00

Should you have any questions regarding this invoice, please contact CUSTOMER CSR CHEM SE1 DUB at 800-531-6964	Invoice Total : USD 7,937.71
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Remit to P.O. Box 116735 ATLANTA GA 30388-8735	ACH Credit Ashland Inc. Account Number:0968468 Mellon Bk NA Bank-ID: 043000261	Wire transfer Ashland Inc. Account Number:40502427 Citibank NA Bank-ID: 021000089
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Please refer to the invoice number on the remittance.
Please return remittance advice with your payment.

Comments:
CONFIRMED PRICING WITH CUST;

Federal ID number 20-0865835 D-U-N-S number 00-500-3264
The terms and conditions of this sale are set forth at <http://www.ashland.com/salesterms>.

Print date 17 Sep 2009

PAID OCT 12 2009
37105



CLIFTON

Adhesive, Inc

Industrial Adhesives & Coatings
Burgess Place Wayne, NJ 07470

Phone: (973) 694-0845 Fax: (973) 694-5678



Invoice No. 14013	Invoice Date 1/28/2009	Cust. Key SURV
	Order No. 000011823	
INVOICE		

Sold To:

SURVIVAL PRODUCTS INC
5614 S.W. 25TH STREET
HOLLYWOOD, FL 33023

Ship To:

SURVIVAL PRODUCTS INC
5614 S.W. 25TH STREET
HOLLYWOOD, FL 33023

Buyer R. POMAREDA		F.O.B. WAYNE, NJ	Terms: Net 30		
Ship Via A B F		P.O. Number 4257	Payment to be received by SELLER within thirty (30) days of date of shipment. Discounts and/or credits taken without prior authority will be recharged to your account		
Item Key	Description	Qty Shipped	Unit Price	Ext. Price	
FA1013 9055	55 GALLON DRUM LOT# 09-016, 3 X 55 GALLON DRUMS	162.95 GAL	23.35 GAL	\$3,804.88	
ACC1013 8450A	5 GAL BLK LINED METAL PL W/POURSPOUT LD LOT# 09-020, 3 X 5 GALLON PAILS	15.00 GAL	55.00 GAL	\$825.00	
				PAID FEB 18 2009 35806	
  Please remit on this invoice, no statement will be rendered. Note: NO discounts allowed. We are not responsible for goods damaged in transit. Damaged goods should be refused, or, if accepted, a full description of damage must be noted on delivery receipt.				TOTAL \$ 4,629.88	



SURVIVAL PRODUCTS, INC.
 HOLLYWOOD, FL 33023
 5614 S.W. 25TH STREET
 Telephone 954/966-7329

Purchase Order 4257

Vendor Number **CLI002**

To
CLIFTON ADHESIVE, INC.
 BURGESS PLACE
 WAYNE, NJ 07470
 U.S.A.

Ship To:
SURVIVAL PRODUCTS, INC.
 5614 S.W. 25TH STREET
 HOLLYWOOD, FL 33023

P. O. Date	Ship Via	F.O.B.	Terms			
01/05/09	ABF	ORIGIN	NET 30 DAYS			
Buyer	Freight	Req. Date	Confirming To	Remarks	Tax	
RP	COLLECT	01/09/09	ROBERTO POMAREDA	SEE NOTES	N	
Qty. Req.	Item Number	Description		Unit Cost	Extended Cost	
165	FA1013ADH	..ADHESIVE,2 PART NEO(ADH0101-1)		20.850	3440.25	
5	..FA1013ACC	..ACCELERATOR,NEOPRENE(ACC0101-1)		50.000	250.00	
CERTIFICATION OF COMPLIANCE REQUIRED ON DOCK DELIVERY SCHEDULE FOR SHIPMENT 165 GAL ADH0101-1 (QTY OF 3 / 55 GAL DRUMS) 5 GAL ACC0101-1 (QTY OF 5 / 5 GAL PAILS) SHIPMENT ON DOCK DATE 09JAN09						
					Non Taxable Subtotal	3690.25
					Taxable Subtotal	0.00
					Tax	0.00
					Total	3690.25



CLIFTON

Adhesive, Inc

Industrial Adhesives & Coatings
Burgess Place Wayne, NJ 07470

Phone: (973) 694-0845 Fax: (973) 694-5678

Invoice No. 14473	Invoice Date 4/15/2009	Cust. Key SURV
	Order No. 000012356	
INVOICE		

Sold To:

SURVIVAL PRODUCTS INC
5614 S.W. 25TH STREET
HOLLYWOOD, FL 33023

Ship To:

SURVIVAL PRODUCTS INC
5614 S.W. 25TH STREET
HOLLYWOOD, FL 33023

Buyer CHARLIE ROGERS	F.O.B. WAYNE, NJ	Terms: Net 30 Payment to be received by SELLER within thirty (30) days of date of shipment. Discounts and/or credits taken without prior authority will be recharged to your account
Ship Via A B F	P.O. Number 4286-B	

Item Key	Description	Qty Shipped	Unit Price	Ext. Price
FA1013 9055	55 GALLON DRUM LOT#: 09-098 - (3 x 55 GALLON DRUMS)	162.54 GAL	23.35 GAL	\$3,795.31
ACC1013 8450A	5 GAL BLK LINED METAL PL W/POURSPOUT LD LOT#: 09-093 - (3 x 5 GALLON PAILS)	15.00 GAL	55.00 GAL	\$825.00

PAID MAY 18 2009
36311

		Please remit on this invoice, no statement will be rendered. Note: NO discounts allowed. We are not responsible for goods damaged in transit. Damaged goods should be refused, or, if accepted, a full description of damage must be noted on delivery receipt.	TOTAL \$ 4,620.31
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SURVIVAL PRODUCTS, INC.
 HOLLYWOOD, FL 33023
 5614 S.W. 25TH STREET
 Telephone 954/966-7329

Purchase Order 4286-B

Vendor Number **CLI002**

To
CLIFTON ADHESIVE, INC.
 BURGESS PLACE
 WAYNE, NJ 07470
 U.S.A.

Ship To:
SURVIVAL PRODUCTS, INC.
 5614 S.W. 25TH STREET
 HOLLYWOOD, FL 33023

**** THIS IS A CHANGE ORDER ****

P. O. Date		Ship Via		F.O.B.		Terms	
03/30/09		ABF		ORIGIN		NET 30 DAYS	
Buyer	Freight	Req. Date	Confirming To		Remarks	Tax	
RP	COLLECT	04/08/09	CHARLIE ROGERS		SEE NOTES	N	
Qty. Req.	Item Number	Description			Unit Cost	Extended Cost	
165	FA1013ADH	..ADHESIVE, 2 PART NEO(ADH0101-1)			23.350	3852.75	
15	..FA1013ACC	..ACCELERATOR, NEOPRENE(ACC0101-1)			55.000	825.00	
CERTIFICATION OF COMPLIANCE REQUIRED ON DOCK DELIVERY SCHEDULE FOR SHIPMENT 165 GAL ADH0101-1 (QTY OF 3 / 55 GAL DRUMS) 5 GAL ACC0101-1 (QTY OF 3 / 5 GAL PAILS) SHIPMENT ON DOCK DATE 08APR09						Non Taxable Subtotal 4677.75 Taxable Subtotal 0.00 Tax 0.00 Total 4677.75	



CLIFTON Adhesive, Inc

Industrial Adhesives & Coatings
 Burgess Place Wayne, NJ 07470
 Phone: (973) 694-0845 Fax: (973) 694-5678

Invoice No. 14758	Invoice Date 6/3/2009	Cust. Key SURV
	Order No. 000012701	
INVOICE		

Sold To:

SURVIVAL PRODUCTS INC
 5614 S.W. 25TH STREET
 HOLLYWOOD, FL 33023

Ship To:

SURVIVAL PRODUCTS INC
 5614 S.W. 25TH STREET
 HOLLYWOOD, FL 33023

Buyer ROBERT POMAREDA	F.O.B. WAYNE, NJ	Terms: Net 30 Payment to be received by SELLER within thirty (30) days of date of shipment. Discounts and/or credits taken without prior authority will be recharged to your account
Ship Via A B F	P.O. Number VERBAL / ROBERT	

Item Key	Description	Qty Shipped	Unit Price	Ext. Price
FA1013 9055	55 GALLON DRUM LOT # 09-148, 3 X 55 GALLON DRUMS	166.30 GAL	23.35 GAL	\$3,883.11
ACC-1013 8450A	5 GAL BLK LINED METAL PL W/POURSPOUT LD LOT # 09-148, 3 X 5 GALLON PAILS	15.00 GAL	55.00 GAL	\$825.00

PAID JUN 28 2009
 \$ 36528



Please remit on this invoice, no statement will be rendered. Note: NO discounts allowed. We are not responsible for goods damaged in transit. Damaged goods should be refused, or, if accepted, a full description of damage must be noted on delivery receipt.

TOTAL
\$ 4,708.11



01 November 2010

VIA – REGULAR MAIL
VIA – CERTIFIED MAIL
VIA – FACSIMILE, 850-922-6979

RECEIVED

NOV 12 2010

Bureau of Air Monitoring
& Mobile Sources

Ms. Sandra F. Veazey, Chief
Bureau of Air Monitoring and Mobile Sources
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Your Letter of 29 OCT 10

Dear Ms. Veazey:

Thank you for your subject letter. I was very disappointed that you did not even address, after almost three weeks, the following two important questions I posed to you.

1. I think the waste toluene should not be considered as used/consumed, since it is disposed of as waste, not volatilized causing any air pollution, and therefore should be deductible when determining the Specific Criteria of 44 Lb/Day.
2. I also indicated that even if you did not agree with the above position, SPI still meets the SC of 44 Lb/Day, as shown in the 2009 figures provided to your office in my 11 OCT 10 letter, and will monitor its future usage to ensure that this limit is not exceeded. **Based on these facts, SPI should be issued an AGP by your office.**

Since you did not have the courtesy to even address these very important issues, I am enclosing a new completed SURFACE COATING OPERATIONS AIR GENERAL PERMIT REGISTRATION FORM which substantiates that SPI did not exceed the General Criteria of 10/25 TPY or the Specific Criteria of 44 Lb/Day for 2009 and will monitor future years so as not to exceed these limits. I would appreciate your issuing an AGP to SPI or at the very least, explaining in detail why you have denied to do so. None of your previous denials ever explained any reasons.

Your prompt processing of this new completed form will be greatly appreciated since all of SPI's manufacturing employees are on layoff since the beginning of September 2010 due to this issue.

Thank you in advance for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Rogers, Jr.", written over a horizontal line.

Charles G. Rogers, Jr.
President



PRODUCTS INC.

01 November 2010

VIA – REGULAR MAIL
VIA – CERTIFIED MAIL
VIA – FACSIMILE, 850-922-6979

RECEIVED

NOV 01 2010

BUREAU OF AIR MONITORING
& MOBILE SOURCES

Ms. Sandra F. Veazey, Chief
Bureau of Air Monitoring and Mobile Sources
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Your Letter of 29 OCT 10

Dear Ms. Veazey:

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Thank you in advance for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "C. G. Rogers, Jr.", written over a horizontal line.

Charles G. Rogers, Jr.
President

Dibble, Dickson

From: Bittle, Clifton [CBITTLE@broward.org]
Sent: Monday, November 15, 2010 10:31 AM
To: Veazey, Sandra; Ajhar, Rebecca; Dibble, Dickson
Cc: Gerberding, Mark; Jones, Daphne; Banu, Daniela; Cisneros, Josefina
Subject: Survival Products Inc. Air General Permit Eligibility
Attachments: Survival Products 11 10 2010.pdf

Thank you for keeping us updated on the status of Survival Products, Inc.(SPI). Attached is letter from Daniela Banu with Broward County's comments on the most recent air general permit registration received by your office from SPI.



Clifton R. Bittle, Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division (PPRAQD)
1 North University Drive, Suite 203
Plantation, Florida 33324
Office: 954-519-1208
www.broward.org

PPRAQD values your feedback as a customer. Please comment on the quality of service you received by clicking [this link to the PPRAQ Customer Survey](#). Thank you.

Under Florida law, most e-mail messages to or from Broward County employees or officials are public records, available to any person upon request, absent an exemption. Therefore, any e-mail message to or from the County, inclusive of e-mail addresses contained therein, may be subject to public disclosure.



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
1 North University Drive, Suite 203, Plantation, Florida 33324
954-519-1220 • FAX 954-519-1495

November 10, 2010

Ms. Sandra F. Veazey, Chief
Bureau of Air Monitoring and Mobile Sources
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Survival Products Inc. Air General Permit Eligibility

Dear Sandra:

This letter is in reference to the surface coating air general permit registration received by your office on November 1, 2010 from Survival Products, Inc. (SPI) of Hollywood, Florida. I want to thank you and your staff for keeping Broward County apprised of developments concerning this company. As you know, Broward County has an unresolved enforcement case concerning this facility that requires payment of a penalty and submittal of an air permit application.

Broward County offers the following comments for your consideration in determining air general permit (GP) eligibility for SPI:

1. SPI provided calendar year 2009 actual material usage data in the GP registration form received by your office on November 1, 2010. Based on previously submitted usage information from SPI to Dick Dibble for calendar years 2006 – 2009 (contained on file), SPI demonstrated 2007 and 2008 usage rates exceeding SPI's 2009 actual usage levels. Your office denied SPI's second request for air general permit registration (AIRS ID 0112711-002-AG) on this basis.
2. We believe it is important to note that the volatile organic compound (VOC) and hazardous air pollutant (HAP) material usage rates provided by SPI represent **actual** rates and not potential rates. SPI has never established a potential-to-emit (PTE) for HAPs and VOCs for its operation. Broward County believes SPI's PTE is driven by specific manufacturing parameters, maximum production rates, maximum usages rates, hours of operation, timing, assembly, market conditions and many other factors which, cannot be readily inferred from actual emissions. In addition, presently, Broward County sees nothing that can prevent SPI from operating multiple shifts and/or increasing production if it had sufficient orders for its product.
3. Broward County believes that the intent of placing a restriction of 10 tons per year of an individual HAP and 25 tons per year of total HAPs in GP registration forms was to prevent a Title V facility from applying for and be eligible to operate under an air general permit. Further we understand the the 10/25 HAPs limitation according to F.A.C. is based on potential-to-emit

which again, SPI has failed to demonstrate. What SPI has demonstrated is actual emissions therefore we do not feel that SPI has demonstrated to satisfaction that on a potential basis, they in fact do not exceed the 10/25 HAPs restriction per 62-210.310(2) (a)1. F.A.C.

4. SPI in this latest submittal, indicates that it does not "expect" VOC levels to exceed 44 lbs/day and that it would notify the Department of Environmental Protection if it exceeds this level. Broward County believes this is an un-enforceable and unreliable commitment. SPI has already demonstrated that it has the ability and the potential to exceed this amount based on a review of 2006 – 2009 records submitted to your office. Also, notifying the Department is something that SPI would be required to do in any case, and SPI obviously fails to understand that Broward County is responsible for compliance assurance involving their facility.
5. SPI has repeatedly ignored permitting correspondence from our Department at all levels including ignoring our enforcement case, an outstanding notice of violation, and failure to be present and testify in front of a Broward County Judge at the latest August 9, 2010 hearing.
6. If DARM determines that SPI is eligible to operate under an air general permit, it will interfere with our ability to pursue prior enforcement actions.

In consideration of the items presented above, Broward County believes there is a basis for denial of air general permit eligibility for Survival Products, Inc. Thank you for your assistance in this matter. Should you have any questions regarding these items, please feel free to call me at (954) 519-1221 or call Cliff Bittle at (954) 519-1208.

Sincerely,



Daniela Banu

Air Program Administrator

Broward County Pollution Prevention, Remediation and Air Quality Division

cc: Dick Dibble
Becky Ajhar
Clifton Bittle
Josie Cisneros
Daphne Jones
Mark Gerberding

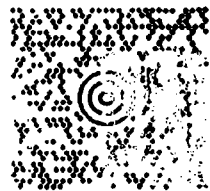
CHARLIE ROGERS
(954) 966-7329
SURVIVAL PRODUCTS, INC.
5614 SW 25TH STREET
WEST PARK FL 33023

2 LBS

1 OF 1

SHIP TO:

MR. DICK DIBBLE
(850) 488-0114
FLORIDA DEPARTMENT OF ENVIRONMENTAL
BOB MARTINEZ CENTER
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-2400

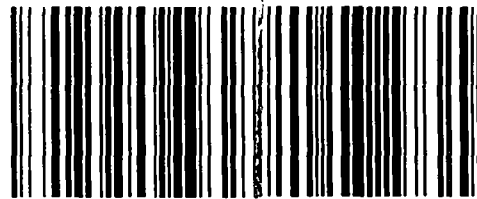


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